



## Pembroke Dock Community School Online Safety Policy

*'Proud to be a community school, striving for success for all.'*

**Updated**

**Reviewed**

**Signed:**

**Chair of the Governors**

**Headteacher**

[Click here for the policy update/reviews information](#)

In Pembroke Dock Community School our aim is to:

Provide an inclusive and equitable 'Acceleration for All' curriculum that is bespoke to our children. We will use eight guiding principles to do this.

- **Provide a curriculum that is relevant and developmentally appropriate. That is responsive to learners' capacity and need and is evolving with the pupils.** (Article 12 – the right to be listen to and take seriously.)
- **Take a holistic approach to learning.** (Article 17 – I have the right to get information in lots of ways, so long as it's safe.)
- **Ensure that learners learn that rights and gender-equity links to relationships, freedom, equity, dignity, well-being and safety.** (Article 1 – Everyone under 18 has these rights.)
- **Provide all students with authentic, engaging learning opportunities on strengths and accelerating learning for all with all stakeholder's involvement.** (Article 3 – adults must do what is best for me.)
- **All practitioners to ensure we offer equitable access and opportunity for all, creating a transformative approach to 'More-able and talented'.** (Article 6 – I should be supported to live and grow.)
- **Provide creative approaches that create ethical, safe and engaging spaces for learners to feel, think, question, embody and share their thoughts.** (Article 17 – I have the right to get information in lots of ways, so long as it's safe.)
- **We will be inclusive to ensure all learners see themselves and each other in what they learn.** (Article 12 – the right to be listen to and take seriously.)
- **We will provide a high quality education, providing access and opportunity to high expectations, critical thinking, flourishing talent, and a sense of belonging bound in strong relationships. Work with partnership with specialist services and expertise.** (Article 29 – I have the right to an education which develops my personality, respect of other's rights and the environment.)

## Scope of the Policy

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

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

## Roles and Responsibilities

### Governors / Board of Directors:

*Governors* are responsible for the approval of the Online Policy and for reviewing the effectiveness of the policy. This will be carried out by the *Governors* receiving regular information about online safety incidents and monitoring reports. A member of the *Governing Body* will take a role on the Online Safety Group. This role will include

- *meetings with the Online Safety Co-ordinator*
- *monitoring of online safety incident logs*
- *reporting to relevant Governors / Board / committee / meeting*

### Headteacher and Senior Leaders:

- The *Headteacher* has a duty of care for ensuring the safety (including online safety) of members of the school community, though the day to day responsibility for online safety will be delegated to the *Online Safety Co-ordinator*.
- The Headteacher and (at least) another member of the Senior Leadership Team / Senior Management Team should be aware of the procedures to be followed in the event of a serious online safety allegation being made against a member of staff. (see flow chart on dealing with online safety incidents – included in a later section – “Responding to incidents of misuse” and relevant *Local Authority HR / other relevant body* disciplinary procedures).
- *The Headteacher / Senior Leaders are responsible for ensuring that the Online Safety Coordinator / Officer and other relevant staff receive suitable training to enable them to carry out their online safety roles and to train other colleagues, as relevant.*
- *The Headteacher / Senior Leaders will ensure that there is a system in place to allow for monitoring and support of those in school who carry out the internal online safety monitoring role. This is to provide a safety net and also support to those colleagues who take on important monitoring roles.*
- *The Senior Leadership Team / Senior Management Team will receive regular monitoring reports from the Online Safety Co-ordinator / Officer.*

### Online Safety Coordinator / Officer:

- leads the online safety committee
- takes day to day responsibility for online safety issues and has a leading role in establishing and reviewing the school online safety policies / documents
- ensures that all staff are aware of the procedures that need to be followed in the event of an online safety incident taking place.
- provides training and advice for staff
- liaises with the Local Authority / relevant body

- liaises with school technical staff
- receives reports of online safety incidents and creates a log of incidents to inform future online safety developments)
- meets regularly with Online Safety *Governor*
- reports regularly to Senior Leadership Team

## Network Manager / Technical staff:

The *Network Manager / Technical Staff / Co-ordinator for ICT / Computing* is responsible for ensuring:

