Charles Williams Church in Wales Primary School

Online Safety Policy

September 2021

Review Date September 2022

This policy applies to all members of the school community (including staff, students/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

Development / Monitoring / Review of this Policy

This online safety policy has been developed by the Science & Technology team and:

- Headteacher
- Staff – including Teachers, Support Staff, Technical staff
- Governors

Consultation with the whole school community has taken place through a range of formal and informal meetings.

Schedule for Development / Monitoring / Review

This online safety policy was approved by the *Governing Body / on:*	To be received
The implementation of this online safety policy will be monitored by the:	21st Century Learning Leader online safety Coordinator ICT Curriculum Team online safety Group
Monitoring will take place at regular intervals:	Twice annually (March & September)
The Governing Body will receive a report on the implementation of the online safety policy generated by the monitoring group (which will include anonymous details of online safety incidents) at regular intervals:	Annually (March)
The online safety policy will be reviewed annually, or more regularly in the light of any significant new developments in the use of the technologies, new threats to online safety or incidents that have taken place. The next anticipated review date will be:	September 2022
Should serious online safety incidents take place, the following external persons/agencies should be informed:	LA Safeguarding Officer Police

The school will monitor the impact of the policy using:

- Logs of reported incidents
- Monitoring logs of internet activity (including sites visited)
- Internal monitoring data for network activity
- Surveys / questionnaires of
- students / pupils
- parents / carers
- staff

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 Governing Body receiving regular information about online safety incidents and monitoring reports. A member of the Governing Body has taken on the role responsible for online safety which includes:

- regular meetings with the online safety co-ordinator
- regular monitoring of online safety incident logs
- regular monitoring of filtering/change control logs
- reporting to relevant Governors

With the rise in popularity of social networking sites such as Facebook and Twitter, governors should remember that they are a representative of the governing body and part of a corporate body. It is therefore sensible for governors to maintain a certain level of separation on social networking sites, as this may create a conflict / difficult situation in the future. - Taken from the Governors Code of Conduct

Headteacher and Senior Leaders:

- **The Headteacher has a duty of care for ensuring the safety (including online safety) of members of the school community**, through the day to day responsibility for online safety is delegated to the 21st Century Learning Leader.
- **The Headteacher and another member of the Senior Leadership Team / Senior Management Team are aware of the procedures to be followed in the event of a serious online safety allegation being made against a member of staff.**
- The Headteacher and online safety co-ordinator are responsible for ensuring that the online safety co-ordinator 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 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 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 Co-ordinator / Officer:

The online safety co-ordinator

- leads the online safety group
- takes a 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 (or identifies sources of) training and advice for staff
- liaises with the Local Authority / relevant body
- liaises with technical staff
- receives reports of online safety incidents and creates a log of incidents to inform future online safety developments.
- meets regularly with online safety Governor to discuss current issues, review incident logs and if possible, filtering/change control logs
- attends relevant meetings
- reports regularly to Senior Leadership Team

The school with support from SRS:

The school with support from SRS 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 (as a minimum) the required online safety technical requirements as identified by the Local Authority and also any Online Safety Policy / Guidance that may apply.**
- **that users may only access the networks and devices through a properly enforced password protection policy, in which passwords are regularly changed**
- *that the filtering policy is applied and updated on a regular basis and its implementation is not the sole responsibility of any single person* (see appendix "Technical Security Policy Template" for good practice)
- 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 policies

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 Agreement (AUA)**
- **they report any suspected misuse or problem to the *Headteacher / online safety Coordinator* for investigation/action**
- **all digital communications with students/pupils/parents/carers should be on a professional level**
- online safety issues are embedded in all aspects of the curriculum and other activities
- pupils understand and follow the online safety and acceptable use agreements
- pupils have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations
- 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

Safeguarding Designated Person

The Safeguarding Officer should be trained in online safety issues and be aware of the potential for serious safeguarding issues to arise from:

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

Online Safety Group

The online safety group provides a consultative group that has wide representation from the school community, with responsibility for issues regarding online safety and monitoring the online safety policy including the impact of initiatives. Depending on the size or structure of the school this committee may be part of the safeguarding group. The group will also be responsible for regular reporting to the Governing Body.

Members of the online safety group will assist the online safety co-ordinator with:

- the production/review/monitoring of the school online safety policy/documents.
- the production/review/monitoring of the school filtering policy and requests for filtering changes.
- mapping and reviewing the online safety curricular provision – ensuring relevance, breadth and progression
- monitoring network/internet/incident logs where possible
- consulting stakeholders – including parents/carers and the students/pupils about the online safety provision
- monitoring improvement actions identified through the use of the 360-degree safe Cymru self-review tool

- *An online safety Group Terms of Reference Template can be found in the appendices*

Students / pupils:

- **are responsible for using the school digital technology systems in accordance with the Student / Pupil Acceptable Use Agreement**
- have a good 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
- will be expected to know and understand policies on the use of mobile devices and digital cameras. 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 practise 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, local online safety campaigns and 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 parents' sections of the website
- their children's personal devices in the school

Community Users

Community Users who access the school system's / 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 – young people

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 ICT / Computing / PSE / Digital Literacy lessons or other lessons and should be regularly revisited**
- **Key online safety messages should be reinforced as part of a planned programme of assemblies and tutorial / pastoral activities**
- **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 in KS2 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 young people visit.

Education – parents/carers

Many parents and carers 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 online behaviours. Parents may underestimate how often children and young people come across potentially harmful and inappropriate material on the internet and maybe unsure about how to respond.

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

- Curriculum activities
- Letters, newsletters, web site
- Parents / Carers evenings / sessions
- High profile events/campaigns eg Safer Internet Day
- Reference to the relevant web sites/publications eg https://hwb.wales.gov.uk/ www.saferinternet.org.uk/ http://www.childnet.com/parents-and-carers

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 family learning courses in the use 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.**
- The online safety Coordinator (or another nominated person) will receive regular updates through attendance at external training events (eg from Consortium / SWGfL / 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/phase meetings.
- The online safety Coordinator (or another nominated person) 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 sub-committee/group 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 (eg SWGfL).
- Participation in school training/information sessions for staff or parents

Technical – infrastructure/equipment, filtering and monitoring

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. It will also 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 will be provided with a username and secure password** by the 21st Century Learning Leader who will keep an up to date record of users and their usernames. **Year 5 & 6 pupils are responsible for the security of their username and password**.
- **The "master/administrator" passwords for the school ICT system, used by the Network Manager (or another person) must also be available to the Headteacher or other nominated senior leader and kept in a secure place.**
- **21st Century Learning Leader 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 (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.
- Where possible, 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.
- 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.
- An agreed policy of issuing a temporary login 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/students/pupils/community users) and their family members are allowed on school devices that may be used out of school.
- An agreed policy is in place that allows staff to / forbids staff from downloading executable files and installing programs 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.

Bring Your Own Device (BYOD) *(not being considered yet)*

Included for awareness purposes, but will need to be adapted once school plan and policy is decided

The educational opportunities offered by mobile technologies are being expanded as a wide range of devices, software and online services become available for teaching and learning, within and beyond the classroom. This has led to the exploration by schools of users bringing their own technologies in order to provide greater freedom of choice and usability. However, there are a number of online safety considerations for BYOD that need to be reviewed prior to implementing such a policy. Use of BYOD must not introduce vulnerabilities into existing secure environments.

