Rainbow Federation
Online Safety Policy

This policy will be reviewed every year, earlier if necessary.

Signed:

Headteacher: Date:

Chair of Governors: Date:

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INTRODUCTION

At the Rainbow Federation digital technologies are used daily to enhance children's learning experiences. Computers, iPads, Chromebooks and interactive whiteboards are used to engage and teach children in a variety of different formats. With using technology comes a responsibility to ensure that children are safe from harmful materials that could be communicated through such devices.

This policy is written to ensure that learners are able to use the internet and related communications technologies appropriately and safely. Through the online safety policy, the statutory obligations ensure that learners are safe and are protected from potential harm, both on and off-site. The policy also forms part of the Rainbow Federation's protection from legal challenge, relating to the use of digital technologies.

The following people have been consulted in the production of this policy,

- Governors
- Teaching staff and support staff
- Learners
- Community users and any other relevant groups.

Due to the ever-changing nature of digital technologies, this policy will be reviewed at least annually and, if necessary, more frequently in response to any significant new developments in the use of the technologies, new threats to online safety or incidents that have taken place.

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

Children's Rights

"The rights of children and young people, as set out in the United Nations Convention on the Rights of the Child (UNCRC), continue to be at the heart of decision making within the Welsh Government."

As a UNICEF Bronze Rights Respecting School, we have fully embraced Children's rights throughout the school, in our policies, lessons and the ethos of the Rainbow Federation. Children's rights are always at the forefront of any discussion and policy setting at Rainbow Federation. Article 17 states "children and young people should be able to access information, particularly from the media. They should be able to get information from many places— from their country and beyond." It further explains that "children and young people should be protected from media that would be harmful to them" The importance on having access to safe media for research and learning is imperative to support our pupils in Rainbow Federation with their learning in today's digital world. The rights that this policy directly links to are:

RRS Article 3
The best interests of children and young people should be thought about at all levels of society.

RRS Article 13
Children have the right to find out and share information.

RRS Article 17
Children and young people have the right to gain information in lots of ways, as long as it is safe.

RRS Article 19
Children have the right to protection from violence, abuse and neglect.

RRS Article 28
Children have the right to an education.

RRS Article 29
Children have the right an education which develops my personality, respect for others' rights and the environment

RRS Article 36
Children have the right to be kept safe from things that could harm my development

Nurture School

As well as a rights respecting school Rainbow Federation Primary School is also a school of nurture, committed to creating a nurturing and inclusive community for all. All stakeholders within the school understand the importance of promoting pupils' wellbeing. The school expresses the importance of addressing pupils' wellbeing within education, resonating with the World Health Organisation's statement that "to achieve their potential, school children must participate fully in educational activities. To do this they must be healthy, attentive and emotionally secure." The school reflected on this statement against what they were seeing in the classroom and decided that they needed a different approach, "one that provided a nurturing environment for all". This policy links directly to the six principles that are embedded in our school:

NP1
Children's learning is understood developmentally

NP2
The classroom offers a safe base

NP3
The importance of nurture for the development of wellbeing

NP4
Language is a vital means of communication

NP5
All behaviour is communication

NP6
The importance of transition in children's lives

Developing and Reviewing

The implementation of this online safety policy will be monitored by:	Dave Guinee – Bryn Hafod Suzy Thompson – Glan Yr Afon Rhian Lundrigan – Executive Headteacher Chair of Governors – Lesley Noaks Safeguarding Governor – Kyle Boddy
Should serious online safety incidents take place, the following external persons/agencies should be informed:	Local Police (101) LA safeguarding officer

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
    - Learners
    - Parents and carers
    - Staff

Roles and Responsibilities

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

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.

The safeguarding governor takes on the role of online safety governor to include:

- regular meetings with the online safety co-ordinator/officer
- regular monitoring of online safety incident logs
- regular monitoring of filtering change control logs (where possible)
- reporting to relevant governors/sub-committee/meeting

Headteacher and senior leaders:

- The headteacher has a duty of care for ensuring the safety (including online safety) of members of the school/college community, though the day-to-day

responsibility for online safety may be delegated to the online safety co-ordinator/officer.

- The headteacher and (at least) another member 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.
- The headteacher/senior leaders are responsible for ensuring that the online safety co-ordinator/officer and 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/college 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 headteacher/senior leaders will receive regular monitoring reports from the online safety coordinators.

Online safety co-ordinators:

The online safety coordinators Suzy Thompson and Dave Guinee work closely with the safeguarding officer Rhian Lundrigan on the following:

- leads the online safety group.
- meetings held when necessary with safeguarding group.
- takes day to day responsibility for online safety issues and has a leading role in establishing and reviewing the school's 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 IT support when necessary.
- 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 meeting/sub-committee of governors.
- reports regularly to headteacher/senior leadership team.

Network manager/technical staff:

The managed service provider – Cardiff Schools ICT support is responsible for ensuring:

- that the school 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 or other relevant body and also the 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 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/learning platform/Hwb/remote access/email is regularly monitored in order that any misuse/attempted misuse can be reported to the headteacher/senior leader; online safety co-ordinators for investigation.
- that monitoring software/systems are implemented and updated.

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/college 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/senior leader or one of the online safety coordinators for investigation/action.
- all digital communications with learners/parents and carers should be on a professional level and only carried out using official school systems e.g. Class dojo or hwb email system.
- Online safety issues are embedded in all aspects of the curriculum and other activities.
- Learners understand and follow the online safety and acceptable use agreements.
- learners 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 regarding these devices.
- in lessons where internet use is pre-planned learners 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 Senior Person

Mrs Rhian Lundrigan / Mr Graham Matthews / Mr Rhys Walters
Deputy – Mrs Ceri Porter / Mrs Samantha Hyde

The designated senior person 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

Rhian Lundrigan, Graham Matthews, Samantha Hyde, Rhys Walters and Ceri Porter (designated senior persons) Suzy Thompson, Dave Guinee (online safety coordinators) all work in collaboration due to the safeguarding issues often related to online safety.

Stem Squad (Suzy Thompson/Dave Guinee & Governor

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. The group will also be responsible for reporting to the Governing Body.

Members of the online safety group will assist the online safety coordinators and designated senior people 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 learners about the online safety provision.
- monitoring improvement actions identified through use of the 360-degree safe Cymru self-review tool.

An online safety group terms of reference template can be found in the appendices.
(RRS Article 3)
(NP1)

Learners:

Are responsible for:

- using the school digital technology systems in accordance with the learner 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 practice when using digital technologies out of school/college and realise that the school online safety policy covers their actions out of school, if related to their membership of the school/college. ***(RRS Articles 3, 13, 17, 19, 28, 29)***
(NP2 & NP3)

Parents and carers:

Parents and carers play a crucial role in ensuring that their children understand the need to use the internet/mobile devices in an appropriate way. Rainbow Federation will take every opportunity to help parents understand these issues through parents' evenings, newsletters, letters, website, Hwb, class dojo, also providing 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 parents' sections of the website, Hwb, learning platform and online learner records.
- their children's personal devices in the school (where this is allowed) ***(RRS Article 3)***

Community Users

Community users who access school systems or websites 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 – learners

Whilst regulation and technical solutions are very important, their use must be balanced by educating learners to take a responsible approach. The education of learners in online safety is therefore an essential part of the school online safety provision. Learners need the help and support of the school to recognise and avoid online safety risks and build their resilience. **(RRS Article 13 and 17)**

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 across all Areas of Learning and Experience (AOLEs)
- Key online safety messages should be reinforced as part of a planned programme of assemblies and nurturing activities.
- Learners will be taught in all lessons to be critically aware of the materials and content they access online and be guided to validate the accuracy of information.
- Learners will be taught to acknowledge the source of information used and to respect copyright when using material accessed on the internet.
- Learners will 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.
- Learners should be helped to understand the need for the learner 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 learners will 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 learners are allowed to freely search the internet, staff will 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, students may need to research topics, (e.g. 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 nominated 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. (***RRS Article 3, 13, 17, 19, 28)*** ***(NP1)***

Education – parents and 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 and 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 may be unsure about how to respond. **(RRS Article 36)**

Rainbow Federation will therefore seek to provide information and awareness to parents and carers through:

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

(See appendix for further links/resources)

Education – the wider community

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

- Providing family learning courses in 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 learning platform, Hwb, website will provide online safety information for the wider community.
- Supporting community groups, e.g. early years settings, childminders, youth/sports/voluntary groups to enhance their online safety provision.

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. It is expected that some staff will identify online safety as a training need within the performance management process.
- 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 coordinators will receive regular updates through attendance at external training events, (e.g. 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/team meetings/INSET days.
- The online safety coordinators 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, (e.g. SWGfL).
- Participation in school/college training/information sessions for staff or parents.

Technical – infrastructure/equipment, filtering and monitoring

The school has a managed ICT service provided by Cardiff School Support. It is the responsibility of the school to ensure that the managed service provider (Cardiff Council) carries out all the online safety measures that would otherwise be the responsibility of the school as suggested below. It is also important that the managed service provider is fully aware of the school online safety policy/acceptable use agreements.
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/college technical systems and devices.
- All users will be provided with a group or class log-ons and passwords, a username and secure password. Class teachers and the ICT coordinators will

keep an up-to-date record of users and their usernames. Users are responsible for the security of their username and password.

- The “master/administrator” passwords for the school digital systems, used by the network manager (or other person) is also available to the safeguarding officer and head teacher and kept in a secure place.
- The online safety coordinator 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
- The school has provided enhanced/differentiated user-level filtering (allowing different filtering levels for different ages/stages and different groups of users: staff/learners, etc.).
- Internet filtering should ensure that children are safe from terrorist and extremist material when accessing the internet.
- 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.
- An appropriate system is in place (incident report log book and inappropriate internet usage form) for users to report any actual/potential technical incident/security breach to online safety coordinator or safeguarding officer).
- 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 by the local authority. The school infrastructure and individual workstations are protected by up to date virus software.

Mobile technologies

Mobile technology devices may be school owned/provided or personally owned and might include: smartphone, watches, 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 the school learning platform and other cloud-based services such as email and data storage.

All users should understand that the primary purpose of the use of mobile/personal devices in a school context is educational. The mobile technologies policy should be consistent with and inter-related to other relevant school policies including but not limited to those for safeguarding, behaviour, anti-bullying, acceptable use, 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 online safety education programme.

The mobile technologies policy considers possible issues and risks. These may include: security risks in allowing connections to the school network; filtering of personal devices; breakages and insurance; access to devices for all learners; avoiding potential classroom distraction; network connection speeds, types of devices; charging facilities; total cost of ownership. A range of mobile technology implementations is possible.

For further reading, please refer to
"Bring your own device: a guide for schools/colleges" by Alberta Education available at:
http://education.alberta.ca/admin/technology/research.aspx and to the "NEN Technical Strategy Guidance Note 5 – Bring your own device" - http://www.nen.gov.uk/bring-your-own-device-byod/

A more detailed mobile technologies policy can be found in the appendix.