- that the *school's* 's technical infrastructure is secure and is not open to misuse or malicious attack
- that the *school* meets required online safety technical requirements and any *Local Authority / other relevant body* Online Safety Policy / Guidance that may apply.
- that users may only access the networks and devices through passwords
- that they keep up to date with online safety technical information in order to effectively carry out their online safety role and to inform and update others as relevant
- that the use of the *network / internet / Virtual Learning Environment / remote access / email* is regularly monitored in order that any misuse / attempted misuse can be reported to the *Headteacher / Senior Leader; Online safety Coordinator* for investigation / action / sanction

## Teaching and Support Staff

are responsible for ensuring that:

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

## Child Protection / Safeguarding Designated Person / Officer

This person should be trained in online safety issues and be aware of the potential for serious child protection / safeguarding issues to arise from:

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

## Online safety Group

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

Members of the *Online Safety Group* (or other relevant group) will assist the *Online safety Coordinator / Officer* (or other relevant person, as above) with:

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

## Students / pupils:

- are responsible for using the school digital technology systems in accordance with the Student / Pupil Acceptable Use Policy
- have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations
- need to understand the importance of reporting abuse, misuse or access to inappropriate materials and know how to do so
- will be expected to know and understand policies on the use of mobile devices and digital cameras. They should also know and understand policies on the taking / use of images and on cyber-bullying.
- should understand the importance of adopting good online safety practice when using digital technologies out of school and realise that the *school's* 's Online Safety Policy covers their actions out of school, if related to their membership of the school

## Parents / Carers

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

- digital and video images taken at school events
- websites
- their children's personal devices in the school (where this is allowed)

## Policy Statements

### Education – students / pupils

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

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

- A planned online safety curriculum should be provided
- Key online safety messages should be reinforced as part of a planned programme of assemblies and tutorial / pastoral activities
- Students / pupils should be taught in all lessons to be critically aware of the materials / content they access on-line and be guided to validate the accuracy of information.
- Students / pupils should be taught to acknowledge the source of information used and to respect copyright when using material accessed on the internet
- *Students / pupils should be helped to understand the need for the student / pupil Acceptable Use Agreement and encouraged to adopt safe and responsible use both within and outside school*
- *Staff should act as good role models in their use of digital technologies the internet and mobile devices in lessons where internet use is pre-planned, it is best practice that students / pupils should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches.*
- *Where students / pupils are allowed to freely search the internet, staff should be vigilant in monitoring the content of the websites the young people visit.*
- *It is accepted that from time to time, for good educational reasons, students may need to research topics (eg racism, drugs, discrimination) that would normally result in internet searches being blocked. In such a situation, staff can request that the Technical Staff (or other relevant designated person) can temporarily remove those sites from the filtered list for the period of study. Any request to do so, should be auditable, with clear reasons for the need.*

## Education – parents / carers

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 on-line behaviours. Parents may underestimate how often children and young people come across potentially harmful and inappropriate material on the internet and may be unsure about how to respond.

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

- *Newsletters, social media and the school website*
- *High profile events / campaigns eg Safer Internet Day*

## Education – The Wider Community

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

- *Providing family learning courses in use of new digital technologies, digital literacy and online safety*
- *Online safety messages targeted towards grandparents and other relatives as well as parents.*
- *The school website will provide online safety information for the wider community*

## Education & Training – Staff / Volunteers

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

- A planned programme of formal online safety training will be made available to staff.
- All new staff should receive online safety training as part of their induction programme.
- *This Online safety policy and its updates will be presented to and discussed by staff in staff / team meetings / INSET days.*
- *The Online safety Coordinator will provide advice / guidance / training to individuals as required*

## Training – Governors

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

- Attendance at training
- Participation in school training / information sessions for staff or parents

## Technical – infrastructure / equipment, filtering and monitoring

The school will be responsible for ensuring that the school infrastructure / network is as safe and secure as is reasonably possible and that policies and procedures approved within this policy are implemented. It will also need to ensure that the relevant people named in the above sections will be effective in carrying out their online safety responsibilities:

- School technical systems will be managed in ways that ensure that the school meets recommended technical requirements
- Servers, wireless systems and cabling must be securely located and physical access restricted
- All users will have clearly defined access rights to school technical systems and devices.
- All users will be provided with a HWB password
- The “master / administrator” passwords for the school ICT system, used by the Network Manager (or other person) must also be available to the Headteacher or other nominated senior leader and kept in a secure place
- The Network Manager is responsible for ensuring that software licence logs are accurate and up to date and that regular checks are made to reconcile the number of licences purchased against the number of software installations
- Internet access is filtered for all users.
- The school has provided enhanced / differentiated user-level filtering
- An appropriate system is in place for users to report any actual / potential technical incident / security breach to the relevant person, as agreed).
- Appropriate security measures are in place to protect the servers, firewalls, routers, wireless systems, work stations, mobile devices etc from accidental or malicious attempts which might threaten the security of the school systems and data. The school infrastructure and individual workstations are protected by up to date virus software.

## Use of digital and video images

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

- When using digital images, staff should inform and educate students / pupils about the risks associated with the taking, use, sharing, publication and distribution of images. In particular, they should recognise the risks attached to publishing their own images on the internet eg on social networking sites.
- In accordance with guidance from the Information Commissioner’s Office, parents / carers are welcome to take videos and digital images of their children at school events for their own personal use (as such use is not covered by the Data Protection Act). To respect everyone’s privacy and in some cases protection, these images should not be published / made publicly available on social networking sites, nor should parents / carers comment on any activities involving other *students / pupils* in the digital / video images.
- Staff and volunteers are allowed to take digital / video images to support educational aims, but must follow school policies concerning the sharing, distribution and publication of those images. Those images should only be taken on school equipment; the personal equipment of staff should not be used for such purposes.

- Care should be taken when taking digital / video images that students / pupils are appropriately dressed and are not participating in activities that might bring the individuals or the school into disrepute.
- Students / pupils must not take, use, share, publish or distribute images of others without their permission
- Photographs published on the website, or elsewhere that include students / pupils will be selected carefully and will comply with good practice guidance on the use of such images.
- Students' / Pupils' 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 students / pupils are published on the school website

## Data Protection

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

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

### The school must ensure that:

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

### Staff must ensure that they:

- At all times take care to ensure the safe keeping of personal data, minimising the risk of its loss or misuse.
- Use personal data only on secure password protected computers and other devices, ensuring that they are properly "logged-off" at the end of any session in which they are using personal data.
- Transfer data using encryption and secure password protected devices.




















When personal data is stored on any portable computer system, memory stick or any other removable media:

- the data must be encrypted and password protected
- the device must be password protected
- the device must offer approved virus and malware checking software

- the data must be securely deleted from the device, in line with school policy (below) once it has been transferred or its use is complete

## Communications

A wide range of rapidly developing communications technologies has the potential to enhance learning. The following table shows how the school currently considers the benefit of using these technologies for education outweighs their risks / disadvantages:

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

## Social Media - Protecting Professional Identity

All schools, academies and local authorities have a duty of care to provide a safe learning environment for pupils and staff. Schools/academies and local authorities could be held responsible, indirectly for acts of their employees in the



course of their employment. Staff members who harass, cyberbully, discriminate on the grounds of sex, race or disability or who defame a third party may render the *school* or local authority liable to the injured party. Reasonable steps to prevent predictable harm must be in place.

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

- Training to include: acceptable use; social media risks; checking of settings; data protection; reporting issues. Clear reporting guidance, including responsibilities, procedures and sanctions
- Risk assessment, including legal risk

School staff should ensure that:

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

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

## Unsuitable / inappropriate activities

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

### User Actions

		Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
Users shall not visit Internet sites, make, post, download, upload, data transfer, communicate or pass on, material, remarks, proposals or comments that contain or relate to:	Child sexual abuse images –The making, production or distribution of indecent images of children. Contrary to The Protection of Children Act 1978					X
	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	

