

# Online Safety Policy

Amended by: Kim Phillips / Mike Nelson

(adopted from (South West Grid for

Learning model policy)

Coordinator: Mike Nelson/ Barry Leslie / Kim Phillips

Nominated Governor:

Review date: June 2023

# **Scope of the Policy**

This policy applies to all members of the school community (including staff, pupils, volunteers, parents / carers, visitors, community users) who have access to and are users of school ICT systems, both in and out of the school.

The Education and Inspections Act 2006 empowers Headteachers to such extent as is reasonable, to regulate the behaviour of pupils when they are off the school site and empowers members of staff to impose disciplinary penalties for inappropriate behaviour. This is pertinent to incidents of cyberbullying or other Online Safety incidents covered by this policy, which may take place outside of the school, but is linked to membership of the school. The 2011 Education Act increased these powers with regard to the searching for and of electronic devices and the deletion of data. In the case of both acts, action can only be taken over issues covered by the published Behaviour Policy.

The school will deal with such incidents within this policy and associated behaviour and anti-bullying policies and will, where known, inform parents / carers of incidents of inappropriate Online Safety behaviour that take place out of school.

# **Roles and Responsibilities**

The following section outlines the online safety roles and responsibilities of individuals and groups within the school:

# **Governors:**

Governors are responsible for the approval of the Online Safety Policy and for reviewing the effectiveness of the policy. This will be carried out by the Quality and Outcomes Committee receiving regular information about online safety incidents and monitoring reports. A member of the Governing Body will take on the role of Online Safety Governor, which is part of the Safeguarding Lead role.

# The role of the Online Safety Governor will include:

- periodic meetings with the Online Safety Co-ordinator
- periodic monitoring of online safety incident logs on IRIS

# **Headteacher and Senior Leaders:**

- The Headteacher has a duty of care for ensuring the safety, (including online safety), of members of the school community, though the day to day responsibility for online safety will be delegated to the Online Safety Co-ordinator.
- The Headteacher and other members of the Senior Leadership Team should be aware of the procedures to be followed in the event of a serious online safety allegation being made against a member of staff. (see flow chart on dealing with online safety incidents)

- The Headteacher / Senior Leaders are responsible for ensuring that the Online Safety Coordinator and other relevant staff receive suitable training to enable them to carry out their online safety roles and to train other colleagues, as relevant.
- The Headteacher / Senior Leaders will ensure that there is a system in place to allow for monitoring and support of those in school who carry out the internal online safety monitoring role. This is to provide a safety net and also support to those colleagues who take on important monitoring roles.
- The Senior Leadership Team will receive regular monitoring reports from the Online Safety Co-ordinator.

### Online Safety Coordinator

- takes day to day responsibility for online safety issues and has a leading role in establishing and reviewing the school online safety policies / documents
- ensures that all staff are aware of the procedures that need to be followed in the event of an online safety incident taking place.
- provides training and advice for staff
- liaises with the Local Authority / relevant body
- liaises with school technical staff
- receives reports of online safety incidents and creates a log of incidents to inform future online safety developments,
- meets regularly with Safeguarding Governor to discuss current issues, review incident logs and filtering / change control logs
- attends relevant meeting / committee of Governors reports regularly to Senior Leadership
   Team
- reports regularly to the Senior Leadership Team

# **ICT Support:**

The ICT Support is responsible for ensuring:

- that the school's technical infrastructure is secure and is not open to misuse or malicious attack that the school meets required online safety technical requirements and any Local Authority Guidance that may apply.
- that users may only access the networks and devices through a properly enforced password protection procedure, in which passwords are regularly changed
- the filtering procedures are applied and updated on a regular basis and that its implementation is not the sole responsibility of any single person
- that they keep up to date with online safety technical information in order to effectively carry out their online safety role and to inform and update others as relevant
- that the use of the network / internet / remote access / email is regularly monitored in order that any misuse / attempted misuse can be reported to the Headteacher / Online Safety Coordinator for investigation / action / sanction
- that monitoring software / systems are implemented and updated as agreed in school procedures

