



Online Safety Policy

2024-2025

Adopted by Greenmount Primary School governing body on
15th November 2023

To be reviewed by governors in November 2024



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Online Safety Policy

Greenmount Primary School

Policy Introduction

Technology is an important and essential part of the learning experience at Greenmount Primary School. We are committed to ensuring that our children leave with the skills and knowledge that will help them to thrive in our digital age. We have laptops and iPads available to every year group and their use are planned to be part of everyday research and use. The teachers use the internet daily with the children. It is therefore also vital that we teach children how to use this valuable resource safely.

This policy will appreciate that all children have access to smart phones, tablets and computers at home and within school. It promotes the use of these technologies whilst committing to keeping our children aware of and safe from the potential risks. We will demonstrate that we have provided the necessary safeguards to help ensure that we have done everything that could reasonably be expected of us to manage and reduce these risks. The e-safeguarding policy that follows explains how we intend to do this, while also addressing wider educational issues in order to help young people, their parents / carers and all staff to be responsible users and stay safe while using the internet and other communications technologies for educational and personal use.

This policy is to be used in conjunction with;

- Acceptable Use Policy for staff/volunteers
- Acceptable Use Policy for Children
- Computing Subject Policy
- Keeping Children Safe in Education
- Behaviour and Relationships Policy
- Anti-Bullying Policy
- Safeguarding and Child Protection Policy

Development/Monitoring/Review of this Policy

This online safety policy has been developed by the Computing Lead, Designated members of staff and the Senior Leadership Team. It was shared with governors on 15th November 2023. It is available for Parents/Carers on our school website.

Schedule for Development/Monitoring/Review

This online safety policy was approved by the Governors on	15 th November 2023
The implementation of this online safety policy will be monitored by the:	Online Safety Lead – Alison Randall Computing Lead-Kim Devlin Senior Leadership Team
The Governors will receive a report on the implementation of the online safety policy (which will include anonymous details of online safety incidents) at regular intervals:	Termly as part of the Headteachers report.
The online safety policy will be reviewed annually, or more regularly in the light of any significant new developments in the use of the technologies, new threats to online safety or incidents that have taken place. The next anticipated review date will be:	October 2024
Should serious online safety incidents take place, the following external persons/agencies should be informed:	Advice sought from Leeds Safeguarding Team- 0113 3789685 We will follow our safeguarding procedures and may involve Children's services, LADO, Police

The school will monitor the impact of the policy using:

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

Scope of the Policy

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

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

Roles and Responsibilities:

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 Governors receiving regular information about online safety incidents and monitoring reports.

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 – included in a later section – “Responding to incidents of misuse” and relevant Local Authority disciplinary procedures).
- 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 Senior Leadership Team will receive regular monitoring reports from the Online Safety Lead.

The 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,
- attends relevant meetings of Governors
- reports regularly to the Headteacher and Senior Leadership Team

Network Manager/Technical staff

Greenmount Primary Technical Support: Eddie Harry (Senior IT Specialist) and Billy Loxton, School ICT Support 0345 2226802

Those with technical responsibilities are responsible for ensuring:

- Greenmount's technical infrastructure is secure and is not open to misuse or malicious attack
- that Greenmount meets required online safety technical requirements and any Local Authority online safety policy/guidance that may apply.
- the filtering policy is applied and updated on a regular basis and that its implementation is not the sole responsibility of any single person (see appendix "Technical Security Policy Template" for good practice)
- that they keep up to date with online safety technical information in order to effectively carry out their online safety role and to inform and update others as relevant
- that the use of online technologies is regularly monitored in order that any misuse/attempted misuse can be reported to the Headteacher, Senior Leaders and Online Safety Lead for investigation/action/sanction
- that monitoring software/systems are implemented and updated as agreed in school policies.
- Updating and educating staff regularly on the importance of security and vigilance when using online systems.

Teaching and Support Staff

Are responsible for ensuring that:

- they have an up to date awareness of online safety matters and of the current school online safety policy and practices
- they have read, understood and signed the staff acceptable use policy (AUP)
- they report any suspected misuse or problem to the Headteacher, Senior Leadership team and/or Online Safety Lead for investigation
- 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 (see child friendly AUP)
- 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 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 pupil acceptable use agreement (see child friendly AUP, should be visible in each classroom)
- 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 online safety policy covers their actions out of school, if related to their membership of the school

Parents/carers

Parents/carers play a crucial role in ensuring that their children understand the need to use the internet/mobile devices in an appropriate way. The school will take every opportunity to help parents understand these issues through parents' day, newsletters, letters, website, social media and information about national online safety 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 school website

Policy Statements

Education – Students/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.

In planning their online safety curriculum schools can refer to:

- DfE Teaching Online Safety in Schools
- Education for a Connected World Framework
- SWGfL Project Evolve – online safety curriculum programme and resources

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. N.B. additional duties for schools/academies under the Counter Terrorism and Securities Act 2015 which requires schools to ensure that children are safe from terrorist and extremist material on the internet.
- Pupils should be helped to understand the need for the pupil acceptable use agreement and encouraged to adopt safe and responsible use both within and outside school.
- Staff should act as good role models in their use of digital technologies, the internet and mobile devices.
- In lessons where internet use is pre-planned, it is best practice that pupils should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches.
- Where pupils are allowed to freely search the internet, staff should be vigilant in monitoring the content of the websites the young people visit.
- It is accepted that from time to time, for good educational reasons, pupils may need to research topics (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 relevant designated person) can temporarily remove those sites from the filtered list for the period of study. Any request to do so, should be auditable, with clear reasons for the need.

Education – Parents/carers

Parents and carers 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, website
- Parents/carers meetings/sessions and workshops
- High profile events/campaigns e.g. Safer Internet Day
- Reference to the relevant web sites/publications e.g. [swgfl.org.uk](http://www.swgfl.org.uk), www.saferinternet.org.uk/, <http://www.childnet.com/parents-and-carers>

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:

- It is a statutory requirement that all staff complete online safety training. The school will access online safety and links to child protection training provided by the Leeds Education and Safeguarding team and will renew training every three years. All new staff will receive online safety training as part of their induction, ensuring that they fully understand the school online

safety policy and acceptable use agreements. [Online Safety BOOST includes an array of presentations and resources that can be presented to new staff](https://boost.swgfl.org.uk/) (<https://boost.swgfl.org.uk/>)

- It is expected that some staff will identify online safety as a training need within the performance management process.
- The Online Safety Lead and Computing Lead will receive regular updates through attendance at external training events (e.g. from 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/training sessions.
- The Online Safety Lead and Computing Lead will provide advice/guidance/training to individuals as required. [Online Safety BOOST includes an array of presentation resources that the Online Safety coordinator can access to deliver to staff](https://boost.swgfl.org.uk/) <https://boost.swgfl.org.uk/>

Training – Governors

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/National Governors Association/or other relevant organisation (e.g. SWGfL).
- Participation in school training/information sessions for staff or parents (this may include attendance at assemblies/lessons).

Technical – infrastructure/equipment, filtering and monitoring

The school is responsible for ensuring that the school infrastructure 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 named in the above sections will be effective in carrying out their online safety responsibilities:

A more detailed Technical Security Template Policy can be found in the appendix.

- 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 Eddie Harry or Billy Loxton (School ICT) who will keep an up to date record of users and their usernames (this will also be shared with Computing subject lead). 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 these are kept in an online content manager.
- The Computing subject lead 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 is filtered by the broadband 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 (see appendix for more details).

- Internet filtering/monitoring ensures that children are safe from terrorist and extremist material when accessing the internet. (N.B. additional duties for schools/academies under the Counter Terrorism and Securities Act 2015 which requires schools/academies to ensure that children are safe from terrorist and extremist material on the internet. (see appendix for information on “appropriate filtering”).)
- The school has enhanced/differentiated user-level filtering, allowing different filtering levels for staff and students.
- An appropriate system is in place for users to report any actual/potential technical incident/security breach to the relevant person.
- 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. 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 – they will be given guest account details to access our internet only.
- Supply teachers and trainee teachers are given an account access our school network and resources.
- An agreed policy is in place regarding the extent of personal use that users (staff/students/pupils/community users) and their family members are allowed on school devices that may be used out of school.
- An agreed policy is in place that allows staff to/forbids staff from downloading executable files and installing programmes on school devices.
- An agreed policy is in place regarding the use of removable media (e.g. memory sticks/CDs/DVDs) by users on school devices. Personal data cannot be sent over the internet or taken off the school site unless safely encrypted or otherwise secured. (see School Personal Data Policy Template in the appendix for further detail)

Mobile Technologies (including ‘Bring Your Own Device’)

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 policies including but not limited to the safeguarding policy, behaviour policy, bullying policy, acceptable use policy,

- **The school acceptable use agreements for staff, pupils/students and parents/carers will give consideration to the use of mobile technologies**

- **The school allows:**

	School Devices			Personal Devices		
	School owned for single user	School owned for multiple users	Authorised device ¹	Student owned	Staff owned	Visitor owned
Allowed in school	Yes	Yes	Yes	*No	Yes	Yes
Full network access	Yes	Yes	Yes	No	No	No
Internet only				No	Yes	No
No network access				Yes	Yes	Yes

- *Children in Year 6 may bring a mobile phone if they are walking home alone. In such cases they must be brought to the school office and placed in a locked drawer.*

Use of digital and video images

The development of digital imaging technologies has created significant benefits to learning, allowing staff and pupils instant use of images that they have recorded themselves or downloaded from the internet. However, staff, parents/carers and pupils need to be aware of the risks associated with publishing digital images on the internet. Such images may provide avenues for 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.
- 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 is not covered by the Data Protection Act). To respect everyone's privacy and in some cases protection, these images should not be published/made publicly available on social networking sites, nor should parents/carers comment on any activities involving other pupils in the digital/video images.
- 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.