A device may be a privately owned smartphone, tablet, notebook/laptop or other new technology that usually has the capability of utilising the school's wireless network. The device then has access to the wider internet including the school's learning platform and other cloud-based services such as email and data storage. The device may typically also be used for the taking of images, for the recording of sounds or video and for generating and storing a wide range of other types of data (often as a result of using an app).
The absolute key to approaching BYOD is that the students, staff and the wider school community understand that the primary purpose of having their personal devices at school is educational and that this is irrespective of whether the device they use is user or school-owned. This understanding then underpins further conventions around acceptable use of both the devices and of the wider network.

Potential Benefits of BYOD

Research is highlighting the widespread uptake of portable, wireless-enabled electronic devices amongst adults and children of all ages. This technology exists as part of their everyday digital world and by allowing them to use these devices freely in school, the school is bringing that familiar digital life into the school classroom. Learners will no longer have to 'power down' when they walk through the doors of the school and can engage with and own their learning more effectively. BYOD has the potential to maximise the huge investments that have been made in schools' infrastructure and allow for greater opportunity to engage with learning technologies.

Considerations

Schools do need to be aware that access to such devices is not yet ubiquitous and that any BYOD implementation will need to address issues over equality of access for all learners.

BYOD brings both real benefits and challenges for the whole school community – including teachers - and the only effective way for a school to implement BYOD successfully is to involve the whole school community from the outset. Before the school embarks on this path, the risks and benefits must be clearly identified and shared with all stakeholders.

The school must develop a new, strengthened Acceptable Use Agreement for staff, students and parents/carers as a minimum, and will need to support teaching staff, learners and parents through this shift in approach.

The essential principle of safe and responsible use of the internet and learning technologies sits with the understanding that this technology is allowed primarily for educational purposes. Online safety should already be enshrined in existing online safety awareness programmes and in the school's current Acceptable Use documentation. The BYOD policy should sit alongside a range of policies including but not limited to the Safeguarding Policy, Bullying Policy, Acceptable Use (of the internet) Policy, policies around theft or malicious damage and the Behaviour Policy.

In school, there are clear rules as to when mobile devices can be used during lessons:

- **Red –** mobile devices are not permitted during this lesson;
- **Amber** – mobile devices can be used during this lesson but they must stay in learner's bag until the teacher allows their use; and
- **Green** – mobile devices can be brought out and placed on the desk.

Further practical rules you might wish to develop if mobile devices can be brought out and placed on the desk might include:

- Screens must be visible at all times i.e. face up on the desk
- Teachers and/or students must be allowed to view any student device
- Photographs and videos cannot be taken without the authorisation of the teacher
- Breaches of the trust being given to the students must be dealt with according to sanctions identified in a 'Responsible Use Policy' (RUP) - which is good practice will have been designed with the involvement of the students/pupils or school online safety group.

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 students/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 long 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 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 eg on social networking sites.**
- 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 is 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. G*overnors will adhere to the appropriate section of the April 2015 edition of "Principles of Conduct for Governors of Schools in Wales".*
- 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, if they have to be taken on personal equipment then they will be deleted immediately after use.
- Parents/carers are welcome to take videos and digital images of their own children, individually and in groups, when supporting school trips, however, these may not be posted on social media sites when fulfilling a supervisory role.
- 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 practise guidance on the use of such images.
- Pupils' full names will not be used anywhere on a website or blogs, particularly in association with photographs.
- Written permission from parents or carers will be obtained before photographs of pupils are published on the school website
- Pupil's work can only be published with the permission of the pupil and parents or carers.

Data Protection

Personal data will be recorded, processed, transferred and made available according to the Data Protection Act 1998 which states that personal data must be:

- Fairly and lawfully processed
- Processed for limited purposes
- Adequate, relevant and not excessive
- Accurate
- Kept no longer than is necessary
- Processed in accordance with the data subject's rights
- Secure
- Only transferred to others with adequate protection.

The school will ensure that:

- **It holds the minimum personal data necessary to enable it to perform its function and it will not hold it for longer than necessary for the purposes it was collected for.**
- **Every effort will be made to ensure that data held is accurate, up to date and that inaccuracies are corrected without unnecessary delay.**
- **All personal data will be fairly obtained in accordance with the "Privacy Notice" and lawfully processed in accordance with the "Conditions for Processing".**
- **It has a Data Protection Policy**
- **It is registered as a Data Controller for the purposes of the Data Protection Act (DPA)**
- Responsible persons are appointed/identified - Senior Information Risk Officer (SIRO) and Information Asset Owners (IAOs)
- Risk assessments are carried out
- It has clear and understood arrangements for the security, storage and transfer of personal data
- Data subjects have rights of access and there are clear procedures for this to be obtained
- There are clear and understood policies and routines for the deletion and disposal of data
- There is a policy for reporting, logging, managing and recovering from information risk incidents
- There are clear Data Protection clauses in all contracts where personal data may be passed to third parties

- There are clear policies about the use of cloud storage/cloud computing which ensure that such data storage meets the requirements laid down by the Information Commissioner's Office.

Staff must ensure that they:

- **At all times take care to ensure the safekeeping of personal data, minimising the risk of its loss or misuse.**
- **Use personal data 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.**
- **Transfer data using encryption and secure password protected devices.**
- 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 offer approved 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

This is an area of rapidly developing technologies and uses. Schools will need to discuss and agree how they intend to implement and use these technologies eg few schools allow students/pupils to use mobile phones in lessons, while others identify educational potential and allow their use. This section may also be influenced by the age of the students/pupils. The table has been left blank for school to choose its own responses.

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			Pupils			
Communication Technologies	Allow	Sometimes allow	Disallow	Allow	Sometimes allow	Allowed by certain pupils	Disallow
Mobile phones may be brought to school	X					X year 6	
Use of mobile phones in lessons			X only for photos				X
Use of mobile phones in social time	X						X
Taking photos on mobile phones/cameras	X						X
Use of other mobile devices eg tablets, gaming devices	X			X			
Use of personal email addresses in school, or on the school network		X					X
Use of school email for personal emails			X				X
Use of messaging apps	X				X When		

					directed		
Use of social media	X						X
Use of blogs	X						

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 can be monitored.**
- **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 students/pupils or parents/carers 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 at KS1, while pupils at KS2 and above will 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

With an increase in the use of all types of social media for professional and personal purposes a policy that sets out clear guidance for staff to manage risk and behaviour online is essential. Core messages should include the protection of pupils, the school and the individual when publishing any material online. Expectations for teachers' professional conduct are set out by the General Teaching Council Wales (GTCW) but all adults working with children and young people must understand that the nature and responsibilities of their workplace them in a position of trust and that their conduct should reflect this.

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. All staff working at any educational establishment are expected to demonstrate a professional approach and respect for pupils and their families and for colleagues and the learning setting.

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

- Training to include: 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 an 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 the risk of loss of personal information.