#### **Teaching and Support Staff**

Are responsible for ensuring that:

- they have an up to date awareness of online safety matters and of the current school Online Safety Policy and practices
- they have read, understood and signed the Staff Acceptable Use Policy (AUP)
- they report any suspected misuse or problem to the Headteacher / Senior Leader; Online Safety Coordinator for investigation / action / sanction
- all digital communications with pupils / parents / carers should be on a professional level and only carried out using official school systems
- online safety issues are embedded in all aspects of the curriculum and other activities pupils understand and follow the Online Safety Policy and acceptable use policies
- they monitor the use of digital technologies, mobile devices, cameras etc in lessons and other school activities (where allowed) and implement current policies with regard to these devices
- in lessons where internet use is pre-planned, pupils should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches

#### Designated Safeguarding Lead / Designated Person / Officer

This individual should be trained in Online Safety issues and be aware of the potential for serious child protection / safeguarding issues to arise from:

- sharing of personal data
- access to illegal / inappropriate materials
- inappropriate on-line contact with adults / strangers
- potential or actual incidents of grooming
- cyber-bullying

### **Pupils:**

Where appropriate, the following points will apply:

- are responsible for using the school digital technology systems in accordance with the Pupil Acceptable Use Agreement
- pupils understand and follow the Online Safety Policy and acceptable use policies
- have an understanding of research skills and the need to avoid plagiarism and uphold copyright regulations
- need to understand the importance of reporting abuse, misuse or access to inappropriate materials and know how to do so
- They should also know and understand policies on the taking / use of images and on cyber-bullying. should understand the importance of adopting good online safety practice when using digital technologies out of school and realise that the school's Online Safety Policy covers their actions out of school, if related to their membership of the school.

# Parents / Carers

Parents / Carers play a crucial role in ensuring that their children understand the need to use the internet / mobile devices in an appropriate way. The school will take every opportunity to help parents understand these issues through parents' evenings, newsletters, letters, website and

information about national / local online safety campaigns / literature. Parents and carers will be encouraged to support the school in promoting good online safety practice and to follow guidelines on the appropriate use of:

- digital and video images taken at school events
- access to sections of the website and on-line pupil records
- their children's personal devices in the school (where this is allowed)

#### **Community Users**

Community Users who access school systems / website as part of the wider school provision
will be expected to sign a Community User AUA before being provided with access to school
systems.

# **Policy Statements**

# **Education – Pupils**

Whilst regulation and technical solutions are very important, their use must be balanced by educating pupils to take a responsible approach. The education of pupils in online safety is therefore an essential part of the school's online safety provision. Children and young people need the help and support of the school to recognise and avoid online safety risks and build their resilience.

Online safety should be a focus in all areas of the curriculum and staff should reinforce online safety messages across the curriculum. The online safety curriculum should be broad, relevant and provide progression, with opportunities for creative activities and will be provided in the following ways:

- A planned online safety curriculum should be provided as part of Computing / PSED / other lessons and should be regularly revisited
- Key online safety messages should be reinforced as part of a planned programme of assemblies
- Pupils should be taught in all lessons to be critically aware of the materials / content they access on-line and be guided to validate the accuracy of information.
- pupils should be taught to acknowledge the source of information used and to respect copyright when using material accessed on the internet
- Pupils should be supported in building resilience to radicalisation by providing a safe environment for debating controversial issues and helping them to understand how they can influence and participate in decision-making
- Pupils should be helped to understand the need for the pupil Acceptable Use Agreement and encouraged to adopt safe and responsible use both within and outside school.
- Staff should act as good role models in their use of digital technologies the internet and mobile devices
- in lessons where internet use is pre-planned, it is best practice that pupils should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches.
- Where pupils are allowed to freely search the internet, staff should be vigilant in monitoring the content of the websites the young people visit.
- It is accepted that from time to time, for good educational reasons, pupils may need to research topics (eg racism, drugs, discrimination) that would normally result in internet

searches being blocked. In such a situation, staff can request that the Technical Staff (or other relevant designated person) can temporarily remove those sites from the filtered list for the period of study. Any request to do so, should be auditable, with clear reasons for the need.

