E Safety Policy

July 2018

COTTERIDGE PRIMARY SCHOOL

Cotteridge School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. The School is committed to the UNICEF Rights Respecting Schools ethos and actively promotes the UN Convention on the Rights of the Child

1) Development of this Policy

This Online Safety policy has been developed for Cotteridge Primary School by a working group made up of:

- Senior Leaders: J. Leonard & K. Lacey
- ESafety Officer: Z. Burnett
- Computing Coordinator: N.Bungaroo

Schedule for Development / Monitoring / Review

This ESafety policy was approved by the Governing Body on:	*9th July 2018*
The implementation of this Online Safety policy will be monitored by:	*ESafety Officer, Senior Leadership Team*
Monitoring will take place at regular intervals:	*Weekly*
The Governing Body of Cotteridge Primary School will receive a report on the implementation of the ESafety Policy at regular intervals:	*As part of safeguarding reports*
The ESafety Policy will be reviewed annually, or more regularly in the light of any significant new developments in the use of the technologies, new threats to online safety or incidents that have taken place. The next anticipated review date will be:	*Summer 2019*
Should serious online safety incidents take place, the following external persons / agencies should be informed:	*LA Safeguarding Officer, Police*

The school will monitor the impact of the policy using:

- Logs of reported incidents – including MyConcern
- Monitoring logs of internet activity (including sites visited) / filtering (Policy Central)
- Internal monitoring data for network activity (Policy Central)

2) Scope of the Policy

This policy applies to all members of Cotteridge Primary School (including staff, 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 Education and Inspections Act 2006 empowers Headteachers to such extent as is reasonable, to regulate the behaviour of pupils when they are off the school site and empowers members of staff to impose disciplinary penalties for inappropriate behaviour. This is pertinent to incidents of cyber-bullying or other ESafety incidents covered by this policy, which may take place outside of the school, but is linked to membership of the school. The 2011 Education Act increased these powers with regard to the searching for and of electronic devices and the deletion of data. The Government document Searching, Screening and Confiscation Feb 2014.
(see link https://www.gov.uk/government/publications/searching-screening-and-confiscation)

Cotteridge Primary School will deal with such incidents within its Behaviour Policy and will, where known, inform parents / carers of incidents of inappropriate Online Safety behaviour that take place out of school. Police involvement may also be sought in specific cases.

3) Roles and Responsibilities

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

Governors:

The Governors of Cotteridge Primary School are responsible for the approval of the ESafety 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 has taken on the role of *Safeguarding Governor* which includes ESafety. The named Safeguarding/ESafety Governor at Cotteridge School is Debbie Kaya. The Governor's role will include:

- regular meetings with the school DSL, SPOC and ESafety Officer
- reporting at relevant Governors 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 ESafety Officer.
- 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.
- The Headteacher and Senior Leaders are responsible for ensuring that the ESafety 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 and Senior Leaders will ensure that there is a system in place to allow for monitoring and support of those in school who carry out the internal online safety monitoring role. This is to provide a safety net and also support to those colleagues who take on important monitoring roles.
- The Senior Leadership Team will receive regular monitoring reports from the ESafety Officer.
- The Headteacher and Senior Leadership Team will monitor reports produced by policy central software.

ESafety Officer Z. Burnett:

- 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 with ESafety Governor to discuss current issues, review incident logs and filtering logs
- attends relevant meeting of Governors
- reports regularly to Senior Leadership Team and the Headteacher

Network Manager:

The Network Manager for Computing is responsible for ensuring:

- that the school's technical infrastructure is secure and is not open to misuse or malicious attack
- that the school meets required online safety technical requirements and any Local Authority Online Safety Guidance that may apply.
- that users may only access the networks and devices through a properly enforced password protection policy, in which passwords are regularly changed
- the filtering policy is applied and updated on a regular basis and that its implementation is not the sole responsibility of any single person
- 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 is regularly monitored in order that any misuse / attempted misuse can be reported to the Headteacher or ESafety Officer for investigation
- that monitoring software is implemented and updated as agreed in school 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 school ESafety Policy and practices
- they have read, understood and signed the Staff Acceptable Use Policy (AUP)
- they report any suspected misuse or problem to the Senior Leadership Team/ ESafety 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
- pupils understand and follow the ESafety Policy and acceptable use policies
- they monitor the use of digital technologies, mobile devices, cameras etc in lessons and other school activities (where allowed) and implement current policies with regard to these devices
- in lessons where internet use is pre-planned pupils should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches

Designated Safeguarding Lead

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

- sharing of personal data

- access to illegal / inappropriate materials
- inappropriate on-line contact with adults / strangers/ other children
- potential or actual incidents of grooming
- cyber-bullying
- messages of a sexual nature sent or received by children (Sexting)

Parental Responsibility

Parents have responsibility for how children use the internet and social media outside of school. They play a crucial role in ensuring that their children understand the need to use the internet / mobile devices in an appropriate way. Cotteridge Primary School will take every opportunity to help parents understand these issues through parents' meetings, newsletters and the school website. Parents and carers will be encouraged to support the school in promoting good online safety practice and to follow guidelines on the appropriate use of:

- digital and video images taken at school events
- access to parents' sections of the website
- their children's personal devices in the school

4) 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 ESafety 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.

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

- A planned ESafety curriculum should be provided as part of Computing and P4C lessons and should be regularly revisited
- Key ESafety messages should be reinforced as part of a planned programme of assemblies and pastoral activities
- Pupils should be taught in all lessons to be critically aware of the materials / content they access on-line and be guided to validate the accuracy of information.
- Pupils should be taught to acknowledge the source of information used and to respect copyright when using material accessed on the internet
- Pupils should be supported in building resilience to radicalisation by providing a safe environment for debating controversial issues and helping them to understand how they can influence and participate in decision-making.
- Pupils should be helped to understand the need for the pupil Acceptable Use Agreement and encouraged to adopt safe and responsible use both within and outside school.
- 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 / 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:

- *Curriculum activities*
- *Letters, newsletters, web site,*
- *Parents / Carers sessions*
- *High profile events / campaigns e.g. Safer Internet Day*
- *Reference to the relevant web sites / publications e.g. swgfl.org.uk www.saferinternet.org.uk/ http://www.childnet.com/parents-and-carers*

Education & Training – Staff / Volunteers

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

- A planned programme of formal ESafety training will be made available to staff. This will be regularly updated and reinforced. An audit of the ESafety training needs of all staff will be carried out regularly.
- All new staff should receive ESafety training as part of their induction programme, ensuring that they fully understand the school ESafety Policy and Acceptable Use Agreements.
- It is possible that some staff will identify ESafety as a training need within the performance management process.
- The ESafety Officer will receive regular updates through attendance at external training events and by reviewing guidance documents released by relevant organisations.
- This ESafety Policy and its updates will be presented to and discussed by staff in staff meetings / INSET days.
- The ESafety Officer will provide advice / guidance / training to individuals as required.

5) Technical – infrastructure / equipment, filtering and monitoring

The school will be responsible for ensuring that the school 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 ESafety responsibilities:

- **School technical systems will be managed in ways that ensure that the school meets recommended technical requirements**
- **There will be regular reviews and audits of the safety and security of school technical systems**
- **Servers, wireless systems and cabling must be securely located and physical access restricted**
- **All users will have clearly defined access rights to school technical systems and devices.**
- **All users will be provided with a username and secure password by** the Computing Co-ordinator/Network Manager/E Safety Officer who will keep an up to date record of users and their usernames. **Users are responsible for the security of their username and password**
- The "administrator" passwords for the school ICT system, used by the Network Manager must also be available to the Headteacher*,* E Safety Officer, Computing Coordinator 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.** Illegal content (including child sexual abuse images) is filtered by the broadband or filtering provider. 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 should ensure that children are safe from terrorist and extremist material when accessing the internet.**
- School technical staff regularly monitor and record the activity of users on the school technical systems and users are made aware of this in the Acceptable Use Agreement.
- An appropriate system is in place for users to report any actual / potential technical incident / security breach to the relevant person, as agreed.
- Appropriate security measures are in place to protect the servers, firewalls, routers, wireless systems, work stations, mobile devices etc from accidental or malicious attempts which might threaten the security of the school systems and data. These are tested regularly. The school infrastructure and individual workstations are protected by up to date virus software.
- An agreed policy is in place for the provision of temporary access of "guests" (eg trainee teachers, supply teachers, visitors) onto the school systems.
- An agreed policy is in place that forbids staff from downloading executable files and installing programmes on school devices.
- The use of 'Policy Central' software can and will be used to monitor computer usage of staff and pupils.