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.

- 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 students/pupils will be selected carefully and will comply with good practice guidance on the use of such images.
- Pupils' full names will not be used anywhere on a website or blog, particularly in association with photographs.
- Pupil's work can only be published with the permission of the pupil and parents or carers.

Data Protection

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

The school must ensure that:

- it has a Data Protection Policy.
- it implements the data protection principles and is able to demonstrate that it does so through use of policies, notices and records.
- it has paid the appropriate fee Information Commissioner's Office (ICO) and included details of the Data Protection Officer (DPO).
- it has appointed an appropriate Data Protection Officer (DPO) who has a high level of understanding of data protection law and is free from any conflict of interest. The school/academy may also wish to appoint a Data Manager and Systems Controllers to support the DPO
- it has an 'information asset register' in place and knows exactly what personal data it holds, where this data is held, why and which member of staff has responsibility for managing it
- the information asset register records the lawful basis for processing personal data (including, where relevant, how consent was obtained and refreshed). Where special category data is processed, an additional lawful basis will have also been recorded
- it will hold only the minimum personal data necessary to enable it to perform its function and it will not hold it for longer than necessary for the purposes it was collected for. The school should develop and implement a 'retention policy' to ensure there are clear and understood policies and routines for the deletion and disposal of data to support this. personal data held must be accurate and up to date where this is necessary for the purpose it is processed for. Have systems in place to identify inaccuracies, such as asking parents to check emergency contact details at suitable intervals
- it provides staff, parents, volunteers, teenagers and older children with information about how the school looks after their data and what their rights are in a clear Privacy Notice (see Privacy Notice section in the appendix)
- 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).

- data Protection Impact Assessments (DPIA) are carried out where necessary. For example, to ensure protection of personal data when accessed using any remote access solutions, or entering into a relationship with a new supplier (this may also require ensuring that data processing clauses are included in the supply contract or as an addendum)
- 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 has undertaken appropriate due diligence and has required data processing clauses in contracts in place with any data processors where personal data is processed.
- it understands how to share data lawfully and safely with other relevant data controllers.
- it [reports any relevant breaches to the Information Commissioner](#) within 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.
- If a maintained school, it must have a Freedom of Information Policy which sets out how it will deal with FOI requests.
- all staff receive data protection training at induction and appropriate refresher training thereafter. Staff undertaking particular data protection functions, such as handling 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

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:

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

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

- The official school email service may be regarded as safe and secure and is monitored. Users should be aware that email communications are monitored. Staff and pupils should therefore use only the school email service to communicate with others when in school, or on school systems (e.g. by remote access).
- Users must immediately report, to the nominated person – in accordance with the school policy, the receipt of any communication that makes them feel uncomfortable, is offensive, discriminatory, threatening or bullying in nature and must not respond to any such communication.
- Any digital communication between staff and pupils or parents/carers (email, social media, chat, blogs, VLE etc) must be professional in tone and content. These communications may only take place on official (monitored) school systems. Personal email addresses, text messaging or social media must not be used for these communications.
- Whole class email addresses may be used at KS1, while students/pupils at KS2 and above will be provided with individual school/academy email addresses for educational use.
- Pupils should be taught about online safety issues, such as the risks attached to the sharing of personal details. They should also be taught strategies to deal with inappropriate communications and be reminded of the need to communicate appropriately when using digital technologies.
- Personal information should not be posted on the school website and only official email addresses should be used to identify members of staff.

Social Media - Protecting Professional Identity

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

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

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

School staff should ensure that:

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

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

- A process for approval by senior leaders

- Clear processes for the administration and monitoring of these accounts – involving at least two members of staff
- A code of behaviour for users of the accounts, including
- Systems for reporting and dealing with abuse and misuse
- Understanding of how incidents may be dealt with under school/academy disciplinary procedures

Personal Use:

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

Monitoring of Public Social Media:

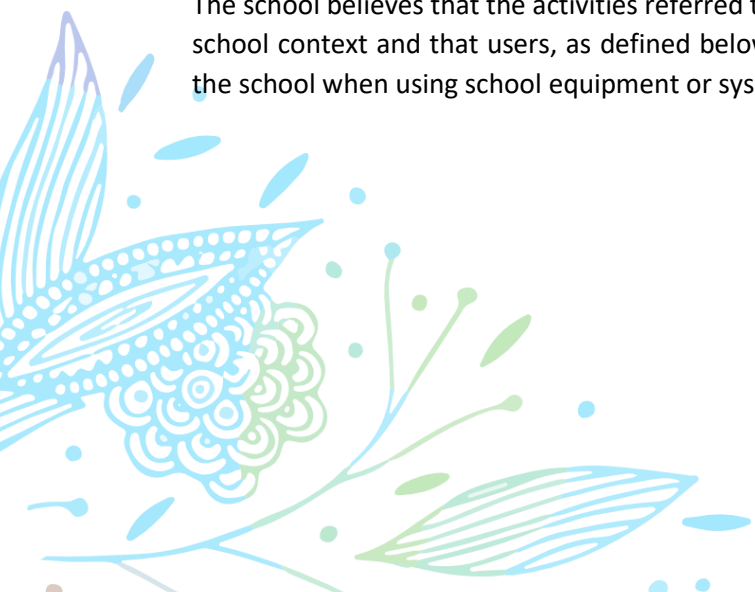
- As part of active social media engagement, it is considered good practice to pro-actively monitor the Internet for public postings about the school
- The school should effectively respond to social media comments made by others according to a defined policy or process

The school's use of social media for professional purposes will be checked regularly by the Online Safety Lead to ensure compliance with the school policies. [Online Safety BOOST includes Reputation Alerts that highlight any reference to the school/academy in online media \(newspaper or social media for example\) https://boost.swgfl.org.uk/](https://boost.swgfl.org.uk/)

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 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 context, either because of the age of the users or the nature of those activities.

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



User Actions		Acceptable	Acceptable at certain times	Acceptable for nominated users	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
	N.B. Schools/academies should refer to guidance about dealing with self-generated images/sexting – UKSIC Responding to and managing sexting incidents and UKCIS – Sexting in schools and colleges					
	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	
Activities that might be classed as cyber-crime under the Computer Misuse Act:	Promotion of extremism or terrorism				X	
	Any other information which may be offensive to colleagues or breaches the integrity of the ethos of the school or brings the school into disrepute				X	
	<ul style="list-style-type: none"> Gaining unauthorised access to school networks, data and files, through the use of computers/devices Creating or propagating computer viruses or other harmful files 					X

<ul style="list-style-type: none"> Revealing or publicising confidential or proprietary information (e.g. financial / personal information, databases, computer / network access codes and passwords) Disable/Impair/Disrupt network functionality through the use of computers/devices Using penetration testing equipment (without relevant permission) 					
Using systems, applications, websites or other mechanisms that bypass the filtering or other safeguards employed by the school/academy				X	
Revealing or publicising confidential or proprietary information (e.g. financial/personal information, databases, computer/network access codes and passwords)				X	
Unfair usage (downloading/uploading large files that hinders others in their use of the internet)				X	
Using school systems to run a private business				X	
Infringing copyright				X	
On-line gaming (educational)		x			
On-line gaming (non-educational)				X	
On-line gambling				X	
On-line shopping/commerce			X		
File sharing			X		,
Use of social media			X		
Use of messaging apps				X	
Use of video broadcasting e.g. Youtube			x		

