Online Safety Policy

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Scope of the Policy

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

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

Roles and Responsibilities

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

Headteacher and Senior Leaders

- The Headteacher has a duty of care for ensuring the safety (including online safety) of members of the school community, though the day to day responsibility for online safety will be delegated to the Online Safety Lead.
- 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. (see flow chart on dealing with online safety incidents)
- The Headteacher and Senior Leaders are responsible for ensuring that the Online Safety Lead and other relevant staff receive suitable training to enable them to carry out their online safety roles and to train other colleagues, as relevant.
- The Headteacher and Senior Leaders will ensure that there is a system in place to allow for monitoring and support of those in school who carry out the internal online safety monitoring role. This is to provide a safety net and also support to those colleagues who take on important monitoring roles.
- The Senior Leadership Team will receive regular monitoring reports from the Online Safety Lead.

Online Safety Lead

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

Network Manager/Technical staff

At Ringway Primary School we use an outside agency to manage and maintain the school's technical infrastructure.

Those with technical responsibilities are responsible for ensuring:

- that the school's technical infrastructure is secure and is not open to misuse or malicious attack
- that the school meets required online safety technical requirements and any Local Authority and any other relevant body online safety policy/guidance that may apply.
- that users may only access the networks and devices through a properly enforced password protection policy
- the filtering policy is applied and updated on a regular basis and that its implementation.
- 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 networks/internet/digital technologies is regularly monitored in order that any misuse/attempted misuse can be reported to the Headteacher and the Online Safety that monitoring software/systems are implemented and updated as agreed in school policies

Teaching and Support Staff
Teaching and support staff are responsible for ensuring that:

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

Designated Safeguarding Lead
Should be trained in online safety issues and be aware of the potential for serious child protection/safeguarding issues to arise from:

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

Students/Pupils:

- are responsible for using the school digital technology systems in accordance with the student/pupil acceptable use agreement
- have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations

- need to understand the importance of reporting abuse, misuse or access to inappropriate materials and know how to do so
- will be expected to know and understand policies on the use of mobile devices and digital cameras. They should also know and understand policies on the taking/use of images and on online-bullying.
- should understand the importance of adopting good online safety practice when using digital technologies out of school and realise that the school's/academy's online safety policy covers their actions out of school, if related to their membership of the school

Parents/carers

Parents/carers play a crucial role in ensuring that their children understand the need to use the internet/mobile devices in an appropriate way. Ringway Primary School will take every opportunity to help parents understand these issues through, newsletters, letters, website, social media and information about national/local online safety campaigns/literature. Parents and carers will be encouraged to support the school in promoting good online safety practice and to follow guidelines on the appropriate use of:

- digital and video images taken at school events
- access to parents' sections of the website/Learning Platform and on-line student/pupil records
- their children's personal devices in the school (where this has been agreed with the Headteacher)

Community Users

Community Users who access school/academy systems or programmes as part of the wider school provision will be expected to sign a Community User AUA before being provided with access to school/academy systems. Community users will not be able to access school systems using any devices that are not set up to the school's monitoring system (Lightspeed MDM).

Policy Statements

Education – Pupils

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

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

- A planned online safety curriculum should be provided as part of Computing/PHSE/other lessons and should be regularly revisited
- Key online safety messages should be reinforced as part of a planned programme of assemblies and pastoral activities
- Pupils should be taught in all lessons to be critically aware of the materials/content they access on-line and be guided to validate the accuracy of information.
- Pupils should be taught to acknowledge the source of information used and to respect copyright when using material accessed on the internet

- Pupils should be supported in building resilience to radicalisation by providing a safe environment for debating controversial issues and helping them to understand how they can influence and participate in decision-making.
- Pupils should be helped to understand the need for the Pupil acceptable use agreement and encouraged to adopt safe and responsible use both within and outside school/academy.
- 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 students/pupils should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches.
- Where students/pupils are allowed to freely search the internet, staff should be vigilant in monitoring the content of the websites the young people visit.