- The school's acceptable use agreements for staff, learners, parents and carers will consider the use of mobile technologies.
- The school allows:

	School Devices			**Personal Devices**	
	School owned (for individual use)	School owned (for multiple users)	Authorised device	Student owned	Staff owned
Allowed in school	Yes	Yes	N/A	Yes (not to be used in school or on site. To be kept in teacher's drawer or box or School Safe)	Personal devices allowed in school with internet only access to "Public".
Full network access	Yes	Yes			
Internet only	Yes	Yes			
Partial network access	Yes	Yes			

Use of digital and video images

The development of digital imaging technologies has created significant benefits to learning, allowing staff and learners instant use of images that they have recorded themselves or downloaded from the internet. However, staff, parents and carers and learners 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/college 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 learners 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/college events for their own personal use (as such use in 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 learners 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 learners are appropriately dressed and are not participating in activities that might bring the individuals or the school into disrepute.
- Learners must not take, use, share, publish or distribute images of others without their permission
- Photographs published on the website, or elsewhere that include learners will be selected carefully and will comply with good practice guidance on the use of such images.
- Learners' full names will not be used anywhere on a website or blog, particularly in association with photographs.
- Digital permission from parents or carers will be obtained before photographs of learners are published on the school website.

Learners' work can only be published with the permission of the learner and parents or carers. ***(RRS Articles 19 & 36) (NP2)***

Data Protection

See GDPR policy for updated information.

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 must ensure that:

- It will hold 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)
- Head teacher is identified as the senior information risk officer (SIRO) and information asset owner (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 safe keeping 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 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 = yellow boxes Pupils = white boxes	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 school	x						x	
Use of mobile phones in lessons				x				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 for school purposes				x				x
Use of school email for personal emails				x				x
Use of messaging apps		x				x	x	
Use of social media		x				x	x	
Use of blogs		x				x	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 are monitored. Staff and learners should therefore use only the school email service to communicate with others regarding school related matters.
- Users must immediately report to the online safety coordinator or safeguarding officer 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 learners or parents/carers (email, chat, learning platform, etc.) must be professional in tone and content. These communications may only take place on official (monitored) school systems (Class Dojo & Hwb) Personal email addresses, text messaging or social media must not be used for these communications.
- All learners have individual email address via the secure HWB email system.
- Learners 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.
- Unnecessary 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

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 work place 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/colleges 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/college 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 learners 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 risk of harm to 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 and 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 account. In all cases, where a personal account is used which associates itself with, 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 during designated social time

Monitoring of Public Social Media

As part of active social media engagement, the school is pro-active in the monitoring of the internet for public postings about the school.
The school effectively responds to social media comments made by others in an appropriate manner.

School use of social media for professional purposes will be checked regularly by the head teacher and online safety committee to ensure compliance with the social media, data protection, communications, digital image and video 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 and all other technical systems. Other activities, e.g. online bullying would be banned 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. ***(RRS Article 19)***

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 out of, school/college when using school equipment or systems. The school policy restricts usage as follows:

		Acceptable	Acceptable at certain times	Acceptable for nominated	Unacceptable	Unacceptable and illegal
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:	Child sexual abuse images –The making, production or distribution of indecent images of children, contrary to The Protection of Children Act 1978					X
	Grooming, incitement, arrangement or facilitation of sexual acts against children Contrary to the Sexual Offences Act 2003.					X
	Possession of an extreme pornographic image (grossly offensive, disgusting or otherwise of an obscene character), contrary to the Criminal Justice and Immigration Act 2008					X
	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					X
	Pornography				X	
	Promotion of any kind of discrimination				X	
	Threatening behaviour, including promotion of physical violence or mental harm				X	
	Promotion of extremism or terrorism				X	
	Any other information which may be offensive to colleagues or breaches the				X	

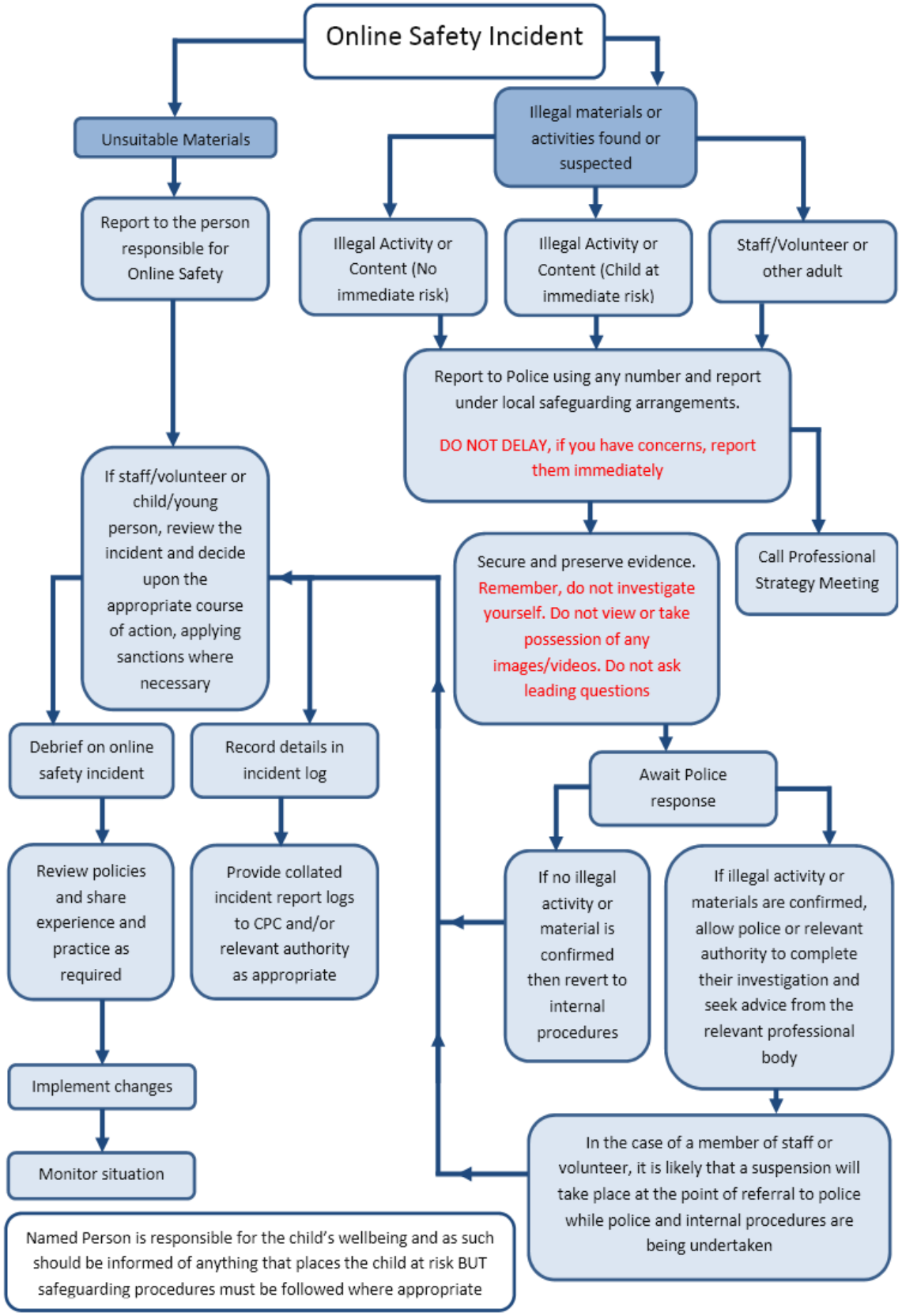
	integrity of the ethos of the school/college or brings the school/college into disrepute					
Using school systems to run a private business					X	
Using systems, applications, websites or other mechanisms that bypass the filtering or other safeguards employed by the school/college					X	
Infringing copyright					X	
Revealing or publicising confidential or proprietary information, (e.g. financial/personal information, databases, computer/network access codes and passwords)					X	
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)					X	
Online gaming (educational)			X			
Online gaming (non-educational)			x			
Online gambling					X	
Online shopping/commerce			x			
File sharing		X				
Use of social media				X		
Use of messaging apps			X			
Use of video broadcasting, e.g. YouTube		X				

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.


Online Safety Incident
Unsuitable Materials
Illegal materials or activities found or suspected
Report to the person responsible for Online Safety
Illegal Activity or Content (No immediate risk)
Illegal Activity or Content (Child at immediate risk)
Staff/Volunteer or other adult
Report to Police using any number and report under local safeguarding arrangements.
DO NOT DELAY, if you have concerns, report them immediately
If staff/volunteer or child/young person, review the incident and decide upon the appropriate course of action, applying sanctions where necessary
Secure and preserve evidence. Remember, do not investigate yourself. Do not view or take possession of any images/videos. Do not ask leading questions
Call Professional Strategy Meeting
Debrief on online safety incident
Record details in incident log
Await Police response
Review policies and share experience and practice as required
Provide collated incident report logs to CPC and/or relevant authority as appropriate
If no illegal activity or material is confirmed then revert to internal procedures
If illegal activity or materials are confirmed, allow police or relevant authority to complete their investigation and seek advice from the relevant professional body
Implement changes
Monitor situation
In the case of a member of staff or volunteer, it is likely that a suspension will take place at the point of referral to police while police and internal procedures are being undertaken
Named Person is responsible for the child's wellbeing and as such should be informed of anything that places the child at risk BUT safeguarding procedures must be followed where appropriate

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, 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 learners 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 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
  - 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/college 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. ***(All)*** ***(All)***

School actions

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 as follows:

Pupil Actions

Incidents	Refer to class	Refer to Safeguarding Officer/Online Safety Coordinator	Refer to Headteacher	Refer to Police	Refer to technical support staff for action re filtering/security etc.	Inform parents/carers	Removal of network/internet	Warning	Further sanction eg. detention/exclusion
Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on unsuitable/inappropriate activities).		X	X	X		X			X
Unauthorised use of non-educational sites during lessons	X					X			
Unauthorised use of mobile phone/digital camera/other mobile device		X	X			X			
Unauthorised use of social media/messaging apps/personal email		X	X			X			
Unauthorised downloading or uploading of files		X				X			
Allowing others to access school network by sharing username and passwords		X				X		X	X
Attempting to access or accessing the school network, using another learners' 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
Corrupting or destroying the data of other users		X	X		X	X			X
Sending an email, text or message that is regarded as offensive, harassment or of a bullying nature		X	X		X	X			X
Continued infringements of the above, following previous warnings or sanctions		X	X	X	X	X			X
Actions which could bring the school into disrepute or breach the integrity of the ethos of the school		X	X		X	X			X
Using proxy sites or other means to subvert the school filtering system		X	X		X	X		X	
Accidentally accessing offensive or pornographic material and failing to report the incident		X	X		X	X		X	
Deliberately accessing or trying to access offensive or pornographic material		X	X	X	X	X	X		X
Receipt or transmission of material that infringes the copyright of another person or infringes the Data Protection Act	X	X	X						