# Education – Parents / Carers

Many parents and carers may have only a limited understanding of online safety risks and issues, yet they play an essential role in the education of their children and in the monitoring / regulation of the children's on-line behaviours. Parents may underestimate how often children and young people come across potentially harmful and inappropriate material on the internet and may be unsure about how to respond.

The school will therefore seek to provide information and awareness to parents and carers through:

- Curriculum activities
- Letters, newsletters, website Parents / Carers evenings
- High profile events / campaigns e.g. Safer Internet Day
- Reference to the relevant web sites / publications e.g. www.saferinternet.org.uk/ http://www.childnet.com/parents-and-carers
- Guidance on enabling 'safe modes' on gaming consoles

#### **Education – The Wider Community**

The school will provide opportunities for local community groups / members of the community to gain from the school's online safety knowledge and experience. This may be offered through the following:

- Providing parent workshop/sessions of new digital technologies, digital literacy and online safety
- Online safety messages targeted towards grandparents and other relatives as well as parents.
- The school website will provide online safety information for the wider community

#### Education & Training – Staff / Volunteers

It is essential that all staff receive online safety training and understand their responsibilities, as outlined in this policy. Training will be offered as follows:

- A planned programme of formal online safety training will be made available to staff. This
  will be regularly updated and reinforced. An audit of the online safety training needs of all
  staff will be carried out regularly.
- All new staff should receive online safety training as part of their induction programme, ensuring that they fully understand the school Online Safety Policy and Acceptable Use Agreements.
- is expected that some staff may identify online safety as a training need within the performance management process.
- The Online Safety Coordinator will receive regular updates through attendance at external training events (eg from LA / other relevant organisations) and by reviewing guidance documents released by relevant organisations.
- This Online Safety Policy and its updates will be presented to and discussed by staff in staff / team meetings / INSET days.

• The Online Safety Coordinator will provide advice / guidance / training to individuals as required.

#### Training – Governors

Governors should take part in online safety training / awareness sessions, with particular importance for those who are members of any subcommittee involved in technology / online safety / health and safety /safeguarding. This may be offered in a number of ways:

- Attendance at training provided by the Local Authority / National Governors Association / or other relevant organisation
- Participation in school training / information sessions for staff or parents, this may include attendance at assemblies / lessons.

# <u>Technical – infrastructure / equipment, filtering and monitoring</u>

The school will be responsible for ensuring that the school infrastructure / network is as safe and secure as is reasonably possible and that policies and procedures approved within this policy are implemented. The school will also need to ensure that the relevant people named in the above sections will be effective in carrying out their online safety responsibilities:

- School technical systems will be managed in ways that ensure that the school meets recommended technical requirements
- There will be regular reviews and audits of the safety and security of school technical systems
- Servers, wireless systems and cabling must be securely located and physical access restricted All users will have clearly defined access rights to school technical systems and devices.
- All users (staff) will be provided with a username and secure password by ICT Support who
  will keep an up to date record of users and their usernames. Users are responsible for the
  security of their username and password and will be required to change their password
  every month.
- All Pupils will be provided with a class username and password.
- The "administrator" passwords for the school ICT system, used by the ICT Support must also be available to the Headteacher, School Business Manager or other nominated senior leader and kept in the school safe.
- ICT Support is responsible for ensuring that software licence logs are accurate and up to date
  and that regular checks are made to reconcile the number of licences purchased against the
  number of software installations.
- Internet access is filtered for all users. Illegal content, (such as child sexual abuse images) is
  filtered by the broadband or filtering provider by actively employing the Internet Watch
  Foundation CAIC list. Content lists are regularly updated and internet use is logged and
  regularly monitored. There is a clear process in place to deal with requests for filtering
  changes.
- Internet filtering should ensure that children are safe from terrorist and extremist material when accessing the internet.
- The school has provided enhanced / differentiated user-level
- School technical staff regularly monitor and record the activity of users on the school technical systems and users are made aware of this in the Acceptable Use Agreement.
- 'Every' system is in place for users to report any actual / potential technical incident / security breach to the relevant person, as agreed).