Mobile Technologies

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

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

The school Acceptable Use Agreements for staff, pupils and parents/carers will give consideration to the use of mobile technologies

- **The school allows:**

	School Devices			Personal Devices		
	School owned for single user	**School owned for multiple users**		**Student owned**	**Staff owned**	**Visitor owned**
Allowed in school	*Yes*	*Yes*		*Yes/No (Mobile Phones Yrs 5/6*)*	*Yes*	*Yes*
Full network access	*Yes*	*Yes*		*No*	*No*	*No*
Internet only				*No*	*Yes*	*No*
Network access				*No*	*No*	*No*

- Children in Years 5 and 6 who walk to or from school on their own are allowed to bring a mobile phone in to school. This however must be switched off once on the school playground. On entering school Mobile phones must be handed straight in to the school office. Parents sign to give permission for pupils to walk to and from school on their own and in doing so accept that the school is not responsible for theft or breakage of the device. The school has the right to answer any phones which may be left on and that ring during the school day.

6) 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 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 pupils about the risks associated with the taking, use, sharing, publication and distribution of images. In particular they should recognise the risks attached to publishing their own images on the internet e.g. on social networking sites.
- Permission from parents or carers will be obtained before photographs of students / pupils are published on the school website / social media / local press
- In accordance with guidance from the Information Commissioner's Office, parents / carers are welcome to take videos and digital images of their children at school events for their own personal use (as such use is not covered by the Data Protection Act). To respect everyone's privacy and in some cases protection, these images should not be published / made publicly available on social networking sites, nor should parents / carers comment on any activities involving other pupils in the digital / video images.
- Staff and volunteers are allowed to take digital / video images to support educational aims, but can only share, distribute or publish such images in the professional context of the school. Those images should only be taken on school equipment, the personal equipment of staff should not be used for such purposes.
- Care should be taken when taking digital / video images that pupils are appropriately dressed and are not participating in activities that might bring the individuals or the school into disrepute.
- Pupils must not take, use, share, publish or distribute images of others without their permission
- Photographs published on the website, or elsewhere that include pupils will be selected carefully and will comply with good practice guidance on the use of such images.
- Pupils' full names will not be used anywhere on a website or blog, particularly in association with photographs.
- Pupil's work can only be published with the permission of the pupil and parents or carers.

7) 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.

Cotteridge Primary 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)
- 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 transfer / 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 once it has been transferred or its use is complete**

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

- The official school email service may be regarded as safe and secure and is monitored. Users should be aware that email communications are monitored.
- Users must immediately report, to the nominated person – in accordance with the school policy, the receipt of any communication that makes them feel uncomfortable, is offensive, discriminatory, threatening or bullying in nature and must not respond to any such communication.
- Any digital communication between staff and pupils or parents / carers (email, blogs, VLE etc) must be professional in tone and content. These communications may only take place on official (monitored) school systems. Personal email addresses, or social media must not be used for these communications.
- Pupils should be taught about ESafety issues, such as the risks attached to the sharing of personal details. They should also be taught strategies to deal with inappropriate

communications and be reminded of the need to communicate appropriately when using digital technologies.

- Personal information should not be posted on the school website and only official email addresses should be used to identify members of staff.

9) 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 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:

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

School staff should ensure that:

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

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

- A process for approval by senior leaders
- Clear processes for the administration and monitoring of these accounts – involving at least two members of staff
- Systems for reporting and dealing with abuse and misuse
- Understanding of how incidents may be dealt with under school disciplinary procedures

Personal Use:

- Personal communications are those made via a personal social media accounts. In all cases, where a personal account is used which associates itself with the school or impacts on the school, it must be made clear that the member of staff is not communicating on behalf of the school with an appropriate disclaimer. Such personal communications are within the scope of this policy
- Personal communications which do not refer to or impact upon the school are outside the scope of this policy