Education – Parents/carers

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

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

- Curriculum activities
- Letters, newsletters, web site, Class Dojo and Parent Pay
- Parents/carers evenings/sessions
- High profile events/campaigns e.g. Safer Internet Day
- Reference to the relevant web sites/publications on school website

Education & Training – Staff/Volunteers

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

- A planned programme of formal online safety training will be made available to staff. This will be regularly updated and reinforced. An audit of the online safety training needs of all staff will be carried out regularly.
- All new staff should receive online safety training as part of their induction programme, ensuring that they fully understand the school/academy online safety policy and acceptable use agreements.
- The Online Safety Lead will receive regular updates through attendance at external training events (e.g. from LA or 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/training sessions.
- The Online Safety Lead will provide advice/guidance/training to individuals as required.

Training – Governors/Directors

Governors should take part in online safety training/awareness sessions, with particular importance for those who are members of any 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 or another relevelant oragnisation.
- Participation in school/academy training/information sessions for staff or parents (this may include Learning Walks or attendance at assemblies/lessons).

Technical – infrastructure/equipment, filtering and monitoring

- School technical systems will be managed in ways that ensure that the school meets recommended technical requirements (There will be regular reviews and audits of the safety and security of school technical systems
- Servers, wireless systems and cabling must be securely located and physical access restricted
- All users will have clearly defined access rights to school technical systems and devices.
- All users will be provided with a username and secure password by the Online Safety Lead who will keep an up to date record of users and their usernames. Users are responsible for the security of their username and password.
- The "administrator" passwords for the school systems, used by the Network Manager (or other person) must also be available to the Headteacher or other nominated senior leader and kept in a secure place (e.g. school safe)
- Internet access is filtered for all users. Illegal content is filtered by the broadband or filtering provider by actively employing the Internet Watch Foundation CAIC list.
- Internet filtering/monitoring should ensure that children are safe from terrorist and extremist material when accessing the internet.
- The school has provided enhanced/differentiated user-level filtering (allowing different filtering levels for different ages/stages and different groups of users – staff/pupils/students etc)
- 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 for users to report any actual/potential technical incident/security breach to the relevant person, as agreed).
- Appropriate security measures are in place to protect the servers, firewalls, routers, wireless systems, work stations, mobile devices, etc. from accidental or malicious attempts which might threaten the security of the school systems and data. These are tested regularly. The school infrastructure and individual devices are protected by up to date virus software.
- An agreed policy is in place for the provision of temporary access of "guests" (e.g. trainee teachers, supply teachers, visitors) onto the school systems. All visitors are al;located a 'guest' log in and they sign an Acceptable Use agreement.

Mobile Technologies

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

All users should understand that the primary purpose of the use mobile/personal devices in a school context is educational. The mobile technologies policy should be consistent with and inter-related to other relevant school polices including but not limited to the safeguarding policy, behaviour policy, bullying policy, acceptable use policy, and policies around theft or malicious damage. Teaching about the safe and appropriate use of mobile technologies should be an integral part of the school's online safety education programme.

Use of digital and video images

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

- When using digital images, staff should inform and educate students/pupils about the risks associated with the taking, use, sharing, publication and distribution of images. In particular they should recognise the risks attached to publishing their own images on the internet e.g. on social networking sites.
- Written permission from parents or carers will be obtained before photographs of students/pupils are published on the school website/social media/local press.
- In accordance with guidance from the Information Commissioner's Office, parents/carers are welcome to take videos and digital images of their children at school events for their own personal use (as such use 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.
- Staff and volunteers are allowed to take digital/video images to support educational aims, but must follow school policies concerning the sharing, distribution and publication of those images. Those images should only be taken on school equipment; the personal equipment of staff should not be used for such purposes.
- Care should be taken when taking digital/video images that pupils are appropriately dressed and are not participating in activities that might bring the individuals or the school into disrepute.
- Pupils must not take, use, share, publish or distribute images of others without their permission
- Photographs published on the website, or elsewhere that include pupils will be selected carefully and will comply with good practice guidance on the use of such images.
- Pupils' full names will not be used anywhere on a website or social media platform, particularly in association with photographs.
- Pupil's work can only be published with the permission of the student/pupil and parents or carers.

Data Protection

Personal data will be recorded, processed, transferred and made available according to the current data protection legislation.

