

Tenby Church in Wales VC Primary School

Online Safety Policy

Create with Safe360 recommended policy  
on – 02.02.2023

Due for review: February 2024



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# Introduction

This portfolio of school or education setting<sup>1</sup> Online Safety Policy templates is intended to help leaders produce a suitable **Online Safety Policy** which will consider all current and relevant issues, in a whole school context, linking with other relevant policies such as a school's Safeguarding Policy, Behaviour Policy and Anti-Bullying Policy.

[The requirement](#) that learners are able to use digital technologies appropriately and safely is addressed as part of the wider duty of care to which all who work in schools are bound. Schools must, through their Online Safety Policy, meet their statutory obligations to ensure that learners are safe and are protected from potential harm, both on and off-site. The policy will also form part of the school's protection from legal challenge, relating to the use of digital technologies.

These policy templates suggest policy statements which, in the view of the Welsh Government, would be essential in any school Online Safety Policy, based on good practice. In addition there are a range of alternative statements that schools should consider, given their particular circumstances.

An effective Online Safety Policy must be tailored to the needs of each school and an important part of the process will be the discussion and consultation which takes place during the writing or review of the policy. This will help ensure that the policy is owned and accepted by the whole school community.

It is suggested that consultation in the production of this policy should involve: governors/management committees<sup>2</sup>; teaching staff and support staff; learners; community users and any other relevant groups.

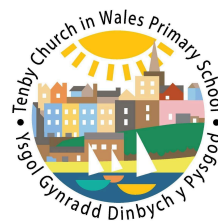
Due to the ever-changing nature of digital technologies, it is best practice that the school reviews their Online Safety Policy at least annually and, if necessary, more frequently in response to any significant new technological developments, new threats to online safety or incidents that have occurred.

The Education Act 2002 and the Children Act 1989 require Local Authorities and schools to ensure children and young people are safe from harm. Schools are subject to an increased level of

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<sup>1</sup> For ease of reference, the term 'school' is used throughout this portfolio of templates, but may be defined (and amended) as 'schools' or 'education settings' as appropriate.

<sup>2</sup> For ease of reference, the term 'governors' will be used throughout this portfolio of templates, but may be defined (and amended) as 'governors' or 'management committees' as appropriate.



scrutiny of their online safety practices by Estyn Inspector Terrorism and Securities Act 2015 requires schools to ensure safe from terrorist and extremist material on the internet.

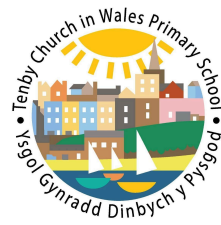
ns, while the Counter and young people are

With its optional statements and guidance notes, this portfolio of templates is longer than the resulting policy document is likely to be. It is intended that, while covering this complex and ever-changing issue, the resulting policy document should be concise and easily understood if it is to be effective and adopted by all. The templates are based on current best practice policies and procedures and schools can amend them to suit their own requirements.

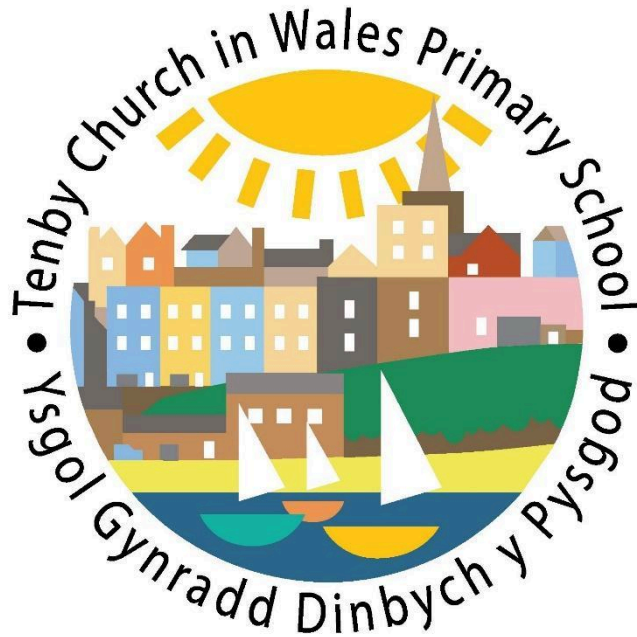
## Guidance notes

- Within the templates, sections which include information or guidance are shown in **BLUE**. It is anticipated that schools would amend or remove these sections from their completed policy document, though this will be a decision for the school group that produces the policy.
- It is strongly advised that sections formatted in **BOLD** are retained, as they should form an essential part of a school's Online Safety Policy.
- Where sections in the template are formatted in *ITALICS*, it is anticipated that schools would wish to carefully consider whether or not to include that section or statement in their completed policy.
- The first part of this document (the first forty pages) provides a template for an overall Online Safety Policy for the school. The appendices contain acceptable use agreement templates and more detailed, specific policy templates. It will be for schools to decide which of these documents they choose to amend and adopt.

# Tenby Primary Church in Wales Primary School



## Online Safety Policy

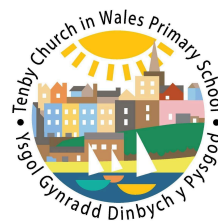


This policy applies to all members of the school community (including staff, learners, volunteers, parents and carers, visitors, community users) who have access to and are users of school digital systems, both in and out of the school. It also applies to the use of personal digital technology on the school site (where allowed).

Version: [1}

Date created: [02/02/23]

Next review date: [02/02/24]



# Scope of the Online Safety Policy

This Online Safety Policy outlines the commitment of Tenby Church in Wales VC Primary to safeguard members of our school community online in accordance with principles of open government and with the law. Schools should be aware of the legislative framework under which this Online Safety Policy template and guidance has been produced as outlined in the attached 'Legislation' Appendix.

This Online Safety Policy applies to all members of the school community (including staff, learners, volunteers, parents and carers, visitors, community users) who have access to and are users of school digital systems, both in and out of the school. It also applies to the use of personal digital technology on the school site (where allowed).

Tenby Church in Wales VC Primary 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.

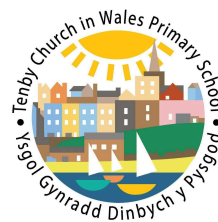
## Policy development, monitoring and review

This Online Safety Policy has been developed by the Online Safety Group consisting of:

The Online Safety Group has the following members:

- online safety lead / ICT and DCF lead and Teacher– Ashley James-Goddard
- Deputy Designated Safeguarding Person and Senior Leader – Oliver Davies
- online safety governor (parents governor) – **ADD NAME IN**
- support staff members – Tracy Sayers
- learners – Year 6 school council and Digital leaders.

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



## Schedule for development, monitoring and review

This Online Safety Policy was approved by the <i>school governing body</i> on:	Insert date
The implementation of this Online Safety Policy will be monitored by:	Online Safety Lead – Ashley James-Goddard and the Senior Leadership Team.
Monitoring will take place at regular intervals:	Once a year with the Online Safety Groups and once a year by the Online Safety Lead.
The <i>governing body</i> will receive a report on the implementation of the Online Safety Policy generated by the monitoring group (which will include anonymous details of online safety incidents) at regular intervals:	Once a year.
The Online Safety Policy will be reviewed annually, or more regularly in the light of any significant new technological developments, new threats to online safety or incidents that have taken place. The next anticipated review date will be:	Once a year.
Should serious online safety incidents take place, the following external persons/agencies should be informed:	PCC ICT Manager – Hugh Benbow and PCC Safeguarding Team.

## Process for monitoring the impact of the Online Safety Policy

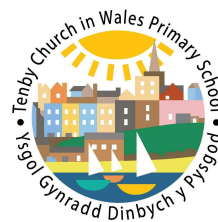
The school will monitor the impact of the policy using:

- *logs of reported incidents*
- *monitoring logs of internet activity (including sites visited)*
- *surveys/questionnaires of:*
  - o *learners*
  - o *parents and carers*
  - o *staff.*

## Policy and leadership

### Responsibilities

In order to ensure the online safeguarding of members of our school community it is important that all members of that community work together to develop safe and responsible online



behaviours, learning from each other and from good practice. Reporting inappropriate online behaviours, concerns and misuse as soon as these are identified. While this will be a team effort, the following sections outline the online safety roles and responsibilities of individuals<sup>3</sup> and groups within the school.

## Headteacher and senior leaders

- The headteacher has a duty of care for ensuring the safety (including online safety) of members of the school community and fostering a culture of safeguarding, though the day-to-day responsibility for online safety may 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<sup>4</sup>.
- The headteacher/senior leaders are responsible for ensuring that the Online Safety Lead, technical staff, and other relevant staff carry out their responsibilities effectively and receive suitable training to enable them to carry out their roles and train other colleagues, as relevant.
- The headteacher/senior leaders will ensure that there is a system in place to allow for monitoring and support of those in school who carry out the internal online safety monitoring role.
- The headteacher/senior leaders will receive regular monitoring reports from the Online Safety Lead.

## Governors

Governors are responsible for the approval of the Online Safety Policy and for reviewing the effectiveness of the policy [e.g. by asking the questions posed in the Welsh Government and UKCIS document Five key questions for governing bodies to help challenge their school to effectively safeguard their learners](#). This will be carried out by the Online Safety Group whose members will receive regular information about online safety incidents and monitoring reports. A member of the governing body will take on the role of Online Safety Governor<sup>5</sup> to include:

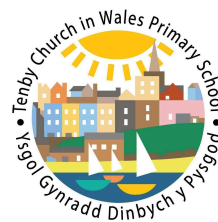
- regular meetings with the Online Safety Lead
- regularly receiving (collated and anonymised) reports of online safety incidents

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<sup>3</sup> In a small school some of the roles described may be combined, though it is important to ensure that there is sufficient 'separation of responsibility' should this be the case.

<sup>4</sup> See flow chart on dealing with online safety incidents in '[Responding to incidents of misuse](#)' and relevant local authority HR/other relevant body disciplinary procedures.

<sup>5</sup> [It is suggested that the role may be combined with that of the designated governor for safeguarding. In other settings this may be the management committee person for child protection](#)



- checking that provision outlined in the Online Safety policy and staff training is taking place as intended
- reporting to relevant *governors group/meeting*
- *membership of the school Online Safety Group*
- *occasional review of the filtering change control logs and the monitoring of filtering logs (where possible)*

The governing body will also support the school in encouraging parents/carers and the wider community to become engaged in online safety activities.

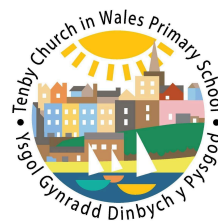
## Online Safety Lead

The online safety lead will:

- lead the Online Safety Group
- work closely on a day-to-day basis with the Designated Safeguarding Person (DSP)
- take day-to-day responsibility for online safety issues, being aware of the potential for serious child protection concerns
- have a leading role in establishing and reviewing the school online safety policies/documents
- promote an awareness of and commitment to online safety education across the school and beyond
- liaise with curriculum leaders to ensure that the online safety curriculum is planned and embedded
- ensure that all staff are aware of the procedures that need to be followed in the event of an online safety incident taking place and the need to immediately report those incidents
- receive reports of online safety incidents<sup>6</sup> and create a log of incidents to inform future online safety developments
- provide (or identify sources of) training and advice for staff/governors/parents/carers/learners
- liaise with (school/local authority) technical staff, pastoral staff and support staff (as relevant)
- meet regularly with the online safety governor to discuss current issues, review (anonymised) incidents and if possible, filtering and monitoring logs
- attend relevant governing body meetings/groups
- report regularly to headteacher/senior leadership team.
- liaises with the local authority/relevant body.

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<sup>6</sup> [The school will need to decide how these incidents will be dealt with and whether the investigation/action will be the responsibility of the online safety lead or another member of staff, e.g. headteacher/senior leader/Designated Safeguarding Person/class teacher/head of year, etc.](#)



## Designated Safeguarding Person (DSP)

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

- sharing of personal data <sup>7</sup>
- access to illegal/inappropriate materials
- inappropriate online contact with adults/strangers
- potential or actual incidents of grooming
- online bullying.

## Curriculum Leads

Curriculum Leads will work with the online safety lead to develop a planned and coordinated online safety education programme. This will be provided through:

- a discrete programme
- the Digital Competence Framework
- personal and social education/sex and relationships education
- assemblies and pastoral programmes
- through relevant national initiatives and opportunities e.g. [Safer Internet Day](#) and [Anti-bullying week](#).

## Teaching and support staff

School staff are responsible for ensuring that:

- they have an awareness of current online safety matters/trends and of the current school Online Safety Policy and practices
- they understand that online safety is a core part of safeguarding
- they have read, understood and signed the staff acceptable use agreement (AUA)
- they immediately report any suspected misuse or problem to [Online Safety Lead – Ashley James-Goddard and John Palmer – Designated Safeguarding Person](#) for investigation/action, in line with the school safeguarding procedures
- all digital communications with learners and 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
- ensure learners understand and follow the Online Safety Policy and acceptable use agreements, have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations

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<sup>7</sup> See 'Personal data policy' in the Appendix.



- they supervise and monitor the use of digital technology in lessons and other school activities (where allowed) and ensure that current policies with regard to these devices
- in lessons where internet use is pre-planned learners should be guided to sites checked as suitable for their use *and that processes are in place for dealing with any unsuitable material that is found in internet searches*
- where lessons take place using live-streaming or video-conferencing, staff must have full regard to national safeguarding guidance and local safeguarding policies and should take note of the guidance contained in the [Live-streaming and video-conferencing: safeguarding principles and practice guidance](#)
- they have a zero-tolerance approach to incidents of online-bullying, sexual harassment, discrimination, hatred etc
- they model safe, responsible and professional online behaviours in their own use of technology, including out of school and in their use of social media.