Staff Actions

Incidents	Refer to online safety coordinator or	Refer to Headteacher	Refer to Local	Refer to Police	Refer to Technical Support Staff for	Disciplinary action
Deliberately accessing or trying to access material that could be considered illegal (see list in 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				
Careless use of personal data, e.g. holding or transferring data in an insecure manner	x	x				
Deliberate actions to breach data protection or network security rules	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			x
Using personal email/social networking/messaging to carrying out digital communications with pupils	x	x	x			x
Actions which could compromise the staff member's professional standing	x	x	x			x

Actions which could bring the school into disrepute or breach the integrity of the ethos of the school	x	x	x			x
Using proxy sites or other means to subvert the school's filtering system	x	x	x		x	x
Accidentally accessing offensive or pornographic material and failing to report the incident	x	x	x		x	
Deliberately accessing or trying to access offensive or pornographic material	x	x	x	x	x	x
Breaching copyright or licensing regulations	x	x	x			
Continued infringements of the above, following previous warnings or sanctions	x	x	x	x	x	x

Appendices – Section A - Acceptable use agreement

A1 Learner Acceptable use agreement template (younger children)

A2 Learner Acceptable use agreement template (older children)

A3 Staff and Volunteers Acceptable use agreement template

A4 Parents /Carers Acceptable use agreement template

A5 Community Users Acceptable use agreement template
Appendices – Section B – Specific Policies
B1 Technical Security Policy template

B2 Personal Data Policy template

B3 Mobile technologies policy template

B4 Social media policy template

B5 Online safety group terms of reference

Appendices – Section C – Supporting documents and links
C1 Responding to incidents of misuse – flowchart

C2 Record of reviewing sites (for internet misuse)

C3 Reporting log template

C4 Training needs audit template

C5 Summary of legislation

C6 Office 365 – further details

C7 Links to other organisations and documents

C8 Glossary of terms

A1 Learner acceptable use agreement – for younger learners (Foundation)
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 the 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/tablet.

Signed (child): .....

Signed (Parent/Teacher): .....

A2 Learner acceptable use agreement (AUA) – for older learners KS2
School policy

Digital technologies have become integral to the lives of children and young people, both within and outside schools. These technologies are 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 safer internet access at all times.

This Acceptable use agreement is intended to ensure:

that learners will be responsible users and stay safe while using the internet and other digital technologies for educational, personal and recreational use.

that school/college 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 learners will have good access to digital technologies to enhance their learning and will, in return, expect the learners to agree to be responsible users.

Acceptable use agreement

I understand that I must use school systems in a responsible way, to ensure that there is no risk to my safety or to the safety and security of the systems and other users.

For my own personal safety:

- I understand that the school/college will monitor my use of 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 online

- I will not disclose or share personal information about myself or others when online (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 online, 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 online.
- 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 only use them for personal or recreational use if I have permission
- I will only make large downloads or uploads that might take up internet capacity and prevent other users from being able to carry out their work, if I have permission
- I will only use the school systems or devices for file sharing, or video broadcasting (eg YouTube), if I have 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 only access, copy, remove or alter any other user's files, with 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 only take or distribute images of others with 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 only open hyperlinks in emails or attachments to emails, if I know and trust the person/organisation who sent the email, and have no concerns about the validity of the email (due to the risk of the attachment containing viruses or other harmful programmes)
- I will only install/ store programmes on a school device, if I have permission
- 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.

Please complete the sections below / on the next page to show that you have read, understood and agree to the rules included in the acceptable use agreement. If you do not sign and return this agreement, access will not be granted to school systems and devices.

Learner acceptable use agreement form

This form relates to the learner acceptable use agreement, to which it is attached. Please complete the sections below to show that you have read, understood and agree to the rules included in the acceptable use agreement. If you do not sign and return this agreement, access will not be granted to school systems.

- I have read and understand 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 the school (when allowed), e.g. mobile phones.
- I use my own equipment out of the school in a way that is related to me being a member of this school, e.g. communicating with other members of the school, accessing school email, learning platform, website, etc.

Name of Learner:.....

Group/Class .....

Signed: .....

Date: .....

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 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 safer internet access at all times.

This acceptable use agreement 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 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 digital technologies in their everyday work.

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

Acceptable use agreement

I understand that I must use school digital technologies in a responsible way, to ensure that there is no risk to my safety or to the safety and security of the systems and other users. I recognise the value of the use of ICT for enhancing learning and will ensure that learners receive opportunities to gain from the use of digital technologies. 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 (e.g. laptops, email, VLE etc.) out of school, and to the transfer of personal data (digital or paper based) out of school
- I understand that the school digital technology 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/college ICT systems:
- I will only access, copy, remove or alter any other user's files, with 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. Where these

images are published, (e.g. on the school website/learning platform) 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 policies.
- I will only communicate with learners and parents/carers using official school systems. Any such communication will be professional in tone and manner. (schools should amend this section to take account of their policy on communications with learners and parents/carers. Staff should be made aware of the risks attached to using their personal email addresses/mobile phones/social networking sites for such communications)
- I will not engage in any online activity that may compromise my professional responsibilities.
- The school and the local authority have the responsibility to provide safe and secure access to technologies and ensure the smooth running of the school/college :
- 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/college 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 use personal email addresses on the school digital technology systems.
- 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, extremist material or 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 only make large downloads or uploads that might take up internet capacity and prevent other users from being able to carry out their work, with permission
- I will only install or attempt to install/store programmes on devices or if 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 learner 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 digital technology equipment in school, but also applies to my use of school 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 agreement, I could be subject to disciplinary action. This could include a warning, a 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 understand the above and agree to use the school digital technology 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 digital technologies for educational, personal and recreational use.
that school/college 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 *learners* will have good access to digital technologies to enhance their learning and will, in return, expect the *learners* to agree to be responsible users. A copy of the Learner Acceptable use agreement is attached to this permission form, so that parents/carers will be aware of the school/college 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:..... Learner's Name .....

.....

As the parent/carer of the above learner(s), I give permission for my son/daughter to have access to the internet and to digital technology systems at school.
Either: (KS2 and above)
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: (Foundation)
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/college 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 digital technology 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 digital technology 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: .....
.....

Use of Digital/Video Images

The use of digital/video images plays an important part in learning activities. Learners and members of staff may use digital cameras to record evidence of activities in lessons and out of school/college. 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/college 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 the young people cannot 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 in not covered by the Data Protection Act). To respect everyones' 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 learners in the digital/video images.

Parents/carers are requested to sign the Rainbow Federation's permission form.

B1 School/college technical security policy (including filtering and passwords)

Introduction

Effective technical security depends not only on technical measures, but also on appropriate policies and procedures and on good user education and training. The school will be responsible for ensuring that the *school* infrastructure is as safe and secure as is reasonably possible and that:

- users can only access data to which they have right of access
- no user should be able to access another's files (other than that allowed for monitoring purposes within the school policies).
- access to personal data is securely controlled in line with the school personal data policy
- logs are maintained of access by users and of their actions while users of the system
- there is effective guidance and training for users
- there are regular reviews and audits of the safety and security of school computer systems
- there is oversight from senior leaders and these have impact on policy and practice.

The school has an externally managed ICT service and it is the responsibility of the school to ensure that the managed service provider carries out all the online safety measures that might otherwise be carried out by the school itself (as suggested below). It is also important that the managed service provider is fully aware of the school online safety policy/ acceptable use agreements.

Responsibilities

The management of technical security will be the responsibility of online safety coordinator.

Technical Security

Policy statements

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 need to ensure that the relevant people will receive guidance and training and will be effective in carrying out their responsibilities:

School/ technical systems will be managed in ways that ensure that the school meets recommended technical requirements (if not managed by the Local Authority, these may be outlined in Local Authority/other relevant body technical/Online safety policy and guidance)

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

Appropriate security measures are in place to protect the servers, firewalls, switches, routers, wireless systems, work stations, mobile devices etc from accidental or malicious attempts which might threaten the security of the school/college systems and data.

Responsibilities for the management of technical security are clearly assigned to appropriate and well trained staff the online safety coordinator.

All users will have clearly defined access rights to school/ technical systems.
Users will be made responsible for the security of their username and password, must not allow other users to access the systems using their log on details and must immediately report any suspicion or evidence that there has been a breach of security.
Online safety coordinator 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 installation.
Mobile device security and management procedures are in place.
The online safety coordinator *regularly monitors and records the activity of users on the school technical systems and users are made aware of this in the acceptable use agreement.*
Remote management tools are used by staff to control workstations and view users activity
An appropriate system is in place (email system) *for users to report any actual/potential technical incident to the online safety co-ordinator.*
An agreed policy is in place (Supply log in) for the provision of temporary access of "guests", (e.g. trainee teachers, supply teachers, visitors) onto the school system.
The school infrastructure and individual workstations are protected by up to date software to protect against malicious threats from viruses, worms, trojans etc.
Personal data cannot be sent over the internet or taken off the school site unless safely encrypted or otherwise secured.
Password Security

A safe and secure username/password system is essential if the above is to be established and will apply to all school technical systems, including networks, devices, email and learning platform).

Policy Statements:

All users will have clearly defined access rights to school/college technical systems and devices. Details of the access rights available to groups of users will be recorded by the Network Manager (or other person) and will be reviewed, at least annually, by the online safety group (or other group).

All school networks and systems will be protected by secure passwords that are regularly changed

The "master/administrator" passwords for the school systems, used by the technical staff must also be available to the safeguarding officer leader and kept in a secure place.

- *Passwords for new users, and replacement passwords for existing users will be allocated by* the online safety coordinator *Any changes carried out must be notified to the manager of the password security policy (above).*
- All users will have responsibility for the security of their username and password, must not allow other users to access the systems using their log on details and must immediately report any suspicion or evidence that there has been a breach of security.
- *Users will change their passwords at regular intervals – as described in the staff and learner sections below.*
- *Requests for password changes should be authenticated by the* online safety coordinator
- Staff passwords:

All staff users will be provided with a username and password by the online safety coordinator who will keep an up to date record of users and their usernames.

for best practice, the password should be a minimum of 8 characters long and must include three of – uppercase character, lowercase character, number, special characters

must not include proper names or any other personal information about the user that might be known by others

for best practice, the account should be "locked out" following six successive incorrect log-on attempts

temporary passwords e.g. used with new user accounts or when users have forgotten their passwords, shall be enforced to change immediately upon the next account log-on

passwords shall not be displayed on screen, and shall be securely hashed (use of one-way encryption)

passwords should be different for different accounts, to ensure that other systems are not put at risk if one is compromised and should be different for systems used inside and outside of school/college

for best practice, should be changed at least every 60 to 90 days

should not re-used for 6 months and be significantly different from previous passwords created by the same user - the last four passwords cannot be re-used .

should be different for different accounts, to ensure that other systems are not put at risk if one is compromised

should be different for systems used inside and outside of school

Learner passwords:

All users in KS2 **will be provided with a username and password** by the online safety coordinator who will keep an up to date record of users and their usernames.