Ringway Primary School ensures that:

- it has appointed an appropriate Data Protection Officer (DPO) who has a high level of understanding of data protection law and is free from any conflict of interest.

- that there is an 'information asset register' in place and knows exactly what personal data it holds, where this data is held, why and which member of staff has responsibility for managing it
- the information asset register records the lawful basis for processing personal data (including, where relevant, how consent was obtained and refreshed).
- it will hold only 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. The school 'retention policy" is followed to ensure there are clear and understood policies and routines for the deletion and disposal of data to support this. personal data held must be accurate and up to date where this is necessary for the purpose it is processed for. Have systems in place to identify inaccuracies, such as asking parents to check emergency contact details annually.
- it provides information about how the school looks after their data and what their rights are in a clear Privacy Notice. This can be found on the school website and is updated regularly.
- procedures must be in place to deal with the individual rights of the data subject, e.g. one of the 8 data subject rights applicable is that of Subject Access which enables an individual to see to have a copy of the personal data held about them (subject to certain exceptions which may apply).
- IT system security is ensured and regularly checked. Patches and other security essential updates are applied promptly to protect the personal data on the systems. Administrative systems are securely ring fenced from systems accessible in the classroom/to learners
- it understands how to share data lawfully and safely with other relevant data controllers.
- it reports any relevant breaches to the Information Commissioner within 72hrs of becoming aware of the breach in accordance with UK data protection law. It also reports relevant breaches to the individuals affected as required by law. In order to do this, it has a policy for reporting, logging, managing, investigating and learning from information risk incidents.
- all staff receive data protection training at induction and appropriate refresher training thereafter. Staff undertaking particular data protection functions, such as handling requests under the individual's rights, will receive training appropriate for their function as well as the core training provided to all staff.

When personal data is stored on any mobile device or removable media the:

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

Staff must ensure that they:

- at all times take care to ensure the safe keeping of personal data, minimising the risk of its loss or misuse

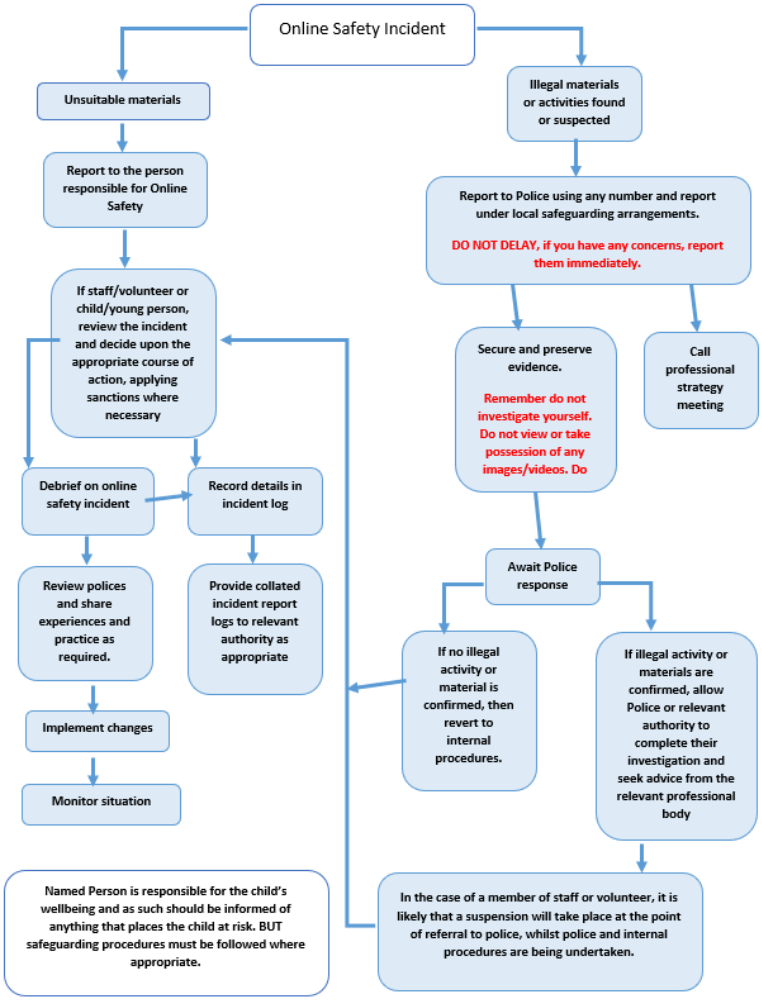
- can recognise a possible breach, understand the need for urgency and know who to report it to within the school
- can help data subjects understands their rights and know how to handle a request whether verbal or written. Know who to pass it to in the school
- where personal data is stored or transferred on mobile or other devices (including USBs) these must be encrypted and password protected.
- will not transfer any school personal data to personal devices except as in line with school policy
- access personal data sources and records only on secure password protected computers and other devices, ensuring that they are properly "logged-off" at the end of any session in which they are using personal data