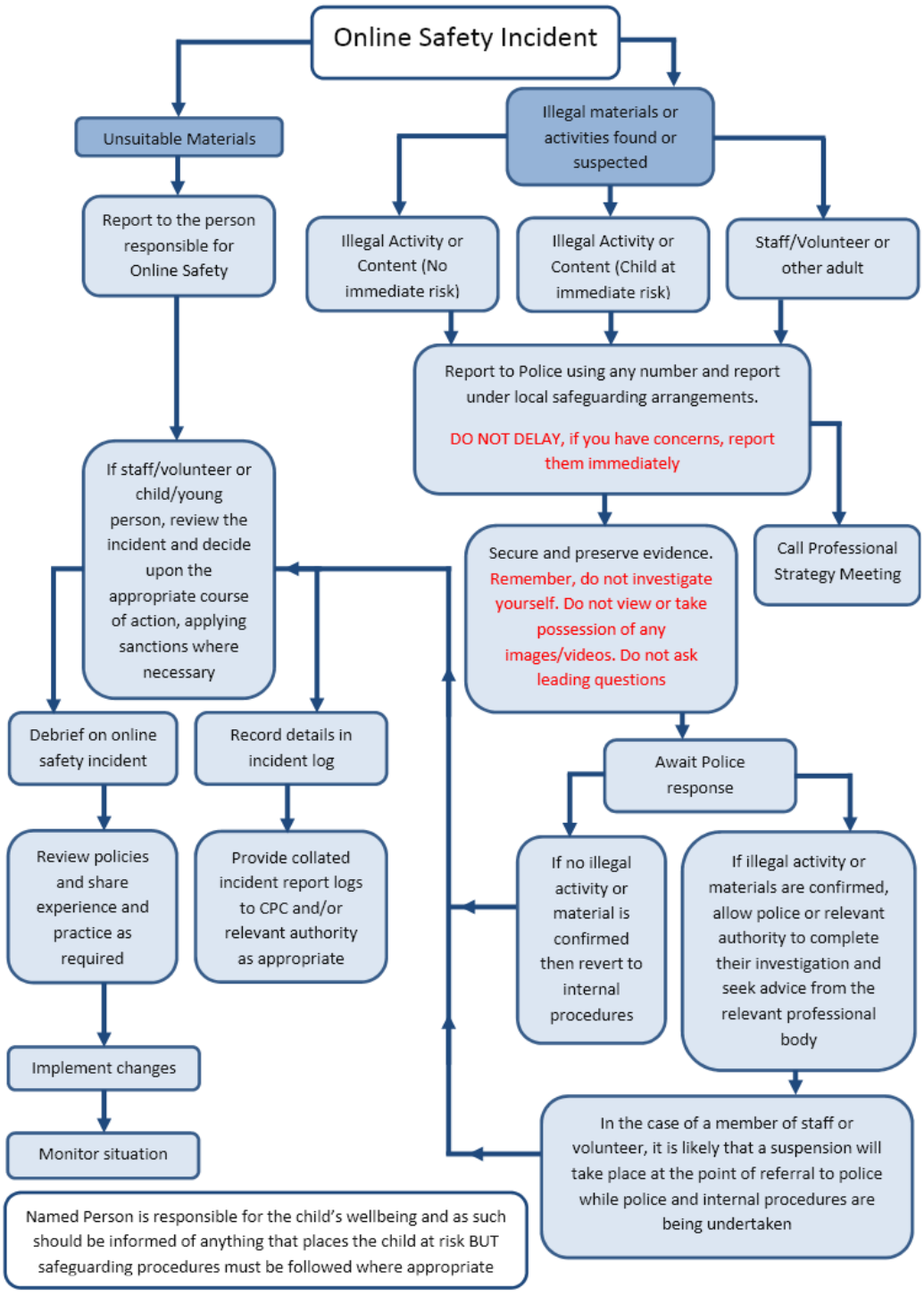
The school's use of social media for professional purposes will be checked regularly by the senior risk officer and online safety group to ensure compliance with the Social Media, Data Protection, Communications, Digital Image and Video Policies.

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 "User Actions" 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 and appendix) for responding to online safety incidents and report immediately to the police.



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/volunteers 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 or national/local organisation (as relevant).
- Police involvement and/or action

If the 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
- other criminal conduct, activity or materials
- **Isolate the computer in question as best you can. Any change to its state may hinder a later police investigation.**

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 - Pupils

Incidents:	Refer to the class teacher	Refer to Headteacher	Refer to Police	Refer to technical support staff for action re filtering/security etc	Inform parents / carers	Removal of network/internet access rights	Warning	Further sanction eg exclusion
Deliberately accessing or trying to access material that could be considered illegal (see the list in the earlier section on unsuitable/inappropriate activities).		X			X	X		
Unauthorised use of non-educational sites during lessons	X							
Unauthorised use of mobile phone / digital camera / another mobile device	X							
Unauthorised use of social media / messaging apps / personal email	X							

Unauthorised downloading or uploading of files	X			X				
Allowing others to access school network by sharing username and passwords	X			X		X		
Attempting to access or accessing the school network, using another student's / pupil's account	X			X		X		
Attempting to access or accessing the school network, using the account of a member of staff	X	X		X	X	X	X	
Corrupting or destroying the data of other users		X			X		X	
Sending an email, text or message that is regarded as offensive, harassment or of a bullying nature	X				X	X		
Continued infringements of the above, following previous warnings or sanctions							X	
Actions which could bring the school into disrepute or breach the integrity of the ethos of the school		X			X			
Using proxy sites or other means to subvert the school's filtering system						X		
Accidentally accessing offensive or pornographic material and failing to report the incident	X			X				
Deliberately accessing or trying to access offensive or pornographic material		X			X	X	X	

School Actions - Staff

Incidents:	Refer to the line manager	Refer to Headteacher	Refer to Local Authority / HR	Refer to Police	Refer to Technical Support Staff for action re filtering etc	Warning	Suspension	Disciplinary action
Deliberately accessing or trying to access material that could be considered illegal (see the list in the earlier section on unsuitable/inappropriate activities).		X	X	X				X
Inappropriate personal use of the internet / social media / personal email	X					X		
Unauthorised downloading or uploading of files	X					X		
Allowing others to access school network by sharing username and passwords or attempting to access or accessing the school network, using another person's account	X				X	X		
Corrupting or destroying the data of other users or causing deliberate damage to hardware or software		X			X			X

Sending an email, text or message that is regarded as offensive, harassment or of a bullying nature	X				X	X		
Using personal email / social networking/instant messaging / text messaging to carrying out digital communications with students/pupils	X	X						X
Actions which could compromise the staff member's professional standing	X							
Actions which could bring the school into disrepute or breach the integrity of the ethos of the school		X				X		
Using proxy sites or other means to subvert the school's filtering system	X				X			
Accidentally accessing offensive or pornographic material and failing to report the incident	X				X	X		
Deliberately accessing or trying to access offensive or pornographic material		X			X			X
Breaching copyright or licensing regulations	X							
Continued infringements of the above, following previous warnings or sanctions		X						X

Appendices – Section A - Acceptable Use Agreement

Appendices – Section B – Specific Policies

Appendices – Section C – Support documents and links

A1 Pupil Acceptable Use Agreement – Foundation Phase

This is how we stay safe when we use computers:

I will ask a teacher or another adult from the school if I want to use computers

I will only use activities that a teacher or another adult from the school has told or allowed me to use.

I will take care of the computer and other equipment

I will ask for help from a teacher or another adult from the school if I am not sure what to do or if I think I have done something wrong.

I will tell a teacher or another adult from the school if I see something that upsets me on the screen.

I know that if I break the rules I might not be allowed to use a computer.

By reading this document you agree to the points mentioned. If you disagree then please sign and return.

Signed (on behalf of the child):……

Signed (parent): ……..

A2 Pupil Acceptable Use Agreement (AUA) – KS2

School Policy

Digital technologies have become integral to the lives of children and young people, both within schools and outside school. These technologies are powerful tools, which open up new opportunities for everyone. These technologies can stimulate discussion, promote creativity and stimulate awareness of context to promote effective learning. Young people should have an entitlement to safe internet access at all times.

This Acceptable Use Agreement is intended to ensure:

- that young people will be responsible users and stay safe while using the internet and other digital technologies for educational, personal and recreational use.
- that school systems and users are protected from accidental or deliberate misuse that could put the security of the systems and users at risk.

