CHALFONT ST PETER
CHURCH OF ENGLAND ACADEMY

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Online Safety Policy

Written by:	Nicola Alburg	September 2023
Approved by:	The Headteacher	
Last reviewed:		September 2024
Next review due by:	Curriculum and Ethos Committee	September 2026

This online safety policy has been developed by the Headteacher, the computing subject leadership team, and the senior leadership team with oversight of the governing body.

This policy has been shared with the school community and questions/comments have been welcomed and responded to.

Schedule for Development/Monitoring/Review

This online safety policy was approved by the Headteacher with oversight from the governing body.	October 2023
The implementation of this online safety policy will be monitored by the:	Senior Leadership Team
Monitoring will take place:	Termly
The Governing Body will receive a report on the implementation of the online safety policy (which will include anonymous details of online safety incidents).	Annually
The online safety policy will be reviewed annually or more regularly in the light of any significant new developments in the use of technologies, new threats to online safety or incidents that have taken place. The next review date will be:	September 2025
Should serious online safety incidents take place, the following external persons/agencies should be informed:	E.g. LA Safeguarding Officer, LADO, police

The school will monitor the impact of the policy using:

- Logs of reported incidents
- Surveys of
    - pupils
    - parents and carers
    - staff

Scope of the Policy

This policy applies to all members of the Chalfont St Peter C of E Academy (CSPA) community (including staff, pupils, volunteers, parents/carers, visitors, community users) who have access to and are users of CSPA digital technology systems, both in and out of CSPA.

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

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

Roles and Responsibilities

The following section outlines the online safety roles and responsibilities of individuals and groups within CSPA.

Governing Body:

Governors have a duty to ensure that policies are in place and regularly reviewed.

Governors are responsible for holding the headteacher to account over the approval of the online safety policy and for reviewing the effectiveness of the policy. Governors will receive regular information about online safety incidents and monitoring reports. A designated member of the Governing Body will monitor IT and online safety (this role may be combined with that of the Safeguarding Governor). The role of the IT Governor will include:

- meetings with the Computing Team and Senior Leadership Team when necessary
- attendance at Online Safety events and initiatives
- monitoring of online safety anonymised incidents
- reporting, where necessary, to relevant Governors/Board/Committee/meeting
- liaison with the Senior Leadership Team about the external IT provider

Headteacher and Senior Leadership Team

- 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 Computing Team.
- The Headteacher and (at least) another member of the Senior Leadership Team should be aware of the procedures to be followed in the event of a serious online safety allegation being made against a member of staff. (see flow chart on dealing with online safety incidents – included in a later section – "Responding to incidents of misuse" and relevant local authority disciplinary procedures).
- The Headteacher and Senior Leadership Team are responsible for ensuring that the Computing Team and other relevant staff receive suitable training to enable them to carry out their online safety roles and to train other colleagues, as relevant.
- The Headteacher and Senior Leadership Team 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 for those colleagues who take on important monitoring roles.
- The Senior Leadership Team will receive monitoring reports from the Computing Team where necessary.

The Computing Team:

Designated members of the Computing Team are responsible for:

- taking day to day responsibility for online safety issues and has a leading role in establishing and reviewing the school online safety policies/documents
- ensuring that all staff are aware of the procedures that need to be followed in the event of an online safety incident taking place.
- providing training and advice for staff
- liaising with the Local Authority
- liaising with external technical support
- receiving reports of online safety incidents and creating a log of incidents to inform future online safety developments
- attending relevant meetings of the Governing Body
- reporting regularly to the Senior Leadership Team where necessary as required.
- the production/review/monitoring of the school online safety policy/documents.
- the mapping and reviewing the online safety/digital literacy curricular provision – ensuring relevance, breadth and progression

- monitoring incidents
- 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

Network Manager/Technical staff:

It is the responsibility of CSPA (Chalfont St Peter C of E Academy) to ensure that our managed ICT service provided by TurnitOn carries out all of the online safety measures as suggested below:

Those with technical responsibilities are responsible for ensuring:

- that CSPA's technical infrastructure is secure and is not open to misuse or malicious attack
- that CSPA meets required online safety technical requirements and any Local Authority online safety policy/guidance that may apply.
- that users may only access the networks and devices through a properly enforced password protection criteria, with password complexity in place and a forced reset every 180 days
- the filtering criteria is applied and updated on a regular basis and that its implementation is not the sole responsibility of any single person. Filtering is managed by ISP
- 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 and other digital technologies is able to be regularly monitored in order that any misuse/attempted misuse can be reported to the Headteacher and Senior Leadership Team
- that monitoring software/systems can be implemented and updated as agreed in CSPA policies

Teaching and Support Staff:

Are responsible for ensuring that:

- they have an up to date awareness of online safety matters and of the current CSPA online safety policy and practices
- they have read, understood and agreed to the staff acceptable use agreement
- they report any suspected misuse or problem to the Year Leader, Headteacher or member of the Senior Leadership Team for investigation/action/sanction
- all digital communications with 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
- pupils understand and follow the Online Safety Policy and acceptable use policies
- pupils have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations
- they have an awareness of how AI can be increasingly used by pupils and staff in the school context
- they monitor the use of digital technologies, mobile devices, cameras, etc. in lessons and other school activities (where allowed) and implement current policies with regard to these devices
- in lessons where internet use is pre-planned students/pupils should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches

Designated Safeguarding Lead:

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

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

- online-bullying

Pupils:

- responsible for using the CSPA digital technology systems in accordance with the pupil acceptable use agreement
- have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations
- need to understand the importance of reporting abuse, misuse or access to inappropriate materials and know how to do so
- will be expected to know and understand policies on the use of mobile devices and digital cameras. They should also know and understand policies on the taking/use of images and online bullying.
- should understand the importance of adopting good online safety practice when using digital technologies out of school and realise that the CSPA 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. CSPA will take every opportunity to help parents understand these issues through parents' evenings, newsletters, letters, school website, social media and information about national/local online safety campaigns/literature. Parents and carers will be encouraged to support CSPA in promoting good online safety practice and to follow guidelines on the appropriate use of:

- digital and video images taken at school events
- access to parents' sections of the website/Learning Platform and online pupil records (if relevant)
- their children's personal devices at CSPA (where this is allowed)

Community Users:

Community Users who access CSPA systems or programmes as part of the wider provision will be expected to read and agree to follow a Community User Acceptable Use Agreement (AUA) before being provided with access to CSPA systems.

Policy Statements

Education – Pupils

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

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

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

- Pupils should be supported in building resilience to radicalisation by providing a safe and age-appropriate environment for debating controversial issues and helping them to understand how they can influence and participate in decision-making.
- Pupils should be helped to understand the need for the pupil acceptable use agreement and encouraged to adopt safe and responsible use both within and outside of CSPA.
- Staff should act as good role models in their use of digital technologies, the internet and mobile devices
- In lessons where internet use is pre-planned, it is best practice that pupils should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches.
- Where pupils are allowed to freely search the internet, staff should be vigilant in monitoring the content of the websites the young people visit.

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 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.

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

- Curriculum activities
- Letters, newsletters, school website
- Parents/carers evenings/sessions
- High profile events/campaigns e.g. Safer Internet Day
- Reference to the relevant websites/publications

Education – The Wider Community

Where possible, CSPA could provide opportunities for local community groups/members of the community to gain from CSPA's online safety knowledge and experience. This may be offered through the following:

- Signposting 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 CSPA website will provide online safety information for the wider community
- Sharing their online safety expertise/good practice with other local schools
- Supporting community groups e.g. Early Years Settings, Childminders, youth/sports/voluntary groups to enhance their online safety provision

Education & Training – Staff/Volunteers

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

- A planned programme of formal online safety training will be made available to staff. This will be regularly updated and reinforced. An audit of the online safety training needs of all staff will be carried out regularly
- All new staff should receive online safety training as part of their induction programme, ensuring that they fully understand the school/academy online safety policy and acceptable use agreements
- It is expected that some staff will identify online safety as a training need within the performance appraisal process
- Members of the Computing Team (or other nominated person) will receive regular updates through attendance at external training events and by reviewing guidance documents released by relevant organisations
- This online safety policy and its updates will be presented to and discussed by staff in staff/team meetings/training sessions
- Members of the Computing Team (or other nominated person) 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 group involved in technology/online safety/health and safety/safeguarding. This may be offered in a number of ways:

- Attendance at training provided by the Local Authority/National Governors Association/or other relevant organisation
- Participation in CSPA training/information sessions for staff or parents (this may include attendance at assemblies/lessons)

Technical – infrastructure/equipment, filtering and monitoring

It is the responsibility of CSPA to ensure that our managed ICT service provided by TurnitOn carries out all of the online safety measures as suggested below. Our managed service provider is also fully aware of our CSPA online safety policy and acceptable use agreements. CSPA has regard to our Local Authority policies on these technical issues.