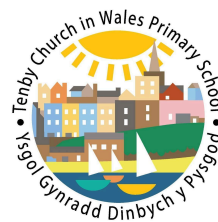
## Network manager/technical staff

The Pembrokeshire County Council local authority managed service provider is responsible for ensuring that:

- they are aware of and follow the school Online Safety Policy and Technical Security Policy in order to carry out their work effectively in line with school policy
- the *school* technical infrastructure is secure and is not open to misuse or malicious attack
- the school meets (as a minimum) the required online safety technical requirements as identified by the local authority or other relevant body
- users may only access the networks and devices through a properly enforced password protection policy
- 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
- the use of the technical and communications systems is regularly monitored in order that any misuse/attempted misuse can be reported to (insert relevant person) for investigation and action
- the filtering policy is applied and updated on a regular basis and its implementation is not the sole responsibility of any single person
- monitoring software/systems are implemented and updated as agreed in school policies

## Learners

- are responsible for using the school digital technology systems in accordance with the learner acceptable use agreement including personal devices



- should understand the importance of reporting all incidents to inappropriate materials and know how to do so
- should know what to do if they or someone they know feels vulnerable when using online technology
- should avoid plagiarism and uphold copyright regulations
- will be expected to know and follow school Online Safety Policy
- 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 and carers

Parents and carers play a crucial role in ensuring that their children understand the need to use the internet/mobile devices in an appropriate way.

The school will take every opportunity to help parents and carers understand these issues through:

- providing them with a copy of the learners' acceptable use agreement
- publish information about appropriate use of social media relating to posts concerning the school
- seeking their permissions concerning digital images, cloud services etc

Parents and carers will be encouraged to support the school in:

- reinforcing the online safety messages provided to learners in school
- the use of their children's personal devices in the school

## Community users

Community users who access school systems/website/Hwb/learning platform as part of the wider school provision will be expected to sign a community user AUA before being provided with access to school systems.

The school encourages the engagement of agencies/members of the community who can provide valuable contributions to the online safety provision and actively seeks to share its knowledge and good practice with other schools and the community.

## Online Safety Group

The Online Safety Group provides a consultative group that has wide representation from the school community, with responsibility for issues regarding online safety and monitoring the Online Safety Policy including the impact of initiatives. Depending on the size or structure of the school



this group may be part of the safeguarding group. The group is responsible for regular reporting to senior leaders and the governing body.

responsible for regular

The Online Safety Group has the following members:

- online safety lead / ICT and DCF lead and Teacher– Ashley James-Goddard
- Deputy Designated Safeguarding Person and Senior Leader – Oliver Davies
- online safety governor (parents governor) – ADD NAME IN
- support staff members – Tracy Sayers
- learners – Year 6 school council and Digital leaders.

Members of the Online Safety Group will assist the Online Safety Lead with:

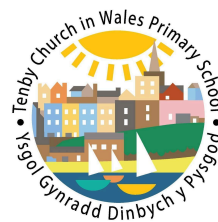
- the production/review/monitoring of the school Online Safety Policy/documents
- the production/review/monitoring of the school filtering policy (if possible and if the school chooses to have one) and requests for filtering changes
- mapping and reviewing the online safety education provision – ensuring relevance, breadth and progression and coverage of the Digital Competence Framework
- reviewing network/filtering/monitoring/incident logs, where possible
- encouraging the contribution of learners to staff awareness, recent trends and the school online safety provision
- consulting stakeholders – including staff/parents/carers about the online safety provision
- monitoring improvement actions identified through use of the 360 degree safe Cymru self-review tool.

An Online Safety Group terms of reference template can be found in the appendices.

## Professional Standards

There is an expectation that national [professional standards](#) will be applied to online safety as in other aspects of school life i.e.

- there is a consistent emphasis on the central importance of literacy, numeracy and digital competence. Learners will be supported in gaining skills across all areas of learning and every opportunity will be taken to extend learners' skills and competence
- there is a willingness to develop and apply new techniques to suit the purposes of intended learning in a structured and considered approach and to learn from the experience.
- practitioners are able to reflect on their practice, individually and collectively, against nationally agreed standards of effective practice and affirm and celebrate their successes



- policies and protocols are in place for the use between the staff and other members of the school, using officially sanctioned school mechanisms.

communication technology community, using officially

# Policy

## Online Safety Policy

The school Online Safety Policy:

- sets expectations for the safe and responsible use of digital technologies for learning, administration, and communication
- allocates responsibilities for the delivery of the policy
- is regularly reviewed in a collaborative manner, taking account of online safety incidents and changes/trends in technology and related behaviours
- establishes guidance for staff in how they can use digital technologies responsibly, protecting themselves and the school and how they can use this understanding to help safeguard learners in the digital world
- describes how the school will help prepare learners to be safe and responsible users of online technologies
- establishes clear procedures to identify, report, respond to and record the misuse of digital technologies and online safety incidents, including external support mechanisms
- is supplemented by a series of related acceptable use agreements
- is made available to staff at induction and through normal communication channels (to be described)
- is published on the school website.

## Acceptable use

**The school has defined what it regards as acceptable/unacceptable use and this is shown in the tables below.**

### Acceptable use agreements

An Acceptable Use Agreement is a document that outlines a school's expectations on the responsible use of technology by its users. In most schools they are signed or acknowledged by their staff as part of their conditions of employment. Some may also require learners and parents/carers to sign them, though it is more important for these to be understood and followed rather than just signed.

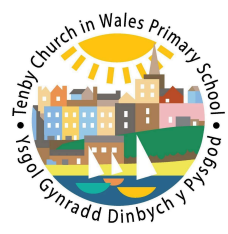


The Online Safety Policy and appendices define acceptable use at the school. Within the appendices there are acceptable use agreements for:

- learners – differentiated by age. Learners will be introduced to the acceptable use rules at induction, the start of each school year and regularly re-enforced during lessons, assemblies and by posters/splash screens around the school.
- staff /volunteer AUAs will be agreed and signed by staff and volunteers
- parent/carers AUAs inform them of the expectations of acceptable use for their children and seek permissions for digital images, the use of cloud systems etc.
- community users that access school digital technology systems will be required to sign an AUA.

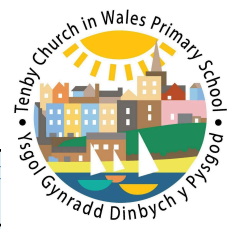
The acceptable use agreements will be communicated/re-enforced through:

- new student handbook
- staff induction and handbook
- posters/notices around where technology is used
- communication with parents/carers
- built into education sessions
- school website
- peer support.



## 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 <u>N.B. Schools should refer to <a href="#">guidance about dealing with nudes and semi-nudes being shared</a>.</u>					X
	grooming, incitement, arrangement or facilitation of sexual acts against children Contrary to the Sexual Offences Act 2003					X
	possession of an extreme pornographic image (grossly offensive, disgusting or otherwise of an obscene character), contrary to the Criminal Justice and Immigration Act 2008					X
	criminally racist material in UK – to stir up religious hatred (or hatred on the grounds of sexual orientation) - contrary to the Public Order Act 1986					X
	pornography				X	
	promotion of any kind of discrimination				X	
	threatening behaviour, including promotion of physical violence or mental harm				X	
	promotion of extremism or terrorism				X	
	any other information which may be offensive to colleagues or breaches the integrity of the ethos of the school or brings the school into disrepute				X	
<b>Activities that might be classed as cyber-crime under the Computer Misuse Act (1990):</b> <ul style="list-style-type: none"> <li>Using another individual's username or ID and password to access data, a program, or parts of a system that the user is not authorised to access (even if the initial access is authorised)</li> <li>Gaining unauthorised access to school networks, data and files, through the use of computers/devices</li> <li>Creating or propagating computer viruses or other harmful files</li> <li>Revealing or publicising confidential or proprietary information (e.g. financial / personal information, databases, computer / network access codes and passwords)</li> <li>Disable/Impair/Disrupt network functionality through the use of computers/devices</li> <li>Using penetration testing equipment (without relevant permission)</li> </ul> <p><u>N.B. Schools will need to decide whether these should be dealt with internally or by the police. Serious or repeat offences should be reported to the police. Under the Cyber-Prevent agenda the National Crime Agency has a remit to prevent</u></p>						X



learners becoming involved in cyber-crime and harness their activity in positive ways – further information <a href="#">here</a>					
Using school systems to run a private business				X	
Using systems, applications, websites or other mechanisms that bypass the filtering or other safeguards employed by the school				X	
Infringing copyright				X	
Revealing or publicising confidential or proprietary information, (e.g. financial/personal information, databases, computer/network access codes and passwords)				X	
Creating or propagating computer viruses or other harmful files				X	
Unfair usage (downloading/uploading large files that hinders others in their use of the internet)				X	
Online gaming (educational)		x			
Online gaming (non educational)				x	
Online gambling				x	
Online shopping/commerce		x			
File sharing		x			
Use of social media		x			
Use of messaging apps		x			
Use of video broadcasting, e.g. YouTube		x			

	Staff and other adults						
	Allowed	Allowed at certain times	Allowed for selected staff	Not allowed	Allowed	Allowed at certain times	Allowed with staff permission
Mobile phones may be brought to school	X						
Use of mobile phones in lessons				X			
Use of mobile phones in social time		X					



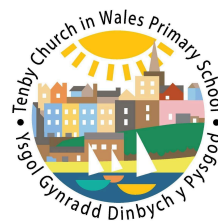
Taking photos on mobile phones/cameras				X			
Use of other mobile devices, e.g. tablets, gaming devices				X			
Use of personal e-mail addresses in school, or on school network				X			
Use of school e-mail for personal e-mails				X			
Use of messaging apps		X					
Use of social media		X?					
Use of blogs		X					

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

- the official school e-mail service may be regarded as safe and secure and is monitored. Users should be aware that e-mail communications are monitored. Staff and learners should therefore use only the school e-mail 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 learners or parents/carers (e-mail, chat, learning platform, etc.) must be professional in tone and content. These communications may only take place on official (monitored) school systems. Personal e-mail addresses, text messaging or social media must not be used for these communications
- learners should be taught about online safety issues, such as the risks attached to the sharing of personal details. They should also be taught strategies to deal with inappropriate communications and be reminded of digital citizenship and the need to communicate appropriately when using digital technologies.
- personal information should not be posted on the school website and only official e-mail addresses should be used to identify members of staff.

## Reporting and responding

The school will take all reasonable precautions to ensure online safety for all school users, but recognises that incidents may occur inside and outside of the school (with impact on the school) which will need intervention. The school will ensure:

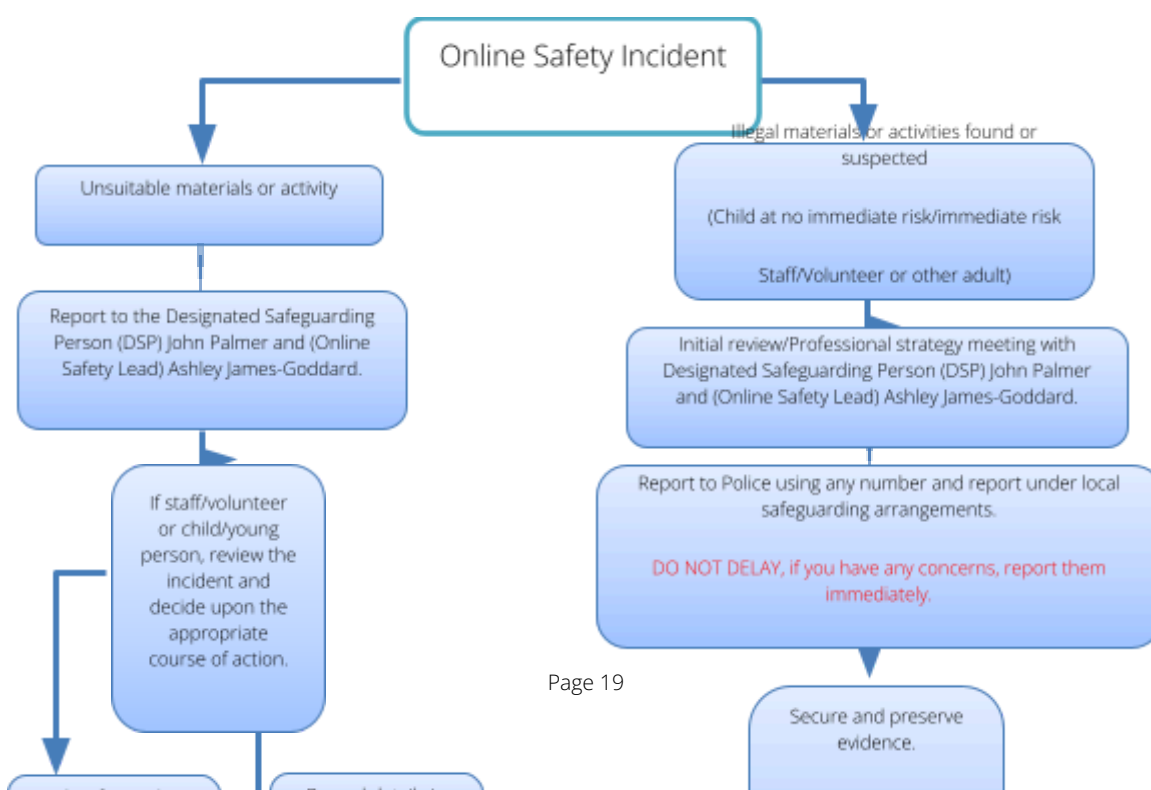


- there are clear reporting routes which are understood by all members of the school community which are consistent with safeguarding procedures, and with the whistleblowing, complaints and managing allegations policies.
- all members of the school community will be made aware of the need to immediately report online safety issues/incidents
- reports will be dealt with as soon as is practically possible once they are received
- the Designated Safeguarding Person, Online Safety Lead and other responsible staff have appropriate skills and training to deal with the various risks related to online safety
- if there is any suspicion that the incident involves child abuse images, any other illegal activity or the potential for serious harm (see flowchart and user actions chart in the appendix), the incident must be escalated through the normal school safeguarding procedures and the police informed. In these circumstances any device involved should be isolated to support a potential police investigation. In addition to child abuse images such incidents would include:
  - incidents of 'grooming' behaviour
  - the sending of obscene materials to a child
  - adult material which potentially breaches the Obscene Publications Act
  - criminally racist material
  - promotion of terrorism or extremism
  - other criminal conduct, activity or materials.
- any concern about staff misuse will be reported immediately to the Headteacher, unless the concern involves the Headteacher, in which case the complaint is referred to the Chair of Governors and the local authority
- as long as there is no suspected illegal activity devices may be checked using the following procedures:
  - one or more senior members of staff should be involved in this process. This is vital to protect individuals if accusations are subsequently reported.
  - conduct the procedure using a designated computer that will not be used by learners and if necessary can be taken off site by the police should the need arise (should illegal activity be subsequently suspected). 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 above**).