The school will try to ensure that pupils will have good access to digital technologies to enhance their learning and will, in return, expect the pupils to agree to be responsible users.

Acceptable Use Agreement

By reading this I understand that I must use school ICT systems in a responsible way, to ensure that there is no risk to my safety or to the safety and security of the ICT systems and other users. **I will only return this form to school if I do not agree to it.**

For my own personal safety:

- I understand that the school will monitor my use of IT systems, devices and digital communications.
- I will keep my username and password safe and secure – I will not share it, nor will I try to use any other person's username and password. I understand that I should not write down or store a password where it is possible that someone may steal it.
- I will be aware of "stranger danger" when I am communicating on-line.
- I will not disclose or share personal information about myself or others when on-line (this could include names, addresses, email addresses, telephone numbers, age, gender, educational details, financial details etc)
- If I arrange to meet people off-line that I have communicated with on-line, I will do so in a public place and take an adult with me.
- I will immediately report any unpleasant or inappropriate material or messages or anything that makes me feel uncomfortable when I see it on-line.

I understand that everyone has equal rights to use technology as a resource and:

- I understand that the school systems and devices are primarily intended for educational use and that I will not use them for personal or recreational use unless I have permission.
- I will not try (unless I have permission) to make large downloads or uploads that might take up internet capacity and prevent other users from being able to carry out their work.
- I will not use the school systems or devices for on-line gaming, on-line gambling, internet shopping, file sharing, or video broadcasting (eg YouTube) unless I have the permission of a member of staff to do so.

I will act as I expect others to act toward me:

- I will respect others' work and property and will not access, copy, remove or otherwise alter any other user's files, without the owner's knowledge and permission.
- I will be polite and responsible when I communicate with others, I will not use strong, aggressive or inappropriate language and I appreciate that others may have different opinions.
- I will not take or distribute images of anyone without their permission.

I recognise that the school has a responsibility to maintain the security and integrity of the technology it offers me and to ensure the smooth running of the school:

- I will only use my own personal device(s) in school if I have permission. I understand that, if I do use my own device(s) in the school, I will follow the rules set out in this agreement, in the same way as if I was using school equipment.
- I understand the risks and will not try to upload, download or access any materials which are illegal or inappropriate or may cause harm or distress to others, nor will I try to use any programmes or software that might allow me to bypass the filtering/security systems in place to prevent access to such materials.
- I will immediately report any damage or faults involving equipment or software, however, this may have happened.
- I will not open any hyperlinks in emails or any attachments to emails, unless I know and trust the person/organisation who sent the email, or if I have any concerns about the validity of the email (due to the risk of the attachment containing viruses or other harmful programmes)
- I will not install or attempt to install or store programmes of any type on any school device, nor will I try to alter computer settings.
- I will only use social media sites with permission and at the times that are allowed.

When using the internet for research or recreation, I recognise that:

- I should ensure that I have permission to use the original work of others in my own work
- Where work is protected by copyright, I will not try to download copies (including music and videos)
- When I am using the internet to find information, I should take care to check that the information that I access is accurate, as I understand that the work of others may not be truthful and may be a deliberate attempt to mislead me.

I understand that I am responsible for my actions, both in and out of school:

- I understand that the school also has the right to take action against me if I am involved in incidents of inappropriate behaviour, that are covered in this agreement, when I am out of school and where they involve my membership of the school community (examples would be cyber-bullying, use of images or personal information).
- I understand that if I fail to comply with this Acceptable Use Agreement, I will be subject to disciplinary action. This may include loss of access to the school network/internet, detentions, suspensions, contact with parents and in the event of illegal activities involvement of the police.

By reading this agreement, you understood and agree to the rules included in the Acceptable Use Agreement. If you sign and return this document then access will not be granted to school systems and devices.

I have read and understood the above and agree to follow these guidelines when:

- I use the school systems and devices (both in and out of school)
- I use my own devices in school (when allowed) eg mobile phones, gaming devices, cameras etc
- I use my own equipment out of the school in a way that is related to me being a member of this *school* eg communicating with other members of the school, accessing school email, VLE, website etc.

This form only needs to be returned to school if you do not agree.

Name of Pupil	
Class	
Signed & Dated	

A3 Staff (and Volunteer) Acceptable Use Agreement

School Policy

New technologies have become integral to the lives of children and young people in today's society, both within schools and in their lives outside school. The internet and other digital information and communications technologies are powerful tools, which open up new opportunities for everyone. These technologies can stimulate discussion, promote creativity and stimulate awareness of context to promote effective learning. They also bring opportunities for staff to be more creative and productive in their work. All users should have an entitlement to safe internet access at all times.

This Acceptable Use Policy is intended to ensure:

- that staff and volunteers will be responsible users and stay safe while using the internet and other communications technologies for educational, personal and recreational use.
- that school ICT systems and users are protected from accidental or deliberate misuse that could put the security of the systems and users at risk.
- that staff are protected from potential risk in their use of ICT in their everyday work.

The school will try to ensure that staff and volunteers will have good access to ICT to enhance their work, to enhance learning opportunities for pupils learning and will, in return, expect staff and volunteers to agree to be responsible users.

Acceptable Use Policy Agreement

I understand that I must use school ICT systems in a responsible way, to ensure that there is no risk to my safety or to the safety and security of the ICT systems and other users. I recognise the value of the use of ICT for enhancing learning and will ensure that students/pupils receive opportunities to gain from the use of ICT. I will, where possible, educate the young people in my care in the safe use of ICT and embed online safety in my work with young people.

For my professional and personal safety:

- I understand that the school will monitor my use of the ICT systems, email and other digital communications.
- I understand that the rules set out in this agreement also apply to use of school ICT systems (eg Chromebooks, iPads, email) out of school, and to the transfer of personal data (digital or paper-based) out of school
- I understand that the school ICT systems are primarily intended for educational use and that I will only use the systems for personal or recreational use within the policies and rules set down by the school.
- I will not disclose my username or password to anyone else, nor will I try to use any other person's username and password. I understand that I should not write down or store a password where it is possible that someone may steal it.
- I will immediately report any illegal, inappropriate or harmful material or incident, I become aware of, to the appropriate person.

I will be professional in my communications and actions when using school ICT systems:

- I will not access, copy, remove or otherwise alter any other user's files, without their express permission.
- I will communicate with others in a professional manner, I will not use aggressive or inappropriate language and I appreciate that others may have different opinions.
- I will ensure that when I take and / or publish images of others I will do so with their permission and in accordance with the school's policy on the use of digital / video images. I will not use my personal equipment to record these images unless I have no other alternative at the time. Where these images are published (eg on the school website) it will not be possible to identify by name, or other personal information, those who are featured.
- I will only use chat and social networking sites in school in accordance with the school's policies.
- Any communication with pupils parents/carers will be professional in tone and manner and only with the school email address I have been issued with.
- I will not engage in any on-line activity that may compromise my professional responsibilities.