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

- Our technical systems will be managed in ways that ensure that CSPA meets recommended technical requirements (as outlined in Local Authority policy guidance)
- There will be regular reviews and audits of the safety and security of CSPA technical systems
- Servers, wireless systems and cabling must be securely located and physical access restricted
- All users will have clearly defined access rights to CSPA technical systems and devices.
- All users will be provided with a username and secure password by TurnitOn technical support or a member of the senior leadership team who will keep an up to date record of users and their usernames. Users are responsible for the security of their username and password.
- The "master/administrator" passwords for the CSPA systems, used by the Network Manager (or other person) is available to the Headteacher or other nominated senior leader via Turniton
- The senior leadership team and our IT service provider are 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)
- Internet access is filtered for all users. Illegal content (child sexual abuse images) is filtered by the broadband or filtering provider by actively employing the Internet Watch Foundation CAIC list. Content lists are regularly updated and internet use is logged and regularly monitored. There is a clear process in place to deal with requests for filtering changes.
- Internet filtering/monitoring should ensure that children are safe from terrorist and extremist material when accessing the internet. N.B. additional duties for schools/academies under the Counter Terrorism and Securities Act 2015 which requires schools/academies to ensure that children are safe from terrorist and extremist material on the internet.
- CSPA has provided enhanced/differentiated user-level filtering, where necessary (allowing different filtering for different groups of users – staff and pupils etc)
- CSPA technical staff regularly can monitor and record the activity of users on the school technical systems and users are made aware of this in the acceptable use agreement. CSPA uses EXA monitor line. Quantum Filtering for monitoring.
- An appropriate system is in place (Turn it On portal) for users to report any actual/potential technical incident/security breach to the relevant person, as agreed.
- Appropriate security measures are in place (Sophos tested by ACM) to protect the servers, firewalls, routers, wireless systems, work stations, mobile devices, etc. from accidental or malicious attempts which

might threaten the security of the school systems and data. These are tested regularly. The school infrastructure and individual devices are protected by up to date virus software.
- Agreed criteria are in place for the provision of temporary access of "guests" (e.g. trainee teachers, supply teachers, visitors) onto the school systems.
- Agreed criteria are in place regarding the extent of personal use that users (staff/students/pupils/community users) and their family members are allowed on school devices that may be used out of school.
- An agreed policy is in place that blocks staff from downloading executable files and installing programmes on school devices.
- An agreed policy is in place regarding the use of removable media (e.g. memory sticks/CDs/DVDs) by users on school devices. Personal data must not be sent over the internet or taken off the school site unless safely encrypted or otherwise secured.

A more detailed IT Security and Acceptable Use Policy can be found as a separate document.

Mobile Technologies (including BYOD/BYOT)

Mobile technology devices may be CSPA owned/provided or personally owned and might include: smartphone, tablet, chromebook/laptop or other technology that usually has the capability of utilising the school's wireless network. The device then has access to the wider internet which may include the school's learning platform and other cloud based services such as email and data storage.

All users should understand that the primary purpose of the use of mobile/personal devices in a school context is educational. Teaching about the safe and appropriate use of mobile technologies should be an integral part of the school's online safety education programme.

A more detailed Mobile Technologies Policy can be found as a separate document. Many aspects of the Mobile Technologies Policy are included in the acceptable use agreements.