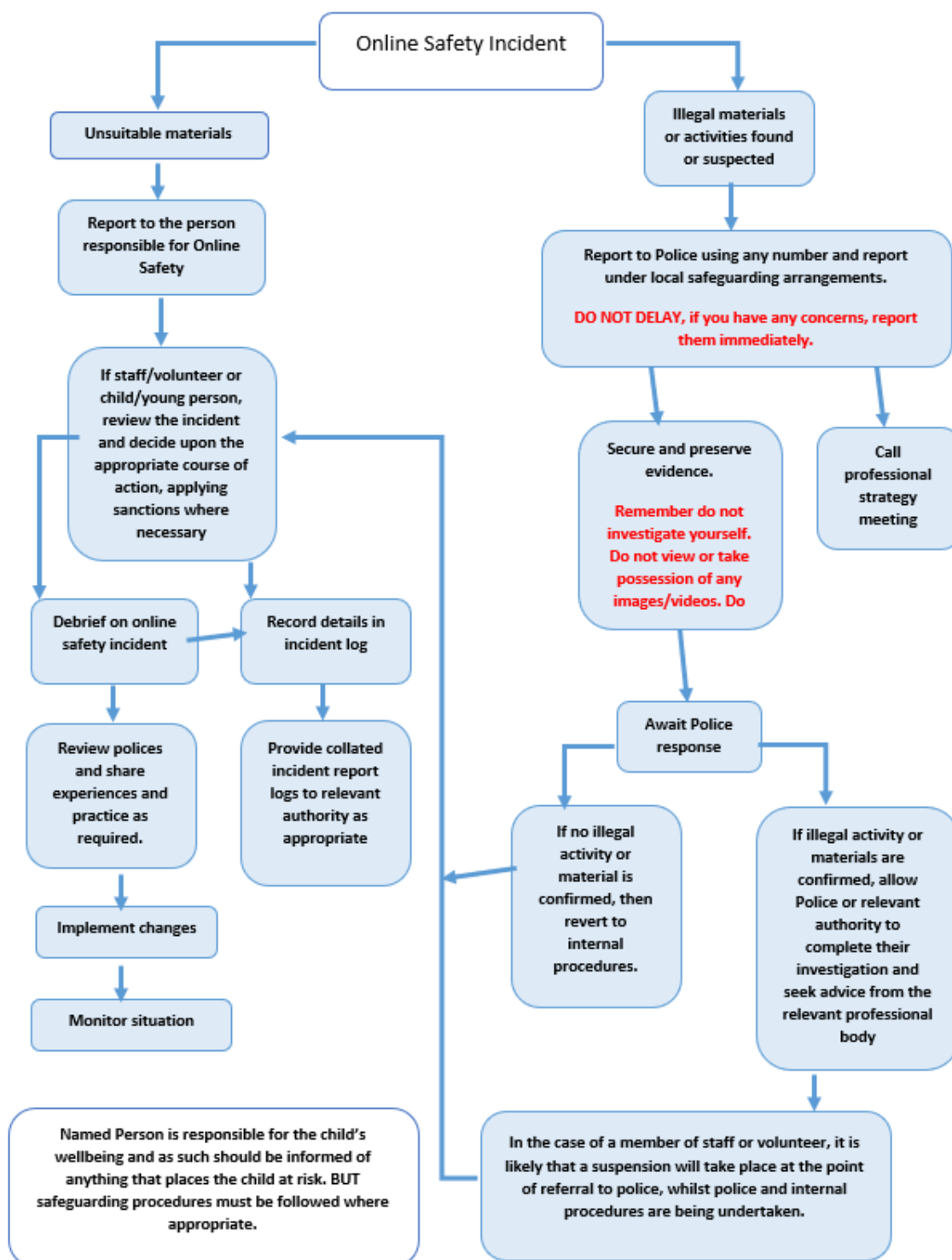
Responding to incidents of misuse

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.



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 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 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 & consequences

It is more likely that the school will need to deal with incidents that involve inappropriate rather than illegal misuse. It is important that any incidents are dealt with as soon as possible in a proportionate manner, and that members of the school community are aware that incidents have been dealt with. It is intended that incidents of misuse will be dealt with through normal behaviour/disciplinary procedures and may include the following actions and consequences;

Pupils Incidents	Refer to class teacher	Refer to Headteacher and Designated staff	Refer to Police	Refer to technical support staff for action re filtering/security etc.	Warning	Further sanction- refer to behaviour policy
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	x	x
Unauthorised/inappropriate use of mobile phone/digital camera/other mobile device- this could be outside of school.	x	x				
Unauthorised/inappropriate use of social media/ messaging apps/personal email- this could be outside of school.	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 pupil's account	x			x	x	
Attempting to access or accessing the school using the account of a member of staff	x	x			x	x
Corrupting or destroying the data of other users	x	x				
Sending an email, text or message that is regarded as offensive, harassment or of a bullying nature	x	x				x

Continued infringements of the above, following previous warnings or sanctions	x	x		x	x	x
Actions which could bring the school/academy into disrepute or breach the integrity of the ethos of the school	x	x		x	x	x
Deliberately accessing or trying to access offensive or pornographic material	x	x			x	x

	Refer to Local Authority/HR	Refer to Police	Refer to Technical Support Staff for action re filtering etc.	Warning	Disciplinary action
Staff Incidents					
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		
Allowing others to access school network by sharing username and passwords or attempting to access or accessing the school network, using another person's account	x		x	x	x
Careless use of personal data e.g. holding or transferring data in an insecure manner	x				
Deliberate actions to breach data protection or network security rules	x				
Corrupting or destroying the data of other users or causing deliberate damage to hardware or software	x				
Sending an email, text or message that is regarded as offensive, harassment or of a bullying nature	x			x	x

Using personal email/social networking/instant messaging/text messaging to carrying out digital communications with pupils	X			x	X
Actions which could compromise the staff member's professional standing	x			x	x
Actions which could bring the school into disrepute or breach the integrity of the ethos of the school	x			x	x
Using proxy sites or other means to subvert the school's filtering system	x		x		
Deliberately accessing or trying to access offensive or pornographic material	x				x
Breaching copyright or licensing regulations					x
Continued infringements of the above, following previous warnings or sanctions	x	x	x	x	x



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KS2 Acceptable Use Policy

Staying safe whilst using the computer

To help me stay safe on the computer/laptop...



I will ask permission before using the Internet and use it for a specific purpose.



I will never share my personal details, such as my full name or address, with people I don't know.



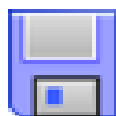
I will never share my password with anyone.



I will never meet up with someone I have met on the Internet.



I will always check my messages are polite before I send them.



I will not reply to a message that isn't kind, but I will save it and show it to an adult.



I will not open or download a file unless I am sure it is safe.



I know I should not believe everything I read on the Internet.



I will always tell an adult if something on the Internet makes me or my friends unhappy.



An Adventure in Learning

Greenmount
Primary School,
Lodge Lane,
Beecham, Leeds

KS1 Acceptable Use Policy

Staying safe whilst using the computer



To help me stay safe on the computer/laptop...



I will only use a computer when an adult tells me I can.



I will keep my password safe and not share it with anyone.



I will always send polite messages.



I will tell an adult if I see something on the computer that makes me unhappy.



EYFS Acceptable Use Policy

Staying safe whilst using the computer or laptop



To help me stay safe on the computer or laptop...



I will only use a computer when an adult tells me I can.



I will tell an adult if I see something on the computer that makes me unhappy.

Please click on link to access the online PDF version of the Greenmount Primary Staff Acceptable Use policy.

[Staff Acceptable use of ICT policy 2023-24.docx](#)



School Technical Security Policy Template (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/network* 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's policies).
- access to personal data is securely controlled in line with the school's 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 is oversight from senior leaders and these have impact on policy and practice.

Policy statements

The school will be responsible for ensuring that their 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 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/academy systems and data
- responsibilities for the management of technical security are clearly assigned to appropriate and well trained staff (this may be at school/academy, local authority or managed provider level)
- all users will have clearly defined access rights to school technical systems. *Details of the access rights available to groups of users will be recorded by the network manager/technical staff/other person and will be reviewed, at least annually, by the online safety group.*
- 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 (*see password section below*)
- The computing lead 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 (Inadequate licencing could cause the school/academy to breach the Copyright Act which could result in fines or unexpected licensing costs)
- an agreed policy is in place (to be described) for the provision of temporary access of "guests", (e.g. trainee teachers, supply teachers, visitors) onto the school/academy system- a guest login and password are given.
- 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. (see school/academy personal data policy template in the appendix for further detail)

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). You can find out more about passwords, why they are important and how to manage them in our blog article. You may wish to share this with staff members to help explain the significance of passwords as this is helpful in explaining why they are necessary and important. Where sensitive data is in use – particularly when accessed on mobile devices – schools/academies may wish to use more secure forms of authentication e.g. two factor authentication.

Further guidance can be found from the [National Cyber Security Centre](#) and [SWGfL "Why password security is important"](#)

Policy Statements:

- These statements apply to all users.
- All school networks and systems will be protected by secure passwords.
- All users have clearly defined access rights to school/academy 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 users (adults and students/pupils) 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.
- Passwords must not be shared with anyone.
- All users will be provided with a username and password by Eddie Harry (ICT technician) (see section on password generation in technical notes) who will keep an up to date record of users and their usernames.