The school and the local authority have a responsibility to provide safe and secure access to technologies and ensure the smooth running of the school:

- When I use my mobile devices (laptops / mobile phones / USB devices etc) in school, I will follow the rules set out in this agreement, in the same way as if I was using school equipment. I will also follow any additional rules set by the school about such use. I will ensure that any such devices are protected by up to date anti-virus software and are free from viruses.
- I will not open any hyperlinks in emails or any attachments to emails, unless the source is known and trusted, or if I have any concerns about the validity of the email (due to the risk of the attachment containing viruses or other harmful programmes)
- I will ensure that my data is regularly backed up, in accordance with relevant school policies.
- I will not try to upload, download or access any materials which are illegal (child sexual abuse images, criminally racist material, adult pornography covered by the Obscene Publications Act) or inappropriate or may cause harm or distress to others. I will not try to use any programmes or software that might allow me to bypass the filtering/security systems in place to prevent access to such materials.
- I will not try (unless I have permission) to make large downloads or uploads that might take up internet capacity and prevent other users from being able to carry out their work.
- I will not install or attempt to install programmes of any type on a machine or store programmes on a computer, nor will I try to alter computer settings, unless this is allowed in school policies.
- I will not disable or cause any damage to school equipment, or the equipment belonging to others.
- I will only transport, hold, disclose or share personal information about myself or others, as outlined in the School / LA Personal Data Policy (or other relevant policy). Where digital personal data is transferred outside the secure local network, it must be encrypted. Paper-based Protected and Restricted data must be held in lockable storage.
- I understand that data protection policy requires that any staff or pupil data to which I have access, will be kept private and confidential, except when it is deemed necessary that I am required by law or by school policy to disclose such information to an appropriate authority.
- I will immediately report any damage or faults involving equipment or software, however, this may have happened.

When using the internet in my professional capacity or for school-sanctioned personal use:

- I will ensure that I have permission to use the original work of others in my own work
- Where work is protected by copyright, I will not download or distribute copies (including music and videos).

I understand that I am responsible for my actions in and out of the school:

- I understand that this Acceptable Use Agreement applies not only to my work and use of school ICT equipment in school, but also applies to my use of school ICT systems and equipment off the premises and my use of personal equipment on the premises or in situations related to my employment by the school.
- I understand that if I fail to comply with this Acceptable Use Policy Agreement, I could be subject to disciplinary action. This could include a warning, suspension, referral to Governors and / or the Local Authority and in the event of illegal activities the involvement of the police.

I have read and understood the above and agree to use the school ICT systems (both in and out of school) and my own devices (in school and when carrying out communications related to the school) within these guidelines.

Staff / Volunteer Name

Signed

Date

A4 Parent / Carer Acceptable Use Agreement

Digital technologies have become integral to the lives of children and young people, both within schools and outside school. These technologies provide powerful tools, which open up new opportunities for everyone. They can stimulate discussion, promote creativity and stimulate awareness of context to promote effective learning. Young people should have an entitlement to safe internet access at all times.

This Acceptable Use Policy is intended to ensure:

- that young people will be responsible users and stay safe while using the internet and other communications technologies for educational, personal and recreational use.
- that school systems and users are protected from accidental or deliberate misuse that could put the security of the systems and users at risk.
- that parents and carers are aware of the importance of online safety and are involved in the education and guidance of young people with regard to their online behaviour.

The school will try to ensure that pupils will have good access to digital technologies to enhance their learning and will, in return, expect the pupils to agree to be responsible users. A copy of the Pupil Acceptable Use Agreement is attached to this permission form so that parents/carers will be aware of the school's expectations of the young people in their care.

Parents are requested to sign the permission form below to show their support of the school in this important aspect of the school's work.

Permission Form

Parent / Carers Name _____ Student / Pupil Name _____

As the parent/carer of the above pupils, I give permission for my son/daughter to have access to the internet and to ICT systems at school.

Either: (KS2)
I know that my son/daughter has signed an Acceptable Use Agreement and has received, or will receive, online safety education to help them understand the importance of safe use of technology and the internet – both in and out of school.

Or: (FP)
I understand that the school has discussed the Acceptable Use Agreement with my son/daughter and that they have received, or will receive, online safety education to help them understand the importance of safe use of technology and the internet – both in and out of school.

I understand that the school will take every reasonable precaution, including applying monitoring and filtering systems, to ensure that young people will be safe when they use the internet and ICT systems. I also understand that the school cannot ultimately be held responsible for the nature and content of materials accessed on the internet and using mobile technologies.

I understand that my son's / daughter's activity on the ICT systems will be monitored and that the school will contact me if they have concerns about any possible breaches of the Acceptable Use Agreement.

I will encourage my child to adopt safe use of the internet and digital technologies at home and will inform the school if I have concerns over my child's online safety.

Signed _____ Date _____

A5 Use of Digital / Video Images Form

The use of digital /video images plays an important part in learning activities. Students/Pupils and members of staff may use cameras to record evidence of activities in lessons and out of school. These images may then be used in presentations in subsequent lessons.

Images may also be used to celebrate success through their publication in newsletters, on the school website and occasionally in the public media,

The school will comply with the Data Protection Act and request parents/carers permission before taking images of members of the school. We will also ensure that when images are published that young people can not be identified by the use of their names.

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 is 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.

Parents/carers are requested to sign the permission form if they DO NOT wish the school to take and use images of their children.

Digital/Video Images Permission Form

Parent/Carer's Name	
Student/Pupil Name	

As the parent/carer of the above pupil, I DO NOT agree to the school taking and using digital / video images of my child/children.

I agree that if I take digital or video images at, or of, – school events which include images of children, other than my own, I will abide by these guidelines in my use of these images.

Signed	
Date	

A6 Acceptable Use Agreement for Community Users

This Acceptable Use Agreement is intended to ensure:

- that community users of school digital technologies will be responsible users and stay safe while using these systems and devices.
- that school systems, devices and users are protected from accidental or deliberate misuse that could put the security of the systems and users at risk.
- that users are protected from potential risk in their use of these systems and devices.

Acceptable Use Agreement

I understand that I must use school systems and devices in a responsible way, to ensure that there is no risk to my safety or to the safety and security of the systems, devices and other users. This agreement will also apply to any personal devices that I bring into the school

- I understand that my use of school systems and devices and digital communications will be monitored
- I will not use a personal device that I have brought into school for any activity that would be inappropriate in a school setting.
- I will not try to upload, download or access any materials which are illegal (child sexual abuse images, criminally racist material, adult pornography covered by the Obscene Publications Act) or inappropriate or may cause harm or distress to others. I will not try to use any programmes or software that might allow me to bypass the filtering/security systems in place to prevent access to such materials.
- I will immediately report any illegal, inappropriate or harmful material or incident, I become aware of, to the appropriate person.
- I will not access, copy, remove or otherwise alter any other user's files without permission.
- I will ensure that if I take and / or publish images of others I will only do so with their permission. I will not use my personal equipment to record these images, without permission. If images are published it will not be possible to identify by name, or other personal information, those who are featured.
- I will not publish or share any information I have obtained whilst in the school on any personal website, social networking site or through any other means unless I have permission from the school.
- I will not, without permission, make large downloads or uploads that might take up internet capacity and prevent other users from being able to carry out their work.
- I will not install or attempt to install programmes of any type on a school device, nor will I try to alter computer settings, unless I have permission to do so.
- I will not disable or cause any damage to school equipment, or the equipment belonging to others.
- I will immediately report any damage or faults involving equipment or software, however, this may have happened.
- I will ensure that I have permission to use the original work of others in my own work
- Where work is protected by copyright, I will not download or distribute copies (including music and videos).
- I understand that if I fail to comply with this Acceptable Use Agreement, the school has the right to remove my access to school systems/devices.

I have read and understood the above and agree to use the school ICT systems (both in and out of school) and my own devices (in school and when carrying out communications related to the school) within these guidelines.

Name

Signed Date

B1 School Policy Template - online safety Group Terms of Reference

1. PURPOSE

To provide a consultative group that has wide representation from the Charles Williams community, with responsibility for issues regarding online safety and the monitoring the online safety policy including the impact of initiatives.