Use of digital and video images

The development of digital imaging technologies has created significant benefits to learning, allowing staff and pupils instant use of images that they have recorded themselves or downloaded from the internet. However, staff, parents/carers and pupils need to be aware of the risks associated with publishing digital images on the internet. Such images may provide avenues for online-bullying to take place. Digital images may remain available on the internet forever and may cause harm or embarrassment to individuals in the short or longer term. It is common for employers to carry out internet searches for information about potential and existing employees. At CSPA, we 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 pupils about the risks associated with the taking, use, sharing, publication and distribution of images. In particular they should recognise the risks attached to publishing their own images on the internet e.g. on social networking sites.
- Permission from parents or carers will be obtained before photographs of students/pupils are published on the school website/social media/local press.
- In accordance with guidance from the Information Commissioner's Office, parents/carers are welcome to take videos and digital images of their children at CSPA events for their own personal use (as such use is not covered by the Data Protection Act). To respect everyone's privacy and in some cases protection, these images should not be published/made publicly available on social networking sites, nor should parents/carers comment on any activities involving other pupils in the digital/video images.
- Staff and volunteers are allowed to take digital/video images to support educational aims, but must follow CSPA policies concerning the sharing, distribution and publication of those images. Those images should ideally be taken on CSPA equipment but in the absence of school equipment, a personal device may be used but the image must be deleted once forwarded to the relevant school platform. This also includes all images deleted from any messaging platforms and the Cloud.
- Care should be taken when taking digital/video images that pupils are appropriately dressed and are not participating in activities that might bring the individuals or the school into disrepute.

- Pupils must not take, use, share, publish or distribute images of others without their permission
- Photographs published on the website, or elsewhere that include pupils will be selected carefully and will comply with good practice guidance on the use of such images.
- Pupils' full names will not be used anywhere on a website or blog, particularly in association with photographs.
- Pupil's work can only be published with the permission of the pupil and parents or carers.

Data Protection

With effect from 25th May 2018, the data protection arrangements for the UK changed following the European Union General Data Protection Regulation (GDPR). As a result, schools are likely to be subject to greater scrutiny in their care and use of personal data. More detailed guidance is available in the CSPA Data Protection Policy and in guidance supplied by our DPO at the Education Data Hub.

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

At CSPA, we ensure that:

- We have a Data Protection Policy.
- We implement the data protection principles and demonstrate that it does so through use of policies, notices and records.
- We have paid the appropriate fee Information Commissioner's Office (ICO) and included details of the Data Protection Officer (DPO).
- We have 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.
- We have an 'information asset register' in place and know what personal data it holds, where this data is held, why and which member of staff has responsibility for managing it
- The information asset register records the lawful basis for processing personal data (including, where relevant, how consent was obtained and refreshed). Where special category data is processed, an additional lawful basis will have also been recorded
- We will hold only the minimum personal data necessary to enable it to perform its function and it will not hold it for longer than necessary for the purposes it was collected for. The school implements a 'retention policy' to ensure there are clear and understood policies and routines for the deletion and disposal of data to support this. Personal data held must be accurate and up to date where this is necessary for the purpose it is processed for and that we have systems in place to identify inaccuracies, such as asking parents to check emergency contact details at suitable intervals
- We provide staff, parents, volunteers, teenagers and older children with information about how CSPA looks after their data and what their rights are in a clear Privacy Notice.
- We have procedures in place to deal with the individual rights of the data subject, e.g. one of the 8 data subject rights applicable is that of Subject Access which enables an individual to see and have a copy of the personal data held about them (subject to certain exceptions which may apply).
- Data Protection Impact Assessments (DPIA) are carried out where necessary. For example, to ensure protection of personal data when accessed using any remote access solutions, or entering into a relationship with a new supplier (this may also require ensuring that data processing clauses are included in the supply contract or as an addendum)
- IT system security is ensured and regularly checked. Patches and other security essential updates are applied promptly to protect the personal data on the systems. Administrative systems are securely ring fenced from systems accessible in the classroom/to learners
- We undertake appropriate due diligence and have required data processing clauses in contracts in place with any data processors where personal data is processed.
- We understand how to share data lawfully and safely with other relevant data controllers.
- We report any relevant breaches to the Information Commissioner within 72 hrs of becoming aware of the breach in accordance with UK data protection law. We also report relevant breaches to the individuals affected as required by law and our policy.
- We have a Freedom of Information Policy which sets out how it will deal with FOI requests.

- All staff receive data protection training at induction and appropriate refresher training thereafter. Staff undertaking particular data protection functions, such as handling requests under the individual's rights, will receive training appropriate for their function as well as the core training provided to all staff.
- Staff take care at all times to ensure the safe-keeping of personal data, minimising the risk of its loss or misuse
- Staff can recognise a possible breach, understand the need for urgency and know who to report it to within the school
- Staff will not transfer any school/academy personal data to personal devices except as in line with school policy

Communications

At CSPA we recognise that a wide range of rapidly developing communications technologies has the potential to enhance learning.