Monitoring of Public Social Media

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

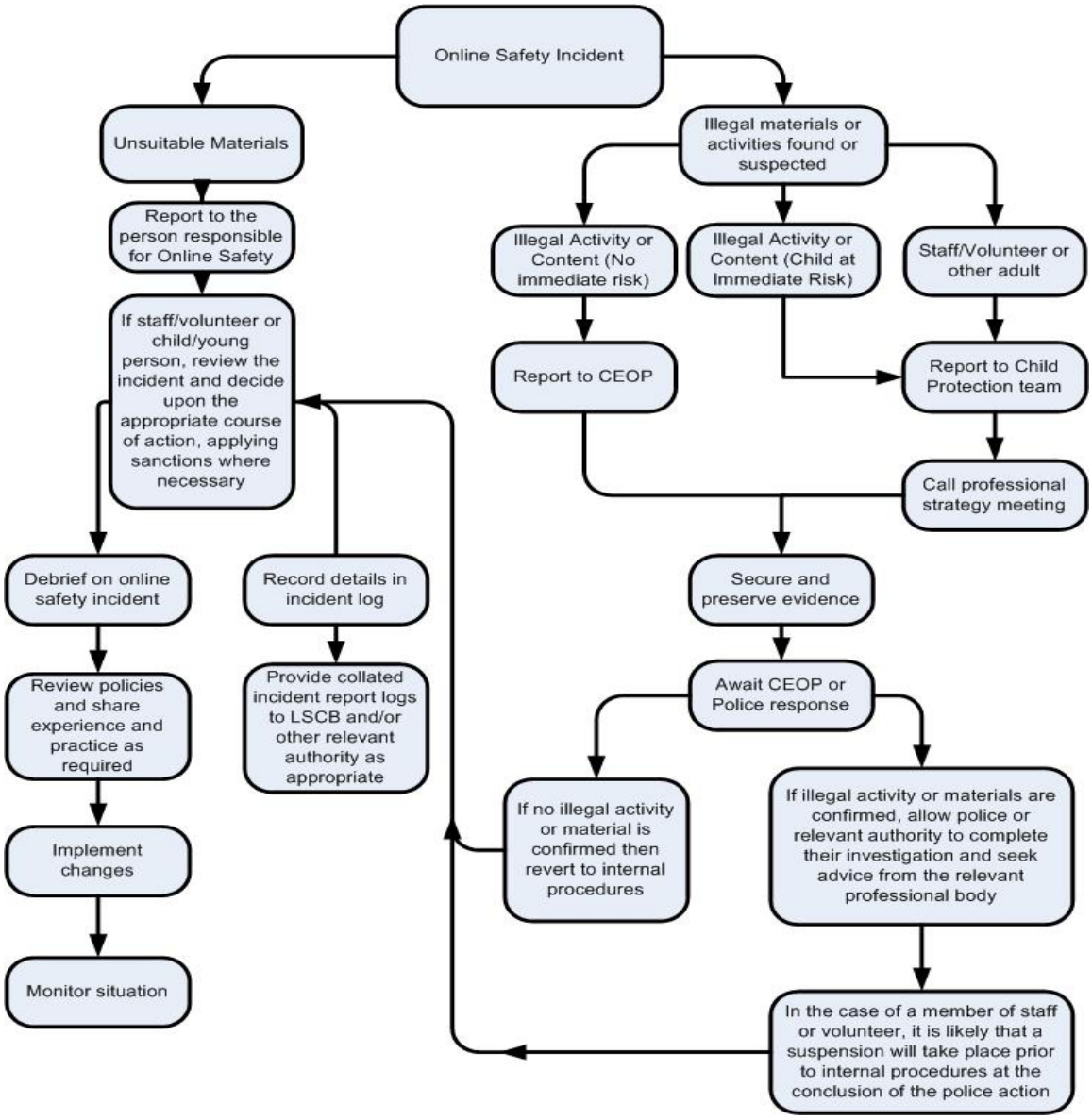
The school's use of social media for professional purposes will be checked regularly by the Online Safety Group to ensure compliance with the school policies.

10) 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) for responding to online safety incidents and report immediately to the police.



Other Incidents

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

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

- Have more than one senior member of staff involved in this process. This is vital to protect individuals if accusations are subsequently reported.
- Conduct the procedure using a designated computer that will not be used by young people and if necessary can be taken off site by the police should the need arise. Use the same computer for the duration of the procedure.
- It is important to ensure that the relevant staff should have appropriate internet access to conduct the procedure, but also that the sites and content visited are closely monitored and recorded (to provide further protection).

- Record the URL of any site containing the alleged misuse and describe the nature of the content causing concern. It may also be necessary to record and store screenshots of the content on the machine being used for investigation. These may be printed, signed and attached to the form (except in the case of images of child sexual abuse – see below)
- Once this has been completed and fully investigated the group will need to judge whether this concern has substance or not. If it does then appropriate action will be required and could include the following:
    - Internal response or discipline procedures
    - Involvement by Local Authority / Academy Group or national / local organisation (as relevant).
    - Police involvement and/or action

- **If content being reviewed includes images of Child abuse then the monitoring should be halted and referred to the Police immediately. Other instances to report to the police would include:**
    - incidents of 'grooming' behaviour
    - the sending of obscene materials to a child
    - adult material which potentially breaches the Obscene Publications Act
    - criminally racist material
    - promotion of terrorism or extremism
    - other criminal conduct, activity or materials
- **Isolate the computer in question as best you can. Any change to its state may hinder a later police investigation.**

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

School Actions & 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.

Date policy adopted by Governing Body: **2nd July 2018**

Date of Review: **Summer 2019**