2. MEMBERSHIP

2.1 The online safety committee will seek to include representation from all stakeholders.
The composition of the group will include

- Leadership team member
- Teaching staff member
- Support staff member
- online safety coordinator
- Governor
- Parent / Carer
- Community users (where appropriate)
- Pupil representation – for advice and feedback.

2.2 Other people may be invited to attend the meetings at the request of the Chairperson on behalf of the committee to provide advice and assistance where necessary.
2.3 Committee members must declare a conflict of interest if any incidents being discussed directly involve themselves or members of their families.
2.4 Committee members must be aware that many issues discussed by this group could be of a sensitive or confidential nature
2.5 When individual members feel uncomfortable about what is being discussed they should be allowed to leave the meeting with steps being made by the other members to allow for these sensitivities

3. CHAIRPERSON

The Committee should select a suitable Chairperson from within the group. Their responsibilities include:

- Scheduling meetings and notifying committee members;
- Inviting other people to attend meetings when required by the committee;
- Guiding the meeting according to the agenda and time available;
- Ensuring all discussion items end with a decision, action or definite outcome;
- Making sure that notes are taken at the meetings and that these with any action points are distributed as necessary

4. DURATION OF MEETINGS

Meetings shall be held termly for a period of 1 hour. A special or extraordinary meeting may be called when and if deemed necessary.

5. FUNCTIONS

These are to assist the online safety Coordinator (or another relevant person) with the following:

- To keep up to date with new developments in the area of online safety
- To (at least) annually review and develop the online safety policy in line with new technologies and incidents
- To monitor the delivery and impact of the online safety policy
- To monitor the log of reported online safety incidents (anonymous) to inform future areas of teaching/learning/training.
- To co-ordinate consultation with the whole school community to ensure stakeholders are up to date with information, training and/or developments in the area of online safety. This could be carried out through:
- Staff meetings
- Student/pupil forums (for advice and feedback)
- Governors meetings

- Surveys/questionnaires for students / pupils, parents / carers and staff
- Parents evenings
- Website/Newsletters
- online safety events
- Internet Safety Day (annually held on the second Tuesday in February)
- Other methods
- To ensure that monitoring is carried out of Internet sites used across the school (if possible)
- To monitor filtering/change control logs (e.g. requests for blocking/unblocking sites).
- To monitor the safe use of data across the [school]
- To monitor incidents involving cyberbullying for staff and pupils

6. AMENDMENTS

The terms of reference shall be reviewed annually from the date of approval. They may be altered to meet the current needs of all committee members, by agreement of the majority

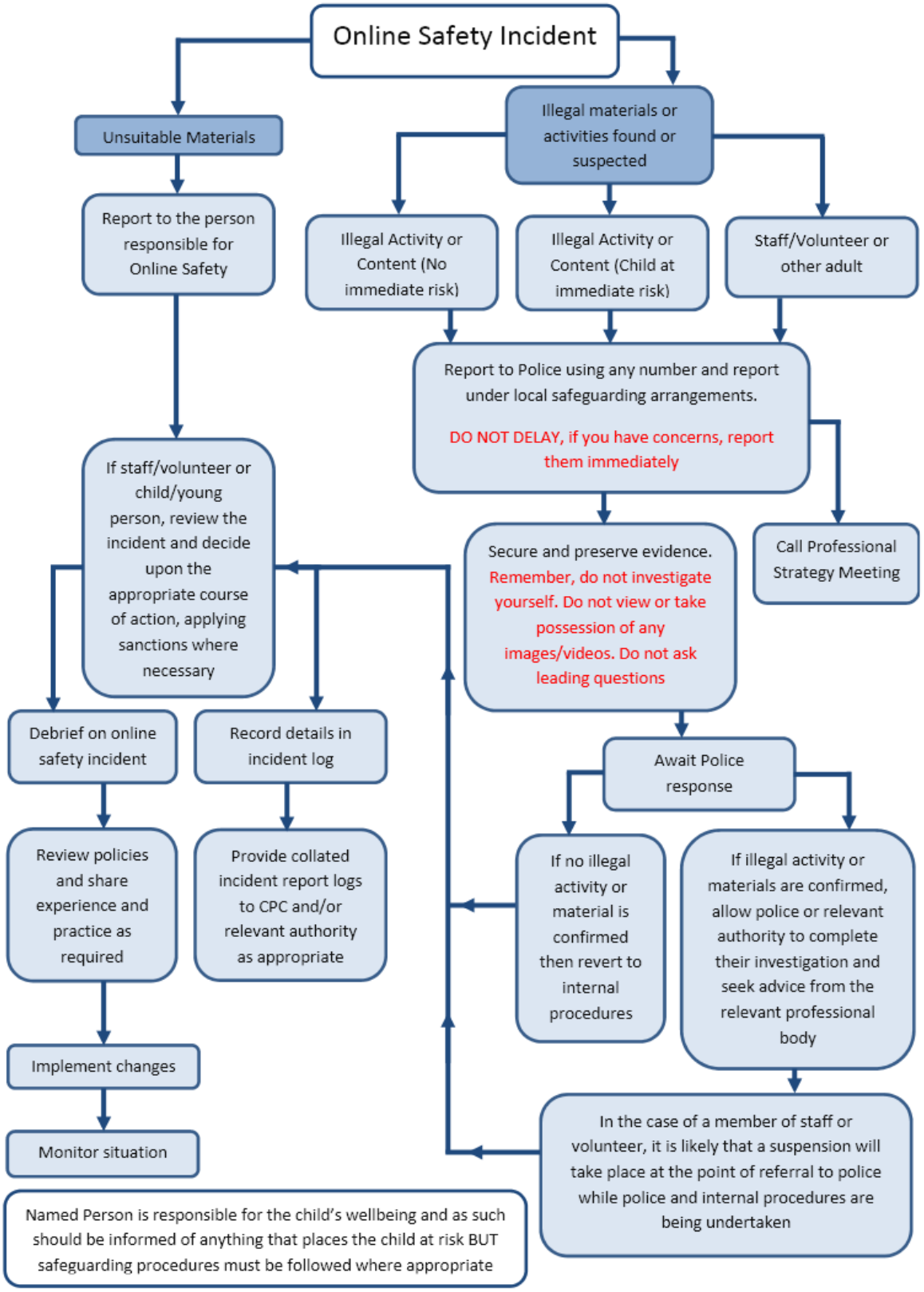
The above Terms of Reference for Charles Williams Primary School have been agreed

Signed by):

Date:

The date for review:

C1 Responding to incidents of misuse – flow chart



C2 Record of reviewing devices/internet sites (responding to incidents of misuse)

Group	
Date	
Reason for investigation	

Details of first reviewing person

Name	
Position	
Signature	

Details of the second reviewing person

Name	
Position	
Signature	

Name and location of the computer used for review (for web sites)

Web site(s) address / device	Reason for concern

Conclusion and Action proposed or taken

C3 Template Reporting Log

Online safety incident report form

Details of the incident

Date incident happened:_____

Time:_____

Name of person reporting incident:_____

Where did the incident occur?
□ In school/service setting □ Outside school/service setting

Who was involved in the incident?
□ child/young person □ staff member □ other (please specify

Description of incident:

Action that was taken

By whom:_____

Action taken:
□ incident reported to headteacher/senior manager
□ advice sought from Safeguarding and Social Care
□ referral made to Safeguarding and Social Care
□ incident reported to police
□ incident reported to Internet Watch Foundation
□ incident reported to IT
□ disciplinary action to be taken
□ online safety policy to be reviewed/amended

Please detail any specific action taken (ie: removal of equipment)

The outcome of incident/investigation

C4 Summary of Legislation

Schools should be aware of the legislative framework under which this online safety Policy template and guidance has been produced. It is important to note that in general terms an action that is illegal if committed offline is also illegal if committed online.