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

- The official CSPA email service may be regarded as safe and secure and is monitored. Users should be aware that email communications are monitored. Staff and pupils should therefore use only the school email service to communicate with others when in school, or on school systems.
- Users must immediately report, to the nominated person – in accordance with the CSPA 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 students/pupils or parents/carers (email, social media, chat, blogs, VLE etc) must be professional in tone and content. These communications may only take place on official (monitored) school/academy systems. Personal email addresses, text messaging or social media must not be used for these communications.
- Pupils at CSPA will be provided with individual academy email addresses but will only be available to use when switched on by the administrator for educational use during school hours.
- Pupils should be taught about online safety issues, such as the risks attached to the sharing of personal details. They should also be taught strategies to deal with inappropriate communications and be reminded of the need to communicate appropriately when using digital technologies.
- Personal information should not be posted on the CSPA website and only official email addresses should be used to identify members of staff.

Social Media - Protecting Professional Identity

With an increase in use of all types of social media for professional and personal purposes our CSPA 'Social Media Policy' sets out clear guidance for staff to manage risk and behaviour online. Core messages include the protection of pupils, the school and the individual when publishing any material online. Expectations for teachers' professional conduct are set out in 'Teachers Standards 2012'. Ofsted's online safety inspection framework reviews how a school protects and educates staff and pupils in their use of technology, including the measures that would be expected to be in place to intervene and support should a particular issue arise. Schools are increasingly using social media as a powerful learning tool and means of communication. It is important that this is carried out in a safe and responsible way.

A more detailed Social Media Policy can be found as a separate document.

Dealing with unsuitable/inappropriate activities

Some internet activity e.g. accessing child abuse images or distributing racist material is illegal and would obviously be banned from school and all other technical systems. Other activities e.g. cyber-bullying would be banned and could lead to criminal prosecution. There are however a range of activities which may, generally, be legal but would be inappropriate in a school context, either because of the age of the users or the nature of those activities.

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

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:

User Actions	Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
Child sexual abuse images - the making, production or distribution of indecent images of children. Contrary to The Protection of Children Act 1978					**X**
Grooming, incitement, arrangement or facilitation of sexual acts against children. Contrary to the Sexual Offences Act 2003					**X**
Possession of an extreme pornographic image (grossly offensive, disgusting or otherwise of an obscene character) Contrary to the Criminal Justice and Immigration Act 2008					**X**
Criminally racist material in UK – to stir up religious hatred (or hatred on the grounds of sexual orientation) - contrary to the Public Order Act 1986					**X**
Pornography				**X**	
Promotion of any kind of discrimination				**X**	
threatening behaviour, including promotion of physical violence or mental harm				**X**	
Promotion of extremism or terrorism				**X**	
Any other information which may be offensive to colleagues or breaches the integrity of the ethos of the school or brings the school into disrepute				**X**	
Activities that might be classed as cyber-crime under the Computer Misuse Act: ● Gaining unauthorised access to school networks, data and files, through the use of computers/devices ● Creating or propagating computer viruses or other harmful files ● Revealing or publicising confidential or proprietary information (e.g. financial / personal information, databases, computer / network access codes and passwords) ● Disable/Impair/Disrupt network functionality through the use of computers/devices ● Using penetration testing equipment (without relevant permission)					**X**
Using systems, applications, websites or other mechanisms that bypass the filtering or other safeguards employed by the school/academy				**X**	