- Appropriate security measures are in place to protect the servers, firewalls, routers, wireless
  systems, work stations, mobile devices etc from accidental or malicious attempts, which
  might threaten the security of the school systems and data. These are tested regularly. The
  school infrastructure and individual workstations are protected by up to date virus software.
- An agreed policy is in place for the provision of temporary access of "guests" (eg trainee teachers, supply teachers, visitors) onto the school systems.
- An agreed policy is in place regarding the extent of personal use that users (staff / pupils / community users) and their family members are allowed on school devices that may be used out of school, (please see the school's remote learning policy).
- An agreed policy is in place that allows staff to / forbids staff from downloading executable files and installing programmes on school devices.
- An agreed policy is in place regarding the use of removable media (eg memory sticks / CDs / DVDs) by users on school devices. Personal data cannot be sent over the internet or taken off the school site unless safely encrypted or otherwise secured.

#### **Mobile Technologies**

Mobile technology devices may be school owned/provided or personally owned and might include: smartphones/devices, tablet, notebook / laptop or other technology that usually has the capability of utilising the school's wireless network. The device then has access to the wider internet which may include cloud based services such as email and data storage.

All users should understand that the primary purpose of the use mobile / personal devices in a school context is educational. The mobile technologies policy should be consistent with and interrelated to other relevant school polices including but not limited to the Safeguarding Policy, Behaviour Policy, Bullying Policy, Acceptable Use Policy, and policies around theft or malicious damage. Teaching about the safe and appropriate use of mobile technologies should be an integral part of the school's Online Safety education programme.

The school Acceptable Use Agreements for staff, pupils and parents/carers will give consideration to the use of mobile technologies

The school allows:

		School Devices	Personal Devices					
	School owned for single user	School owned for multiple users	Authorised device <sup>1</sup>	Pupil owned	Staff owned	Visitor owned		
Allowed in school	Yes	Yes	Yes	Yes	Yes	Yes		
Full network access	Yes	Yes	Yes	No	No	No		
Internet only				Yes	Yes	Yes		
No network access				No	No	No		

# Use of digital and video images

The development of digital imaging technologies has created significant benefits to learning, allowing staff and pupils instant use of images that they have recorded themselves or downloaded from the internet. However, staff, parents / carers and pupils need to be aware of the risks associated with publishing digital images on the internet. Such images may provide avenues for cyberbullying to take place. Digital images may remain available on the internet forever and may cause harm or embarrassment to individuals in the short or longer term. It is common for employers to carry out internet searches for information about potential and existing employees. The school will inform and educate users about these risks and will implement policies to reduce the likelihood of the potential for harm:

- When using digital images, staff should inform and educate pupils about the risks associated with the taking, use, sharing, publication and distribution of images. In particular, they should recognise the risks attached to publishing their own images on the internet e.g. on social networking sites.
- Written permission from parents or carers will be obtained before photographs of pupils are published on the school website / social media / local press
- In accordance with guidance from the Information Commissioner's Office, parents / carers are welcome to take videos and digital images of their children at school events for their own personal use (as such use not covered by the Data Protection Act). To respect everyone's privacy and in some cases protection, these images should not be published / made publicly available on social networking sites, nor should parents / carers comment on any activities involving other pupils in the digital / video images.
- Staff and volunteers are allowed to take digital / video images to support educational aims, but must follow school policies concerning the sharing, distribution and publication of those images. Those images should only be taken on school equipment; the personal equipment of staff should not be used for such purposes.
- Care should be taken when taking digital / video images that pupils are appropriately
  dressed and are not participating in activities that might bring the individuals or the school
  into disrepute.
- Pupils must not take, use, share, publish or distribute images of others without their permission
- Photographs published on the website, or elsewhere that include pupils will be selected carefully and will comply with good practice guidance on the use of such images.
- Pupils' full names will not be used anywhere on a website or blog, particularly in association with photographs.
- Pupil's work can only be published with the permission of the pupil and parents or carers.

# **General Data Protection Regulations**

Personal data will be recorded, processed, transferred and made available according to the General Data Protection Regulations

The school must ensure that:

- It has a General Data Protection Regulation Policy
- It implements the data protection principles and is able to demonstrate that it does so through use of policies, notices and records

- It had paid the appropriate fee for information commissioner's office (ICO) and included details of the Data Protection Officer (DPO)
- It has appointed an appropriate Data Protection Officer (DPO) who has a high level of understanding of data protection law and is free from any conflict of interest.
- It has an "information asset register" in place and knows exactly what personal data it holds, where this data is held, why and which member of staff has responsibility for managing it
- The information asset register records the lawful basis for processing personal data (including, where relevant, how consent was obtained and refreshed). Where special category data is processed, an additional lawful basis will have also been recorded
- It will hold only the minimum personal data necessary to enable it to perform its function and it will not hold it longer than nessecary for the purposes it was collected for. The school should develop and implement a 'retention policy' to ensure there are clear and understood policies and routines for the deletion and disposal of data to support this, personal data held must be accurate and up to date where this is necessary for the purpose it is processed for. Have systems in place to identify inaccuracies, such as asking parents to check emergency contact details at suitable intervals.
- It provides staff, parents, volunteers, teenagers and older children with information about how the school looks after their data and what their rights are in a clear Privacy Notice
- Procedures must be in place to deal with individual right of the data subject, e.g Subject
   Access requests.
- Data protection impact assessments (DPIA) are carried out where necessary. For example, to ensure protection of personal data when accessed using any remote solutions, or entering into a relationship with a new supplier.
- IT system security is ensured and regularly checked. Patches and other security essential updates are applied promptly to protect data on the systems. Administrative systems are securely ring fenced from systems accessible in the classroom
- It has undertaken appropriate due diligence and has required data processing clauses in contracts in place with any data processors where personal data is processed.
- It understands how to share data lawfully and safely with other relevant data controllers
- It reports any relevant breaches to the information commissioner within 72 hours of becoming aware of the breach in accordance with the UK data protection law. It also reports relevant breaches to the individuals affected as required by law. In order to do this, it has a policy for reporting, logging, managing, investigating and learning from information risk incidents
- If a maintained school, it must have a Freedom of Information Policy which sets out how it will deal with FOI requests
- All staff receive data protection training at induction and appropriate refresher training thereafter. Staff undertaking particular data protection functions, such as handling request under the individuals rights, will receive training appropriate for their function as well as the core training provided to all staff

#### Staff must ensure that they:

- At all times take care to ensure the safe keeping of personal data, minimising the risk of its loss or misuse.
- Can recognise a possible breach, understand the need for urgency and know who to report it to within the school
- Can help data subjects understand their rights and know how to handle a request whether verbal or written and know who to pass it onto in school
- Where personal data is stored or transferred on mobile or other devices (including USBs)
   these must be encrypted or password protected

- Will not transfer any school personal data to personal devices except as in line with school policy
- Access personal data sources and records only on secure password protected computers and other devices, ensuring that they are properly "logged-off" at the end of any session in which they are using personal data

When personal data is stored on any portable computer system, memory stick or any other removable media:

- the data must be encrypted and password protected
- the device must be password protected
- the device must be protected by up to date virus and malware checking software
- the data must be securely deleted from the device, in line with school policy (below) once it has been transferred or its use is complete

# **Communications**

A wide range of rapidly developing communications technologies has the potential to enhance learning. The following table shows how the school currently considers the benefit of using these technologies for education outweighs their risks / disadvantages:

	Staff & other adults			Students/Pupils							
Communication Technologies	Allowed	Allowed at certain times	Allowed for selected staff	Not allowed	Allowed	Allowed at certain times	Allowed with staff permission	Not allowed			
Mobile phones may be brought to the school/academy											
Use of mobile phones in lessons											
Use of mobile phones in social time											
Taking photos on mobile phones/cameras											
Use of other mobile devices e.g. tablets, gaming devices											
Use of personal email addresses in school/academy, or on school/academy network											
Use of school/academy email for personal emails											
Use of messaging apps											
Use of social media											
Use of blogs											

When using communication technologies, the school considers the following as good practice:

- The official school email service may be regarded as safe and secure and is monitored. Users should be aware that email communications are monitored. Staff and pupils should therefore use only the school email service to communicate with others when in school, or on school systems (e.g. by remote access).
- Users must immediately report, to the nominated person in accordance with the school policy, the receipt of any communication that makes them feel uncomfortable, is offensive, discriminatory, threatening or bullying in nature and must not respond to any such communication.
- Any digital communication between staff and pupils or parents / carers (email, social media, chat, blogs, VLE etc) must be professional in tone and content. These communications may only take place on official (monitored) school systems. Personal email addresses, text messaging or social media must not be used for these communications.
- Whole class / group email addresses may be used, KS3 and above may be provided with individual school email addresses for educational use.
- Pupils should be taught about online safety issues, such as the risks attached to the sharing
  of personal details. They should also be taught strategies to deal with inappropriate
  communications and be reminded of the need to communicate appropriately when using
  digital technologies.
- Personal information should not be posted on the school website and only official email addresses should be used to identify members of staff.

# Social Media - Protecting Professional Identity

All schools and local authorities have a duty of care to provide a safe learning environment for pupils and staff. Schools and local authorities could be held responsible, indirectly for acts of their employees in the course of their employment. Staff members who harass, cyberbully, discriminate on the grounds of sex, race or disability or who defame a third party may render the school or local authority liable to the injured party. Reasonable steps to prevent predictable harm must be in place.

The school provides the following measures to ensure reasonable steps are in place to minimise risk of harm to pupils, staff and the school through:

- Ensuring that personal information is not published
- Training is provided including: acceptable use; social media risks; checking of settings; data protection; reporting issues.
- Clear reporting guidance, including responsibilities, procedures and sanctions
- Risk assessment, including legal risk

#### School staff should ensure that:

- No reference should be made in social media to pupils, parents / carers or school staff
- They do not engage in online discussion on personal matters relating to members of the school community
- Personal opinions should not be attributed to the school or local authority
- Security settings on personal social media profiles are regularly checked to minimise risk of loss of personal information

When official school social media accounts are established there should be:

- A process for approval by senior leaders
- Clear processes for the administration and monitoring of these accounts involving at least two members of staff
- A code of behaviour for users of the accounts, including systems for reporting and dealing with abuse and misuse
- Understanding of how incidents may be dealt with under school disciplinary procedures

# Personal Use:

- Personal communications are those made via a personal social media accounts. In all cases,
  where a personal account is used which associates itself with the school or impacts on the
  school, it must be made clear that the member of staff is not communicating on behalf of
  the school with an appropriate disclaimer. Such personal communications are within the
  scope of this policy
- Personal communications which do not refer to or impact upon the school are outside the scope of this policy
- Where excessive personal use of social media in school is suspected, and considered to be interfering with relevant duties, disciplinary action may be taken
- The school permits reasonable and appropriate access to private social media sites

# Monitoring of Public Social Media

- As part of active social media engagement, it is considered good practice to pro-actively monitor the Internet for public postings about the school
- The school should effectively respond to social media comments made by others according to a defined policy or process
- The school's use of social media for professional purposes will be checked regularly by the Online Safety Co-coordinator to ensure compliance with the school policies.