It is recommended that legal advice is sought in the advent of an online safety issue or situation.

Computer Misuse Act of 1990

This Act makes it an offence to:

- Erase or amend data or programs without authority;
- Obtain unauthorised access to a computer;
- “Eavesdrop” on a computer;
- Make unauthorised use of computer time or facilities;
- Maliciously corrupt or erase data or programs;
- Deny access to authorised users.

Data Protection Act of 1998

This protects the rights and privacy of an individual’s data. To comply with the law, information about individuals must be collected and used fairly, stored safely and securely and not disclosed to any third party unlawfully. The Act states that personal data must be:

- Fairly and lawfully processed.
- Processed for limited purposes.
- Adequate, relevant and not excessive.
- Accurate.
- Not kept longer than necessary.
- Processed in accordance with the data subject’s rights.
- Secure.
- Not transferred to other countries without adequate protection.

Freedom of Information Act 2000

The Freedom of Information Act gives individuals the right to request information held by public authorities. All public authorities and companies wholly owned by public authorities have obligations under the Freedom of Information Act. When responding to requests, they have to follow a number of set procedures.

Communications Act of 2003

Sending by means of the Internet a message or other matter that is grossly offensive or of an indecent, obscene or menacing character; or sending a false message by means of or persistently making use of the Internet for the purpose of causing annoyance, inconvenience or needless anxiety is guilty of an offence liable, on conviction, to imprisonment. This wording is important because an offence is complete as soon as the message has been sent: there is no need to prove any intent or purpose.

Malicious Communications Act 1988

It is an offence to send an indecent, grossly offensive, or threatening letter, electronic communication or another article to another person. It is also an offence to send information which is false and known or believed to be false by the sender.

Regulation of Investigatory Powers Act 2000

It is an offence for any person to intentionally and without lawful authority intercept any communication. Where the system controller has given express consent monitoring or keeping a record of any form of electronic communications is permitted, in order to:

- Establish the facts;
- Ascertain compliance with regulatory or self-regulatory practices or procedures;
- Demonstrate standards which are or ought to be achieved by persons using the system;
- Investigate or detect unauthorised use of the communications system;
- Prevent or detect crime or in the interests of national security;
- Ensure the effective operation of the system.
- Monitoring but not recording is also permissible in order to:
- Ascertain whether the communication is business or personal;
- Protect or support helpline staff.

Trade Marks Act of 1994

This provides protection for Registered Trade Marks, which can be any symbol (words, shapes or images) that are associated with a particular set of goods or services. Registered Trade Marks must not be used without permission. This can also arise from using a Mark that is confusingly similar to an existing Mark.

Copyright, Designs and Patents Act 1988

It is an offence to copy all or a substantial part of a copyrighted work. There are, however, certain limited user permissions, such as fair dealing, which means under certain circumstances permission is not needed to copy small amounts for non-commercial research or private study. The Act also provides for Moral Rights, whereby authors can sue if their name is not included in a work they wrote, or if the work has been amended in such a way as to impugn their reputation. Copyright covers materials in print and electronic form and includes words, images, and sounds, moving images, TV broadcasts and other media (e.g. Youtube).

Criminal Justice & Public Order Act 1994 / Public Order Act of 1986

This defines a criminal offence of intentional harassment, which covers all forms of harassment, including sexual. A person is guilty of an offence if, with intent to cause a person harassment, alarm or distress, they:

- Use threatening, abusive or insulting words or behaviour, or disorderly behaviour; or
- Display any writing, sign or other visible representation which is threatening, abusive or insulting, thereby causing that or another person harassment, alarm or distress.

Racial and Religious Hatred Act 2006 / Public Order Act 1986

This Act makes it a criminal offence to threaten people because of their faith or to stir up religious hatred by displaying, publishing or distributing written material which is threatening. Other laws already protect people from threats based on their race, nationality or ethnic background.

Protection from Harassment Act 1997

A person must not pursue a course of conduct, which amounts to harassment of another, and which he knows or ought to know amounts to harassment of the other. A person whose course of conduct causes another to fear, on at least two occasions, that violence will be used against him is guilty of an offence if he knows or ought to know that his course of conduct will cause the other so to fear on each of those occasions.

Protection of Children Act 1978

It is an offence to take, permit to be taken, make, possess, show, distribute or advertise indecent images of children in the United Kingdom. A child for these purposes is anyone under the age of 18. An image of a child also covers pseudo-photographs (digitally collated or otherwise). A person convicted of such an offence is liable to imprisonment for a term of not more than 10 years, or to a fine or to both.

Sexual Offences Act of 2003

The new grooming offence is committed if you are over 18 and have communicated with a child under 16 at least twice (including by phone or using the Internet) it is an offence to meet them or travel to meet them anywhere in the world with the intention of committing a sexual offence. Causing a child under 16 to watch a sexual act is illegal,

including looking at images such as videos, photos or webcams, for your own gratification. It is also an offence for a person in a position of trust to engage in sexual activity with any person under 18, with whom they are in a position of trust. (Typically, teachers, social workers, health professionals, connexions staff fall in this category of trust). Any sexual intercourse with a child under the age of 13 commits the offence of rape.

Public Order Act 1986

This Act makes it a criminal offence to stir up racial hatred by displaying, publishing or distributing written material which is threatening. Like the Racial and Religious Hatred Act 2006 it also makes the possession of inflammatory material with a view of releasing it a criminal offence.

Obscene Publications Act 1959 and 1964

Publishing an “obscene” article is a criminal offence. Publishing includes electronic transmission.

Human Rights Act of 1998

This does not deal with any particular issue specifically or any discrete subject area within the law. It is a type of “higher law”, affecting all other laws. In the school context, human rights to be aware of include:

- The right to a fair trial
- The right to respect for private and family life, home and correspondence
- Freedom of thought, conscience and religion
- Freedom of expression
- Freedom of assembly
- Prohibition of discrimination
- The right to education
- The right not to be subjected to inhuman or degrading treatment or punishment

The school is obliged to respect these rights and freedoms but should balance them against those rights, duties and obligations, which arise from other relevant legislation.

The Education and Inspections Act 2006

Empowers Headteachers, to such an extent as is reasonable, to regulate the behaviour of students/pupils when they are off the school site and empowers members of staff to impose disciplinary penalties for inappropriate behaviour.

The Protection of Freedoms Act 2012

Requires schools to seek permission from a parent/carer to use Biometric systems

C5 Google Apps for Education (GafE) – further information

Where is the data stored?

Data for UK Schools is all hosted within the EU. The primary Google data centre we host the service in is located in Dublin and the fail-over is to Amsterdam.

How often is the data backed up?

The idea of “backup” is very different with GafE than with traditional locally hosted services. We use a network of globally redundant data centres and replicate data on multiple servers across the two data centres. Any one time we keep 3 copies of schools data across the two data-centres mentioned (Dublin & Amsterdam).

Does the email service provider have a clear process for recovering data?

Yes. Users themselves can recover data for 30 days after deleting an item. Administrators then have a further 30 days once the item is deleted from the deleted items folder. There are also additional paid-for archiving services available with GafE.

How does the email provider protect your privacy?

3 key things: No advertising, no “mingling” of GafE data with our consumer services and full data-portability, in case you ever want to leave the service.

Who owns the data that you store on the email platform?