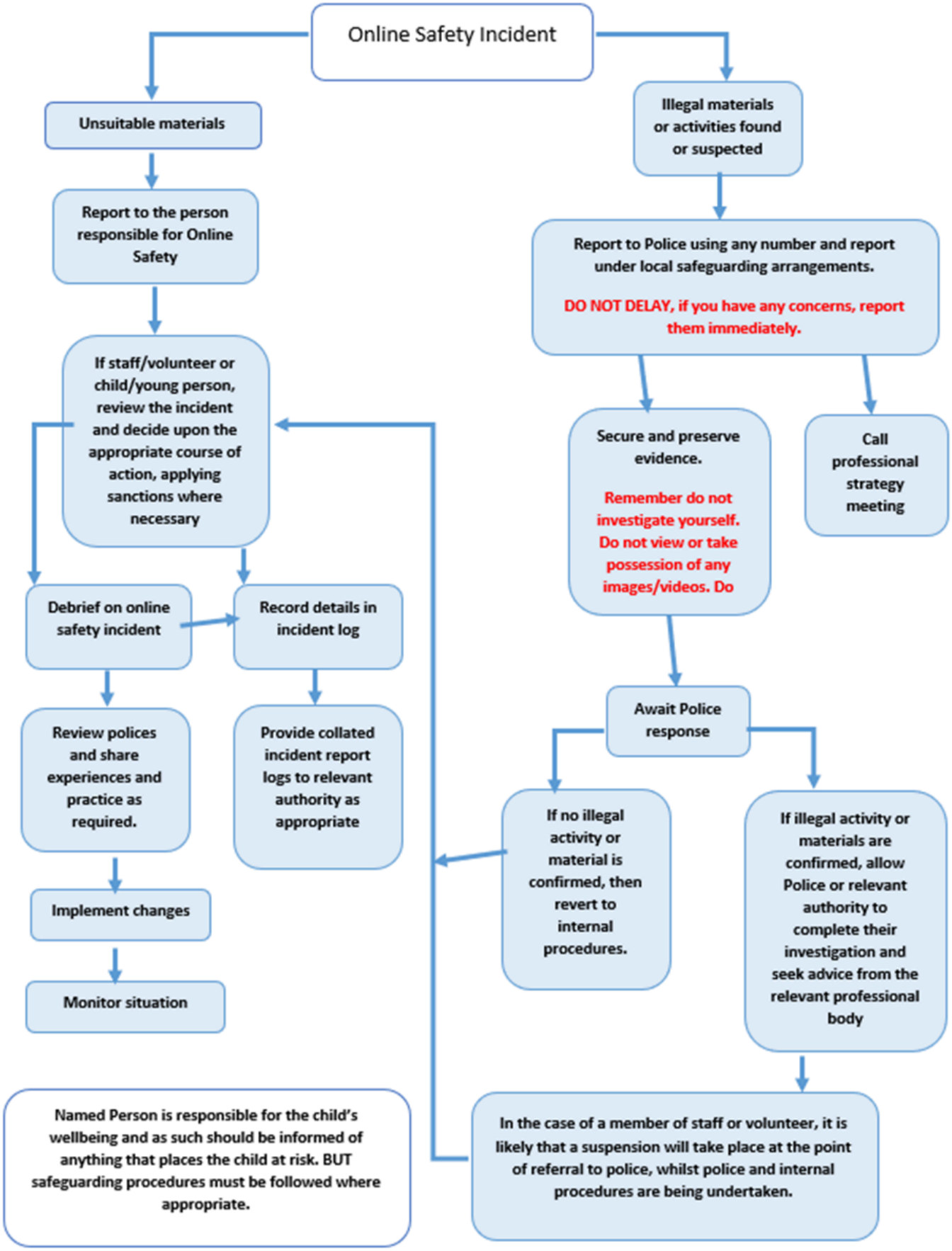
Revealing or publicising confidential or proprietary information (e.g. financial/personal information, databases, computer/network access codes and passwords)				X	
Unfair usage (downloading/uploading large files that hinders others in their use of the internet)				X	
Using school systems to run a private business				X	
Infringing copyright				X	
Online gaming (educational)	X				
Online gaming (non-educational)		X			
Online gambling				X	
Online shopping			X		
File sharing		X			
Use of social media			X		
Use of messaging apps		X			
Use of video broadcasting (e.g. Youtube)			X		

Responding to incidents of misuse

This section is intended for use when staff need to manage incidents that involve the use of online services. It encourages a safe and secure approach to the management of the incident. Incidents might involve illegal or inappropriate activities (see “User Actions” above).

Illegal Incidents

If there is any suspicion that a web site 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 for responding to online safety incidents and report immediately to the police.