Dealing with 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/academy and all other technical systems. Other activities e.g. cyber-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/academy context, either because of the age of the users or the nature of those activities.

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
Report to the person responsible for Online Safety
If staff/volunteer or child/young person, review the incident and decide upon the appropriate course of action, applying sanctions where necessary
Debrief on online safety incident
Record details in incident log
Review polices and share experiences and practice as required.
Provide collated incident report logs to relevant authority as appropriate
Implement changes
Monitor situation
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.
Illegal materials or activities found or suspected
Report to Police using any number and report under local safeguarding arrangements.
DO NOT DELAY, if you have any concerns, report them immediately.
Secure and preserve evidence.
Remember do not investigate yourself. Do not view or take possession of any images/videos. Do
Call professional strategy meeting
Await Police response
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
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, whilst police and internal procedures are being undertaken.

Other Incidents

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

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

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

School actions & sanctions

It is 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.

Cyber-bullying

Definition of Cyber-bullying

Cyber-bullying is an aggressive, intentional act carried out by a group or individual using electronic forms of contact repeatedly over time against a victim who cannot easily defend himself/herself. By cyber-bullying, we mean bullying by electronic media:

- Bullying by texts or messages or calls on mobile phones.
- The use of mobile phone cameras to cause distress, fear or humiliation.
- Posting threatening, abusive, defamatory or humiliating material on websites, to include blogs, personal websites, social networking sites.
- Using e-mail to message others.
- Hijacking/cloning e-mail accounts.
- Making threatening, abusive, defamatory or humiliating remarks in chat rooms.

Cyber-bullying is generally criminal in character. The law applies to cyberspace.

- It is unlawful to disseminate defamatory information in any media including internet sites.
- Section 127 of the Communications Act 2003 makes it an offence to send, by public means of a public electronic communications network, a message or other matter that is grossly offensive or one of an indecent, obscene or menacing character.
- The Protection from Harassment Act 1997 makes it an offence to knowingly pursue any course of conduct amounting to harassment.

Ringway Primary educates its pupils both in the proper use of telecommunications and about the serious consequences of cyber-bullying and will, through PSHE and in ICT lessons and assemblies, continue to inform and educate its pupils in these fast changing areas.

Ringway Primary trains its staff to respond effectively to reports of cyber-bullying or harassment and has systems in place to respond to it. Ringway Primary endeavours to block access to inappropriate web sites, using firewalls, antivirus protection and filtering systems and no pupil is allowed to work on the internet without a member of staff present. Where appropriate and responsible, Ringway Primary audits ICT communications and regularly reviews the security arrangements in place.

Whilst education and guidance remain at the heart of what we do, Ringway Primary reserves the right to take action against those who take part in cyber-bullying.

- All bullying is damaging but cyber-bullying and harassment can be invasive of privacy at all times. These acts may also be criminal acts.
- Ringway Primary supports victims and, when necessary, will work with the Police to detect those involved in criminal acts.
- Ringway Primary will use, as appropriate, the full range of sanctions to correct, punish or remove pupils who bully fellow pupils or harass staff in this way, both in or out of school.
- Ringway Primary will use its power of confiscation where necessary to prevent pupils from committing crimes or misusing equipment.
- All members of the School community are aware they have a duty to bring to the attention of the Head any example of cyber-bullying or harassment that they know about or suspect.