Password requirements:

- Staff passwords should be long. Good practice highlights that passwords over 12 characters in length are considerably more difficult to compromise than shorter passwords. Passwords generated by using a combination of unconnected words that are over 16 characters long are extremely difficult to crack. Password length trumps any other special requirements such as uppercase/lowercase letters, number and special characters. Passwords should be easy to remember, but difficult to guess or crack.
- 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/academy
- Passwords must not include names or any other personal information about the user that might be known by others
- **Learner passwords:**
- Records of learner usernames and passwords for foundation phase pupils can be kept in an electronic or paper-based form, but they must be securely kept when not required by the user. *Password complexity in foundation phase should be reduced (for example 6-character maximum) and should not include special characters. Where external systems have different password requirements the use of random words or sentences should be encouraged.*
- Password requirements for students/pupils at Key Stage 2 and above should increase as students'/pupils progress through school
- Users will be required to change their password if it is compromised.
- Students/pupils will be taught the importance of password security, this should include how passwords are compromised, and why these password rules are important.

Notes for technical staff

- An administrator account password for the school systems should also be kept in a secure place e.g. school safe. This account and password should only be used to recover or revoke access. Other administrator accounts should not have the ability to delete this account. (A school/academy should never allow one user to have sole administrator access)

- Any digitally stored administrator passwords should be hashed using a suitable algorithm for storing passwords (e.g. Bcrypt or Scrypt). Message Digest algorithms such as MD5, SHA1, SHA256 etc. should not be used.
- It is good practice that where passwords are used there is a user-controlled password reset process to enable independent, but secure re-entry to the system. This ensures that only the owner has knowledge of the password.
- Where user-controlled reset is not possible, passwords for new users, and replacement passwords for existing users will be allocated by Eddie Harry (ICT Technician).
- Requests for password changes should be authenticated by (the responsible person) to ensure that the new password can only be passed to the genuine
- Passwords shall not be displayed on screen, and shall be securely hashed when stored (use of one-way encryption).

Training/Awareness:

Members of staff will be made aware of the school/academy's password policy:

- at induction
- through the school/academy's online safety policy and password security policy
- through the acceptable use agreement

Students/pupils will be made aware of the school's/college's password policy:

- in lessons (the school/academy should describe how this will take place)
- through the acceptable use agreement

Audit/Monitoring/Reporting/Review:

The responsible person (insert title) will ensure that full records are kept of:

- User Ids and requests for password changes
- *User logons*
- *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 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's filtering policy will be held by Alison Randall (Designated Safeguarding Lead). 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 (schools should choose their relevant responses):

- be logged in change control logs by Eddie Harry (School ICT technician)
- *be reported to and authorised by Alison Randall (DSL) prior to changes being made*

All users have a responsibility to report immediately to the designated safeguarding lead 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 the broadband provider- 'School Broadband' 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. The monitoring process alerts the school 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.

- *The school maintains and supports the managed filtering service provided by the Internet Service Provider- 'Schools Broadband'.*
- *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.)*
- *In the event of the technical staff needing to switch off the filtering for any reason, or for any user, this must be logged and carried out by a process that is agreed by the Headteacher and Designated Safeguarding Lead..*
- *Any filtering issues will be reported immediately to the filtering provider by the school reporting first to SchoolICT for further support and advice.*
- *Requests from staff for sites to be removed from the filtered list will be considered by the technical staff- Eddie Harry (N.B. an additional person should be nominated – to ensure protection for the Network Manager or any other member of staff, should any issues arise re unfiltered access). In conjunction with the designated safeguarding lead- Alison Randall. If the request is agreed, this action will be recorded.*

Education/Training/Awareness

Pupils will be made aware of the importance of filtering systems through online safety lessons. 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
- induction training
- staff meetings, briefings, Inset.

Parents will be informed of the school's filtering policy through online safety awareness sessions/newsletters and the Online Safety Policy on the school website.

Changes to the Filtering System

Users who gain access to, or have knowledge of others being able to access, sites which they feel should be filtered should report this in the first instance to Alison Randall who will discuss with Eddie Harry (ICT school technician) to decide if to give whole school/differentiated access.

Monitoring

No filtering system can guarantee 100% protection against access to unsuitable sites. The filtering system logs all denied access to sites and these are sent via email to designated staff who monitor. All concerns are logged on CPOMS and actioned as appropriate. The designated safeguarding lead will test the filtering system at least half termly through a guest pupil account and keep a log of when this has been carried out. All pupils must login with their own login and password. Staff are vigilant throughout lessons to ensure pupils are accessing appropriate materials online.

Further Guidance

Schools/academies may wish to seek further guidance. The following is recommended:

Schools in England (and Wales) are required *“to ensure children are safe from terrorist and extremist material when accessing the internet in school, including by establishing appropriate levels of filtering”* (Revised Prevent Duty Guidance: for England and Wales, 2015).

The Department for Education ‘Keeping Children Safe in Education’ requires schools to: *“ensure appropriate filters and appropriate monitoring systems are in place. Children should not be able to access harmful or inappropriate material from the school or colleges IT system”* however, schools will need to *“be careful that “over blocking” does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.”*

In response UKSIC produced guidance on – information on “Appropriate Filtering”

Somerset Guidance for schools – questions for technical support – this checklist is particularly useful where a school/academy uses external providers for its technical support/security.

SWGfL provides a site for schools to test their filtering to ensure that illegal materials cannot be accessed: SWGfL Test Filtering



School Personal Data Advice and Guidance

Data Protection Law – A Legislative Context

With effect from 25th May 2018, the data protection arrangements for the UK changed following the implementation of the European Union General Data Protection Regulation (GDPR). This represented a significant shift in legislation and in conjunction with the Data Protection Act 2018 replaced the Data Protection Act 1998.

GDPR - As a European Regulation, the GDPR has direct effect in UK law and automatically applies in the UK until we leave the EU (or until the end of any agreed transition period, if we leave with a deal). After this date, it will form part of UK law under the European Union (Withdrawal) Act 2018, with some technical changes to make it work effectively in a UK context.

Data Protection Act 2018 – this Act sits alongside the GDPR, and tailors how the GDPR applies in the UK and provides the UK-specific details such as; how to handle education and safeguarding information.

No Deal Brexit -The Information Commissioner advises that in the event of a no- deal Brexit it is anticipated that the Government of the day will pass legislation to incorporate GDPR into UK law alongside the DPA 2018. Unless your school/academy receives personal data from contacts in the EU there will be little change save to update references to the effective legislation in privacy notices etc.

In this document the term “Data Protection Law” refers to the legislation applicable to data protection and privacy as applicable in the UK from time to time.

Does the Data Protection Law apply to schools?

In short, yes. Any natural or legal person, public authority, agency or other body which processes personal data is considered a ‘data controller’.

A school/academy is, for the purposes of the Data Protection Law, a “public body” and further processes the **personal data** of numerous **data subjects** on a daily basis.

Personal data is information that relates to an identified or identifiable living individual (a data subject).

Guidance for schools/academies is available on the [Information Commissioner's Office](https://ico.org.uk/) (ICO) website including information about the Data Protection Law.

The ICO's powers are wide ranging in the event of non-compliance and schools/academies must be aware of the huge impact that a fine or investigation will have on finances and also in the wider community for example in terms of trust.

The Data Protection Law sets out that a data controller must ensure that personal data shall be:

- a) processed lawfully, fairly and in a transparent manner in relation to data subjects;
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical

research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the Data Protection Law in order to safeguard the rights and freedoms of data subjects; and

- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

These principles of the Data Protection Law drive the need for the school/academy to put in place appropriate **privacy notices** (to give a data subject information about the personal data processing activities, **legal basis of processing** and **data subject rights**) and policies (such as for reporting a breach, managing a data subject access request, training, retention etc.) to demonstrate compliance.

Data Mapping to identify personal data, data subjects and processing activities

The school/academy and its employees will collect and/ or process a wide range of information concerning numerous data subjects and some of this information will include personal data. Further, the school/academy may need to share some personal data with third parties. To be able to demonstrate and plan compliance and it is important that the school/academy has a **data map** of these activities; it can then make sure that the correct privacy notices are provided, put in place **security measures** to keep the personal data secure and other steps to avoid **breach** and also put in place data processing agreements with the third parties.

The data map should identify what personal data held in digital format or on paper records in a school/ academy, where it is stored, why it is processed and how long it is retained.

In a typical data map for a school/academy the data subjects and personal data will include, but is not limited to:

- Parents, legal guardians, governors – and personal data of names, addresses, contact details
- Learners - curricular / academic data e.g. class lists, learner progress records, reports, references, contact details, health and SEN reports
- Staff and contractors - professional records e.g. employment history, taxation and national insurance records, appraisal records and references, health records

Some types of personal data are designated as '**special category**' being personal data;

"revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation"

This should be identified separately and to lawfully process special category data, you must identify both a [lawful basis](#) and a [separate condition for processing special category data](#). You should decide and document this before you start processing the data.