# **Unsuitable / Inappropriate activities**

Some internet activity, e.g. accessing child abuse images or distributing racist material, is illegal and would obviously be banned from school technical systems and could lead to criminal prosecution. There are however a range of activities which may, generally, be legal but would be inappropriate in a school context, either because of the age of the users or the nature of those activities.

The school believes that the activities referred to in the following section would be inappropriate in a school context and that users, as defined below, should not engage in these activities in / or outside the school when using school equipment or systems. The school policy restricts usage as follows:

Jser Actior	ns	Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	
ad, data imments elate to:	Child sexual abuse images –The making, production or distribution of indecent images of children. Contrary to The Protection of Children Act 1978					
download, upload, data proposals or comments that contain or relate to:	Grooming, incitement, arrangement or facilitation of sexual acts against children Contrary to the Sexual Offences Act 2003.					
, post, down marks, prope that co	Possession of an extreme pornographic image (grossly offensive, disgusting or otherwise of an obscene character) Contrary to the Criminal Justice and Immigration Act 2008					
sites, make material, rei	Criminally racist material in UK – to stir up religious hatred (or hatred on the grounds of sexual orientation) - contrary to the Public Order Act 1986					
iternet ss on,	Pornography				х	
Users shall not visit Internet sites, make, post, download, upload, data transfer, communicate or pass on, material, remarks, proposals or comments that contain or relate to:	Promotion of any kind of discrimination				Х	
	threatening behaviour, including promotion of physical violence or mental harm				Х	
	Promotion of extremism or terrorism				Х	
	Any other information which may be offensive to colleagues or breaches the integrity of the ethos of the school or brings the school into disrepute				х	
Jsing school	ol systems to run a private business				Х	
	ms, applications, websites or other mechanisms that bypass the filtering feguards employed by the school				Х	

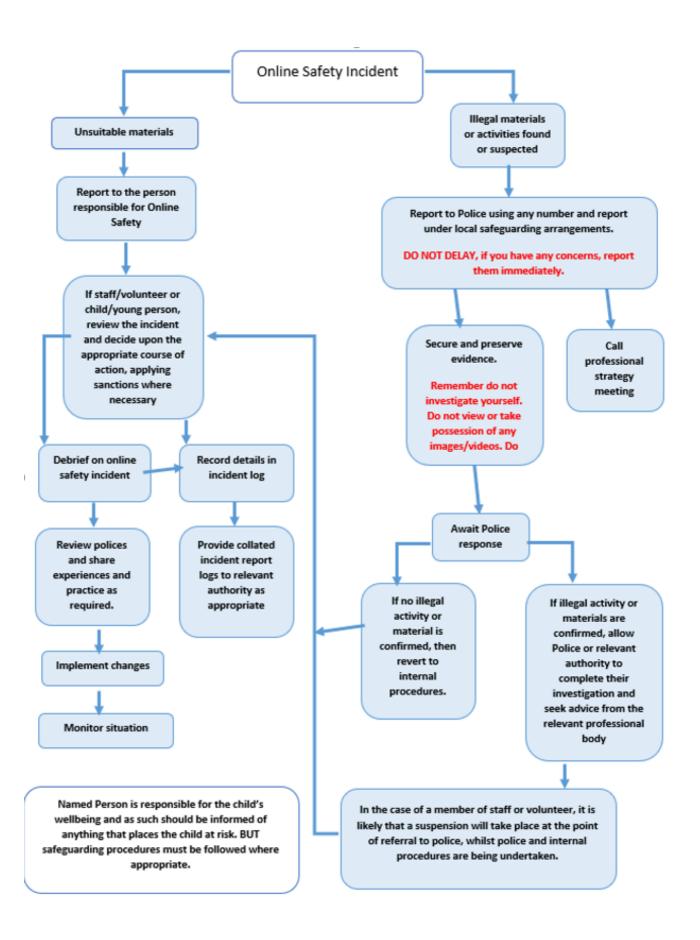
Infringing copyright				X	
Revealing or publicising confidential or proprietary information (eg financial / personal information, databases, computer / network access codes and passwords)				х	
Creating or propagating computer viruses or other harmful files				X	
Unfair usage (downloading / uploading large files that hinders others in their use of the internet)				х	
On-line gaming (educational)	✓				
On-line gaming (non-educational)		✓			
On-line gambling				✓	
On-line shopping / commerce		✓			
File sharing				✓	
Use of social media		✓			
Use of messaging apps		✓			
Use of video broadcasting e.g. Youtube			✓		