- once this has been completed and fully investigated, the Online Safety Group will need to judge whether this concern has substance or not. Appropriate action will be required and could include the following:
  - internal response or discipline procedures
  - involvement by local authority (as relevant)
  - police involvement and/or action
- it is important that those reporting an online safety incident have confidence that the report will be treated seriously and dealt with effectively
- there are support strategies in place e.g. peer support for those reporting or affected by an online safety incident
- incidents should be logged using the reporting log in the appendix of this document
- relevant staff are aware of external sources of support and guidance in dealing with online safety issues, e.g. local authority; police; [Professionals Online Safety Helpline](#); [Reporting Harmful Content](#); [CEOP](#); [Keeping safe online](#) on Hwb
- those involved in the incident will be provided with feedback about the outcome of the investigation and follow up actions
- learning from the incident (or pattern of incidents) will be provided to:
  - the Online Safety Group for consideration of updates to policies or education programmes and to review how effectively the report was dealt with
  - staff, through regular briefings
  - learners, through assemblies/lessons
  - parents/carers, through newsletters, school social media, website
  - governors, through regular safeguarding updates
  - local authority/external agencies, as relevant

The school will make the flowchart below available to staff to support the decision-making process for dealing with online safety incidents.



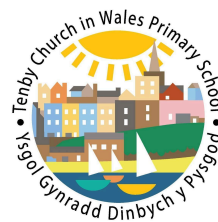


## School actions

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

## Learner actions

Incidents	Refer to class teacher/tutor	Refer to Online Safety Lead	Refer to Headteacher	Refer to Police	Refer to technical support staff for action re filtering/security etc.	Inform parents/carers	Removal of network/internet access rights	Issue a warning	Further sanction, e.g. detention/exclusion
Deliberately accessing or trying to access material that could be considered illegal (see list <a href="#">in earlier section</a> on unsuitable/inappropriate activities).		X	X	X	X	X			
Unauthorised use of non-educational sites during lessons.	X								
Unauthorised use of mobile phone/digital camera/other mobile device.	X	X	X			X		X	
Unauthorised use of social media/messaging apps/personal e-mail.	X	X	X			X		X	
Unauthorised downloading or uploading of files.	X	X	X			X		X	
Allowing others to access school network by sharing username and passwords.	X	X	X			X		X	
Attempting to access or accessing the school network, using another learners' account.	X								

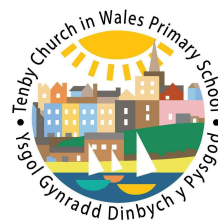


Attempting to access or accessing the school network, using the account of a member of staff.	x	x				x		x	
Corrupting or destroying the data of other users.	x	x	x			x		x	
Sending an e-mail, text or message that is regarded as offensive, harassment or of a bullying nature.	x	x	x			x		x	
Continued infringements of the above, following previous warnings or sanctions.	x	x	x			x		x	x
Actions which could bring the school into disrepute or breach the integrity or the ethos of the school.	x	x	x			x		x	
Using proxy sites or other means to subvert the school's filtering system.	x	x	x			x		x	
Accidentally accessing offensive or pornographic material and failing to report the incident.	x	x	x		x	x		x	
Deliberately accessing or trying to access offensive or pornographic material.	x	x	x		x	x		x	
Receipt or transmission of material that infringes the copyright of another person or infringes the Data Protection Act.	x	x	x			x		x	



## Staff Actions

Incidents	Refer to line manager	Refer to Headteacher	Refer to local authority /H R	Refer to Police	Refer to Technical Support Staff for action re filtering, etc.	Issue a warning	Suppression	Disciplinary action
Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on unsuitable/inappropriate activities)		X	X	X				
Inappropriate personal use of the internet/social media/personal e-mail		X				X		
Unauthorised downloading or uploading of files.		X				X		
Allowing others to access school network by sharing username and passwords or attempting to access or accessing the school network, using another person's account.		X				X		
Careless use of personal data, e.g. displaying, holding or transferring data in an insecure manner		X				X		
Deliberate actions to breach data protection or network security rules.		X			X	X		
Corrupting or destroying the data of other users or causing deliberate damage to hardware or software		X			X	X		
Sending an e-mail, text or message that is regarded as offensive, harassment or of a bullying nature.		X	X		X	X		
Using personal e-mail/social networking/messaging to carrying out digital communications with learners and parents/carers		X	X		X	X		



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

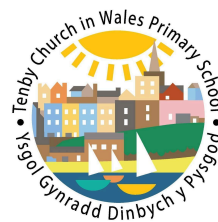
# Education

## Online Safety Education Programme

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

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

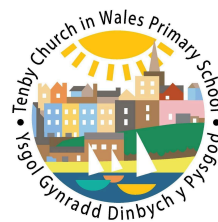
- a planned online safety curriculum across all year groups and a range of subjects, (e.g. DCF/PSE/RSE/Health and Well-being) and topic areas and should be regularly revisited – lessons can be found here: [Digital Citizenship SOW \(Web view\)](#) and here: <https://projectevolve.co.uk/> and through our JIGSAW Scheme of work.
- key online safety messages should be reinforced as part of a planned programme of assemblies and tutorial/pastoral activities



- it incorporates/makes use of relevant national i opportunities e.g. [Safer Internet Day](#) and [Anti-bullying week](#)
- the programme will be accessible to learners at different ages and abilities such as those with additional learning needs or those with English as an additional language. Learners considered to be at increased risk online (e.g. children in care, SEND learners, learners experiencing loss or trauma or mental health issues) are provided with targeted or differentiated online safety education
- learners should be taught in all lessons to be critically aware of the materials/content they access online and be guided to validate the accuracy of information
- learners should be taught to acknowledge the source of information used and to respect copyright when using material accessed on the internet
- learners 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.
- learners should be helped to understand the need for the learner acceptable use agreement and encouraged to adopt safe and responsible use both within and outside school
- staff should act as good role models in their use of digital technologies the internet and mobile devices
- in lessons where internet use is pre-planned, it is best practice that learners 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 learners are allowed to freely search the internet, staff should be vigilant in supervising the learners and monitoring the content of the websites the young people visit
- it is accepted that from time to time, for good educational reasons, students may need to research topics, (e.g. racism, drugs, discrimination) that would normally result in internet searches being blocked. In such a situation, staff can request that the technical staff (or other nominated person) can temporarily remove those sites from the filtered list for the period of study. Any request to do so, should be auditable, with clear reasons for the need
- the online safety education programme will be regularly audited and evaluated to ensure the quality of learning and outcomes.

## Contribution of Learners

The school acknowledges, the skills and knowledge of learners in the use of digital technologies. We recognise the potential for this to shape the online safety strategy for the school community and how this contributes positively to the personal development of young people. Their contribution is recognised through:



- mechanisms to canvass learner feedback and opinion
- appointment of digital leaders
- the Online Safety Group has learner representation
- learners contribute to the online safety education programme e.g. digital leaders leading lessons for younger learners and online safety campaigns

## Staff/volunteers

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

- a planned programme of formal online safety and data protection training will be made available to all staff. This will be regularly updated and reinforced. An audit of the online safety training needs of all staff will be carried out regularly. This can be found here: <https://hwb.gov.wales/news/articles/2ec00cee-59e5-4e21-85e2-a4bf1ef14ed1>
- the training will be an integral part of the school's annual safeguarding and data protection training for all staff
- all new staff will receive online safety training as part of their induction programme, ensuring that they fully understand the school online safety policy and acceptable use agreements. It includes explicit reference to classroom management, professional conduct, online reputation and the need to model positive online behaviours
- the Online Safety Lead and Designated Safeguarding Person (or other nominated person) will receive regular updates through attendance at external training events, (e.g. Hwb Keeping safe online training events, from the Regional Consortium/SWGfL/LA/other relevant organisations) and by reviewing guidance documents released by relevant organisations
- this Online Safety Policy and its updates will be presented to and discussed by staff in staff/team meetings/INSET days
- the Online Safety Lead will provide advice/guidance/training to individuals as required.

## Governors

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

- Hwb training – [Online safety for governors](#)
- attendance at training provided by the local authority or other relevant organisation (e.g. SWGfL)
- participation in school training/information sessions for staff or parents ([this may include attendance at assemblies/lessons](#)).

A higher level of training will be made available to the Online Safety Governor.



Schools should consider providing all governors with a H...der to use the secure  
tools and services available e.g. Microsoft Outlook, Teams, appropriate application  
training. This would negate the need for governors to use personal email accounts, thereby  
reducing the risk to data.

## Families

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

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

- regular communication, awareness-raising and engagement on online safety issues, curriculum activities and reporting routes
- regular opportunities for engagement with parents/carers on online safety issues through awareness workshops/parent/carer evenings etc
- the learners – who are encouraged to pass on to parents the online safety messages they have learned in lessons and by learners leading sessions at parent/carer evenings.
- letters, newsletters, website, learning platform, Hwb
- high profile events/campaigns e.g. [Safe Internet Day](#)
- reference to the relevant web sites/publications, e.g. Hwb [Keeping safe online](#), [www.saferinternet.org.uk/](http://www.saferinternet.org.uk/) [www.childnet.com/parents-and-carers](http://www.childnet.com/parents-and-carers) (see Appendix for further links/resources).
- Sharing good practice with other schools in clusters and or the local authority

## Adults and Agencies

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

- providing family learning courses in use of new digital technologies and online safety
- online safety messages targeted towards families and relatives.
- the school will provide online safety information via their learning platform, website, and social media for the wider community
- supporting community groups, e.g. early years settings, childminders, youth/sports/voluntary groups to enhance their online safety provision



# Technology

The school is responsible for ensuring that the school infrastructure/network is as safe and secure as is reasonably possible and that policies and procedures approved within this policy are implemented. The school should ensure that all staff are made aware of policies and procedures in place on a regular basis and explain that everyone is responsible for online safety and data protection.

## Filtering

- the school filtering policies are agreed by senior leaders and technical staff and are regularly reviewed and updated in response to changes in technology and patterns of online safety incidents/behaviours
- the school manages access to content across its systems for all users. The filtering provided meets the standards defined in the Welsh Government [Recommended web filtering standards for schools](#) and the UK Safer Internet Centre [Appropriate filtering](#).
- internet access is filtered for all users
- illegal content (e.g. child sexual abuse images) is filtered by the broadband or filtering provider by actively employing the Internet Watch Foundation CAIC list and the police assessed list of unlawful terrorist content, produced on behalf of the Home Office. Content lists are regularly updated
- there are established and effective routes for users to report inappropriate content
- there is a clear process in place to deal with requests for filtering changes (see Appendix for more details).
- the school has provided enhanced/differentiated user-level filtering (allowing different filtering levels for different ages/stages and different groups of users: staff/learners, etc.)
- younger learners will use child friendly/age appropriate search engines e.g. [SWGfL Swiggle](#)
- there is an appropriate and balanced approach to providing access to online content according to role and/or need
- filtering logs are regularly reviewed and alert the school to breaches of the filtering policy, which are then acted upon.
- where personal mobile devices have internet access through the school network, content is managed in ways that are consistent with school policy and practice.
- the system manages access to content through non-browser services (e.g. apps and other mobile technologies)

If necessary, the school will seek advice from, and report issues to, the SWGfL [Report Harmful Content](#) site.



# Monitoring

The school follows the UK Safer Internet Centre [Appropriate Monitoring](#) guidance and protects users and school systems through:

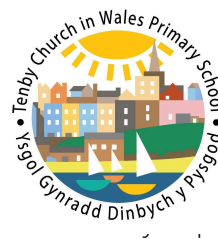
- physical monitoring (adult supervision in the classroom)
- internet use is logged, regularly monitored and reviewed
- filtering logs are regularly analysed and breaches are reported to senior leaders
- pro-active alerts inform the school of breaches to the filtering policy, allowing effective intervention.
- where possible, school technical staff regularly monitor and record the activity of users on the school technical systems

Users are made aware, through the acceptable use agreements, that monitoring takes place.

# Technical Security

The school will use the following technical security procedures:

- 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 are securely located and physical access restricted
- there are rigorous and verified back-up routines, including the keeping of copies off-site or in the cloud
- all users have clearly defined access rights to school technical systems and devices. Details of the access rights available to groups of users will be recorded by the Network Manager and will be reviewed, at least annually, by the Online Safety Group
- all users (adults and learners) have responsibility for the security of their username and password, must not allow other users to access the systems using their log on details. Sharing of passwords or ID and passwords could lead to an offence under the Computer Misuse Act 1990. Users must immediately report any suspicion or evidence that there has been a breach of security
- all school networks and system will be protected by secure passwords. Passwords must not be shared with anyone.
- the master account passwords for the school systems are kept in a secure place, e.g. school safe. It is recommended that these are secured using two factor authentication for such accounts
- passwords should be long.



- records of learner usernames and passwords for Foundation Phase learners can be kept in an electronic or paper-based form, but they must be kept secure 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 learners at Key Stage 2 and above should increase as learners progress through school
- Online Safety Lead – Ashley James-Goddard 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
- appropriate security measures are in place to protect the servers, firewalls, routers, wireless systems, work stations, mobile devices, etc., from accidental or malicious attempts which might threaten the security of the school systems and data. These are tested regularly. The school infrastructure and individual workstations are protected by up to date virus software.
- an agreed policy is in place for the provision of temporary access of 'guests', (e.g. trainee teachers, supply teachers, visitors) onto the school systems through PCC Network Managers
- an agreed policy is in place regarding the use of removable media (e.g. memory sticks/CDs/DVDs) by users on school devices. Devices need to be encrypted with password protection and not taken off-site.