The school/academy will need to identify appropriate lawful process criteria for each type of personal data and if this is not possible such activities should be discontinued. The lawful processing criteria can be summarised as:

- | | |
|-----------------------|---|
| (a) Consent: | the data subject has given clear consent for you to process their personal data for a specific purpose (see below for further guidance) |
| (b) Contract: | the processing is necessary for a contract you have with the data subject |
| (c) Legal obligation: | the processing is necessary for you to comply with the law (not including contractual obligations). |
| (d) Vital interests: | the processing is necessary to protect someone's life. |
| (e) Public task: | the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law. |

(f) Legitimate interests: the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. (This cannot apply if you are a public authority processing data to perform your official tasks) Please also be aware that these criteria must be supported by a written legitimate interest assessment.

No single basis is 'better' or more important than the others – which basis is most appropriate to use will depend on your purpose and relationship with the data subject.

Several of the lawful purpose criteria may relate to a particular specified purpose – a legal obligation, a contract with the individual, protecting someone's vital interests, or performing your public tasks. If you are processing for these purposes then the appropriate lawful basis may well be obvious, so it is helpful to consider these first.

As a public authority, and if you can demonstrate that the processing is to perform your tasks as set down in UK law, then you are able to use the public task basis. If not, you may still be able to consider consent or legitimate interests in some cases, depending on the nature of the processing and your relationship with the data subject. There is no absolute ban on public authorities using consent or legitimate interests as their lawful basis, but the Data Protection law does restrict public authorities' use of these two criteria.

The majority of processing of personal data conducted by public authorities will fall within Article 6(1)(e) GDPR, that *"processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"* however careful consideration must be given to any processing, especially in more novel areas. As you can see, consent is just one of several possible lawful processing criteria.

Consent has changed as a result of the GDPR and is now defined as: "in relation to the processing of personal data relating to an individual, means a freely given, specific, informed and unambiguous indication of the individual's wishes by which the individual, by a statement or by a clear affirmative action, signifies agreement to the processing of the personal data"

This means that where a school/academy is relying on consent as the basis for processing personal data that consent has to be clear, meaning that pre-ticked boxes, opt-out or implied consent are no longer suitable. The GDPR does not specify an age of consent for general processing but schools/academies should consider the capacity of pupils to freely give their informed consent.

The Information Commissioner's Office (ICO) gives clear advice on when it's appropriate to [use consent](#) as a lawful base. It states:

"Consent is appropriate if you can offer people real choice and control over how you use their data and want to build their trust and engagement. But if you cannot offer a genuine choice, consent is not appropriate. If you would still process the personal data without consent, asking for consent is misleading and inherently unfair."

You should only use consent if none of the other lawful bases is appropriate. If you do so, you must be able to cope with people saying no (and/or changing their minds), so it's important that you only use consent for optional extras, rather than for core information the school requires in order to function. Examples;

- consent would be appropriate for considering whether a child's photo could be published in any way.
- if your school or academy requires learner details to be stored in an MIS, it would not be appropriate to rely on consent if the learner cannot opt out of this. In this case, you could apply the public task lawful base.

Content of Privacy Notices

Privacy Notices are a key compliance requirement as they ensure that each data subject is aware of the following points when data is collected/ processed by a data controller:

- Who the controller of the personal data is
- What personal data is being processed and the lawful purpose of this processing
- where and how the personal data was sourced
- to whom the personal data may be disclosed
- how long the personal data may be retained
- data subject's rights and how to exercise them or make a complaint

In order to comply with the fair processing requirements in data protection law, the school/academy will inform parents/carers of all learners of the data they collect, process and hold on the learners, 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/carers for example in the prospectus, newsletters, reports or a specific letter / communication or you could publish it on your website and keep it updated there. Parents/carers of young people who are new to the school/academy will be provided with the privacy notice through an appropriate mechanism.

In some circumstances you may also require privacy notices for children / learners as data subjects as children have the same rights as adults over their personal data. These include the rights to access their personal data; request rectification; object to processing and have their personal data erased. The policies that explain this should be clear and age appropriate.

Data subject's right of access

Data subjects have a number of rights in connection with their personal data. They have the right:

- to be informed – Privacy Notices
- of access – Subject Access Requests
- to rectification – correcting errors
- to erasure – deletion of data when there is no compelling reason to keep it
- to restrict processing – blocking or suppression of processing
- to portability – unlikely to be used in a school/academy context
- to object – objection based on grounds pertaining to their situation
- related to automated decision making, including profiling

Several of these could impact schools and academies, such as the right of access. You need to put procedures in place to deal with [Subject Access Requests](#). These are written or verbal requests to see all or a part of the personal data held by the Controller in connection with the data subject. Controllers normally have 1 calendar month to provide the information, unless the case is unusually complex in which case an extension can be obtained.

A school/academy must not disclose personal data even if requested in a Subject Access Request;

- if doing so would cause serious harm to the individual
- child abuse data
- adoption records
- statements of special educational needs

Your school or academy must provide the information free of charge. However, if the request is clearly unfounded or excessive – and especially if this is a repeat request – you may charge a reasonable fee.

Breaches and how to manage a breach

Recent publicity about data breaches suffered by organisations and individuals continues to make the area of personal data protection a current and high profile issue for schools, academies and other organisations. It is important that the school/academy has a clear and well understood personal data handling policy in order to minimise the risk of personal data breaches.

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This includes breaches that are the result of both accidental and deliberate causes. It also means that a breach is more than just about losing personal data.

A breach may arise from a theft, a deliberate attack on your systems, the unauthorised or malicious use of personal data by a member of staff, accidental loss, or equipment failure. In addition:

- no school/academy or individual would want to be the cause of a data breach, particularly as the impact of data loss on individuals can be severe, put individuals at risk and affect personal, professional or organisational reputation
- schools/academies are “data rich” and the introduction of electronic storage and transmission of data has created additional potential for the loss of data
- the school/academy will want to avoid the criticism and negative publicity that could be generated by any personal data breach

Schools / academies have always held personal data on the learners in their care, and increasingly this data is held digitally and accessible not just in school/academy but also from remote locations. It is important to stress that the Data Protection Laws apply 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 / Academies will need to carefully review their policy, in the light of pertinent Local Authority regulations and guidance and changes in legislation.

All significant [data protection incidents must be reported](#) through the DPO to the Information Commissioner’s Office based upon the local incident handling policy and communication plan. The new laws require that this notification should take place within 72 hours of the breach being detected, where feasible.

If you experience a personal data breach you need to consider whether this poses a risk to people. You need to consider the likelihood and severity of any risk to people’s rights and freedoms, following the breach. When you’ve made this assessment, if it’s likely there will be a risk then you must notify the ICO; if it’s unlikely then you don’t have to report it. You do not need to report every breach to the ICO.

The school/academy should have a policy for reporting, logging, managing and recovering from information risk incidents, which establishes a:

- “responsible person” for each incident
- communications plan, including escalation procedure
- plan of action for rapid resolution
- plan of action of non-recurrence and further awareness raising

Privacy by Design and Data Protection Impact Assessments (DPIA)

Data Protection Impact Assessments (DPIA) identify and address privacy risks early on in any project so that you can mitigate them before the project goes live.

DPIAs should be carried out by Data Managers (where relevant) under the support and guidance of the DPO. Ideally you should conduct a DPIA before processing activity starts. However, some may need to be retrospective in the early stages of compliance activity.

The risk assessment will involve:

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

According to the ICO a DPIA should contain:

- a description of the processing operations and the purpose
- an assessment of the necessity and proportionality of the processing in relation to the purpose
- an assessment of the risks to individuals
- the measures in place to address risk, including security and to demonstrate that you comply.

Or more simply and fully:

- who did you talk to about this?
- what is going to happen with the data and how – collection, storage, usage, disposal
- how much personal data will be handled (number of subjects)
- why you need use personal data in this way
- what personal data (including if it's in a 'special category') are you using
- at what points could the data become vulnerable to a breach (loss, stolen, malicious)
- what the risks are to the rights of the individuals if the data was breached
- what are you going to do in order to reduce the risks of data loss and prove you are compliant with the law.

DPIA is an ongoing process and should be re-visited at least annually to verify that nothing has changed since the processing activity started.

Secure storage of and access to data

The school/academy should ensure that 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.

[Good practice](#) suggests that all users will use strong passwords made up from a combination of simpler words. User passwords must never be shared.

Personal data may only be accessed on machines that are securely protected. Any device that can be used to access personal 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 should only be stored on school/academy equipment. Private equipment (i.e. owned by the users) must not be used for the storage of school/academy 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/academy policy once it has been transferred or its use is complete.

The school/academy 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/academy should have a clear policy and procedures for the automatic backing up, accessing and restoring of all data held on school/academy systems, including off-site backups.

The school/academy should have clear policy and procedures for the use of “Cloud Based Storage Systems” (for example Dropbox, Microsoft 365, Google Drive) 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/academy 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/academy is responsible for the security of any data passed to a “third party”. Specific data processing clauses must be included in all contracts where personal data is likely to be passed to a third party.