Learners will be taught the importance of password security
Training/Awareness:

Members of staff will be made aware of the school password policy:
at induction
through the school online safety policy and password security policy
through the acceptable use agreement
Pupils will be made aware of the school's/college's password policy:
in lessons
through the acceptable use agreement
Audit/Monitoring/Reporting/Review:
The the online safety coordinator will ensure that full records are kept of:
User Ids and requests for password changes
User log-ons
Security incidents related to this policy

Filtering

Introduction

The filtering of internet content provides an important means of preventing users from accessing material that is illegal or is inappropriate in an educational context. The filtering system cannot, however, provide a 100% guarantee that it will do so, because the content on the web changes dynamically and new technologies are constantly being developed. It is important, therefore, to understand that filtering is only one element in a larger strategy for online safety and acceptable use. It is important that the school/college has a filtering policy to manage the associated risks and to provide preventative measures which are relevant to the situation in this school.

Responsibilities:

The responsibility for the management of the school filtering policy will be held by Cardiff County Council. They will manage the school filtering, in line with this policy and will keep records/logs of changes and of breaches of the filtering systems.
To ensure that there is a system of checks and balances and to protect those responsible, changes to the school filtering service must
be logged in change control logs
be reported to a second responsible person the online safety coordinator
either... be reported to and authorised by a second responsible person prior to changes being made - the safeguarding officer
be reported to the online safety group termly in the form of an audit of the change control logs

All users have a responsibility to report immediately to the online safety coordinator any infringements of the school's filtering policy of which they become aware or any sites that are accessed, which they believe should have been filtered.
Users must not attempt to use any programmes or software that might allow them to bypass the filtering/security systems in place to prevent access to such materials.
Policy Statements:
Internet access is filtered for all users. Differentiated internet access is available for staff and customised filtering changes are managed by the school. Illegal content is filtered by broadband or filtering provider by actively employing the Internet Watch

Foundation CAIC list and other illegal content lists . Filter content lists are regularly updated and internet use is logged and frequently monitored. Ideally, the monitoring process alerts the school/college to breaches of the filtering policy, which are then acted upon. There is a clear route for reporting and managing changes to the filtering system. Where personal mobile devices are allowed internet access through the school network, filtering will be applied that is consistent with school/college practice.
The school maintains and supports the managed filtering service provided by the internet service provider (ISP) (or other filtering service provider)
the school has provided enhanced/differentiated user-level filtering through the use of the Swurl filtering programme.
mobile devices that access the school/college internet connection (whether school or personal devices) will be subject to the same filtering standards as other devices on the school/ systems
any filtering issues should be reported immediately to the filtering provider.
requests from staff for sites to be removed from the filtered list will be considered by the technical staff or Service Provider and the online safety coordinator. If the request is agreed, this action will be recorded and logs of such actions shall be reviewed regularly by the online safety group.

Education/Training/Awareness:
Learners will be made aware of the importance of filtering systems through the online safety education programme. They will also be warned of the consequences of attempting to subvert the filtering system.
Staff users will be made aware of the filtering systems through:

- The acceptable use agreement
- Staff meetings, briefings, Inset.
- Parents will be informed of the school's filtering policy through the acceptable use agreement and through online safety awareness sessions/newsletter.

Changes to the Filtering System:
In this section the school should provide a detailed explanation of:
how, and to whom, users may request changes to the filtering (whether this is carried out in school/college or by an external filtering provider)
the grounds on which they may be allowed or denied (schools/colleges may choose to allow access to some sites, e.g. social networking sites for some users, at some times, or for a limited period of time. There should be strong educational reasons for changes that are agreed).
how a second responsible person will be involved to provide checks and balances (preferably this will be at the time of request, but could be retrospectively through inspection of records/audit of logs)
any audit/reporting system.
Users who gain access to, or have knowledge of others being able to access, sites which they feel should be filtered (or unfiltered) should report this in the first instance to the online safety coordinator who will decide whether to make school level changes (as above).

Monitoring:
No filtering system can guarantee 100% protection against access to unsuitable sites. The school will therefore monitor the activities of users on the school network and on school equipment as indicated in the school online safety policy and the acceptable use agreements.

Audit/Reporting:
Logs of filtering change controls and of filtering incidents will be made available to:
the Safeguarding Officer

- online safety group
- online safety governor/governors committee
- external filtering provider/local authority/police on request

The filtering policy will be reviewed in the response to the evidence provided by the audit logs of the suitability of the current provision.

Further Guidance:
Schools/colleges may wish to seek further guidance. The following is recommended:

NEN Technical guidance: http://www.nen.gov.uk/advice/266/nen-guidance-notes.html
NEN Technical guidance: *http://www.nen.gov.uk/e-security-managing-and-maintaining-e-securitycyber-security-in-schools/colleges/*
Somerset Guidance for schools/colleges – this checklist is particularly useful where a school/college uses external providers for its technical support/security: http://www.360safe.org.uk/Files/Documents/Questions-for-Technical-Support-Somerset.aspx
Prevent duty - schools/colleges in England (and Wales) are required *"to ensure children are safe from terrorist and extremist material when accessing the internet in school/college, including by establishing appropriate levels of filtering"* (Revised Prevent Duty Guidance: for England and Wales, 2015).
In response to the above, the UK Safer Internet Centre produced guidance for schools on "Appropriate filtering and appropriate monitoring".

B2 School/college personal data handling policy

Recent publicity about data breaches suffered by organisations and individuals has made the area of personal data protection compliance a current and high profile issue for schools/colleges and other organisations. It is important that the school/college has a clear and well understood personal data handling policy in order to avoid or at least minimise the risk of personal data breaches. A breach may arise from a theft, a deliberate attack on your systems, the unauthorised use of personal data by a member of staff, accidental loss, or equipment failure. In addition: no school or individual would want to be the cause of any data breach, particularly as the impact of data loss on individuals can be severe and cause extreme embarrassment, put individuals at risk and affect personal, professional or organisational reputation

schools are “data rich” and the introduction of electronic storage and transmission of data has created additional potential for the loss of data

The school will want to avoid the criticism and negative publicity that could be generated by any personal data breach.

The school is subject to a wide range of legislation related to data protection and data use, with significant penalties for failure to observe the relevant legislation.

It is a statutory requirement for all schools to have a Data Protection Policy.

Schools/colleges have always held personal data on the pupils in their care, and increasingly this data is held digitally and accessible not just in school but also from remote locations. Legislation covering the safe handling of this data is mainly the Data Protection Act 1998 (‘the DPA’). Moreover, following a number of losses of sensitive data, a report was published by the Cabinet Office in June 2008, Data Handling Procedures in Government. The latter stipulates the procedures that all departmental and public bodies should follow in order to maintain security of data. Given the personal and sensitive nature of much of the data held in schools/colleges, it is critical that they adopt these procedures too.

It is important to stress that the personal data handling policy template applies to all forms of personal data, regardless of whether it is held on paper or in electronic format. However, as it is part of an overall online safety policy template, this document will place particular emphasis on data which is held or transferred digitally.

Schools will need to carefully review this policy template and amend sections, as necessary, in the light of pertinent local authority regulations and guidance, and changes in legislation.

Data Protection Act

Schools, like any other organisation, are subject to the Data Protection Act (DPA) and its eight basic principles. The DPA refers to ‘personal data’ – this can be described generally as information which identifies an individual and is personal to an individual.

The DPA contains eight ‘Data Protection Principles’ which specify that personal data must be:

Processed fairly and lawfully

Obtained for specified and lawful purposes

Adequate, relevant and not excessive

Accurate and up to date

Not kept any longer than necessary

Processed in accordance with the ‘data subject’s’ (the individual’s) rights

Securely kept

Not transferred to any other country without adequate protection
It's also worth considering that whilst not all data is 'personal', the information that is, has varying levels of sensitivity based on the impact were it to be compromised.
The Information Commissioners Office has produced a report aimed at helping schools/colleges meet their data protection obligations; you can read the report detailing data protection advice for schools/colleges – ICO Guidance we gave to schools 2012 and a simple summary of the Data protection laws – ICO Guide to data protection for organisations

Rainbow Federation Personal Data Handling Policy

Introduction

Schools and their employees should do everything within their power to ensure the safety and security of any material of a personal or sensitive nature.
It is the responsibility of all members of the school community to take care when handling, using or transferring personal data that it cannot be accessed by anyone who does not:
have permission to access that data, and/or
need to have access to that data.
Data breaches can have serious effects on individuals and/or institutions concerned, can bring the school/college into disrepute and may well result in disciplinary action, criminal prosecution and fines imposed by the Information Commissioners Office for the school/college and the individuals involved. Particularly, all transfer of data is subject to risk of loss or contamination.
Anyone who has access to personal data must know, understand and adhere to this policy, which brings together the legal requirements contained in relevant data protection legislation and relevant regulations and guidance (where relevant from the local authority).
The DPA lays down a set of rules for processing of personal data (both structured manual records and digital records). It provides individuals (data subjects) with rights of access and correction. The DPA requires organisations to comply with eight data protection principles, which, among others require data controllers to be open about how the personal data they collect is used.
The DPA defines "Personal Data" as data which relate to a living individual who can be identified:
http://ico.org.uk/for_organisations/data_protection/the_guide/key_definitions
from those data, or
from those data and other information which is in the possession of, or is likely to come into the possession of, the data controller,
and includes any expression of opinion about the individual and any indication of the intentions of the data controller or any other person in respect of the individual.
It further defines "Sensitive Personal Data" as personal data consisting of information as to:
the racial or ethnic origin of the data subject,
his political opinions,
his religious beliefs or other beliefs of a similar nature,
whether he is a member of a trade union (within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992),
his physical or mental health or condition,

his sexual life,
the commission or alleged commission by him of any offence, or
any proceedings for any offence committed or alleged to have been committed by him, the disposal of such proceedings or the sentence of any court in such proceedings.
Guidance for organisations processing personal data is available on the Information Commissioner's Office website:
http://www.ico.gov.uk/for_organisations/data_protection_guide.aspx
Policy Statements
The school will hold 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".

Personal Data
The school and individuals will have access to a wide range of personal information and data. The data may be held in a digital format or on paper records. Personal data is defined as any combination of data items that identifies an individual and provides specific information about them, their families or circumstances. This will include:
Personal information about members of the school/college community – including learners, members of staff and parents/carers, e.g., names, addresses, contact details, legal guardianship contact details, health records, disciplinary records
Curricular/academic data eg class lists, pupil/student progress records, reports, references
Professional records, e.g., employment history, taxation and national insurance records, appraisal records and references
Any other information that might be disclosed by parents/carers or by other agencies working with families or staff members.