## Mobile technologies

Mobile technology devices used in school will be exclusively school owned/provided or might include smartphone, tablet, wearable devices, notebook/laptop or other technology that usually has the capability of utilising the school's wireless network. The device then has access to the wider internet which may include the school learning platform and other cloud-based services such as e-mail and data storage.

- The school acceptable use agreements for staff, learners, parents and carers outline the expectations around the use of mobile technologies.
- The school allows:

	School devices	Personal devices
--	----------------	------------------



	School owned for individual use	School owned for multiple users	Authorised device <sup>8</sup>	owned	Staff owned	Staff owned
Allowed in school	x	x		No <sup>9</sup>	No <sup>8</sup>	No <sup>8</sup>
Full network access	x	x				
Internet only						
No network access			x	x	x	x

Personal devices may be within school grounds for staff members but must only be used during; break/ lunch times, in the event of an emergency or as a communication tool with school whilst on an off-site trip unless permission has been sought from the Headteacher – John Palmer. Any students bringing in personal technology (for example, a phone to be used whilst walking to and from school) must hand this technology to their class teacher to be kept in a locked drawer and returned to the child at the end of the day.

### School owned/provided devices:

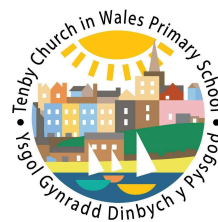
- may be allocated to specific staff members and a log will be kept
- may be used on or off-site through the use of Microsoft Authenticator
- must not be used for personal use
- must be reported to the Online Safety Lead if damaged or missing, in the latter instance being reported as a possible data breach.

### Personal devices

- staff and visitors are allowed personal devices on site.
- personal devices must be used without learners present and during non-teaching times and kept out of sight – including times where staff are on duty supervising learners
- staff may carry devices on their person
- staff may use their personal devices in case of emergency or as a communication tool during off-site visits

<sup>8</sup> Authorised device – purchased by the learner/family through a school-organised scheme. This device may be given full access to the network as if it were owned by the school.

<sup>9</sup> The school should add below any specific requirements about the use of mobile/personal devices in school.



- If an emergency occurs during an off-site visit at school, learners will be encouraged to use their personal device for a call to a parent or carer, staff or the emergency services. Learners will be encouraged to avoid sharing personal information
- no access will be given to the school network including no use of the guest access
- personal devices should not be used for the taking of images or videos under any circumstances
- the school retains no liability for loss/damage or malfunction on premises
- the safe and responsible use of mobile devices is included in the school online safety education
- misuse of personal devices will result in discussion with the Online Safety Lead and Headteacher who will take appropriate action for each instance

## Social media

The school provides the following measures to ensure reasonable steps are in place to minimise risk of harm to learners through:

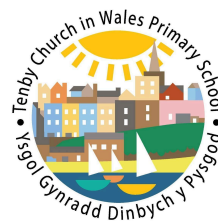
- ensuring that personal information is not published
- education/training being provided including acceptable use, age restrictions, social media risks, digital and video images policy, checking of settings, data protection and reporting issues
- clear reporting guidance, including responsibilities, procedures and sanctions
- risk assessment, including legal risk
- guidance for learners, parents/carers

School staff should ensure that:

- no reference should be made in social media to learners, 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
- they act as positive role models in their use of social media

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 the Online Safety Lead – Ashley James-Goddard and one other teaching member of staff
- a code of behaviour for users of the accounts



- systems for reporting and dealing with abuse and n
  - understanding of how incidents may be dealt with u
- linary procedures.

## Personal use

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

## Monitoring of public social media

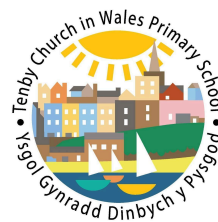
- As part of active social media engagement, the school will pro-actively monitor the Internet for public postings about the school
- the school should effectively respond to social media comments made by others according to a defined policy or process
- when parents/carers express concerns about the school on social media we will urge them to make direct contact with the school, in private, to resolve the matter. Where this cannot be resolved, parents/carers should be informed of the school complaints procedure.

School use of social media for professional purposes will be checked regularly by a senior leader and the Online Safety Group to ensure compliance with the social media, data protection, communications, digital image and video policies. In the event of any social media issues that the school is unable to resolve support may be sought from the [Professionals Online Safety Helpline](#).

## Digital and video images

The school will inform and educate users about these risks and will implement policies to reduce the likelihood of the potential for harm

- should a maintained school or setting choose to use live-streaming or video-conferencing, governing bodies, headteachers and staff must have full regard to national safeguarding guidance and local safeguarding policies and should take note of the guidance contained in the [Live-streaming and video-conferencing: safeguarding principles and practice guidance](#)

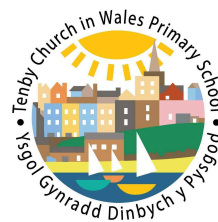


- when using digital images, staff should inform learners about the risks associated with the taking, use, sharing, publication of images. In particular they should recognise the risks attached to publishing their own images on the internet, e.g. on social networking sites
- in accordance with guidance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

## Online Publishing

The school communicates with parents/carers and the wider community and promotes the school through

- Public-facing website
- Social media – Facebook and Twitter
- ClassDojo



The school website is managed/hosted by PCC Digital Team. The school ensures that good practice has been observed in the use of online publishing e.g. use of digital and video images, copyright, identification of young people, publication of school calendars and personal information – ensuring that there is no risk to members of the school community, through such publications.

Where learner work, images or videos are published, their identities are protected and full names are not published. When using ClassDojo, staff are able to use personal devices for messaging if they wish but are not to use personal devices for the taking of photos and/or videos to send to parents and carers.

The school public online publishing provides information about online safety e.g. publishing the schools Online Safety Policy; curating latest advice and guidance; news articles etc, creating an online safety page on the school website.

The website includes an online reporting process for parents and the wider community to register issues and concerns to complement the internal reporting process.

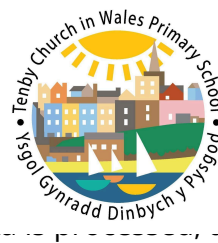
During off-site trips staff will need to use an allocated school device and not a personal device to take photos and/or videos to share with parents.

## Data Protection

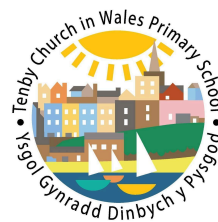
Personal data will be recorded, processed, transferred and made available according to the current data protection legislation.

The school:

- has a Data Protection Policy.
- implements the data protection principles and is able to demonstrate that it does so
- has paid the appropriate fee to the Information Commissioner's Office (ICO)
- 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 – Kath Palin.
- has a 'Record of Processing Activities' in place and knows exactly what personal data is held, where, why and which member of staff has responsibility for managing it
- the Record of Processing Activities lists the lawful basis for processing personal data (including, where relevant, consent). Where special category data is processed, an additional lawful basis is listed
- has an 'information asset register' in place and knows exactly [what personal data is held](#), where, why and which member of staff has responsibility for managing it



- information asset register lists the lawful basis for processing personal data (including, where relevant, consent). Where special category data is processed, an additional lawful basis will have also been listed
- will hold the minimum personal data necessary to enable it to perform its function and will not hold it for longer than necessary for the purposes it was collected for. The school 'retention schedule' supports this
- data held is accurate and up to date and is held only for the purpose it was held for. Systems are in place to identify inaccuracies, such as asking parents to check emergency contact details at suitable intervals
- 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)
- has procedures in place to deal with the individual rights of the data subject, e.g. [one of the dozen rights applicable is that of Subject Access which enables an individual to see/have a copy of the personal data held about them](#)
- carries out Data Protection Impact Assessments (DPIA) where necessary e.g. to ensure protection of personal data when accessed using any remote access solutions, or entering into a relationship with a new supplier
- IT system security is ensured and regularly checked. Patches and other security essential updates are applied promptly to protect the personal data on the systems. Administrative systems are securely ring fenced from systems accessible in the classroom/to learners
- has undertaken appropriate due diligence and has data protection compliant contracts in place with any data processors
- understands how to share data lawfully and safely with other relevant data controllers. [In Wales, schools should consider using the Wales Accord on Sharing Personal Information toolkit to support regular data sharing between data controllers](#)
- has clear and understood policies and routines for the deletion and disposal of data
- [reports any relevant breaches to the Information Commissioner](#) within 72hrs of becoming aware of the breach as required by 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
- [As a maintained school](#), has a Freedom of Information Policy which sets out how it will deal with FOI requests
- provides protection training for all staff 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 as well as the core training provided to all staff

for their function as

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

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

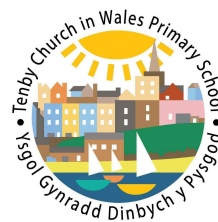
Staff must ensure that they:

- 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 understand their rights and know how to handle a request whether verbal or written and know who to pass it to in the school
- only use encrypted mobile devices (including USBs) for personal data, particularly when it is about children
- will not transfer any school personal data to personal devices – devices may be used from home through the use of Microsoft Authenticator
- use personal data only on secure password protected computers and other devices, ensuring that they are properly “logged-off” at the end of any session in which they are using personal data
- transfer data using encryption, a secure email account (where appropriate), and secure password protected devices.

## Outcomes

The impact of the Online Safety Policy and practice is regularly evaluated through the review/audit of online safety incident logs; behaviour/bullying reports; surveys of staff, learners; parents/carers and is reported to relevant groups:

- there is balanced professional debate about the evidence taken from the reviews/audits and the impact of preventative work e.g. online safety education, awareness and training



- there are well-established routes to regularly report safety incidents and outcomes to school leadership and Governors
- parents/carers are informed of patterns of online safety incidents as part of the school's online safety awareness raising
- online safety (and related) policies and procedures are regularly updated in response to the evidence gathered from these reviews/audits/professional debate
- the evidence of impact is shared with other schools, agencies and LAs to help ensure the development of a consistent and effective local online safety strategy.

## Appendix

Copies of the more detailed template policies and agreements, contained in the appendix, can be [downloaded from Hwb](#).

The Welsh Government and SWGfL would like to acknowledge a range of individuals and organisations whose policies, documents, advice and guidance have contributed to the development of this school Online Safety Policy template and of the 360 safe Cymru online safety self-review tool:

### Acknowledgements:

- Members of the SWGfL Online Safety Group
- Representatives of Welsh local authorities
- Representatives from a range of Welsh schools involved in consultation and pilot groups

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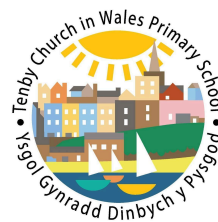
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# A2 Learner Acceptable Use Policy

## Progression Step 3.

### Introduction

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

### This acceptable use agreement is intended:

- to ensure that learners will have good access to devices and the internet, be responsible users and stay safe while using digital technologies for educational, personal and recreational use
- to help learners understand good online behaviours that they can use in school, but also outside school
- to protect school devices and networks from accidental or deliberate misuse that could put the security of the systems and users at risk.

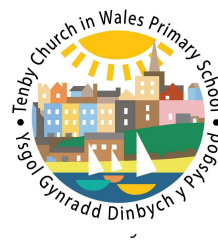
## Acceptable Use Agreement

When I use devices I must behave responsibly to help keep me and other users safe online and to look after the devices.

### For my own personal safety:

- I understand that what I do online will be supervised and monitored and that I may not be allowed to use devices in school unless I follow these rules and use them responsibly
- I will only visit internet sites that adults have told me are safe to visit
- I will keep my username and password safe and secure and not share it with anyone else
- I will be aware of "stranger danger" when I am online
- I will not share personal information about myself or others when online
- If I arrange to meet people off-line that I have communicated with online, I will do so in a public place and take a trusted adult with me
- I will immediately tell an adult if I see anything that makes me feel uncomfortable when I see it online.

**I will look after the devices I use, so that the school and everyone there can be safe:**



- I will handle all the devices carefully and only use them with permission.
- I will not try to alter the settings on any device or install any software or programmes.
- I will tell an adult if a device is damaged or if anything else goes wrong.
- I will only use the devices to do things that I am allowed to do.

**I will think about how my behaviour online might affect other people:**

- When online, I will act as I expect others to act toward me.
- I will not copy anyone else's work or files without their permission.
- I will be polite and responsible when I communicate with others and I appreciate that others may have different opinions to me.
- I will not take or share images of anyone without their permission.

**I know that there are other rules that I need to follow:**

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

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

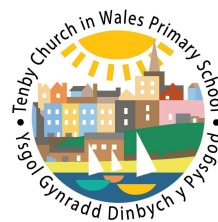
- I know that I am expected to follow these rules in school and that I should behave in the same way when out of school as well.
- I understand that if I do not follow these rules, I may be subject to disciplinary action. This could include loss of access to the school network/internet and parents / carers contacted.

## **Learner Acceptable Use Agreement Form**

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

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

- I use the school systems and devices (both in and out of school)
- I use my own devices in the school (when allowed) e.g. mobile phones, gaming devices USB devices, cameras etc.



- I am out of school and involved in any online behaviour that affects the school or other members of the school.

Name of Learner: \_\_\_\_\_ Group/Class: \_\_\_\_\_

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

**Parent/Carer Countersignature**

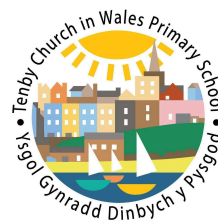
## A3 Learner Acceptable Use Policy Agreement Progression Step 1 and 2.

This is how we stay safe when we use computers:

- I will ask a teacher or suitable adult if I want to use the computers/tablets.
- I will only use activities that a teacher or suitable adult has told or allowed me to use.
- I will take care of computers/tablets and other equipment.
- I will ask for help from a teacher or suitable adult if I am not sure what to do or if I think I have done something wrong.
- I will tell a teacher or suitable adult if I see something that upsets me on the screen.
- I know that if I break the rules I might not be allowed to use a computer/tablet.