All paper based personal data must be held in lockable storage, whether on or off site.

Secure transfer of data and access out of school

The school/academy recognises that personal data may be accessed by users out of school/academy or transferred to the local authority or other agencies. In these circumstances:

- Users may not remove or copy sensitive or restricted or protected personal data from the school/academy 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 (e.g. family members) when out of school/academy
- 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
- 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 (if relevant) in this event.

Disposal of personal data

The school/academy should implement a document retention schedule that defines the length of time personal data is held before secure destruction. The Information and Records Management Society [Toolkit for schools](#) provides support for this process. The school/academy must ensure 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 disposed of, and other media must be shredded, incinerated or otherwise disintegrated.

- 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.

Demonstrating Compliance - Audit Logging / Reporting / Incident Handling

Organisations are required to keep records of processing activity. The data map referred to above will assist here. Records must include:

- the name and contact details of the data controller
- where applicable, the name and contact details of the joint controller and data protection officer
- the purpose of the processing
- to whom the data has been/will be disclosed
- description of data subject and personal data
- where relevant the countries it has been transferred to
- under which condition for processing the personal data has been collected
- under what lawful basis processing is being carried out
- where necessary, how it is retained and destroyed
- a general description of the technical and organisational security measures.

Clearly, in order to maintain these records good auditing processes must be followed, both at the start of the exercise and on-going throughout the lifetime of the requirement. Therefore, audit logs will need to be kept to:

- provide evidence of the processing activity and the DPIA
- record where, why, how and to whom personal data has been shared
- log the disposal and destruction of the personal data
- enable the school/academy to target training at the most at-risk data
- record any breaches that impact on the personal data

Fee

The school/academy should pay the relevant annual fee to the Information Commissioner's Office (ICO). Failure to renew may render the school/academy to a penalty in addition to other fines possible under the Data Protection Law.

Responsibilities

Every maintained school/academy is required to appoint a Data Protection Officer as a core function of 'the business'

The Data Protection Officer (DPO) can be internally or externally appointed.

They must have:

- expert knowledge
- timely and proper involvement in all issues relating to data protection
- the necessary resources to fulfil the role
- access to the necessary personal data processing operations
- a direct reporting route to the highest management level

The data controller must:

- not give the DPO instructions regarding the performance of tasks
- ensure that the DPO does not perform a duty or role that would lead to a conflict of interests
- not dismiss or penalise the DPO for performing the tasks required of them

As a minimum a Data Protection Officer must:

- inform, as necessary, the controller, a processor or an employee of their obligations under the data protection laws
- provide advice on a data protection impact assessment
- co-operate with the Information Commissioner

- act as the contact point for the Information Commissioner
- monitor compliance with policies of the controller in relation to the protection of personal data
- monitor compliance by the controller with Data Protection Law

The school/academy may also wish to appoint a Data Manager. Schools/academies are encouraged to separate this role from that of Data Protection Officer, where possible. This person will keep up to date with current legislation and guidance and will:

- determine and take responsibility for the school's / academy's information risk policy and risk assessment
- oversee the System Controllers

The school/academy may also wish to appoint System Controllers for the various types of data being held (e.g. learner information / staff information / assessment data etc.). System Controllers will manage and address risks to the information and will understand:

- what information is held, for how long and for what purpose
- how information has been amended or added to over time, and
- who has access to the data and why.

Everyone in the school/academy 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 (either in the school/academy or elsewhere if on school/academy business).

Training & awareness

All staff must receive data handling awareness / data protection training and will be made aware of their responsibilities. This should be undertaken regularly. You can do this through:

- Induction training for new staff
- Staff meetings / briefings / INSET
- Day to day support and guidance from System Controllers

Freedom of Information Act

All schools / academies must have a Freedom of Information Policy which sets out how it will deal with FOI requests. FOI aims to increase transparency and accountability in public sector organisations as part of a healthy democratic process. Whilst FOI requests are submitted by an individual, the issue is for the school/academy to consider whether the requested information should be released into the public domain. FOI links to Data Protection Law whenever a request includes personal data. Good advice would encourage the school/academy to:

- delegate to the Headteacher day-to-day responsibility for FOI policy and the provision of advice, guidance, publicity and interpretation of the school's/academy's policy
- consider designating an individual with responsibility for FOI, to provide a single point of reference, coordinate FOI 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
- ensure a record of refusals and reasons for refusals is kept, allowing the school/academy to review its access policy on an annual basis

Model Publication Scheme

The Information Commissioner's Office provides schools and organisations with a [model publication scheme](#) which they should complete. The school's / academy's publication scheme should be reviewed annually.

The ICO produce [guidance on the model publication scheme](#) for schools. This is designed to support schools / academies complete the [Guide to Information for Schools](#).

Parental permission for use of cloud hosted services

Schools/academies that use cloud hosting services are advised to seek appropriate consent to set up an account for learners.

Use of Biometric Information

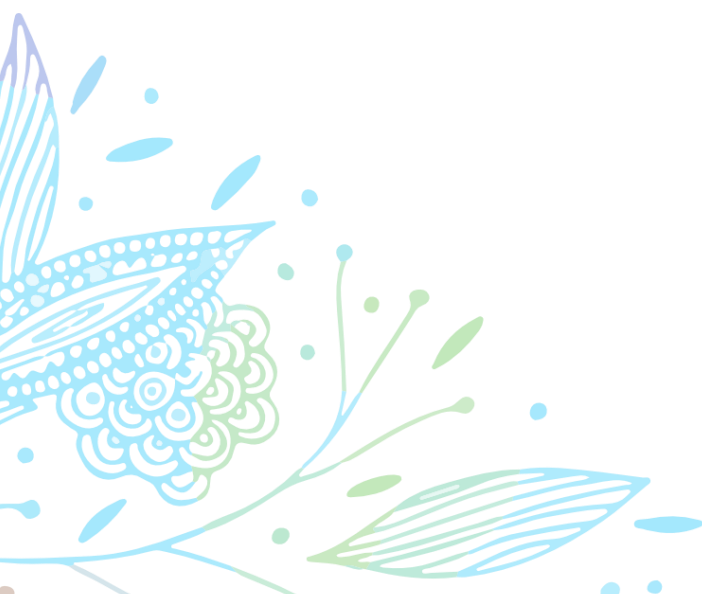
Biometric information is special category data. The Protection of Freedoms Act 2012, included measures that affect schools/academies that use biometric recognition systems, such as fingerprint identification and facial scanning:

- For all pupils in schools/academies under 18, they must obtain the written consent of a parent before they take and process their child's biometric data
- They must treat the data with appropriate care and must comply with data protection principles as set out in the Data Protection Law
- They must provide alternative means for accessing services where a parent or pupil has refused consent

[New advice](#) to schools/academies makes it clear that they are not able to use pupils' biometric data without parental consent. Schools/academies may wish to incorporate the parental permission procedures into revised consent processes. ([see Appendix Parent / Carer Acceptable Use Agreement](#))

Privacy and Electronic Communications

Schools/academies should be aware that they are subject to the Privacy and Electronic Communications Regulations in the operation of their websites.



Mobile Technologies Policy (inc. BYOD/BYOT)

Mobile technology devices may be a school owned/provided or privately owned 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.

The absolute key to considering the use of mobile technologies is that the pupils, 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 owned/provided or personally owned. The mobile technologies policy should sit alongside a range of policies including but not limited to the safeguarding policy, anti-bullying policy, acceptable use policy, 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.

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. Students 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 student learning, but they can also develop digital literacy, fluency and citizenship in students/pupils that will prepare them for the high tech world in which they will live, learn and work.

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/academy network, filtering of personal devices, breakages and insurance, access to devices for all students/pupils, avoiding potential classroom distraction, network connection speeds, types of devices, charging facilities, total cost of ownership

Schools/academies 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/academy 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/academy embarks on this path, the risks and benefits must be clearly identified and shared with all stakeholders.