Responsibilities
The school/college's Senior information risk officer (SIRO) is the head teacher. This person will keep up to date with current legislation and guidance and will:
determine and take responsibility for the school/college's information risk policy and risk assessment
appoint the Information asset owners (IAOs)
The school will identify Information asset owners (IAOs) for the various types of data being held (eg learner/staff/information/assessment data etc). The IAOs will manage and address risks to the information and will understand:
what information is held, for how long and for what purpose,
how information as been amended or added to over time, and
who has access to protected data and why.
Everyone in the school has the responsibility of handling protected or sensitive data in a safe and secure manner.
Governors are required to comply fully with this policy in the event that they have access to personal data, when engaged in their role as a governor.

Registration
The school/college is registered as a Data controller on the Data protection register held by the Information Commissioner.
Information to parents and carers – the “Privacy Notice”
In order to comply with the fair processing requirements of the DPA, the school/college will inform parents and carers of all learners of the data they collect, process and hold on the pupils/students, the purposes for which the data is held and the third parties, (e.g., LA, etc.) to whom it may be passed. This privacy notice will be passed to parents and carers through the prospectus, newsletters, reports, schoop or a specific letter/communication.

Training & awareness
All staff will receive data handling awareness/data protection training and will be made aware of their responsibilities, as described in this policy through:
induction training for new staff
staff meetings/briefings/Inset
day to day support and guidance from Information asset owners
Risk Assessments
Information risk assessments will be carried out by Information asset owners to establish the security measures already in place and whether they are the most appropriate and cost effective. The risk assessment will involve:

- recognising the risks that are present
- judging the level of the risks (both the likelihood and consequences); and
- prioritising the risks.

Risk assessments are an ongoing process and should result in the completion of an Information Risk Actions Form (example below):

Risk ID	Information asset affected	Information asset owner	Protective marking (Impact level)	Likelihood	Overall risk level (low, medium, high)	Action(s) to minimise risk

Impact Levels and protective marking

Government Protective Marking Scheme label	Impact Level (IL)	Applies to schools/colleges?
NOT PROTECTIVELY MARKED	0	Will apply in schools/colleges
PROTECT	1 or 2	
RESTRICTED	3	
CONFIDENTIAL	4	Will not apply in schools/colleges
HIGHLY CONFIDENTIAL	5	
TOP SECRET	6	

The school will ensure that all school/college staff, independent contractors working for it, and delivery partners, comply with restrictions applying to the access to, handling and storage of data classified as Protect, Restricted or higher. Unmarked material is considered 'unclassified'. The term 'UNCLASSIFIED' or 'NON' or 'NOT PROTECTIVELY MARKED' may be used to indicate positively that a protective marking is not needed.
All documents (manual or digital) that contain protected or restricted data will be labelled clearly with the impact level shown in the header and the release and destruction classification in the footer.
Users must be aware that when data is aggregated the subsequent impact level may be higher than the individual impact levels of the original data. Combining more and more individual data elements together in a report or data view increases the impact of a breach. A breach that puts learners at serious risk of harm will have a higher impact than a risk that puts them at low risk of harm. Long-term significant damage to anyone's reputation has a higher impact than damage that might cause short-term embarrassment.
Release and destruction markings should be shown in the footer, e.g., "Securely delete or shred this information when you have finished using it".
Secure storage of and access to data
The school will ensure that ICT systems are set up so that the existence of protected files is hidden from unauthorised users and that users will be assigned a clearance that will determine which files are accessible to them. Access to protected data will be controlled according to the role of the user. Members of staff will not, as a matter of course, be granted access to the whole management information system.
All users will use strong passwords which must be changed regularly User passwords must never be shared.
Personal data may only be accessed on machines that are securely password protected. Any device that can be used to access data must be locked if left (even for very short periods) and set to auto lock if not used for five minutes.
All storage media must be stored in an appropriately secure and safe environment that avoids physical risk, loss or electronic degradation.
Personal data can only be stored on school/college equipment (this includes computers and portable storage media. Private equipment (ie owned by the users) must not be used for the storage of personal data.
When personal data is stored on any portable computer system, USB 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/college policy (below) once it has been transferred or its use is complete.
The school will need to set its own policy as to whether data storage on removal media is allowed, even if encrypted – some organisations do not allow storage of personal data on removable devices.
The school has clear policy and procedures for the automatic backing up, accessing and restoring all data held on school systems, including off-site backups.
The school has clear policy and procedures for the use of "Cloud Based Storage Systems" (for example Office365) and is aware that data held in remote and cloud storage is still required to be protected in line with the Data Protection Act. The

school/college will ensure that it is satisfied with controls put in place by remote/cloud based data services providers to protect the data.
As a Data Controller, the school is responsible for the security of any data passed to a “third party”. Data Protection clauses will be included in all contracts where data is likely to be passed to a third party.
All paper based Protected and Restricted (or higher) material must be held in lockable storage, whether on or off site.
The school recognises that under Section 7 of the DPA, data subjects have a number of rights in connection with their personal data, the main one being the right of access. Procedures are in place to deal with Subject access requests, i.e. a written request to see all or a part of the personal data held by the data controller in connection with the data subject. Data subjects have the right to know: if the data controller holds personal data about them; a description of that data; the purpose for which the data is processed; the sources of that data; to whom the data may be disclosed; and a copy of all the personal data that is held about them. Under certain circumstances the data subject can also exercise rights in connection with the rectification; blocking; erasure and destruction of data.
Secure transfer of data and access out of school
The school/college recognises that personal data may be accessed by users out of school/college, or transferred to the LA or other agencies. In these circumstances:
users may not remove or copy sensitive or restricted or protected personal data from the school/college or authorised premises without permission and unless the media is encrypted and password protected and is transported securely for storage in a secure location
users must take particular care that computers or removable devices which contain personal data must not be accessed by other users (eg family members) when out of school/college
when restricted or protected personal data is required by an authorised user from outside the organisation’s premises (for example, by a member of staff to work from their home), they should preferably have secure remote access to the management information system or learning platform
if secure remote access is not possible, users must only remove or copy personal or sensitive data from the organisation or authorised premises if the storage media, portable or mobile device is encrypted and is transported securely for storage in a secure location
Users must protect all portable and mobile devices, including media, used to store and transmit personal information using approved encryption software; and
Particular care should be taken if data is taken or transferred to another country, particularly outside Europe, and advice should be taken from the local authority in this event.

Disposal of data
The school/ will comply with the requirements for the safe destruction of personal data when it is no longer required.
The disposal of personal data, in either paper or electronic form, must be conducted in a way that makes reconstruction highly unlikely. Electronic files must be securely overwritten, in accordance with government guidance and other media must be shredded, incinerated or otherwise disintegrated for data.

A Destruction Log should be kept of all data that is disposed of. The log should include the document ID, classification, date of destruction, method and authorisation.

Audit logging/reporting/incident handling

It is good practice, as recommended in the "Data Handling Procedures in Government" document that the activities of data users, in respect of electronically held personal data, will be logged and these logs will be monitored by responsible individuals. The audit logs will be kept to provide evidence of accidental or deliberate data security breaches – including loss of protected data or breaches of an acceptable use policy, for example.

The school has a policy for reporting, managing and recovering from information risk incidents, which establishes: (schools/colleges should determine their own reporting policy, in line with that of their LA (if relevant), and add details here)

a "responsible person" for each incident

a communications plan, including escalation procedures

and results in a plan of action for rapid resolution; and

a plan of action of non-recurrence and further awareness raising.

All significant data protection incidents must be reported through the SIRO to the Information Commissioner's Office based upon the local incident handling policy and communication plan.

Use of technologies and protective marking

The following provides a useful guide:

	The information	The technology	Notes on Protect Markings (Impact Level)
School/college life and events	School/college terms, holidays, training days, the curriculum, extra-curricular activities, events, displays of pupils work, lunchtime menus, extended services, parent consultation events	Common practice is to use publically accessible technology such as school/college websites or portal, emailed newsletters, subscription text services	Most of this information will fall into the NOT PROTECTIVELY MARKED (Impact Level 0) category.
Learning and achievement	Individual pupil/student academic, social and behavioural achievements, progress with learning, learning behaviour, how parents can support their child's learning, assessments, attainment,	Typically schools/colleges will make information available by parents logging on to a system that provides them with appropriately secure access, such as a Learning Platform or portal, or by communication to a	Most of this information will fall into the PROTECT (Impact Level 2) category. There may be learners whose personal data requires a RESTRICTED marking (Impact Level 3) or higher. For example, the home

	attendance, individual and personalised curriculum and educational needs.	personal device or email account belonging to the parent.	address of a child at risk. In this case, the school/college may decide not to make this pupil/student record available in this way.
Messages and alerts	Attendance, behavioural, achievement, sickness, school/college closure, transport arrangements, and other information that it may be important to inform or contact a parent about as soon as possible. This may be particularly important when it is necessary to contact a parent concerning information that may be considered too sensitive to make available using other online means.	Email and text messaging are commonly used by schools/colleges to contact and keep parents informed. Where parents are frequently accessing information online then systems e.g. Learning Platforms or portals, might be used to alert parents to issues via "dashboards" of information, or be used to provide further detail and context.	Most of this information will fall into the PROTECT (Impact Level 1) category. However, since it is not practical to encrypt email or text messages to parents, schools/colleges should not send detailed personally identifiable information. General, anonymous alerts about schools/colleges closures or transport arrangements would fall into the NOT PROTECTIVELY MARKED (Impact Level 0) category.

Appendices: Additional issues/documents related to personal data handling in schools

Freedom of Information (FOI)

FOI may require anything you write in an official capacity to be potentially made public. This might mean you need to consider how long content is stored for and the ease of which it can be recovered from a cloud archive.

Cloud services very often are not designed for the long term storage of content, particularly transient communications with high volume like email. Schools/colleges should consider how to secure and back-up to a local system what could be sensitive or important data.

A summary of good practice in dealing with requests and details of model publication schemes can be found on the ICO website

Freedom of Information Act

All schools must have a Freedom of Information Policy which sets out how it will deal with FOI requests. In this policy the school should:

Delegate to the headteacher day-to-day responsibility for FOIA policy and the provision of advice, guidance, publicity and interpretation of the school's/college's policy.
Consider designating an individual with responsibility for FOIA, to provide a single point of reference, coordinate FOIA and related policies and procedures, take a view on possibly sensitive areas and consider what information and training staff may need.
Consider arrangements for overseeing access to information and delegation to the appropriate governing body.
Proactively publish information with details of how it can be accessed through a Publication Scheme (see Model Publication Scheme below) and review this annually.
Ensure that a well managed records management and information system exists in order to comply with requests.

Model Publication Scheme
The Information Commissioners Office provides schools with a model publication scheme which they should complete. This was revised in 2009, so any school with a scheme published prior to then should review this as a matter of urgency. The school publication scheme should be reviewed annually.