Schools own the data. Google does not. You own your data and retain all rights, title and interest in the data you store with GafE. You can download a copy of all of your data at any time and for any reason, without any assistance from Microsoft.

Who has access to the data?

By default, no one has access to customer data within the GafE service. Google employees who have completed appropriate background checks and have justified need can raise an escalation for time-limited access to Customer data. Access is regularly audited, logged and verified through the ISO 27001 Certification.
As detailed in a recent accreditation submission to the UK Government, any organisation that specify “UK” as their country during tenant creation will be provisioned and data stored within the EU datacenters (Dublin and Amsterdam).

Google has been granted accreditation up to and including the UK government’s “Impact Level 2” (IL2) assurance for GafE.

Schools may wish to consider the extent to which applicable laws in the US – which apply to services operated by companies registered in the US, e.g. Microsoft and Google – affect the suitability of these services. For example, the US Patriot Act provides a legal means through which law enforcement agencies can access data held within these services without necessarily needing the consent or even the knowledge of the customer. Whilst SWGfL doesn’t intend to put anyone off getting value from these beneficial services we feel it’s only right to share what we know about them.

Is personal information shared with anyone else?

No personal information is shared.

Does the email provider share email addresses with third party advertisers? Or serve users with ads?

No. There is no advertising in GafE.

What steps does the email provider take to ensure that your information is secure?

Google uses 5 layers of security - data, application, host, network and physical.

GafE is certified for ISO 27001, one of the best security benchmarks available across the world.

Data Processing Agreement. Google offers a comprehensive standard Data Processing Agreement (DPA) to all customers. DPA addresses privacy, security and handling of customer data. Our standard Data Processing Agreement enables customers to comply with their local regulations.

How reliable is the email service?

There is a 99.9% uptime commitment with financially-backed SLA for any paid-for services in GafE (though most schools will be using ‘free’ services and therefore will not receive the financially backed SLA).

What level of support is offered as part of the service?

Google offer schools direct telephone support 24/7 for IT administrators and there is also a large range of online help services, which you can read about here. Our recommendation is that schools use a Google partner or support organisation with industry-specific expertise in cloud services for schools.

C6 Links to other organisations or documents

The following links may help those who are developing or reviewing a school online safety policy.

UK Safer Internet Centre

- Safer Internet Centre
- South West Grid for Learning
- Childnet
- Professionals Online Safety Helpline
- Internet Watch Foundation

CEOP

- http://ceop.police.uk/
- ThinkUKnow

Others

- INSAFE - http://www.saferinternet.org/ww/en/pub/insafe/index.htm
- UK Council for Child Internet Safety (UKCCIS) - www.education.gov.uk/ukccis
- Netsmartz - http://www.netsmartz.org/index.aspx

Support for Schools

- Specialist help and support - SWGfL BOOST

Cyberbullying

- Scottish Anti-Bullying Service, Respectme - http://www.respectme.org.uk/
- Scottish Government - Better relationships, better learning, better behaviour
- Welsh Government – Respecting Others
- Anti-Bullying Network - http://www.antibullying.net/cyberbullying1.htm
- Cyberbullying.org - http://www.cyberbullying.org/

Social Networking

- Digizen – Social Networking
- SWGfL - Facebook - Managing risk for staff and volunteers working with children and young people
- Connectsafely Parents Guide to Facebook
- Facebook Guide for Educators

Curriculum

- SWGfL Digital Literacy & Citizenship curriculum
- Alberta, Canada - digital citizenship policy development guide.pdf
- Teach Today – www.teachtoday.eu/
- Insafe - Education Resources
- Somerset - e-Sense materials for schools

Mobile Devices / BYOD

- Cloudlearn Report Effective practice for schools moving to end locking and blocking
- NEN - Guidance Note - BYOD

Data Protection

- Information Commissioners Office:
- Your rights to your information – Resources for Schools - ICO
- ICO pages for young people
- Guide to Data Protection Act - Information Commissioners Office
- Guide to the Freedom of Information Act - Information Commissioners Office
- ICO guidance on the Freedom of Information Model Publication Scheme
- ICO Freedom of Information Model Publication Scheme Template for schools (England)
- ICO - Guidance we gave to schools - September 2012 (England)
- ICO Guidance on Bring Your Own Device
- ICO Guidance on Cloud Hosted Services
- Information Commissioners Office good practice note on taking photos in schools
- ICO Guidance Data Protection Practical Guide to IT Security
- ICO – Think Privacy Toolkit
- ICO – Personal Information Online – Code of Practice
- ICO – Access Aware Toolkit
- ICO Subject Access Code of Practice
- ICO – Guidance on Data Security Breach Management
- SWGfL - Guidance for Schools on Cloud Hosted Services
- LGfL - Data Handling Compliance Check List
- Somerset - Flowchart on Storage of Personal Data
- NEN - Guidance Note - Protecting School Data

Professional Standards / Staff Training

- DfE - Safer Working Practice for Adults who Work with Children and Young People
- Kent - Safer Practice with Technology
- Childnet / TDA - Social Networking - a guide for trainee teachers & NQTs
- Childnet / TDA - Teachers and Technology - a checklist for trainee teachers & NQTs
- UK Safer Internet Centre Professionals Online Safety Helpline

Infrastructure / Technical Support

- Somerset - Questions for Technical Support
- NEN - Guidance Note - esecurity SWGfL / Common Sense Media Digital Literacy & Citizenship Curriculum

Working with parents and carers

- SWGfL BOOST Presentations - parents presentation
- Connect Safely - a Parents Guide to Facebook
- Vodafone Digital Parents Magazine
- Childnet Webpages for Parents & Carers
- DirectGov - Internet Safety for parents
- Get Safe Online - resources for parents
- Teach Today - resources for parents workshops/education
- The Digital Universe of Your Children - animated videos for parents (Insafe)
- Cerebra - Learning Disabilities, Autism and Internet Safety - a Parents' Guide
- Insafe - A guide for parents - education and the new media
- The Cybersmile Foundation (cyberbullying) - advice for parents

Research

- EU Kids on Line Report - "Risks and Safety on the Internet" - January 2011
- Futurelab - "Digital participation - it's not chalked and talk any more!"

C7 Glossary of terms

AUP	Acceptable Use Policy – see templates earlier in this document
CEOP	Child Exploitation and Online Protection Centre (part of UK Police, dedicated to protecting children from sexual abuse, providers of the Think U Know programmes.
CPD	Continuous Professional Development
CYPS	Children and Young People's Services (in Local Authorities)
FOSI	Family Online Safety Institute
EA	Education Authority
ICO	Information Commissioner's Office
ICT	Information and Communications Technology
ICTMark	Quality standard for schools provided by NAACE
INSET	In-Service Education and Training
IP address	The label that identifies each computer to other computers using the IP (internet protocol)
ISP	Internet Service Provider
ISPA	Internet Service Providers' Association
IWF	Internet Watch Foundation
LA	Local Authority
LAN	Local Area Network
MIS	Management Information System
NEN	National Education Network – works with the Regional Broadband Consortia (e.g. SWGfL) to provide the safe broadband provision to schools across Britain.
Ofcom	Office of Communications (Independent communications sector regulator)
SWGfL	South West Grid for Learning Trust – the Regional Broadband Consortium of SW Local Authorities – is the provider of broadband and other services for schools and other organisations in the SW
TUK	Think U Know – educational online safety programmes for schools, young people and parents.
VLE	Virtual Learning Environment (a software system designed to support teaching and learning in an educational setting.
WAP	Wireless Application Protocol