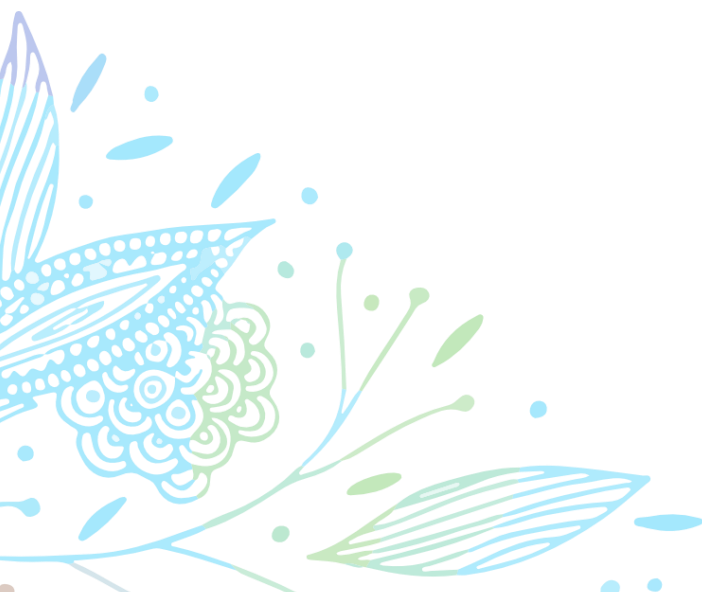
The school acceptable use agreements for staff, pupils/students and parents/carers will give consideration to the use of mobile technologies. The school allows:

	School devices			Personal devices		
	School owned and allocated to a single user	School owned for use by multiple users	Authorised device ²	Pupil owned	Staff owned	Visitor owned
Allowed in school	Yes	Yes	Yes	No	Yes	Yes
Full network access	Yes	Yes	Yes	no	no	no
Internet only	yes	yes	yes	no	yes	No
No network access	yes	yes	no	yes	yes	yes

- The school has provided technical solutions for the safe use of mobile technology for school devices/personal devices :
 - All school devices are controlled through the use of Mobile Device Management 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)
 - 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
 - For all mobile technologies, filtering will be applied to the internet connection and attempts to bypass this are not permitted
 - Appropriate exit processes are implemented for devices no longer used at a school/academy location or by an authorised user. [These may include; revoking the link between MDM software and the device, removing proxy settings, ensuring no sensitive data is removed from the network, uninstalling school-licensed software etc.](#)
 - *All school/academy devices are subject to routine monitoring*
 - *Pro-active monitoring has been implemented to monitor activity*
- *When personal devices are permitted:*
 - *All personal devices are restricted through the implementation of technical solutions that provide appropriate levels of 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 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 school*
 - *The school accepts no responsibility or liability in respect of lost, stolen or damaged devices while at school or on activities organised or undertaken by the school (the school recommends insurance is purchased to cover that device whilst out of the home)*
 - *The school/academy accepts no responsibility for any malfunction of a device due to changes made to the device while on the school/academy network or whilst resolving any connectivity issues*

² 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

- *The school/academy 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/academy is not responsible for the day to day maintenance or upkeep of the users personal device such as the charging of any device, the installation of software updates or the resolution of hardware issues*
- Users are expected to act responsibly, safely and respectfully in line with current acceptable use agreements, in addition;
 - Devices may not be used in tests or exams
 - Visitors should be provided with information about how and when they are permitted to use mobile technology in line with local safeguarding arrangements
 - 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
 - Personal devices should be charged before being brought to the school as the charging of personal devices is not permitted during the school day
 - Devices must be in silent mode on the school site and on school buses
 - Confiscation and searching (England) - the school has the right to take, examine and search any device that is suspected of unauthorised use, either technical or inappropriate.
 - 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 to work is not permitted
 - 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/academy 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 devices contain the necessary apps for school work. Apps added by the school will remain the property of the school and will not be accessible to students on authorised devices once they leave the school/academy roll. Any apps bought by the user on their own account will remain theirs.
 - Users should be mindful of the age limits for app purchases and use and should ensure they read the terms and conditions before use.
 - Users must only photograph people with their permission. Users 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, unless in exceptional circumstances
 - Printing from personal devices is not possible



Social Media 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/carers and pupils 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, carers and children.

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 pupils 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 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 pupils 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

- SLT
 - 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
- Administrator/Moderator
 - 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 organisation (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/academy accounts
 - Adding an appropriate disclaimer to personal accounts when naming the school/academy

Process for creating new accounts

The school community is encouraged to consider if a social media account will help them in their work, e.g. a history department Twitter account, or a "Friends of the school" Facebook page. Anyone wishing to create such an account must present a case to the 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 SLT an application will be approved or rejected. In all cases, the SLT 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 activity.
- If a journalist makes contact about posts made using social media staff must follow the school 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 escalated where appropriate.
- The use of social media by staff while at work may be monitored, in line with school policies. The school/academy permits reasonable and appropriate access to private social media sites during non-contact, social times of the day. However, where excessive use is suspected, and considered to be interfering with relevant duties, disciplinary action may be taken

- The school will take appropriate action in the event of breaches of the social media policy. Where conduct is found to be unacceptable, the school will deal with the matter internally. Where conduct is considered illegal, the school 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, e.g. 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 must be sought from parents/carers.** 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 pupil 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/academy social media accounts. Students/pupils should be appropriately dressed, not be subject to ridicule and must not be on any school/academy 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 the school or impacts on the school, it must be made clear that the member of staff is not communicating on behalf of the school with an appropriate disclaimer. Such personal communications are within the scope of this policy.
 - Personal communications which do not refer to or impact upon the school are outside the scope of this policy.
 - Where excessive personal use of social media in school/academy is suspected, and considered to be interfering with relevant duties, disciplinary action may be taken
 - The school/academy permits reasonable and appropriate access to private social media sites during non-contact times of the school day.

- **Pupil/Students**
 - Staff are not permitted to follow or engage with current or prior pupils of the school on any personal social media network account.
 - The school's education programme should enable the pupils to be safe and responsible users of social media.
 - Pupils are encouraged to comment or post appropriately about the school. Any offensive or inappropriate comments will be resolved by the use of the school's behaviour and relationships policy
- **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 supports the safe and positive use of social media by parents/carers. This includes information on the website.
 - Parents/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.
-

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

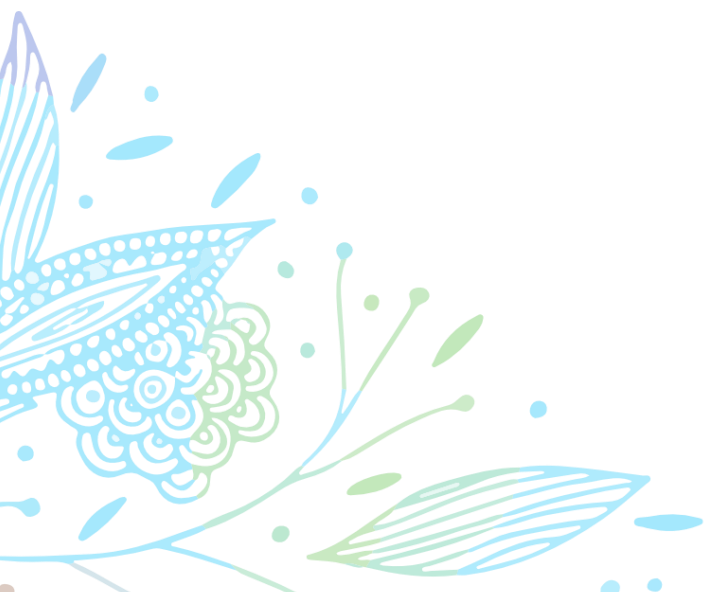
Managing school social media accounts

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/academy 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



Legislation

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

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

Computer Misuse Act 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.

School/academies may wish to view the National Crime Agency website which includes information about [“Cyber crime – preventing young people from getting involved”](#). Each region in England (& Wales) has a Regional Organised Crime Unit (ROCU) Cyber-Prevent team that works with schools to encourage young people to make positive use of their cyber skills. There is a useful [summary of the Act on the NCA site](#).

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.

The Data Protection Act 2018:

Updates the 1998 Act, incorporates the General Data Protection Regulations (GDPR) and aims to:

- Facilitate the secure transfer of information within the European Union.
- Prevent people or organisations from holding and using inaccurate information on individuals. This applies to information regarding both private lives or business.
- Give the public confidence about how businesses can use their personal information.
- Provide data subjects with the legal right to check the information businesses hold about them. They can also request for the data controller to destroy it.
- Give data subjects greater control over how data controllers handle their data.
- Place emphasis on accountability. This requires businesses to have processes in place that demonstrate how they’re securely handling data.
- Require firms to keep people’s personal data safe and secure. Data controllers must ensure that it is not misused.
- Require the data user or holder to register with the Information Commissioner.

All data subjects have the right to:

- Receive clear information about what you will use their data for.

- Access their own personal information.
- Request for their data to be revised if out of date or erased. These are known as the right to rectification and the right to erasure
- Request information about the reasoning behind any automated decisions, such as if computer software denies them access to a loan.
- Prevent or query about the automated processing of their personal data.

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, offensive, or threatening letter, electronic communication or other article to another person.

Regulation of Investigatory Powers Act 2000

It is an offence for any person to intentionally and without lawful authority intercept any communication. 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.
- The school reserves the right to monitor its systems and communications in line with its rights under this act.

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).

Telecommunications Act 1984

It is an offence to send a message or other matter that is grossly offensive or of an indecent, obscene or menacing character. It is also an offence to send a message that is intended to cause annoyance, inconvenience or needless anxiety to another that the sender knows to be false.

Criminal Justice & Public Order Act 1994

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

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

Protection from Harassment Act 1997

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

Protection of Children Act 1978

It is an offence to take, permit to be taken, make, possess, show, distribute or advertise indecent images of children in the United Kingdom. A child for these purposes is anyone under the age of 18. Viewing an indecent image of a child on your computer means that you have made a digital image. An image of a child also covers pseudo-photographs (digitally collated or otherwise). A person convicted of such an offence may face up to 10 years in prison.