Signed (child): \_\_\_\_\_

Signed (parent): \_\_\_\_\_



# A4 Parent/Carer Acceptable Use Agreement Template and permission forms

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

## This acceptable use policy is intended to ensure:

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

The school will try to ensure that learners will have good access to digital technologies to enhance their learning and will, in return, expect the learners to agree to be responsible users. A copy of the learner acceptable use agreement is attached to this permission form, so that parents/carers will be aware of the school expectations of the learners in their care.

Parents are requested to sign the permission form below to show their support of the school in this important aspect of the school's work. [\(Schools will need to decide whether or not they wish parents to sign the acceptable use agreement on behalf of their child\)](#)

## Permission Form

Parent/Carers Name: \_\_\_\_\_ Name(s) of Learners \_\_\_\_\_

As the parent/carers of the above learners, I give permission for my child to have access to the internet and to ICT systems at school.

[Either: \(KS2 and above\)](#)

*I know that my child has signed an acceptable use agreement and has received, or will receive, online safety education to help them understand the importance of safe use of technology and the internet – both in and out of school.*

[Or: \(Foundation\)](#)



*I understand that the school has discussed the acceptable use of technology and the internet – both in and out of the school.*

*my child and that they understand the importance of safe*

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

I understand that my child's activity on the systems will be monitored and that the school will contact me if they have concerns about any possible breaches of the acceptable use agreement.

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

As the school is collecting personal data by issuing this form, it should inform parents/carers as to:

This form (electronic or printed)
Who will have access to this form.
Where this form will be stored.
How long this form will be stored for.
How this form will be destroyed.

Signed: \_\_\_\_\_

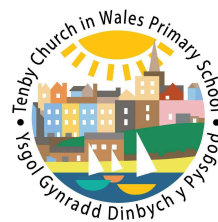
Date: \_\_\_\_\_

When complete, ensure the information on this form is recorded in the school database.

Paper copies should be securely destroyed.

When complete, this page should be stored in a secure location for the duration of:

*insert period*



## Use of Digital/Video Images

There are certain activities where the school do not use children's data for processing your child's data. We take photographs/videos of the children for the purposes of recording and tracking pupil progress under the [e.g. *Education Act 1996*] and compiling evidence for assessment purposes. These are kept in secure locations within the school and destroyed in line with our retention policy. We may also need to share these files with third parties, such as [*Insert professionals/third parties who may be a recipient or contributor, if any*]. Further details can be found in the school privacy notice.

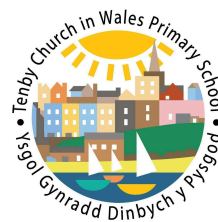
On other occasions the school may wish to publish photographs and/or video footage of pupils in public documents such as the school prospectus, our social media pages (e.g. Twitter) and website, on display around the school, and in community publications such as local newspapers. All images are published with the strictest regard for safeguarding and child protection, and only with your consent.

The school will comply with data protection laws and request parent's/carers permission before publishing images of members of the school. We will also ensure that when images are published the learner cannot be identified using their names.

Please note that you can withdraw your consent at any time. If you have any queries or wish to withdraw or review your consent, please contact the school.

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 2018). To respect everyone's privacy and in some cases protection, these images should not be published/made publicly available on social networking sites, nor should parents/carers comment on any activities involving other learners in the digital/video images.

Parents/carers are requested to sign the permission form below to allow the school to take and use images of their children and for the parents/carers to agree.



As the school is collecting personal data by issuing this form

parents/carers as to:

This form (electronic or printed)	The images
The school will retain the consent form for the period of 1 academic year. Consent for the publication of photographs/images will be renewed on an annual basis.	Where the images may be published. Such as; Twitter, Facebook, the school website, local press, etc. (see relevant section of form below)
	Who will have access to the images.
	Where the images will be stored.
	How long the images will be stored for.
	How the images will be destroyed.
	<p>How a request for deletion of the images can be made.</p> <p>Parents/Carers should note that websites can be viewed throughout the World, and not just in the United Kingdom where UK/EU data protection law applies. Images and information can no longer be controlled by the school when copied from the website.</p>

## Digital/Video Images Permission Form



Parent/Carers Name: \_\_\_\_\_ Name(s) of Learner(s): \_\_\_\_\_

Description of the use of Photographs or Images	Please Tick	
I agree for photographs/videos to be taken of my child during school activities for use <u>on display boards or walls around the school.</u>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
I agree for photographs/videos to be taken of my child during school activities for use <u>within school printed publications.</u>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
I agree for photographs/videos to be taken of my child during school activities for use <u>on school digital channels (e.g. websites, social media).</u>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
I agree for photographs/videos to be taken of my child during school activities and <u>used in local or national media (e.g. newspapers or television appearance).</u>	<input type="checkbox"/> Yes	<input type="checkbox"/> No

OR

I <u>do not</u> wish any photographs/videos to be taken of my child for the purposes outlined above.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
--	------------------------------	-----------------------------

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

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 Data Protection Laws). However, to respect everyone's privacy (and in some cases protection) these images should not be published/made publicly available on social networking sites, nor should parents/carers comment on any activities involving other learners in the digital/video images.



## Use of Cloud Systems

In Wales, all learners have access to Hwb through a personal account. In order for an account to be created, personal data is shared between the school and Hwb. The use of personal data in this manner is considered to be a public task, for the purposes of data protection. This means that consent is not required in order for a learner to have a Hwb account and access to the tools and services on this platform. More details can be found in the Hwb Trust Centre.

Schools that use other cloud hosting services should assess the risk of sharing personal data with any other third party and should identify the correct lawful basis for this data sharing. It is likely that parent/carer consent may be required in order to create an account. Schools should consider the impact of relying on consent as the lawful basis if the service is regarded as essential to providing education. If consent is withdrawn and access to the service no longer possible, the school should consider if this would have a negative impact on the learners' education?

Schools may wish to include a simple form to collect any necessary permission [here](#).

## Use of Biometric Systems in England and Wales

If the school uses biometric systems (e.g. fingerprint/palm recognition technologies) to identify children for access, attendance recording, charging, library lending etc it must (under the "Protection of Freedoms" and Data Protection legislation) seek permission from a parent or carer.

The school uses biometric systems for the recognition of individual children in the following ways [\(the school should describe here how it uses the biometric system\)](#).

Biometric technologies have certain advantages over other automatic identification systems as learners do not need to remember to bring anything with them [\(to the canteen or school library\)](#) so nothing can be lost, such as a swipe card.

The school has carried out a Data Privacy Impact Assessment and is confident that the use of such technologies is effective and justified in a school context. Please see below for more information:



As the school is collecting special category personal data and appropriate\* sharing this with a third party, it should inform parents/carers about:

This form (electronic or printed)	The data shared with the service provider
Who will have access to this form.	What data will be shared
Where this form will be stored.	Who the data will be shared with
How long this form will be stored for.	Who will have access to the data.
How this form will be destroyed.	Where the data will be stored.
	How long the data will be stored for.
	How the data will be destroyed.
	How consent to process the biometric data can be withdrawn.

No complete images of [fingerprints/palms](#) are stored and the original image cannot be reconstructed from the data. Meaning that it is not possible, for example, to recreate a learner's fingerprint or even the image of a fingerprint from what is in effect a string of numbers.

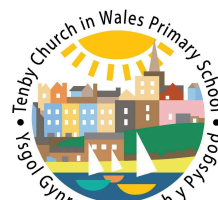
Parent/Carers Name: \_\_\_\_\_ Name(s) of Learner(s) \_\_\_\_\_

Where your child is over 13 years of age, we recommend that you complete this form with them, as learners may be able to decide how their data may be used in certain circumstances.

As the parent/carer of the above learner(s), I agree to the school using biometric recognition systems, as described above. Yes/No

I understand that the images cannot be used to create a whole [fingerprint/palm print](#) of my child and that these images will not be shared with anyone outside the school Yes/No

Signed: \_\_\_\_\_



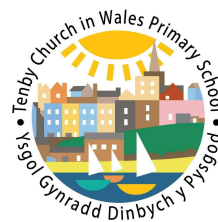
## Further guidance

- Each parent of the child should be notified by the school of the planning to process their child's biometrics and notified that they are able to object.
- In order for a school to process children's biometrics at least one parent must consent and no parent has withdrawn consent. This needs to be in writing.
- A child aged over 13 can object or refuse to participate in the processing of their biometric data regardless of parents' consent.
- Schools must provide reasonable alternative means of accessing services for those learners who will not be using an automated biometric recognition system.
- Permission only needs to be collected once during the period that the learner attends the school, but new permission is required if there are changes to the biometric systems in use.

## Learner Acceptable Use Agreement

On the following pages we have copied, for the information of parents and carers, the learner acceptable use agreement.

It is suggested that when the learner AUA is written that a copy should be attached to the parents/carers acceptable use agreement to provide information for parents and carers about the rules and behaviours that learners have committed to by signing the form.



# A5 Staff (and Volunteer) Acceptable Use Policy Agreement Template

Sections that include advice or guidance are written in BLUE. It is anticipated that schools will remove these sections from their final document. Schools should review and amend the contents of this agreement to ensure that it is consistent with their Online Safety Policy and other relevant school policies. Due to the number of optional statements and the advice/guidance sections included in this template, it is anticipated that the final AUA will be more concise.

## School Policy

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

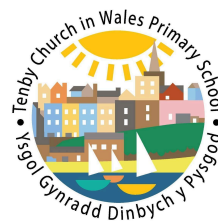
## This acceptable use policy is intended to ensure:

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

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

## Acceptable Use Policy Agreement

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



## For my professional and personal safety:

- I understand that the school will monitor my use of digital technology and communications systems
- I understand that the rules set out in this agreement also apply to use of these technologies (e.g. laptops, e-mail, VLE etc.) out of school, and to the transfer of personal data (digital or paper based) out of the school (schools should amend this section in the light of their policies which relate to the use of school systems and equipment out of the school)
- I understand that the school digital technology systems are primarily intended for educational use and that I will only use the systems for personal or recreational use within the policies and rules set down by the school. (schools should amend this section in the light of their policies which relate to the personal use, by staff and volunteers, of school systems)
- I will not disclose my username or password to anyone else, nor will I try to use any other person's username and password. I understand that I should not write down or store a password where it is possible that someone may steal it
- I will immediately report any illegal, inappropriate or harmful material or incident, I become aware of, to the appropriate person.

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

- I will not access, copy, remove or otherwise alter any other user's files, without their express permission.
- I will communicate with others in a professional manner. I will not use aggressive or inappropriate language and I appreciate that others may have different opinions.
- I will ensure that when I take and/or publish images of others I will do so with their permission and in accordance with the school's policy on the use of digital/video images. I will not use my personal equipment to record these images, unless I have permission to do so. Where these images are published (e.g. on the school website/VLE) it will not be possible to identify by name, or other personal information, those who are featured.
- I will only use social networking sites in the school in accordance with school policies. (schools should amend this section to take account of their policy on access to social networking and similar sites)
- I will only communicate with learners and parents/carers using official school systems. Any such communication will be professional in tone and manner. (schools should amend this section to take account of their policy on communications with learners and parents/carers. Staff should be made aware of the risks attached to using their personal e-mail addresses/mobile phones/social networking sites for such communications)



- I will not engage in any online activity that will compromise my professional responsibilities.

## **The school has the responsibility to provide safe and secure access to technologies and ensure the smooth running of the school:**

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



- I will immediately report any damage or faults involving hardware or software, however this may have happened.

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

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

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

- I understand that this acceptable use policy applies not only to my work and use of school digital technology equipment in the school, but also applies to my use of school systems and equipment off the premises and my use of personal equipment on the premises or in situations related to my employment by the school.
- I understand that if I fail to comply with this acceptable use agreement, I could be subject to disciplinary action. This could include (schools should amend this section to provide relevant sanctions as per their behaviour policies) a warning, a suspension, referral to Governors and/or the local authority and in the event of illegal activities the involvement of the police.

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

**Staff/Volunteer Name:** \_\_\_\_\_

**Signed:** \_\_\_\_\_

**Date:** \_\_\_\_\_



# A6 Acceptable Use Agreement Community Users Template

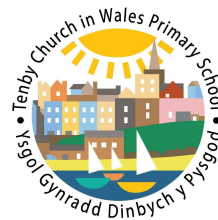
**This acceptable use agreement is intended to ensure that:**

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

## **Acceptable Use Agreement**

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

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



- I will immediately report equipment/software damage, however this may have happened.
- I will ensure that I have permission to use the original work of others in my own work.
- I will not download or distribute copies of work protected by copyright (including music and videos).
- I understand that if I fail to comply with this acceptable use agreement, the school has the right to remove my access to school systems/devices

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

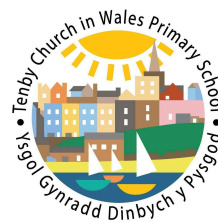
As the school is collecting personal data by issuing this form, it should inform community users about:

Who will have access to this form.	How this form will be destroyed.
Where this form will be stored.	How long this form will be stored for.

Name: \_\_\_\_\_

Signed: \_\_\_\_\_

Date: \_\_\_\_\_



# A7 Online Safety Group Template

## 1. Purpose

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

## 2. Membership

2.1. The Online Safety Group will seek to include representation from all stakeholders. The composition of the group should include (N.B. in small schools one member of staff may hold more than one of these posts):

[add/delete where appropriate]

- SLT member/s
- Child Protection/Safeguarding officer
- Teaching staff member
- Support staff member
- Online safety lead (not ICT coordinator by default)
- Governor
- Parent/Carer
- ICT Technical Support staff (where possible)
- Community users (where appropriate)
- *Learner representation – for advice and feedback. Learner voice is essential in the make-up of the Online Safety Group, but learners would only be expected to take part in committee meetings where deemed relevant.*

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

## 3. Chairperson

The Online Safety Group should select a suitable chairperson from within the group. Their responsibilities include:

- Scheduling meetings and notifying group members;
- Inviting other people to attend meetings when required by the group;



- Guiding the meeting according to the agenda and time
- Ensuring all discussion items end with a decision, action plan, or outcome;
- Making sure that notes are taken at the meetings and that those with any action points are distributed as necessary

#### 4. Duration of Meetings

Meetings shall be held [\[insert frequency\]](#) for a period of [\[insert number\]](#) hour(s). A special or extraordinary meeting may be called when and if deemed necessary.