Safeguarding
There are also safeguarding obligations for the use of technology in schools/ that include (possibly in partnership with your service provider):
effectively monitoring the use of systems to detect potential and actual safeguarding issues

- monitoring, alerting and responding to illegal activity
- providing consistent safeguarding provision both within and beyond school if devices/services leave the site

Criminal Activity
Schools have an immediate obligation to report illegal or criminal activity to the Police. A detailed summary of legislation that pertains to safeguarding and schools which can be found elsewhere in this documentation.
Other services e.g. Facebook, Twitter, etc are useful cloud tools in and beyond the classroom but it is important to be aware of age restrictions here too. US Law requires any company operating within the US to comply with the Children's Online Privacy Protection Act (COPPA) which legislates against companies who store, process and manage information on children aged 13 and under and the active or targeted marketing to that age group.

Privacy and Electronic Communications
Schools should be aware that the Privacy and Electronic Communications Regulations have changed and that they are subject to these changes in the operation of their websites**.**

Use of Cloud Services
The movement towards tablet and other mobile technologies in schools presents both opportunities as well as challenges. Ultimately, the opportunities are around teaching and learning; the challenges are around successfully managing this pedagogical shift and taking staff, parents and pupils through this technological

change. At the heart of the change is a move away from devices or systems where information is stored locally, to devices which can access data stored 'in the cloud'. Just as a PC needs to be connected to a network to get to the stored data, so must these mobile and tablet devices be connected to the cloud. Wireless access provides this connection.
Software too can sit in the cloud removing the need for locally installed suites of software. Apps offer an opportunity to create low cost, flexible learning opportunities which are device agnostic and which can create personalised learning on a new level.
Schools using the Hwb learning platform will have been provisioned with Office 365 which offers cloud based email, calendar and storage facilities as well as MS Office. By it's nature, Office 365 is available on any device which is connected to the internet meaning that these cloud based services can be accessed in school/college or at home on smartphones, tablets, laptops, notebooks and PCs.
Just as a school has obligations around data on its physical network, the same obligations are required when dealing with data in the cloud i.e. it is still required to be protected in line with the Data Protection Act (DPA) and may be subject to Freedom of Information (FOI) requests.

Where is the cloud?
Most education systems have to make use of personal information to function. The DPA (Principle 8) states that personal data must not be transferred to any other country without adequate protection in situ. Data protection requirements vary widely across the globe. Countries in the EU approach privacy protection differently to those outside and are more stringent in the detail and responsibilities of data users than perhaps the US. Microsoft Office 365 is held in data centres in Amsterdam and Dublin.

Security concerns
Can anyone access data in the cloud centre where it sits? Data centres are required to have stringent physical interventions in place against data being compromised from internal or external access. There are sophisticated security mechanisms in place to prevent external hacking of data. Whilst this cannot always be guaranteed to be 100% safe, this sophistication is often beyond the local capability of a single school and so can be regarded as reasonable duty of care.
Access to data through devices is much more likely given that devices are going to and from school in bags, on buses, or left lying around at home or school so security now becomes much more of an issue at a user level than it ever has before. If a device goes missing or breaks, the big advantage of cloud systems is that, apart from simple local settings, content is in the cloud so data is not 'lost' in the same way as if your laptop was stolen or suffers a hard drive failure. Cloud services can offer device management systems that can lock or locate a device if missing.
Passwords and authentication are critical at any point in securing access to data but are especially so with data in the cloud. Some points to consider are:

- *Are passwords strong?*
- *Do users know what a strong password looks like?*
- *Do you insist on rolling user passwords regularly? Every 60 days? Many businesses do as good practice.*
- *Are users educated in good password practice? Is this backed up with a clear and reliable password policy?*

It's also important to ensure there is a clear and reliable culture around reporting issues such as compromise, loss or unethical practice. This doesn't happen on its own and needs to be taught. Again, the common sense, everyday good practice around logging out of systems when finished, having a management plan in place if something goes wrong, and having reporting mechanisms in place also applies to using cloud technologies.

The Online Safety Resource available from Hwb has a variety of strands, one of which focuses on Privacy and Security. There are opportunities to learn strategies for managing online information and keeping it secure online risks such as identity thieves and phishing. Learners learn how to create strong passwords, how to avoid scams and schemes, and how to analyse privacy policies.
Monitoring users

Local networks based on site have the advantage of being relatively easy to filter and monitor for inappropriate or illegal use and many schools will already have these systems in place. Filtering can be provided as part of a school internet provision, particularly if they have that service delivered through the local/unitary authority. A school may choose to provide its own through a variety of commercial solutions. However, when services move into a wider cloud-based environment hosted by an external partner it becomes more difficult to know what users are storing or accessing, particularly if their connectivity away from the school/college is a domestic one.

With all of those separate user folders and portfolios with their separate passwords and widely varying content, how can you be sure they are not being used to store inappropriate materials? Illegal materials? The school provides the tools, e.g. Office 365 and there is therefore an expectation that the school should ensure that users are operating in a space that is safe as can be created.
Microsoft state in their user agreements that they reserve the right to actively search stored files.

This means that the school also needs to be clear about what the expectations are around illegal and inappropriate content and how it intends to ensure those expectations are met. These might include:

- *clear and effective agreement through an acceptable use agreement or computer splash screen with "agree" button*
- *positive statements around the use of technology dotted around areas where that technology might be used (particularly effective are student-designed posters)*
- *active education in raising awareness of what illegal or inappropriate both mean*
- *staff development in recognising and escalating reports of illegal content*
- *reminders that Cloud Service Providers can and do scan content stored on their servers and that an archive exists*
- *establish regular spot checks on mobile devices and advertise the fact that these will be carried out on school/college devices and removable media*
- *establish and communicate that One Drive provided as part of a school/college cloud solution will be subject to random spot checks by resetting passwords back to default to allow auditing or set the expectation that users should share their online folders with their teacher. The system has been provided for educational use so there should not be anything in there that isn't related to learning.*

Managing accounts and users

Dealing with one tablet or smartphone on your own account is empowering; you can make choices about how you set it up, the apps you want; the subscriptions you choose and how many photos or documents to store on it. Setting up tens of devices with potentially hundreds of users has a whole different set of considerations:
the distribution and timetabling of school/college owned devices (particularly those that go home?)
can users store content locally on the tablet eg photos?
can school/college network and connectivity sustain the use of many devices?
is there one standard profile for everyone or can each user customise?
how are those profiles managed or swapped?
are personal devices allowed to be commissioned to the school/college system (BYOD)?

A Mobile Device Management layer can be critical in establishing access rights to these technologies. You may need to consult with your service provider to investigate what options are available to you.
If things go wrong
Like any other safeguarding issue there must be clear and rigorous incident management practice that is consistent with other safeguarding policy.

- *clear and well communicated policy*
- *effective routines for securing and recording evidence*
- *established reporting routes that are well-communicated, respected and agreed by all*
- *clearly communicated sanctions that have been agreed and shared with all users*
- *audit trails that are used to shape interventions and inform future practice*

What policies and procedures should be put in place for individual users of cloud-based services?

The school/college is ultimately responsible for the contract with the provider of the system.
Appendix C6 provides a useful summary of issues around Office 365 written with the support of Microsoft:
The document focusses on Office 365, but poses important considerations if a school/college is considering services from another provider.

B3 School/college Mobile Technologies Policy T (inc. BYOD/BYOT)
Mobile technology devices may be a school/college owned/provided or privately owned smartphone, tablet, notebook / laptop or other technology that usually has the capability of utilising the school's/college's wireless network. The device then has access to the wider internet which may include the school's/college's learning platform and other cloud based services such as email and data storage.
The absolute key to considering the use of mobile technologies is that the learners, staff and wider school community understand that the primary purpose of having their personal device at school is educational and that this is irrespective of whether the device is school/college owned/provided or personally owned. The mobile technologies policy should sit alongside a range of polices including but not limited to

the safeguarding policy, anti-bullying policy, acceptable use agreement, policies around theft or malicious damage and the behaviour policy. Teaching about the safe and appropriate use of mobile technologies should be included in the online safety education programme.

A policy that completely prohibits pupil/student, staff or visitors from bringing mobile technologies to the school/academy could be considered to be unreasonable and unrealistic for school/academy to achieve. For example many parents/carers would also be concerned for health and safety reasons if their child were not allowed to carry a mobile phone and many staff and visitors use mobile phones to stay in touch with family. Contractors require mobile technologies for legitimate business reasons.

Potential Benefits of Mobile Technologies

Research has highlighted the widespread uptake of mobile technologies amongst adults and children of all ages. Web-based tools and resources have changed the landscape of learning. Learners now have at their fingertips unlimited access to digital content, resources, experts, databases and communities of interest. By effectively maximizing the use of such resources, schools not only have the opportunity to deepen learning, but they can also develop digital literacy, fluency and citizenship in learners that will prepare them for the high-tech world in which they will live, learn and work.

For further reading, please refer to “Bring your own device: a guide for schools” by Alberta Education available at:
http://education.alberta.ca/admin/technology/research.aspx and to the “ NEN Technical Strategy Guidance Note 5 – Bring your own device” - http://www.nen.gov.uk/bring-your-own-device-byod/

Considerations

There are a number of issues and risks to consider when implementing mobile technologies, these include; security risks in allowing connections to your school network, filtering of personal devices, breakages and insurance, access to devices for all learners, avoiding potential classroom distraction, network connection speeds, types of devices, charging facilities, total cost of ownership

Schools may consider implementing the use of mobile technologies as a means of reducing expenditure on school provided devices. However, it is important to remember that the increased network management costs and overheads involved in implementing this properly are likely to counterbalance or outweigh any savings.

The use of mobile technologies brings both real benefits and challenges for the whole school community – including teachers - and the only effective way for a school to implement these 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 has addressed broadband performance and capacity to ensure that core educational and administrative activities are not negatively affected by the increase in the number of connected devices

The school has provided technical solutions for the safe use of mobile technology for school/ devices and for personal devices

For all mobile technologies, filtering will be applied to the school internet connection and attempts to bypass this are not permitted

Where mobile broadband (e.g. 3G and 4G) use is allowed in the school, users are required to follow the same acceptable use requirements as they would if using school owned devices.
Mobile technologies must only be used in accordance with the law
Mobile technologies are not permitted to be used in certain areas within the school site such as changing rooms, toilets and swimming pools.
Learners will be educated in the safe and appropriate use of mobile technologies as part of the online safety curriculum
The school acceptable use agreements for staff, learners, parents and carers will give consideration to the use of mobile technologies
The school allows:

	School Devices			Personal Devices		
	School owned and allocated to a single user	School owned for use by multiple users	Authorised device[1]	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	Yes	Yes
No network access				No	No	No

School devices

All school devices are controlled though the use of mobile device management (MDM) software
Appropriate access control is applied to all mobile devices according to the requirements of the user (e.g internet only access, network access allowed, shared folder network access)
All school devices must be suitably protected via a passcode/password/pin (and encryption where relevant). Those devices allocated to members of staff must only be accessed and used by members of staff
Appropriate exit processes are implemented for devices no longer used at a school location or by an authorised user.
The software / apps originally installed by the school must remain on the school owned device in usable condition and be easily accessible at all times. From time to time the school may add software applications for use in a particular lesson. Periodic checks of devices will be made to ensure that users have not removed required apps
The school will ensure that school devices contain the necessary apps for school/college work. Apps added by the school/college will remain their