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. Children, Families and Education Directorate page 38 April 2007.

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 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

These rights are not absolute. The school is obliged to respect these rights and freedoms, balancing them against those rights, duties and obligations, which arise from other relevant legislation.

The Education and Inspections Act 2006

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

The Education and Inspections Act 2011

Extended the powers included in the 2006 Act and gave permission for Headteachers (and nominated staff) to search for electronic devices. It also provides powers to search for data on those devices and to delete data.

(see template policy in these appendices and for DfE guidance -

<http://www.education.gov.uk/schools/pupilsupport/behaviour/behaviourpolicies/f0076897/screening-searching-and-confiscation>)

The Protection of Freedoms Act 2012

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

The School Information Regulations 2012

Requires schools to publish certain information on its website:

<https://www.gov.uk/guidance/what-maintained-schools-must-publish-online>

Serious Crime Act 2015

Introduced new offence of sexual communication with a child. Also created new offences and orders around gang crime (including CSE)

Criminal Justice and Courts Act 2015

Revenge porn – as it is now commonly known – involves the distribution of private and personal explicit images or video footage of an individual without their consent, with the intention of causing them embarrassment and distress. Often revenge porn is used maliciously to shame ex-partners. Revenge porn was made a specific offence in the Criminal Justice and Courts Act 2015. The Act specifies that if you are accused of revenge porn and found guilty of the criminal offence, you could be prosecuted and face a sentence of up to two years in prison.

For further guidance or support please contact the [Revenge Porn Helpline](#)



Links to other organisations or documents

The following links may help those who are developing or reviewing a school online safety policy and creating their online safety provision:

UK Safer Internet Centre

Safer Internet Centre – <https://www.saferinternet.org.uk/>

South West Grid for Learning - <https://swgfl.org.uk/products-services/online-safety/>

Childnet – <http://www.childnet-int.org/>

Professionals Online Safety Helpline - <http://www.saferinternet.org.uk/about/helpline>

Revenge Porn Helpline - <https://revengepornhelpline.org.uk/>

Internet Watch Foundation - <https://www.iwf.org.uk/>

Report Harmful Content - <https://reportharmfulcontent.com/>

CEOP

CEOP - <http://ceop.police.uk/>

ThinkUKnow - <https://www.thinkuknow.co.uk/>

Others

LGfL – [Online Safety Resources](#)

Kent – [Online Safety Resources page](#)

INSAFE/Better Internet for Kids - <https://www.betterinternetforkids.eu/>

UK Council for Internet Safety (UKCIS) - <https://www.gov.uk/government/organisations/uk-council-for-internet-safety>

Netsmartz - <http://www.netsmartz.org/>

Tools for Schools

Online Safety BOOST – <https://boost.swgfl.org.uk/>

360 Degree Safe – Online Safety self-review tool – <https://360safe.org.uk/>

360Data – online data protection self-review tool: www.360data.org.uk

SWGfL Test filtering - <http://testfiltering.com/>

UKCIS Digital Resilience Framework - <https://www.gov.uk/government/publications/digital-resilience-framework>

Bullying/Online-bullying/Sexting/Sexual Harassment

Enable – European Anti Bullying programme and resources (UK coordination/participation through SWGfL & Diana Awards) - <http://enable.eun.org/>

SELMA – Hacking Hate - <https://selma.swgfl.co.uk>

Scottish Anti-Bullying Service, Respectme - <http://www.respectme.org.uk/>

Scottish Government - Better relationships, better learning, better behaviour - <http://www.scotland.gov.uk/Publications/2013/03/7388>

DfE - Cyberbullying guidance -

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/374850/Cyberbullying_Advice_for_Headteachers_and_School_Staff_121114.pdf

Childnet – Cyberbullying guidance and practical PSHE toolkit:

<http://www.childnet.com/our-projects/cyberbullying-guidance-and-practical-toolkit>
[Childnet – Project deSHAME – Online Sexual Harrassment](#)
[UKSIC – Sexting Resources](#)
Anti-Bullying Network – <http://www.antibullying.net/cyberbullying1.htm>
[Ditch the Label – Online Bullying Charity](#)
[Diana Award – Anti-Bullying Campaign](#)

Social Networking

Digizen – [Social Networking](#)
UKSIC - [Safety Features on Social Networks](#)
[Children's Commissioner, TES and Schillings – Young peoples' rights on social media](#)

Curriculum

SWGfL Evolve - <https://projectevolve.co.uk>
[UKCCIS – Education for a connected world framework](#)
Teach Today – www.teachtoday.eu/
Insafe - [Education Resources](#)

Data Protection

[360data - free questionnaire and data protection self review tool](#)
[ICO Guides for Education \(wide range of sector specific guides\)](#)
[DfE advice on Cloud software services and the Data Protection Act](#)
[IRMS - Records Management Toolkit for Schools](#)
[NHS - Caldicott Principles \(information that must be released\)](#)
[ICO Guidance on taking photos in schools](#)
[Dotkumo - Best practice guide to using photos](#)

Professional Standards/Staff Training

[DfE – Keeping Children Safe in Education](#)
DfE - [Safer Working Practice for Adults who Work with Children and Young People](#)
[Childnet – School Pack for Online Safety Awareness](#)
[UK Safer Internet Centre Professionals Online Safety Helpline](#)

Infrastructure/Technical Support

[UKSIC – Appropriate Filtering and Monitoring](#)
[SWGfL Safety & Security Resources](#)
Somerset - [Questions for Technical Support](#)
NCA – [Guide to the Computer Misuse Act](#)
NEN – [Advice and Guidance Notes](#)

Working with parents and carers

[Online Safety BOOST Presentations - parent's presentation](#)
[Vodafone Digital Parents Magazine](#)
[Childnet Webpages for Parents & Carers](#)

[Get Safe Online - resources for parents](#)

[Teach Today - resources for parents workshops/education](#)

[Internet Matters](#)

Prevent

[Prevent Duty Guidance](#)

[Prevent for schools – teaching resources](#)

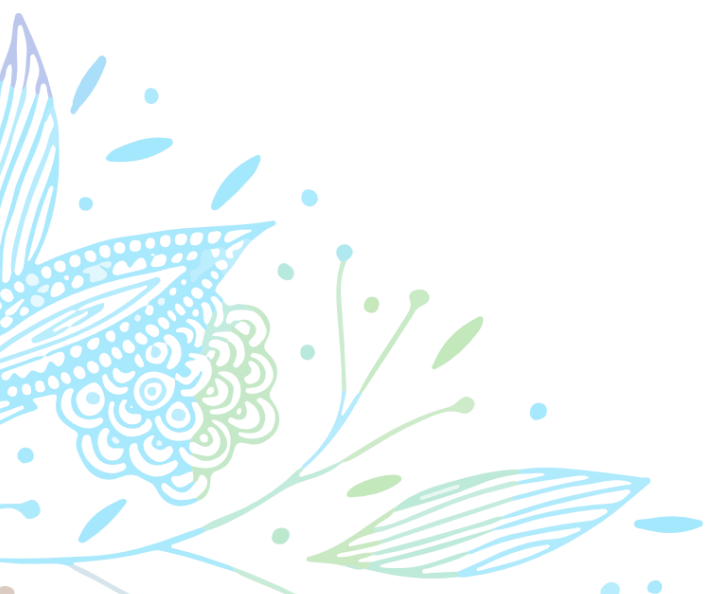
[NCA – Cyber Prevent](#)

Childnet – [Trust Me](#)

Research

[Ofcom –Media Literacy Research](#)

Further links can be found at the end of the UKCIS [Education for a Connected World Framework](#)



Glossary of Terms

AUP/AUA	Acceptable Use Policy/Agreement – see templates earlier in this document
CEOP	Child Exploitation and Online Protection Centre (part of National Crime Agency, 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
ICO	Information Commissioners Office
ICT	Information and Communications Technology
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
MAT	Multi Academy Trust
MIS	Management Information System
NEN	National Education Network – works with the Regional Broadband Consortia (e.g. SWGfL) to provide the safe broadband provision to schools across Britain.
Ofcom	Office of Communications (Independent communications sector regulator)
SWGfL	South West Grid for Learning Trust – the Regional Broadband Consortium of SW Local Authorities – is the provider of broadband and other services for schools and other organisations in the SW
TUK	Think U Know – educational online safety programmes for schools, young people and parents.
UKSIC	UK Safer Internet Centre – EU funded centre. Main partners are SWGfL, Childnet and Internet Watch Foundation.
UKCIS	UK Council for Internet Safety
VLE	Virtual Learning Environment (a software system designed to support teaching and learning in an educational setting,
WAP	Wireless Application Protocol

A more comprehensive glossary can be found at the end of the UKCIS [Education for a Connected World Framework](#)

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