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

Other Incidents

It is hoped that all members of the school community will be responsible users of digital technologies, who understand and follow our CSPA 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 will be followed:

- More than one senior member of staff will 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 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
    - Police involvement and/or action

If content being reviewed includes images of child abuse, then the monitoring should be halted and referred to the Police immediately. Other instances to report to the police would include:

- incidents of 'grooming' behaviour
- the sending of obscene materials to a child
- adult material which potentially breaches the Obscene Publications Act
- criminally racist material
- promotion of terrorism or extremism
- offences under the Computer Misuse Act (see User Actions chart above)
- other criminal conduct, activity or materials

Isolate the computer in question as best you can. Any change to its state may hinder a later police investigation.

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

School/academy 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 and in line with our behaviour policy, acceptable use policies, staff code of conduct policy and other relevant policies.

Any online safety incidents/concerns regarding children will be recorded on CPOMS assigned to the Designated Safeguarding Lead and with members of the Senior Leadership Team alerted.

Any online safety incidents/concerns regarding members of staff will be recorded on Staff Safe by a member of the Senior Leadership Team.

Legislation

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 website which includes information about "Cyber crime – preventing young people from getting involved". Each region in England (& Wales) has a Regional Organised Crime Unit (ROCU) Cyber-Prevent team that works with schools to encourage young people to make positive use of their cyber skills. There is a useful summary of the Act on the NCA site.

Data Protection Act 1998

This protects the rights and privacy of an individual's data. To comply with the law, information about individuals must be collected and used fairly, stored safely and securely and not disclosed to any third party unlawfully. The Act states that person data must be:

- Fairly and lawfully processed.
- Processed for limited purposes.
- Adequate, relevant and not excessive.
- Accurate.
- Not kept longer than necessary.
- Processed in accordance with the data subject's rights.
- Secure.
- Not transferred to other countries without adequate protection.

The Data Protection Act 2018:

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

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

misused.

- Require the data user or holder to register with the Information Commissioner.

All data subjects have the right to:

- Receive clear information about what you will use their data for.
- Access their own personal information.
- Request for their data to be revised if out of date or erased. These are known as the right to rectification and the right to erasure
- Request information about the reasoning behind any automated decisions, such as if computer software

denies them access to a loan.

- Prevent or query about the automated processing of their personal data.

Freedom of Information Act 2000

The Freedom of Information Act gives individuals the right to request information held by public authorities. All public authorities and companies wholly owned by public authorities have obligations under the Freedom of Information Act. When responding to requests, they have to follow a number of set procedures.

Communications Act 2003

Sending by means of the Internet a message or other matter that is grossly offensive or of an indecent, obscene or menacing character; or sending a false message by means of or persistently making use of the Internet for the purpose of causing annoyance, inconvenience or needless anxiety is guilty of an offence liable, on conviction, to imprisonment. This wording is important because an offence is complete as soon as the message has been sent: there is no need to prove any intent or purpose.

Malicious Communications Act 1988

It is an offence to send an indecent, offensive, or threatening letter, electronic communication or other article to another person.

Regulation of Investigatory Powers Act 2000

It is an offence for any person to intentionally and without lawful authority intercept any communication. Monitoring or keeping a record of any form of electronic communications is permitted, in order to:

- Establish the facts;
- Ascertain compliance with regulatory or self-regulatory practices or procedures;
- Demonstrate standards, which are or ought to be achieved by persons using the system;
- Investigate or detect unauthorised use of the communications system;
- Prevent or detect crime or in the interests of national security;
- Ensure the effective operation of the system.
- Monitoring but not recording is also permissible in order to:
- Ascertain whether the communication is business or personal;
- Protect or support 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 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, connections staff fall in this category of trust). Any sexual intercourse with a child under the age of 13 commits the offence of rape.

Public Order Act 1986

This Act makes it a criminal offence to stir up racial hatred by displaying, publishing or distributing written material which is threatening. Like the Racial and Religious Hatred Act 2006 it also makes the possession of inflammatory material with a view of releasing it a criminal offence. Children, Families and Education Directorate page 38 April 2007.

Obscene Publications Act 1959 and 1964

Publishing an "obscene" article is a criminal offence. Publishing includes electronic transmission.