[1] Authorised device – purchased by the pupil/family through a school-organised scheme. This device may be given full access to the network as if it were owned by the school

property and will not be accessible to learners on authorised devices once they leave the school/college roll. Any apps bought by the user on their own account will remain theirs
The school is responsible for keeping devices up to date through software, security and app updates. The device is virus protected and should not be capable of passing on infections to the network. Where user intervention or support for this process is required, this will be made clear to the user
School devices are provided to support learning. It is expected that learners will bring devices to school as required
The changing of settings (exceptions include personal settings such as font size, brightness, etc.) that would stop the device working as it was originally set up and intended is not permitted
All school devices are subject to routine monitoring
***Pro-active monitoring has been implemented to monitor activity* every week.**

Personal devices

When personal devices are permitted:

- *All personal devices are restricted through the implementation of technical solutions that provide appropriate levels of filtered network access*
- *Personal devices are brought into the school entirely at the risk of the owner and the decision to bring the device in to the school/college lies with the user (and their parents/carers) as does the liability for any loss or damage resulting from the use of the device in the school/college*
- *Staff personal devices should not be used to contact learners or their families, nor should they be used to take images of learners*
- *The school accepts no responsibility or liability in respect of lost, stolen or damaged devices while at the school/college or on activities organised or undertaken by the school/college (the school recommends insurance is purchased to cover that device whilst out of the home)*
- *The school accepts no responsibility for any malfunction of a device due to changes made to the device while on the school network or whilst resolving any connectivity issues*
- *The school recommends that the devices are made easily identifiable and have a protective case to help secure them as the devices are moved around the school. Pass-codes or PINs should be set on personal devices to aid security*
- *The school is not responsible for the day to day maintenance or upkeep of the user's personal device such as the charging of any device, the installation of software updates or the resolution of hardware issues*

User behaviour

Users are expected to act responsibly, safely and respectfully in line with current acceptable use agreements, in addition;

- *The sending of abusive or inappropriate messages or content via mobile phones or personal devices is forbidden by any member of the community and any breaches will be dealt with as part of the discipline/behaviour policy*
- *Guidance is made available by the school to users concerning where and when mobile devices may be used*
- *Devices may not be used in tests or exams*
- *Users are responsible for keeping their device up to date through software, security and app updates. The device is virus protected and should not be capable of passing on infections to the network*
- *Users are responsible for charging their own devices and for protecting and looking after their devices while in the school*
- *Devices must be in silent mode on the school site and on school buses*

- *Users should be mindful of the age limits for app purchases and use and should ensure they read the terms and conditions before use.*
- *Learners must only photograph people with their permission and must only take pictures or videos that are required for a task or activity. All unnecessary images or videos will be deleted immediately*
- *Staff owned devices should not be used for personal purposes during teaching sessions, except in emergency situations*

Residential settings

Learners may access digital technologies if engaged in residential activities away from the site.

B4 Social Policy

Social media (e.g. Facebook, Twitter, LinkedIn) is a broad term for any kind of online platform which enables people to directly interact with each other. However some games, for example Minecraft or World of Warcraft and video sharing platforms such as You Tube have social media elements to them.

The school recognises the numerous benefits and opportunities which a social media presence offers. Staff, parents and carers and learners are actively encouraged to find creative ways to use social media. However, there are some risks associated with social media use, especially around the issues of safeguarding, bullying and personal reputation. This policy aims to encourage the safe use of social media by the school its staff, parents and carers and learners.
Scope

This policy is subject to the school's codes of conduct and acceptable use agreements.
This policy:
applies to all staff and to all online communications which directly or indirectly, represent the school.
applies to such online communications posted at any time and from anywhere.
encourages the safe and responsible use of social media through training and education
defines the monitoring of public social media activity pertaining to the school

The school respects privacy and understands that staff and learners may use social media forums in their private lives. However, personal communications likely to have a negative impact on professional standards and/or the school's reputation are within the scope of this policy.
Professional communications are those made through official channels, posted on a school/college account or using the school name. All professional communications are within the scope of this policy.

Personal communications are those made via a personal social media accounts. In all cases, where a personal account is used which associates itself with, 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.

Digital communications with learners are also considered. Staff may use social media to communicate with learners via a school social media account for teaching and learning purposes but must consider whether this is appropriate and consider the potential implications.

- *Organisational control*
- *Roles & Responsibilities*
- *Online safety committee*
- *facilitating training and guidance on Social Media use.*
- *developing and implementing the Social Media policy*

- *taking a lead role in investigating any reported incidents.*
- *making an initial assessment when an incident is reported and involving appropriate staff and external agencies as required.*
- *receive completed applications for Social Media accounts*
- *approve account creation*

online safety coordinator

- create the account following SLT approval
- store account details, including passwords securely
- be involved in monitoring and contributing to the account
- control the process for managing an account after the lead staff member has left the school (closing or transferring)

Staff

- know the contents of and ensure that any use of social media is carried out in line with this and other relevant policies
- attending appropriate training
- regularly monitoring, updating and managing content he/she has posted via school accounts
- adding an appropriate disclaimer to personal accounts when naming the school
- Managing accounts
- Process for creating new accounts
- The school community is encouraged to consider if a social media account will help them in their work, eg a history department Twitter account, or a "Friends of the school" Facebook page. Anyone wishing to create such an account must present a business case to the School/ Leadership Team which covers the following points:-
- the aim of the account
- the intended audience
- how the account will be promoted
- who will run the account (at least two staff members should be named)
- will the account be open or private/closed
- Following consideration by the online safety coordinator and safeguarding officer an application will be approved or rejected. In all cases, the online safety coordinator and safeguarding officer must be satisfied that anyone running a social media account on behalf of the school has read and understood this policy and received appropriate training. This also applies to anyone who is not directly employed by the school, including volunteers or parents.
- Monitoring

School accounts must be monitored regularly and frequently (preferably 7 days a week, including during holidays). Any comments, queries or complaints made through those accounts must be responded to within 24 hours (or on the next working day if received at a weekend) even if the response is only to acknowledge receipt. Regular monitoring and intervention is essential in case a situation arises where bullying or any other inappropriate behaviour arises on a school social media account.

Behaviour

The school requires that all users using social media adhere to the standard of behaviour as set out in this policy and other relevant policies.

Digital communications by staff must be professional and respectful at all times and in accordance with this policy. Staff will not use social media to infringe on the rights

and privacy of others or make ill-considered comments or judgments about staff. School social media accounts must not be used for personal gain. Staff must ensure that confidentiality is maintained on social media even after they leave the employment of the school.
Users must declare who they are in social media posts or accounts. Anonymous posts are discouraged in relation to school/college activity.
If a journalist makes contact about posts made using social media staff must follow the school/college media policy before responding.
Unacceptable conduct, (e.g. defamatory, discriminatory, offensive, harassing content or a breach of data protection, confidentiality, copyright) will be considered extremely seriously by the school and will be reported as soon as possible to a relevant senior member of staff and the online safety coordinator and safeguarding officer , and escalated where appropriate.

The use of social media by staff while at work may be monitored, in line with school policies. *The school/college permits reasonable and appropriate access to private social media sites. However, where excessive use is suspected, and considered to be interfering with relevant duties, disciplinary action may be taken*

The school/college will take appropriate action in the event of breaches of the social media policy. Where conduct is found to be unacceptable, the school/college will deal with the matter internally. Where conduct is considered illegal, the school/college will report the matter to the police and other relevant external agencies, and may take action according to the disciplinary policy.

Legal considerations
Users of social media should consider the copyright of the content they are sharing and, where necessary, should seek permission from the copyright holder before sharing.

Users must ensure that their use of social media does not infringe upon relevant data protection laws, or breach confidentiality.

Handling abuse
When acting on behalf of the school, handle offensive comments swiftly and with sensitivity.
If a conversation turns and becomes offensive or unacceptable, school users should block, report or delete other users or their comments/posts and should inform the audience exactly why the action was taken
If you feel that you or someone else is subject to abuse by colleagues through use of a social networking site, then this action must be reported using the agreed school protocols.

Tone
The tone of content published on social media should be appropriate to the audience, whilst retaining appropriate levels of professional standards. Key words to consider when composing messages are:

- *engaging*
- *conversational*
- *informative*

- *friendly (on certain platforms, eg. Facebook)*

Use of images

School use of images can be assumed to be acceptable, providing the following guidelines are strictly adhered to.

permission to use any photos or video recordings should be sought in line with the school's digital and video images policy. If anyone, for any reason, asks not to be filmed or photographed then their wishes should be respected

under no circumstances should staff share or upload learner pictures online other than via school owned social media accounts

staff should exercise their professional judgement about whether an image is appropriate to share on school social media accounts. Students should be appropriately dressed, not be subject to ridicule and must not be on any school/college list of children whose images must not be published

if a member of staff inadvertently takes a compromising picture which could be misconstrued or misused, they must delete it immediately.

Personal use

Staff

- personal communications are those made via a personal social media accounts. In all cases, where a personal account is used which associates itself with, 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 the 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.

Pupils

Staff are not permitted to follow or engage with current learners of the school on any personal social media network account

the school's education programme should enable the learners to be safe and responsible users of social media

learners are encouraged to comment or post appropriately about the school. Any offensive or inappropriate comments will be resolved in school

Parents/Carers

If parents/carers have access to a school learning platform where posting or commenting is enabled, parents/carers will be informed about acceptable use

the school has an active parent and carer education programme which supports the safe and positive use of social media. This includes information on the website

parents and carers are encouraged to comment or post appropriately about the school. In the event of any offensive or inappropriate comments being made, the school will ask the parent/carer to remove the post and invite them to discuss the issues in person. If necessary, refer parents to the school's complaints procedures.

Monitoring posts about the school

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.

Appendix

- Managing your personal use of Social Media:
- "nothing" on social media is truly private
- social media can blur the lines between your professional and private life. Don't use the school logo and/or branding on personal accounts
- check your settings regularly and test your privacy
- keep an eye on your digital footprint
- keep your personal information private
- regularly review your connections – keep them to those you want to be connected to
- when posting online consider; Scale, Audience and Permanency of what you post
- if you want to criticise, do it politely
- take control of your images – do you want to be tagged in an image? What would children or parents say about you if they could see your images?
- know how to report a problem
- Managing school social media accounts

The Do's

- check with a senior leader before publishing content that may have controversial implications for the school
- use a disclaimer when expressing personal views
- make it clear who is posting content
- use an appropriate and professional tone
- be respectful to all parties
- ensure you have permission to 'share' other peoples' materials and acknowledge the author
- express opinions but do so in a balanced and measured manner
- think before responding to comments and, when in doubt, get a second opinion
- seek advice and report any mistakes using the school's reporting process
- consider turning off tagging people in images where possible

The Don'ts

- don't make comments, post content or link to materials that will bring the school into disrepute
- don't publish confidential or commercially sensitive material
- don't breach copyright, data protection or other relevant legislation
- consider the appropriateness of content for any audience of school accounts, and don't link to, embed or add potentially inappropriate content
- don't post derogatory, defamatory, offensive, harassing or discriminatory content
- don't use social media to air internal grievances

B5 School policy - Online safety group terms of reference

1. **PURPOSE**

To provide a consultative group that has wide representation from the school/college 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 group will seek to include representation from all stakeholders.