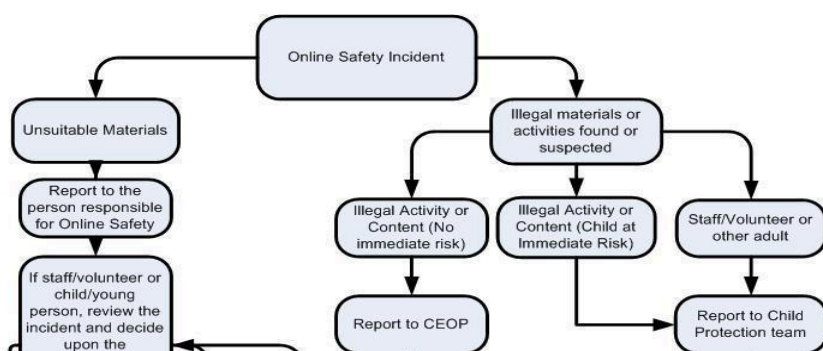
	threatening behaviour, including promotion of physical violence or mental harm				X	
	any other information which may be offensive to colleagues or breaches the integrity of the ethos of the school or brings the school into disrepute				X	
Using school systems to run a private business					X	
Using systems, 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 (eg 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	
On-line gaming (educational)			X			
On-line gaming (non educational)			X			
On-line gambling					X	
On-line shopping / commerce					X	
File sharing			X			
Use of social media					x	
Use of messaging apps			X			
Use of video broadcasting eg Youtube			x			

## Responding to incidents of misuse

This guidance is intended for use when staff need to manage incidents that involve the use of online services. It encourages a safe and secure approach to the management of the incident. Incidents might involve illegal or inappropriate activities.

### Illegal Incidents

If there is any suspicion that the web site(s) concerned may contain child abuse images, or if there is any other suspected illegal activity, refer to the right hand side of the Flowchart (below and appendix) for responding to online safety incidents and report immediately to the police.



**Other Incidents**

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

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

- Have more than one senior member of staff / volunteer involved in this process. This is vital to protect individuals if accusations are subsequently reported.
- Conduct the procedure using a designated computer that will not be used by young people and if necessary can be taken off site by the police should the need arise. Use the same computer for the duration of the procedure.
- It is important to ensure that the relevant staff should have appropriate internet access to conduct the procedure, but also that the sites and content visited are closely monitored and recorded (to provide further protection).
- Record the url of any site containing the alleged misuse and describe the nature of the content causing concern. It may also be necessary to record and store screenshots of the content on the machine being used for investigation. These may be printed, signed and attached to the form (except in the case of images of child sexual abuse – see below)
- Once this has been completed and fully investigated the group will need to judge whether this concern has substance or not. If it does, then appropriate action will be required and could include the following:
  - Internal response or discipline procedures
  - Involvement by Local Authority or national / local organisation (as relevant).
  - Police involvement and/or action
- If content being reviewed includes images of Child abuse, then the monitoring should be halted and referred to the Police immediately. Other instances to report to the police would include:
  - incidents of ‘grooming’ behaviour
  - the sending of obscene materials to a child
  - adult material which potentially breaches the Obscene Publications Act
  - criminally racist material
  - other criminal conduct, activity or materials
- Isolate the computer in question as best you can. Any change to its state may hinder a later police investigation.

It is important that all of the above steps are taken as they will provide an evidence trail for the *school* and possibly the police and demonstrate that visits to these sites were carried out for child protection purposes. The completed form should be retained by the group for evidence and reference purposes.

## School Actions & Sanctions

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

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### Students / Pupils

### Actions / Sanctions

[illegible]

## Staff

## Actions / Sanctions

Incidents:	Refer to line manager	Refer to Head teacher / Principal	Refer to Local Authority / HR	Refer to Police	Refer to Technical Support Staff for action re filtering etc	Warning	Suspension	Disciplinary action
<b>Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on unsuitable / inappropriate activities).</b>		X	X	X				
Inappropriate personal use of the internet / social media / personal email								
Unauthorised downloading or uploading of files								
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								
Careless use of personal data eg holding or transferring data in an insecure manner								
Deliberate actions to breach data protection or network security rules								
Corrupting or destroying the data of other users or causing deliberate damage to hardware or software								
Sending an email, text or message that is regarded as offensive, harassment or of a bullying nature								
Using personal email / social networking / instant messaging / text messaging to carrying out digital communications with students / pupils								
Actions which could compromise the staff member's professional standing								
Actions which could bring the school into disrepute or breach the integrity of the ethos of the school								
Using proxy sites or other means to subvert the school's filtering system								
Accidentally accessing offensive or pornographic material and failing to report the incident								
Deliberately accessing or trying to access offensive or pornographic material								
Breaching copyright or licensing regulations								
Continued infringements of the above, following previous warnings or sanctions								