Human Rights Act 1998

This does not deal with any particular issue specifically or any discrete subject area within the law. It is a type of "higher law", affecting all other laws. In the school context, human rights to be aware of include:

- The right to a fair trial
- The right to respect for private and family life, home and correspondence
- Freedom of thought, conscience and religion
- Freedom of expression
- Freedom of assembly
- Prohibition of discrimination
- The right to education

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

The Education and Inspections Act 2006

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

The Education and Inspections Act 2011

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

(see template policy in these appendices and for DfE guidance - http://www.education.gov.uk/schools/pupilsupport/behaviour/behaviourpolicies/f0076897/screening-searching-and-confiscation)

The Protection of Freedoms Act 2012

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

The School Information Regulations 2012

Requires schools to publish certain information on its website:

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

Serious Crime Act 2015

Introduced 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.

Links to other organisations or documents

Safer Internet Centre – https://www.saferinternet.org.uk/
South West Grid for Learning - https://swgfl.org.uk/products-services/online-safety/
Childnet – http://www.childnet-int.org/
Professionals Online Safety Helpline - http://www.saferinternet.org.uk/about/helpline
Revenge Porn Helpline - https://revengepornhelpline.org.uk/
Internet Watch Foundation - https://www.iwf.org.uk/
Report Harmful Content - https://reportharmfulcontent.com/
CEOP - http://ceop.police.uk/
ThinkUKnow - https://www.thinkuknow.co.uk/
Others
LGfL – Online Safety Resources
Kent – Online Safety Resources page
INSAFE/Better Internet for Kids - https://www.betterinternetforkids.eu/
UK Council for Internet Safety (UKCIS) - https://www.gov.uk/government/organisations/uk-council-for-internet-safety
Netsmartz - http://www.netsmartz.org/
Tools for Schools
Online Safety BOOST – https://boost.swgfl.org.uk/
360 Degree Safe – Online Safety self-review tool – https://360safe.org.uk/
360Data – online data protection self-review tool: www.360data.org.uk
SWGfL Test filtering - http://testfiltering.com/
UKCIS Digital Resilience Framework - https://www.gov.uk/government/publications/digital-resilience-framework
Bullying/Online-bullying/Sexting/Sexual Harassment
Enable – European Anti Bullying programme and resources (UK coordination/participation through SWGfL & Diana Awards) - http://enable.eun.org/
SELMA – Hacking Hate - https://selma.swgfl.co.uk
Scottish Anti-Bullying Service, Respectme - http://www.respectme.org.uk/
Scottish Government - Better relationships, better learning, better behaviour http://www.scotland.gov.uk/Publications/2013/03/7388
DfE Cyberbullying guidance - https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/374850/Cyberbullying_Advice_for_Headteachers_and_School_Staff_121114.pdf
Childnet – Cyberbullying guidance and practical PSHE toolkit:
http://www.childnet.com/our-projects/cyberbullying-guidance-and-practical-toolkit
Childnet – Project deSHAME – Online Sexual Harassment
UKSIC – Sexting Resources
Anti-Bullying Network – http://www.antibullying.net/cyberbullying1.htm
Ditch the Label – Online Bullying Charity
Diana Award – Anti-Bullying Campaign
Social Networking
Digizen – Social Networking

UKSIC - Safety Features on Social Networks
Children's Commissioner, TES and Schillings – Young peoples' rights on social mediaCurriculum

SWGfL Evolve - https://projectevolve.co.uk
UKCCIS – Education for a connected world framework
Teach Today – www.teachtoday.eu/
Insafe - Education Resources
Data Protection
360data - free questionnaire and data protection self review tool
ICO Guides for Education (wide range of sector specific guides)
DfE advice on Cloud software services and the Data Protection Act
IRMS - Records Management Toolkit for Schools
NHS - Caldicott Principles (information that must be released)
ICO Guidance on taking photos in schools
Dotkumo - Best practice guide to using photos

Professional Standards/Staff Training
DfE – Keeping Children Safe in Education
Safer Working Practice for Adults who Work with Children and Young People
Childnet – School Pack for Online Safety Awareness
UK Safer Internet Centre Professionals Online Safety Helpline

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

Working with parents and carers
Online Safety BOOST Presentations - parent's presentation
Vodafone Digital Parents Magazine
Childnet Webpages for Parents & Carers
Get Safe Online - resources for parents
Teach Today - resources for parents workshops/education
Internet Matters

Prevent
Prevent Duty Guidance
Prevent for schools – teaching resources
NCA – Cyber Prevent
Childnet – Trust Me

Research
Ofcom –Media Literacy Research

Further links can be found at the end of the UKCIS Education for a Connected World Framework