#### 5. Functions

These are to assist the Online Safety Lead (or other relevant person) with the following [\[add/delete where relevant\]](#):

- To keep up to date with new developments in the area of online safety.
- To (at least) annually review and develop the Online Safety Policy in line with new technologies and incidents.
- To monitor the delivery and impact of the Online Safety Policy.
- To monitor the log of reported online safety incidents (anonymous) to inform future areas of teaching/learning/training.
- To co-ordinate consultation with the whole school community to ensure stakeholders are up to date with information, training and/or developments in the area of online safety. This could be carried out through [\[add/delete as relevant\]](#):
  - staff meetings
  - learner forums (for advice and feedback)
  - governors meetings
  - surveys/questionnaires for learners, parents/carers and staff
  - parents evenings
  - website/VLE/newsletters
  - online safety events
  - Safer Internet Day (SID) which is held on the second Tuesday in February every year
  - other methods
- To ensure that monitoring is carried out of internet sites used across the school.
- To monitor filtering/change control logs (e.g. requests for blocking/unblocking sites).
- To monitor the safe use of data across the school.
- To monitor incidents involving online bullying for staff and pupils.

#### 6. Amendments

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

The above Terms of Reference for [\[insert name of organisation\]](#) have been agreed



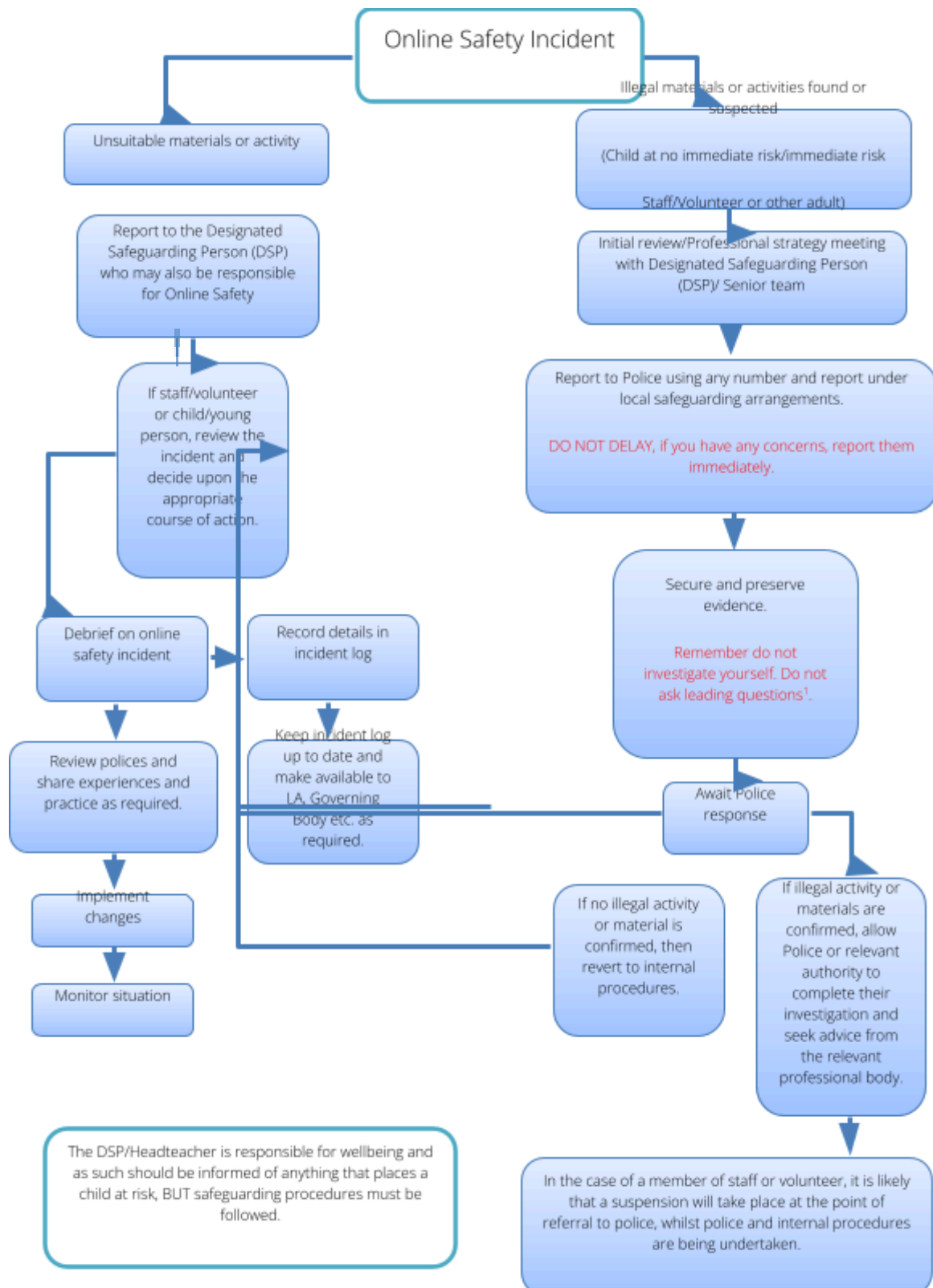
Signed by (SLT): \_\_\_\_\_

Date: \_\_\_\_\_

Date for review: \_\_\_\_\_



# A8 Responding to incident – flow chart





# A9 Record of reviewing de sites ternet

## (responding to incidents of misuse)

School: \_\_\_\_\_

Date: \_\_\_\_\_

Reason for investigation: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

### Details of first reviewing person

Name: \_\_\_\_\_

Position: \_\_\_\_\_

Signature: \_\_\_\_\_

### Details of second reviewing person

Name: \_\_\_\_\_

Position: \_\_\_\_\_

Signature: \_\_\_\_\_

### Name and location of device used for review (for web sites)

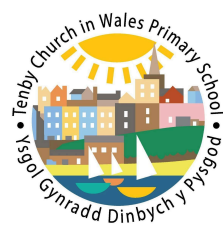
\_\_\_\_\_

\_\_\_\_\_

Web site(s) address/device	Reason for concern
_____	_____
_____	_____
_____	_____
_____	_____

### Conclusion and action proposed or taken

_____	_____
_____	_____
_____	_____



A10 Reporting Log      School: _____						
Date	Time	Incident	Action Taken		Incident Reported By	Signature
			What?	By Whom?		

## B1 Training Needs Audit Log

School: \_\_\_\_\_

Relevant training in the last 12 months	Identified Training Need	To be met by	Cost	Review Date

# C1 Technical Security Policy Template (including filtering and passwords)

## Suggestions for use

Within this template sections which include information or guidance are shown in BLUE. It is anticipated that schools would remove these sections from their completed policy document, though this will be a decision for the group that produces the policy.

*Where sections in the template are written in italics it is anticipated that schools would wish to consider whether or not to include that section or statement in their completed policy.*

Where sections are highlighted in BOLD text, it is the view of the SWGfL Online Safety Group that these would be an essential part of a school Online Safety Policy.

## 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 are regular reviews and audits of the safety and security of school computer systems
- there is oversight from senior leaders and these have impact on policy and practice.

If the school has a managed ICT service provided by an outside contractor, it is the responsibility of the school to ensure that the managed service provider carries out all the online safety measures that might otherwise be carried out by the school itself (as suggested below). It is also important that the managed service provider is fully aware of the school Online Safety Policy/acceptable use agreements). The school should also check their Local Authority/other relevant body policies/guidance on these technical issues. Schools should also consider the guidance available in the [Hwb Trust Centre](#).

## Responsibilities

The management of technical security will be the responsibility of (insert title) (schools will probably choose the Network Manager/Technical Staff/Head of Computing or other relevant responsible person)

## Technical Security

### 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 systems and data
- responsibilities for the management of technical security are clearly assigned to appropriate and well trained staff (this may be at school, 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)
- (insert name or role) 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 to breach the Copyright Act which could result in fines or unexpected licensing costs)

- *mobile device security and management procedures are in place (where mobile devices are allowed access to school systems). (schools may wish to add details of the mobile device security procedures that are in use).*
- *school/local authority/managed service provider/technical staff regularly monitor and record the activity of users on the school technical systems and users are made aware of this in the acceptable use agreement. (schools may wish to add details of the monitoring programmes that are used)*
- *remote management tools are used by staff to control workstations and view users activity*
- *an appropriate system is in place (to be described) for users to report any actual/potential technical incident to the Online Safety Lead/network manager/technician (or other relevant person, as agreed)*
- *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 system*
- *an agreed policy is in place (to be described) regarding the downloading of executable files and the installation of programmes on school devices by users*
- *an agreed policy is in place (to be described) regarding the extent of personal use that users (staff/learners/community users) and their family members are allowed on school devices that may be used out of school*
- *an agreed policy is in place (to be described) regarding the use of removable media (e.g. memory sticks/CDs/DVDs) by users on school devices (see school personal data policy template in the appendix for further detail)*
- *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 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, e-mail and learning platform). Where sensitive data is in use – particularly when accessed on mobile devices – schools may wish to use more secure forms of authentication e.g. two factor authentication.

Further guidance can be found from the [Hwb Trust Centre, 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 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 learners) 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 xxxxx (insert name or title) (see [section on password generation in technical notes](#)) who will keep an up to date record of users and their usernames.

### Password requirements:

- 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 the school
- Passwords must not include names or any other personal information about the user that might be known by others
- Passwords must be changed on first login to the system
- *The school may wish to recommend to staff and learners (depending on age) that they make use of a 'password vault' these can store passwords in an encrypted manner and can generate very difficult to crack passwords. There may be a charge for these services.*
- *Passwords should not be set to expire as long as they comply with the above, but should be unique to each service the user logs into.*

## Learner passwords:

Primary schools will need to decide at which point they will allocate individual usernames and passwords to learners. They may choose to use class logons for Foundation Phase (though increasingly children are using their own passwords to access programmes). Schools need to be aware of the risks associated with not being able to identify any individual who may have infringed the rules set out in the policy and the acceptable use agreement (AUA). Use by learners in this way should always be supervised and members of staff should never use a class log on for their own network/internet access. Schools should also consider the implications of using whole class logons when providing access to learning environments and applications, which may be used outside school.

- Records of learner usernames and passwords for foundation phase learners 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 learners at Key Stage 2 and above should increase as learners progress through school.
- Users will be required to change their password if it is compromised. *Some schools may choose to reset passwords at the start of each academic year to avoid large numbers of forgotten password reset requests where there is no user-controlled reset process. (Note: passwords should not be regularly changed but should be secure and unique to each account.)*
- Learners will be taught the importance of password security, this should include how passwords are compromised, and why these password rules are important.

Schools may wish to add to this list for all or some learners any of the relevant policy statements from the staff section above.

## Notes for technical staff/teams

- Each administrator should have an individual administrator account, as well as their own user account with access levels set at an appropriate level. Consideration should also be given to using two factor authentication for such accounts.
- 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 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 xxxxx (insert title) (schools may wish to have someone other than the school's technical staff carrying out this role e.g. an administrator who is easily accessible to users). Good practice is that the password generated by this change process should be system generated and only known to the user. This password should be temporary and the user should be forced to change their password on first login. The generated passwords should also be long and random.*
- *Where automatically generated passwords are not possible, then a good password generator should be used by xxxxx (insert title) to provide the user with their initial password. There should be a process for the secure transmission of this password to limit knowledge to the password creator and the user. The password should be temporary and the user should be forced to change their password on the first login.*
- *Requests for password changes should be authenticated by (the responsible person) to ensure that the new password can only be passed to the genuine user (the school will need to decide how this can be managed – possibly by requests being authorised by a line manager for a request by a member of staff or by a member of staff for a request by a learner)*
- **Suitable arrangements should be in place to provide visitors with appropriate access to systems which expire after use. (For example, your technical team may provide pre-created user/password combinations that can be allocated to visitors, recorded in a log, and deleted from the system after use.)**
- **In good practice, the account is “locked out” following six successive incorrect log-on attempts.**
- **Passwords shall not be displayed on screen, and shall be securely hashed when stored (use of one-way encryption).**

### **Training/Awareness:**

It is essential that users should be made aware of the need for keeping passwords secure, and the risks attached to unauthorised access/data loss. This should apply to even the youngest of users. It is also essential that users be taught how passwords are compromised, so they understand why things should be done a certain way. Please see our [blog](#) for more details on this.

### **Members of staff will be made aware of the school's password policy:**

- at induction
- through the school's Online Safety Policy and password security policy
- through the acceptable use agreement

### **Learners will be made aware of the school's password policy:**

- in lessons (the school 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.

Many users are not aware of the flexibility provided by many filtering services at a local level for schools. Where available, schools should use this flexibility to meet their learning needs and reduce some of the frustrations occasionally felt by users who wish to maximise the use of the new technologies.

Schools need to consider carefully the issues raised and decide:

- Whether they will use the provided filtering service without change or to allow flexibility for sites to be added or removed from the filtering list for their organisation
- Whether to introduce differentiated filtering for different groups/ages of users
- Whether to remove filtering controls for some internet use (e.g. social networking sites) at certain times of the day or for certain users
- Who has responsibility for such decisions and the checks and balances put in place
- What other system and user monitoring systems will be used to supplement the filtering system and how these will be used

[DfE Keeping Learners Safe](#) in Education requires schools to have “appropriate filtering”. Guidance can be found on the [UK Safer Internet Centre](#) site.

Schools may wish to test their filtering for protection against illegal materials at: [SWGfL Test Filtering](#)

## Responsibilities

The responsibility for the management of the school's filtering policy will be held by (insert title). 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
- be reported to a second responsible person (insert title):
- *either... be reported to and authorised by a second responsible person prior to changes being made (recommended)*
- *or... be reported to a second responsible person (insert title) every X weeks/months in the form of an audit of the change control logs*
- *be reported to the Online Safety Group every X weeks/months in the form of an audit of the change control logs*

All users have a responsibility to report immediately to (insert title) any infringements of the school's filtering policy of which they become aware or any sites that are accessed, which they believe should have been filtered.