The composition of the group includes

- SLT member/s
- safeguarding officer
- teaching staff member
- support staff member
- online safety co-ordinator
- governor
- parent/carer
- technical support staff
- *learner representation* – for advice and feedback –Stem Squad.

2.2 Other people may be invited to attend the meetings at the request of the Chairperson on behalf of the group to provide advice and assistance where necessary.
2.3 Group members must declare a conflict of interest if any incidents being discussed directly involve themselves or members of their families.
2.4 Group 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 group should select a suitable chairperson from within the group. Their responsibilities include:
scheduling meetings and notifying group members;
inviting other people to attend meetings when required by the group;
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 one hour. A special or extraordinary meeting may be called when and if deemed necessary.

5. **FUNCTIONS**

These are to assist the online safety co-ordinator and safeguarding officer with the following:

- to keep up to date with new developments in the area of online safety
- to 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
- learner forums (for advice and feedback)
- governors meetings
- surveys/questionnaires for learners, parents/carers and staff
- parents evenings
- website/learning platform/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

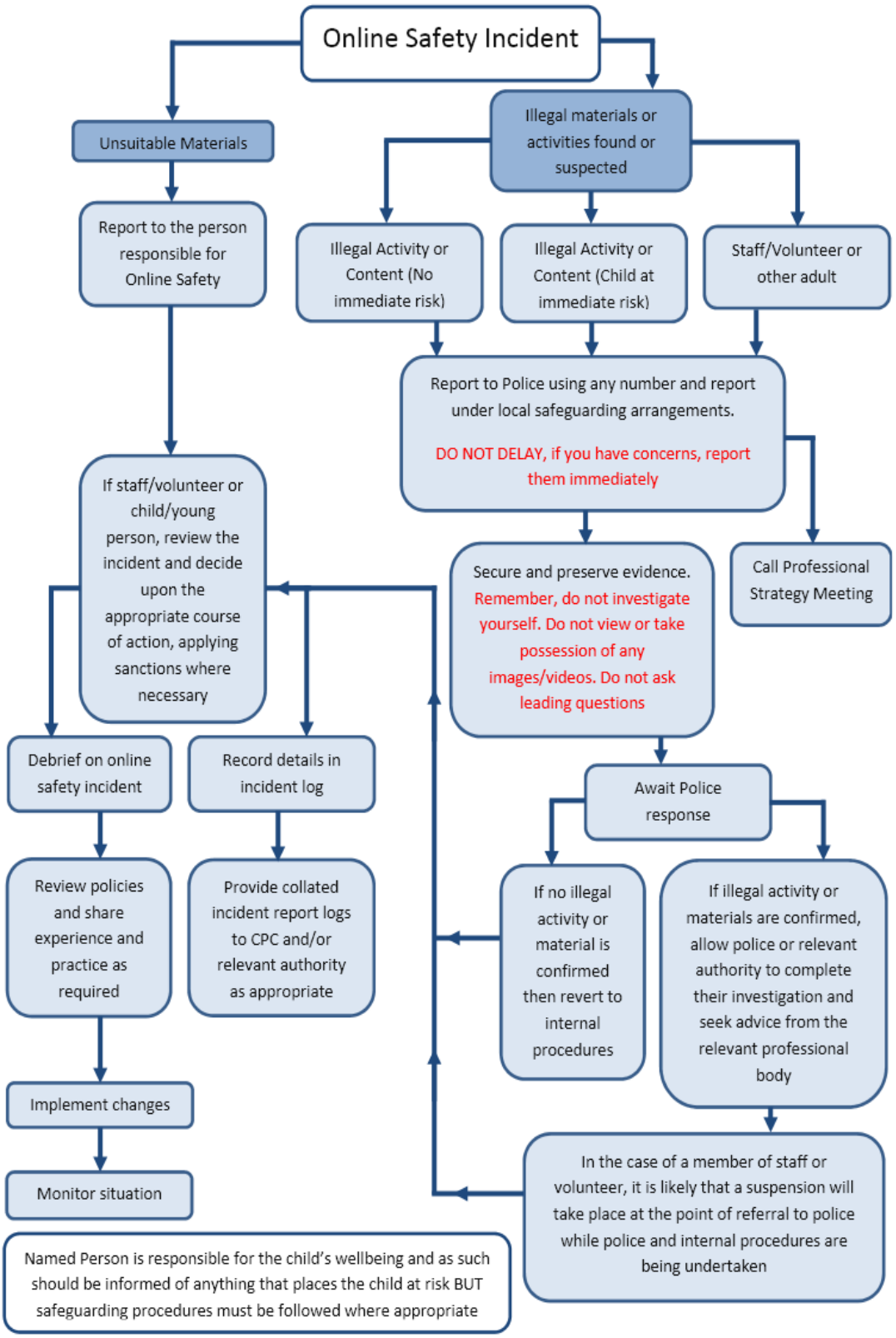
6. **AMENDMENTS**

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

The above Terms of Reference for Rainbow Federation have been agreed
Signed by (SLT): .....
Date: .....
Date for review: .....

Acknowledgement

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 second reviewing person

Name	
Position	
Signature	

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

Web site(s) address/device	Reason for concern

Conclusion and action proposed or taken

C3 Reporting Log Template Group:						
Date	Time	Incident	Action Taken		Incident Reported By	Signature
			What?	By Whom?		

C4 Training Needs Audit Log Template Group:						
Relevant training the last 12 months	Identified Training Need	To be met by	Cost	Review Date		

C5 Summary of Legislation

Schools/colleges 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 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 1998

This protects the rights and privacy of 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 person 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 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 other 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 help line staff

Trade Marks Act 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 copyright 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 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 Harrassment 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 a 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 2003

A 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 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/college 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/college 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 Protection of Freedoms Act 2012

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

C6 Office 365 – further information

Where is the data stored?

Data for UK Schools/colleges is all hosted within the EU. The primary Microsoft 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 “back up” is very different with Office365 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/colleges 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 Office365, but with a 25GB inbox per person the pressure on users to archive email is not as great compared to existing email systems.

How does the email provider protect your privacy?
3 key things: No advertising, no "mingling" of Office 365 data with our consumer services (such as Hotmail) 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/colleges own the data. Microsoft does not. You own your data, and retain all rights, title and interest in the data you store with Office 365. 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 Office 365 service. Microsoft 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). Microsoft has been granted accreditation up to and including the UK government's "Impact Level 2" (IL2) assurance for Office 365. As of February 2013 Microsoft are the only major international public cloud service provider to have achieved this level of accreditation and, indeed, it is the highest level of accreditation possible with services hosted outside of the UK (but inside of the EEA).
Schools/colleges 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 Office365.
What steps does the email provider take to ensure that your information is secure?
Microsoft uses 5 layers of security - data, application, host, network and physical. You can read about this in a lot more detail here.
Office365 is certified for ISO 27001, one of the best security benchmarks available across the world. Office 365 was the first major business productivity public cloud

service to have implemented the rigorous set of physical, logical, process and management controls defined by ISO 27001.

EU Model Clauses. In addition to EU Safe Harbor, Office 365 is the first major business productivity public cloud service provider to sign the standard contractual clauses created by the European Union ("EU Model Clauses") with all customers. EU Model Clauses address international transfer of data.
Data Processing Agreement. Microsoft 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. Visit here to get a signed copy of the DPA.

How reliable is the email service?
There is a 99.9% uptime commitment with financially-backed SLA for any paid-for services in Office365 (though most schools/colleges 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?
Microsoft offer schools/colleges 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/colleges use a Microsoft partner or support organisation with industry specific expertise in cloud services for schools/colleges.

Additional Resources
There is a wealth of information about Office365 in the Office365 Trust Centre. You can also read articles about Office365, get deployment resources and contact Microsoft Cloud experts direct on their UK Schools/colleges Cloud Blog.

C7 Links to other organisations or documents
These may help those who are developing or reviewing an 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
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/
Enable – EU funded anti-bullying project - http://enable.eun.org/
Sexting
UKCCIS - Sexting in schools and colleges: responding to incidents and safeguarding young people (to be added to both language versions)
UKSIC – Responding to and managing sexting incidents
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 Online Safety Resource (accessed through Hwb)
Alberta, Canada - digital citizenship policy development guide.pdf
Teach Today – www.teachtoday.eu/
Insafe - Education Resources
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 we gave to schools/colleges - September 2012 (England)
ICO Guidance on Bring Your Own Device
ICO Guidance on Cloud Computing
Information Commissioners Office good practice note on taking photos in schools/colleges
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/colleges on Cloud Hosted Services
NEN - Guidance Note - Protecting School/college Data
Professional Standards/Staff Training
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
Working with parents and carers
Connect Safely - a Parents Guide to Facebook

Vodafone Digital Parents Magazine
Childnet Webpages for Parents & Carers
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
Internetmatters.org
Research
EU Kids on Line Report - "Risks and Safety on the Internet" - January 2011
Futurelab - "Digital participation - its not chalk and talk any more!"

C8 Glossary of terms

AUA Acceptable use agreement – 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
FOSI Family Online safety Institute
EA Education Authority
ICO Information Commissioners Office
ICT Information and Communications Technology
ICTMark Quality standard for schools/colleges 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/colleges 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/colleges and other organisations in the SW
TUK Think U Know – educational Online safety programmes for schools/colleges, 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

Abbreviation Key	
LLC	Language, literacy and communication
MD	Mathematical Development
ESDGC	Education for sustainable development and global citizenship.
KUW	Knowledge and understanding of the world
WLD	Welsh language development
CD	Creative Development
WALT	We are learning to
CP	Continuous provision
EP	Enhanced provision
PE	Physical education
IT	Information technology
CPD	Continuing professional development
TPS	Think, pair, share
INCERTS	Online assessment tracking
BMBT	Big Maths Beat That
IEP	Individual education plan
IBP	Individual behaviour plan
DCF	Digital competence framework
IWB	Interactive white board
PSHE	Personal, social and health education
ALN	Additional learning needs
TA	Teaching assistant
LSA	Learning support assistant
SA	School action
SA+	School action plus
G2BG	Good to be green
G4G	Green for growth
2BAP	2 Simple 2 Build a Profile
SLT	Senior Leadership Team
DT	Design and Technology
RE	Religious Education
KS2	Key Stage 2
FPh	Foundation Phase
PEP	Pupil Education Plan
LACE	Looked after Child in education
CLA	Child who is looked after
SGO	Special Guardianship Order
ALNCO	Additional Learning Needs Coordinator
AOLEs	Areas of Learning and Experience