# Responding to incidents of misuse

This guidance is intended for use when staff need to manage incidents that involve the use of online services. It encourages a safe and secure approach to the management of the incident. Incidents might involve illegal or inappropriate activities (see above).

# **Illegal Incidents**

If there is any suspicion that the web site(s) concerned may contain child abuse images, or if there is any other suspected illegal activity, refer to the right hand side of the Flowchart below for responding to online safety incidents and report immediately to the police.



LSCB = Local Safeguard Children Board (01733 864170)

CEOP = Child Exploitation Online Protection (https://www.ceop.police.uk/ceop-reporting/)

#### Other Incidents

It is hoped that all members of the school community will be responsible users of digital technologies, who understand and follow school policy. However, there may be times when infringements of the policy could take place, through careless or irresponsible or, very rarely, through deliberate misuse.

In the event of suspicion, all steps in this procedure should be followed:

- Have more than one senior member of staff / volunteer involved in this process. This is vital to protect individuals if accusations are subsequently reported.
- Conduct the procedure using a designated computer that will not be used by young people and if necessary can be taken off site by the police should the need arise. Use the same computer for the duration of the procedure.
- It is important to ensure that the relevant staff should have appropriate internet access to conduct the procedure, but also that the sites and content visited are closely monitored and recorded (to provide further protection).
- Record the URL of any site containing the alleged misuse and describe the nature of the
  content causing concern. It may also be necessary to record and store screenshots of the
  content on the machine being used for investigation. These may be printed, signed and
  attached to the form (except in the case of images of child sexual abuse see below)
- Once this has been completed and fully investigated, the group will need to judge whether
  this concern has substance or not. If it does, then appropriate action will be required and
  could include the following:
  - Internal response or discipline procedures
  - Involvement by Local Authority
  - Police involvement and/or action

If content being reviewed includes images of child abuse then the monitoring should be halted and referred to the Police immediately. Other instances to report to the police would include:

- incidents of 'grooming' behaviour
- the sending of obscene materials to a child
- adult material which potentially breaches the Obscene Publications Act
- criminally racist material
- promotion of terrorism or extremism
- offences under the Computer Misuse Act (see User Actions chart above)
- other criminal conduct, activity or materials

# <u>Isolate the computer in question as best you can. Any change to its state may hinder a later police investigation.</u>

It is important that all of the above steps are taken, as they will provide an evidence trail for the school and possibly the police and demonstrate that visits to these sites were carried out for safeguarding purposes. The completed form should be retained by the group for evidence and reference purposes.

# **School Actions & Sanctions**

It is more likely that the school will need to deal with incidents that involve inappropriate rather than illegal misuse. It is important that any incidents are dealt with as soon as possible in a proportionate manner, and that members of the school community are aware that incidents have been dealt with. It is intended that incidents of misuse will be dealt with through normal behaviour / disciplinary procedures and lead to suspense/dismal dependant on level of misuse.