Users must not attempt to use any programmes or software that might allow them to bypass the filtering/security systems in place to prevent access to such materials.

## Policy Statements

Internet access is filtered for all users. Differentiated internet access is available for staff and customised filtering changes are managed by the school. Illegal content is filtered by the broadband or filtering provider by actively employing the Internet Watch Foundation CAIC list and other illegal content lists. Filter content lists are regularly updated and internet use is logged and frequently monitored. 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. Where personal mobile devices are allowed internet access through the school network, filtering will be applied that is consistent with school practice.

- *Either - The school maintains and supports the managed filtering service provided by the Internet Service Provider (or other filtering service provider)*

- *Or – The school manages its own filtering service (N.B. If a school decides to remove the external filtering and replace it with another internal filtering system, this should be clearly explained in the policy and evidence provided that the Headteacher would be able to show, in the event of any legal issue that the school was able to meet its statutory requirements to ensure the safety of staff/learners)*
- *The school has provided enhanced/differentiated user-level filtering through the use of the (insert name) filtering programme. (allowing different filtering levels for different ages/stages and different groups of users – staff/learners 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 (or other nominated senior leader).*
- *Mobile devices that access the school internet connection (whether school or personal devices) will be subject to the same filtering standards as other devices on the school systems*
- *Any filtering issues should be reported immediately to the filtering provider.*
- *Requests from staff for sites to be removed from the filtered list will be considered by the technical staff (insert name or title) (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). If the request is agreed, this action will be recorded and logs of such actions shall be reviewed regularly by the Online Safety Group.*

## Education/Training/Awareness

Learners will be made aware of the importance of filtering systems through the online safety education programme (schools may wish to add details). 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: (amend as relevant)

- the acceptable use agreement
- induction training
- staff meetings, briefings, Inset.

Parents will be informed of the school's filtering policy through the acceptable use agreement and through online safety awareness sessions/newsletter etc. (amend as relevant)

## Changes to the Filtering System

In this section the school should provide a detailed explanation of:

- how, and to whom, users may request changes to the filtering (whether this is carried out in the school or by an external filtering provider)
- the grounds on which they may be allowed or denied (schools may choose to allow access to some sites e.g. social networking sites for some users, at some times, or

for a limited period of time. There should be strong educational reasons for changes that are agreed).

- how a second responsible person will be involved to provide checks and balances (preferably this will be at the time of request, but could be retrospectively through inspection of records/audit of logs)
- any audit/reporting system

Users who gain access to, or have knowledge of others being able to access, sites which they feel should be filtered (or unfiltered) should report this in the first instance to [\(insert title\) who](#) will decide whether to make school level changes (as above).

## Monitoring

Some schools supplement their filtering systems with additional monitoring systems. If this is the case, schools should include information in this section, including – if they wish – details of internal or commercial systems that are in use. They should also ensure that users are informed that monitoring systems are in place.

No filtering system can guarantee 100% protection against access to unsuitable sites. The school will therefore monitor the activities of users on the school network/equipment as indicated in the school Online Safety Policy and the acceptable use agreement. *Monitoring will take place as follows:* [\(details should be inserted if the school so wishes\)](#).

## Audit/Reporting

Logs of filtering change controls and of filtering incidents will be made available to: [\(schools should amend as relevant\)](#)

- the second responsible person [\(insert title\)](#)
- Online Safety Group
- Online Safety Governor/Governors committee/Management Committee **member for child protection**
- External Filtering provider/Local Authority/Police on request

The filtering policy will be reviewed in the response to the evidence provided by the audit logs of the suitability of the current provision. [\(The evidence might show a large number of requests to remove the filtering from sites – in which case schools might question whether their current level of filtering is too restrictive for educational purposes. Alternatively, a large number of incidents where users try to subvert the filtering system might suggest that improved monitoring/disciplinary action might be necessary\)](#).

## Further Guidance

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

Welsh Government – [Keeping Learners Safe](#)

### [Recommended filtering standards for schools in Wales](#)

#### [Hwb Support/Trust Centre](#)

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](#)).

UKSIC - ["Appropriate Filtering"](#)

[Somerset Guidance for schools – questions for technical support](#) – this checklist is particularly useful where a school 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](#)

## C2 Personal Data Advice and Guidance

### Suggestions for use

This document is for advice and guidance purposes only. It is anticipated that schools will use this advice alongside their own data protection policy. This document is not intended to provide legal advice and the school is encouraged to seek their own legal counsel when considering their management of personal data.

### 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.

After the end of the Brexit transition period, the GDPR is expected to be incorporated into UK law. The 'UK GDPR' will sit alongside an amended version of the DPA 2018 and means the UK will have the independence to keep the framework under review. Therefore, the key principles, rights and obligations are predicted to remain the same. However, there are implications regarding the rules for transferring personal data between the UK and the EEA.

Please be aware that the Data Protection Act 2018 (DPA2018) sits alongside the GDPR (i.e. the laws complement each other). The DPA2018 tailors how the GDPR applies to the UK and covers aspects not included in the GDPR, such as Law Enforcement processing and exemptions about how to handle education and child protection data.

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

### Does the Data Protection Law apply to schools?

In short, yes. All schools process personal data and are considered a separate 'data controller' for the purposes of data protection.

Personal data is "any information relating to an identified or identifiable natural person ('data subject')". An identifiable natural person is one who can be identified, directly or indirectly, by reference to:

- an identifier such as a name, an identification number, location data, an online identifier or
- to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

**Some types of personal data are known as ‘special categories of personal data’ and include the following:**

“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”

The school must identify both a [lawful basis](#) (Article 6 of the GDPR) and a [separate condition for processing special category data](#) (Article 9 of the GDPR). These should be decided prior to any processing taking place, and further guidance is available on the [Information Commissioner’s Office \(ICO\) website](#)

The ICO’s powers are wide ranging in the event of non-compliance and schools 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;
- b) collected for specified, explicit and legitimate purposes (“purpose limitation”);
- c) adequate, relevant and limited to what is necessary (“data limitation”);
- d) accurate and, where necessary, kept up to date;
- 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 (“storage limitation”); and
- f) processed in a manner that ensures appropriate security of the personal data

An overall principle of accountability requires the school to be responsible for and demonstrate compliance with data protection law.

Data protection law requires the school to always have a **lawful basis for processing** personal data. These 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 individual, or because they have asked you to take specific steps before entering into a contract.

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|---------------------------|--|
| (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). |

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

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

The school 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 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 has a **data map** of these activities. These inform privacy notices and help put security measures in place to keep personal data secure, including steps to avoid a **breach**, and ensure Data Processing Agreements (i.e. contracts) are in place with the suppliers or contractors.

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

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

- Parents, legal guardians, governors: 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)

The [ICO have advice and guidance](#) on keeping a Record of Processing Activities.

The school 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.

A school can use the public task lawful basis if processing takes place to perform an official task as set down in UK law (e.g. Education Act 1996):

*“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”* (Article 6(1)(e) of the GDPR)

If not, the school should consider each of the other lawful bases for processing in turn to assess how they fit with the processing and relationship with the data subject. As a public authority, please remember that legitimate interests cannot be used as a lawful basis when processing personal data to perform an official task or a public function.

The rules around consent should be considered carefully, as another lawful basis may be more appropriate. GDPR sets a high standard for consent and should put individuals in charge. Consent 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 consent must be freely given, specific, informed, and an unambiguous indication of wishes by a statement or affirmative action. As a result, consent forms should be clear and concise; include an opt-in, granular approach; as well as explain why information is collected and how it will be processed to inform individuals. Implied consent is no longer suitable.

The DPA2018 modifies the GDPR so that the minimum age for consent to be obtained from a child is lowered to 13 years old.

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.”

The school should only use consent if none of the other lawful bases are appropriate. If you do so, you must be able to cope with people saying no (and/or changing their minds). Therefore, it's important that you only use consent for optional extras, rather than for core information the school requires in order to carry out its function. The below are examples where consent may or may not be appropriate;

- consent should be obtained when publishing a child's photo in any way (i.e. a school website, newsletter, prospectus, or social media).
- the school is required to hold learner and parent/carers details in an MIS. Therefore, it would not be appropriate to rely on consent, as the individual(s) would then have the right to opt out of the processing. In this case, the school could apply the public task lawful basis.
- The school is required to share information for the purposes of child protection issues. As a result, it would not be appropriate to rely on consent, as the individual(s) would have the right to opt out of the processing. The school could also alert an individual about an allegation made against them. In this case, the school could apply the public task lawful basis.

## **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:

- the identity and contact details of the data controller
- what categories of personal data are being processed
- the purposes and lawful basis for processing the personal data
- where and how the personal data was sourced
- to whom the personal data may be shared with
- whether any personal data is transferred to a country outside of the EEA
- how long the personal data will be stored and retained
- the contact details of the Data Protection Officer
- the existence of automated decision making, including profiling
- data subject's rights and how to exercise them
- details of how to make a complaint to the school or ICO

The right to be informed is closely linked to the fair processing and transparency requirements of data protection principles. In order to comply, the school must provide parents/carers and learners with the above information when collecting personal data from individuals and ensure a privacy notice is easily accessible throughout the processing. For example, privacy notices could be passed to parents/carers and learners in the school prospectus, newsletters, or a specific letter/communication. The school could publish privacy notices on the school website. Parents/carers and learners who are new to the school should be provided with the privacy notice through an appropriate mechanism. Please be aware, however, that different forms of processing require a Privacy Notice, such as when processing visitor information or using personal data for employment purposes.

A school should ensure that privacy notices are available for learners as data subjects. Children and young people have the same rights as adults when it comes to their personal data. These include the rights described below and 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, which include:

- **Right to be informed** how personal data is collected, stored, managed, protected, and processed.
- **Right of access** to request a copy of personal information held of yourself. However, please be aware that information can sometimes be legitimately withheld.
- **Right to rectification** of inaccurate or incomplete personal data.
- **Right to erasure** where you have the right to have your personal data erased in certain circumstances. This does not include any personal data that must be retained by law.
- **Right to restriction**, which allows you to limit the way we use your personal data in some circumstances.
- **Right to portability** gives an individual the right to receive copies of data provided to a controller in a portable format.
- **Right to object** to the processing of one's personal data.
- **Rights in relation to automated decision making and profiling.**

Several of these are likely impact schools, such as the right of access. Therefore, the school should put procedures in place to deal with [Subject Access Requests](#) and other individual rights requests (e.g. erasure and rectification).

Subject Access Requests are probably the most common individual right request made to any organisation. These are written or verbal requests to access all or a part of the personal data held by the Data Controller in connection with a living individual. Controllers have one calendar month to provide the information, unless the case is unusually complex and an extension can be obtained.

A schools must consider all information requested for disclosure. However, there are instances where personal data must not be disclosed to the applicant, even if requested:

- the personal data of any third parties (not relating to the data subject)
- if doing so would cause serious harm to the individual
- child abuse data
- adoption records
- Individual Development Plans for learners with Additional Learning Needs (ALN)

Your school must provide the information free of charge. However, there are occasional instances where a reasonable fee can be charged, for example if the request is clearly unfounded, or excessive.

## **Personal data breaches and how to manage them**

Schools are “data rich” and hold a large volume of personal data on the learners in their care. This data can be in paper (i.e. manual records) and electronic format (e.g. shared drives, electronic databases, and Cloud solutions). Personal data is increasingly being held digitally with the introduction of electronic storage solutions (e.g. Google Drive) and the digital transfer or sharing of information. As a result, personal data is more accessible and the potential for data loss has increased significantly, especially where staff are working from remote locations (such as at home, other schools, or even public spaces).

Data protection law applies to all forms of personal data, regardless of whether it is held on paper or in electronic format. However, this document will place emphasis on data that is held or transferred digitally due to being part of an overall Online Safety Policy template.

A personal data breach is described as a *“breach of security leading to accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed”*. As a result, there is more to a personal data breach than simply losing personal data, and breaches can be the result of both accidental and deliberate causes. For example, 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 or a pupil, accidental loss of equipment or paper records, or equipment failure.

An important part of managing a personal data breach is for the school to have a clear and well understood procedure for reporting breaches so they can implement actions and minimise any further risk. The school should have a policy for reporting, logging, managing and recovering from incidents, which establishes:

- a “responsible person” for reporting and investigating incidents
- how to manage personal data breaches, including an escalation procedure
- criteria for determining incident level and timescales, which should help to:

The school may find it useful to develop an incident report form template for staff to complete if a personal data breach is discovered. These forms support the school to record all the information required to analyse the incident and comply with the accessibility principle. An example form should include the following.

All ‘high risk’ [breaches must be reported](#) to the Information Commissioner’s Office through the DPO based upon the school procedure for reporting incidents. Data protection laws require this notification to take place within 72 hours of becoming aware of the breach (where feasible).

Schools must consider whether an incident discovered poses a risk to the individuals (i.e. data subjects) involved, including the likelihood and severity of any risk to people’s rights and freedoms. If the assessment suggested a high risk is unlikely, the incident does not need to be reported. However, there is a legal duty under data protection law to document the facts relating to a breach, its effects, and the remedial action taken by the organisation. The school should, therefore, maintain a log of all incidents.

## **Data Protection Impact Assessments (DPIAs)**

Data Protection Impact Assessments (DPIAs) identify and assess privacy risks early on in a project that processes personal data to enable the school to mitigate them before the project launches.

DPIAs should be carried out by project leads under the support and guidance of the DPO. Schools should conduct a DPIA before processing activity starts and run alongside the planning and development process.

- **Step 1:** Identify the need for using personal data
- **Step 2:** Describe the information flows

- **Step 3:** Identify the privacy and related risks
- **Step 4:** Identify privacy solutions
- **Step 5:** Sign off and record the DPIA outcomes
- **Step 6:** Integrate the DPIA outcomes back into the project plan

Data protection law requires a DPIA to be completed where processing is likely to result in a high risk to the rights and freedoms of individuals and for the below types of processing:

1. Systematic and extensive profiling with significant effects
2. Large scale use of sensitive data (i.e. special category or criminal data)
3. Public monitoring (i.e. CCTV)

For more information about DPIAs, please see [this guidance on the ICO website](#).

A DPIA should contain the following:

- a description of the processing 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.

And could be laid out in this way:

Describe source of risk and potential impact on individuals	Likelihood of harm Remote, possible or probable	Severity of harm Minimal, significant, or severe	Overall risk Low medium high*	If medium or high, options to reduce or eliminate risk	Effect on risk Eliminated, reduced, or accepted	Residual risk Low medium high*	Measure approved yes/no

A 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 should ensure that systems are set up so that the existence of protected files is hidden from unauthorised users and those processing personal data will be assigned appropriate access. For example, 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, numbers, and special characters. 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 equipment. Private equipment (i.e. owned by the users) must not be used for the storage of school 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 offer approved virus and malware checking software
- The data must be securely deleted from the device, in line with school policy once it has been transferred or its use is complete.

The school will need to set its own policy as to whether data storage on removal media is allowed, even if encrypted. Some organisations do not allow storage of personal data on removable devices.

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

Clear policies and procedures should be in place for the use of “Cloud Based Storage Systems” (e.g. Dropbox, Microsoft 365, Google Drive). Please be aware that data held in remote and cloud storage is still required to be protected in line with the Data Protection Act. The school must ensure that it is satisfied with controls put in place by remote/cloud-based data services providers to protect the data. **In Wales, all schools have access to Microsoft Office 365 and G-Suite for Education via Hwb.** For more information please visit [the Data Governance section of Hwb](#).

As a Data Controller, the school 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. These require a Data Processor that is processing personal data on behalf of the school to:

- only act on the written instructions of the school
- ensure that staff processing the personal data are subject to a duty of confidence
- take appropriate measures to ensure the security of processing
- only engage sub-processors with the prior consent of the controller, and under a written contract
- assist the controller in providing subject access to information and allowing data subjects to exercise their rights under the GDPR
- assist the controller in meeting its data protection obligations in relation to the security of processing, including the notification of personal data breaches and carrying out DPIAs
- delete or return all personal data to the controller as requested at the end of the contract
- provide the controller with whatever information it needs to ensure that they are both meeting their data protection obligations
- tell the controller immediately if it is asked to do something infringing the GDPR, Data Protection Act 2018, or other data protection law of the EU/member state

### **Secure transfer of data and access out of school**

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

- Users may not remove or copy sensitive/restricted/protected personal data from the school or authorised premises without permission. Media should be encrypted and password protected and transferred 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.
- Secure remote access to a management information system or learning platform is preferable when personal data (particularly special categories of personal data) is required by an authorised user from outside the organisation’s premises (e.g. by a member of staff to work from their home). 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 transferred to another country (particularly outside Europe) and advice should be sought from the Data Protection Officer in this event.

## **Disposal of personal data**

The school should implement a 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 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 record of destruction log (i.e. Schedule for Disposal/Destruction) 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 (DPO)
- 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.

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 to target training at the most at-risk data
- record any breaches that impact on the personal data

## Data Protection Fee

**Schools are required to pay the relevant annual fee to the Information Commissioner's Office (ICO) by law. This means the school is breaking the law if, as a data controller, it processes personal data and have either not paid a fee, or not paid the correct fee.**

## Responsibilities

Every maintained school is required to appoint an independent Data Protection Officer (DPO) 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 DPIA
- 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 may also wish to appoint a Data Manager or Information Governance Lead. Schools 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 information risk policy and risk assessment
- oversee the System Controllers.

The school may also wish to appoint staff members to be responsible for the various types of data being held (e.g. learner information / staff information / assessment data etc.). These staff members 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 has the responsibility of handling protected or sensitive data (including learner data) in a safe and secure manner.

Governors are required to comply fully with this policy where they have access to personal data as part of their role as a Governor (either in the school or elsewhere if on school 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
- Annual data protection training for all staff

- Staff meetings / briefings / INSET
- Day to day support and guidance

## **Freedom of Information Act**

All schools must have a Freedom of Information Policy which sets out how it will deal with FOI requests. FOI aims to increase “openness by design” in public sector organisations as part of a healthy democratic process. FOI requests are submitted by an individual and the school are required to consider whether the requested information should be released into the public domain. Any requests for personal data should be dealt with under data protection law. The FOI Section 40(1) and (2) exemption covers personal data.

Good advice would encourage the school 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 policy
- consider designating an individual with responsibility for FOI, to provide a single point of reference, and coordinate FOI (including related policies and procedures). The school should 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 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 publication scheme should be reviewed annually.

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

## **Parental permission for use of cloud hosted services**

Schools that use cloud hosting services are advised to identify the relevant lawful basis 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 that use biometric recognition systems, such as fingerprint identification and facial scanning:

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

## Privacy and Electronic Communications

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

## C3 Mobile Technologies Policy Template (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 wireless network. The device then has access to the wider internet which may include the school learning platform and other cloud based services such as e-mail and data storage.

The absolute key to considering the use of mobile technologies is that the learners, staff and wider school community understand that the primary purpose of having their personal device at school is educational and that this is irrespective of whether the device is school 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 resilience, fluency and citizenship in learners 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 network, filtering of personal devices, breakages and insurance, access to devices for all learners, avoiding potential classroom distraction, network connection speeds, types of devices, charging facilities, total cost of ownership

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

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

A range of mobile technology implementations is possible. The school should consider the following statements and remove those that do not apply to their planned implementation approach.

- The school acceptable use agreements for staff, learners and parents/carers will give consideration to the use of mobile technologies
- The school allows: (the school should complete the table below to indicate which devices are allowed and define their access to school systems)

	School/devices			Personal devices		
	School owned and allocated to a single user	School owned for use by multiple users	Authorised device <sup>10</sup>	Learner owned	Staff owned	Visitor owned
Allowed in the school	Yes	Yes	Yes	Yes/No <sup>11</sup>	Yes/No <sup>11</sup>	Yes/No <sup>11</sup>
Full network access	Yes	Yes	Yes			
Internet only						

<sup>10</sup> Authorised device – purchased by the learner/family through a school-organised scheme. This device may be given full access to the network as if it were owned by the school

<sup>11</sup> The school should add below any specific requirements about the use of personal devices in the school e.g. storing in a secure location, use during the day, liability, taking images etc

No network access						
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- The school has provided technical solutions for the safe use of mobile technology for school devices/personal devices (delete/amend as appropriate):
- 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 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 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 accepts no responsibility for any malfunction of a device due to changes made to the device while on the school network or whilst resolving any connectivity issues*
- *The school recommends that the devices are made easily identifiable and have a protective case to help secure them as the devices are moved around the school. Pass-codes or PINs should be set on personal devices to aid security*

- *The school is not responsible for the day to day maintenance or upkeep of the 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
- School devices are provided to support learning. It is expected that learners will bring devices to the school as required.
- The changing of settings (exceptions include personal settings such as font size, brightness, etc...) that would stop the device working as it was originally set up and intended 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 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 learners on authorised devices once they leave the school 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
- *Devices may be used in lessons in accordance with teacher direction*
- *Staff owned devices should not be used for personal purposes during teaching sessions, unless in exceptional circumstances*

- *Printing from personal devices will not be possible*

## Insurance

Schools that have implemented an authorised device approach (1:1 deployment) may wish to consider how they will insure these devices and should include details of the claims process in this policy.

# C4 Social Media Policy Template

Social media (e.g. Facebook, Twitter, LinkedIn, Instagram) 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 YouTube have social media elements to them.

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

## Scope

**This policy is subject to the school codes of conduct and acceptable use agreements.**

**This policy:**

- **applies to all staff and to all online communications which directly or indirectly, represent the school**
- **applies to such online communications posted at any time and from anywhere**
- **encourages the safe and responsible use of social media through training and education**
- *defines the monitoring of public social media activity pertaining to the school.*

The school respects privacy and understands that staff and learners may use social media forums in their private lives. However, personal communications likely to have a negative impact on professional standards and/or the school 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 personal social media accounts. In all cases, where a personal account is used which associates itself with, or impacts on, the school, it must be made clear that the member of staff is not communicating on behalf of the school with an appropriate disclaimer. Such personal communications are within the scope of this policy.

Personal communications which do not refer to or impact upon the school are outside the scope of this policy.

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

## **Organisational control**

### **Roles & Responsibilities**

- **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 they have posted via school accounts
  - Adding an appropriate disclaimer to personal accounts when naming the school

## **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 business 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/carers.

## **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 serious 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 permits reasonable and appropriate access to private social media sites. However, where excessive use is suspected, and considered to be interfering with relevant duties, disciplinary action may be taken*
- The school 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 should be sought in line with the school's digital and video images policy.** If anyone, for any reason, asks not to be filmed or photographed then their wishes should be respected.
- **Under no circumstances should staff share or upload learner pictures online other than via school owned social media accounts.**
- Staff should exercise their professional judgement about whether an image is appropriate to share on school social media accounts. Learners should be appropriately dressed, not be subject to ridicule and must not be on any school 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 personal social media accounts. In all cases, where a personal account is used which associates itself with the school or impacts on the school, it must be made clear that the member of staff is not communicating on behalf of the school with an appropriate disclaimer. Such personal communications are within the scope of this policy.
  - Personal communications which do not refer to or impact upon the school are outside the scope of this policy.
  - Where excessive personal use of social media in school is suspected, and considered to be interfering with relevant duties, disciplinary action may be taken

- The school permits reasonable and appropriate access to private social media sites.
- **Pupil/Students**
  - Staff are not permitted to follow or engage with current or prior pupils/students of the school on any personal social media network account.
  - The school's education programme should enable the learners to be safe and responsible users of social media.
  - Learners are encouraged to comment or post appropriately about the school. Any offensive or inappropriate comments will be resolved by the use of the school's behaviour 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 has an active parent/carer education programme which supports the safe and positive use of social media. 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.

## **Appendix**

### **Managing your personal use of Social Media:**

- "Nothing" on social media is truly private.
- Social media can blur the lines between your professional and private life. Don't use the school logo and/or branding on personal accounts.
- Check your settings regularly and test your privacy.

- Keep an eye on your digital footprint.
- Keep your personal information private.
- Regularly review your connections/'friends' – keep them to those you want to be connected to.
- When posting online consider; scale, audience and permanency of what you post.
- If you want to criticise, do it politely.
- Take control of your images – do you want to be tagged in an image? What would children or parents say about you if they could see your images?
- Know how to report a problem.

## **Managing school social media accounts**

### **The Do's**

- Check with a senior leader before publishing content that may have controversial implications for the school.
- Use a disclaimer when expressing personal views.
- Make it clear who is posting content.
- Use an appropriate and professional tone.
- Be respectful to all parties.
- Ensure you have permission to 'share' other peoples' materials and acknowledge the author.
- Express opinions but do so in a balanced and measured manner.
- Think before responding to comments and, when in doubt, get a second opinion.
- Seek advice and report any mistakes using the school's reporting process.
- Consider turning off tagging people in images where possible.

### **The Don'ts**

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

# 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 event 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.

Schools may wish to view the National Crime Agency (NCA) website which includes information about ["Cyber Choices: Helping you choose the right and legal path"](#). The [TARIAN Regional Cyber Crime Unit \(RCCU\)](#) now has dedicated 'Cyber Prevent' officers whose role is to prevent young people from committing cybercrime and/or re-offending. [Supportive resources are available on Hwb](#) and there is a useful [summary of the Computer Misuse 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's Office (ICO).

**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:
  - o ascertain whether the communication is business or personal
  - o 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 Protection of Freedoms Act 2012**

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

## **Serious Crime Act 2015**

This Act introduced a 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:

## Welsh Government

[Safeguarding children](#) (including Keeping Learners Safe and Respect and resilience: developing community cohesion)

[School bullying advice](#)

## Hwb

[Hwb homepage](#)

[Keeping safe online](#)

[Support Services](#)

[Hwb Support Centre](#)

[Enhancing digital resilience in education: An action plan to protect children and young people online - 2020](#)

[Online safety: Five key questions for governing bodies to help challenge their schools and colleges to effectively safeguard their learners](#)

[Digital Competence Framework](#)

[Health and Well-being AOLE](#)

[Keeping Learners Safe Modules 4 and 5 Online Safety for Practitioners and Governors](#)

[Live-streaming and video-conferencing: safeguarding principles and practice](#)

## UK Safer Internet Centre

[UK Safer Internet Centre](#)

[South West Grid for Learning](#)

[Childnet](#)

[Professionals Online Safety Helpline](#)

[Internet Watch Foundation](#)

[Report Harmful Content](#)

[UK Safer Internet Centre – Research Summaries](#)

## Others

[CEOP / ThinkUKnow](#)

[INSAFE/Better Internet for Kids](#)

[UK Council for Internet Safety \(UKCIS\)](#)

## **Tools for Schools**

[SWGfL Test filtering](#)

[UKCIS Digital Resilience Framework](#)

## **Bullying/Online-bullying/Sexting/Sexual Harassment**

[Childnet – Project deSHAME – Online Sexual Harassment](#)

## **Data Protection**

[ICO Guides for Education \(wide range of sector specific guides\)](#)

[IRMS - Records Management Toolkit for Schools](#)

[ICO Guidance on taking photos in schools](#)

## **Infrastructure/Technical Support**

[UKSIC – Appropriate Filtering and Monitoring](#)

[NCA Guide to the Computer Misuse Act](#)

[NEN Advice and Guidance Notes](#)

[SWGfL – Test Filtering](#)

## **Working with parents and carers**

[Vodafone Digital Parents Magazine](#)

[Childnet Webpages for Parents & Carers](#)

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

[Internet Matters](#)

## **Prevent**

[Prevent Duty Guidance](#)

[Prevent for schools – teaching resources](#)

[NCA – CyberChoices](#)

[TARIAN Regional Cyber Crime Unit \(RCCU\)](#)

[Hwb - TrustMe](#)

## **Research**

[Ofcom –Media Literacy Research](#)

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arises in respect of any aspect of this new legislation or generally to do with school conduct or discipline.