St Vincent de Paul Catholic Primary School

Online Safety Policy

Policy Date:	September 2022
Policy Status:	Statutory
Policy Review Cycle:	Annual
Next Review Date:	September 2023

Introduction

This policy, with its two appendices (the Acceptable Usage Policy for Pupils and Acceptable Usage Policy for Staff) is used to educate and protect pupils and staff in their use of technology and to provide the appropriate mechanisms to intervene and to deal with any incidents that may arise. It should be read alongside the following policies:

- Computing
- Anti-bullying
- Safeguarding
- Behaviour

Scope of the Policy

This policy applies to all members of the school community (including staff, pupils, volunteers, parents and carers, visitors) 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 online incidents covered by this policy, which may take place outside of the school, but are 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. In the case of both acts, action can only be taken over issues covered by the published Behaviour Policy.

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

Roles and Responsibilities

Governors are responsible for the approval of the Online Policy and for reviewing the effectiveness of the policy.

The Headteacher has a duty of care for ensuring the safety (including online) of members of the school community. The Headteacher is aware of the procedures to be followed in the event of a serious online allegation being made against a member of staff**.**

The Computing Coordinator:

- takes day to day responsibility for online issues
- has a leading role in establishing and reviewing the school online safety policy and documents
- ensures that all staff are aware of the procedures that need to be followed in the event of an online incident taking place.
- provides training and advice for staff
- liaises with school technical support staff provided by MGL
- receives reports of online incidents and creates a log of incidents to inform future online developments

It is the responsibility of the school to ensure that the **technical service provider (MGL)** ensures:

- that the school's technical infrastructure is secure and is not open to misuse or malicious attack
- that the school meets required online technical requirements and any Local Authority Online Policy/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
- that the school keeps up to date with online technical information in order to effectively carry out their online role and to inform and update others as relevant
- that the use of the network, internet and email is regularly monitored in order that any misuse or attempted misuse can be reported to the Headteacher for investigation, action or sanction.

Teaching and Support Staff are responsible for ensuring that:

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

The Child Protection / Safeguarding Designated Person is aware of any potential online issues and 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

Parents and Carers play a crucial role in ensuring that their children understand the need to use the internet and mobile devices in an appropriate way. Parents and carers will be encouraged to support the school in promoting good online practice and to follow guidelines on the appropriate use of digital and video images taken at school events.

Pupils are responsible for using the school digital technology systems in accordance with the Acceptable Usage Policy for Pupils.

Education and training

Relevant and age appropriate online messages are taught and revisited across the curriculum, in particular during Computing and PHSE lessons. Pupils are helped to understand the need for the Acceptable Usage Policy for Pupils and are encouraged to adopt safe and responsible use both within and outside of school. Pupils are taught to be critically aware of the content they access on-line and be guided to validate the accuracy of information. They are also taught to acknowledge the source of information used for research, rather than copying information and presenting it as their own work. 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.

All staff receive online training in order that they understand their responsibilities as outlined in this policy.

Technical: infrastructure, equipment, filtering and monitoring

It is the responsibility of the school to ensure that the **technical service provider (MGL)** carries out all the following online measures:

- School technical systems are managed in ways that ensure that the school meets recommended technical requirements
- Internet access is filtered for all users.
- 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 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. 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.

In accordance with guidance from the Information Commissioner's Office, parents and carers are welcome to take videos and digital images of their children at school events for their own personal use (as such use in 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 and carers comment on any activities involving other pupils in the digital / video images.

Staff and volunteers are allowed to take digital / video images to support educational aims, but must follow school policies concerning the sharing, distribution and publication of those images. Those images should only be taken on school equipment, the personal equipment of staff should not be used for such purposes.

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.

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".
- It is registered as a Data Controller for the purposes of the Data Protection Act (DPA).
- 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.

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.

Communications

The liverpool.sch.uk school email system is regarded as safe and secure and is monitored.

Users must report to the Headteacher 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 must be professional in tone and content.

Social Media - Protecting Professional Identity

All schools 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 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:

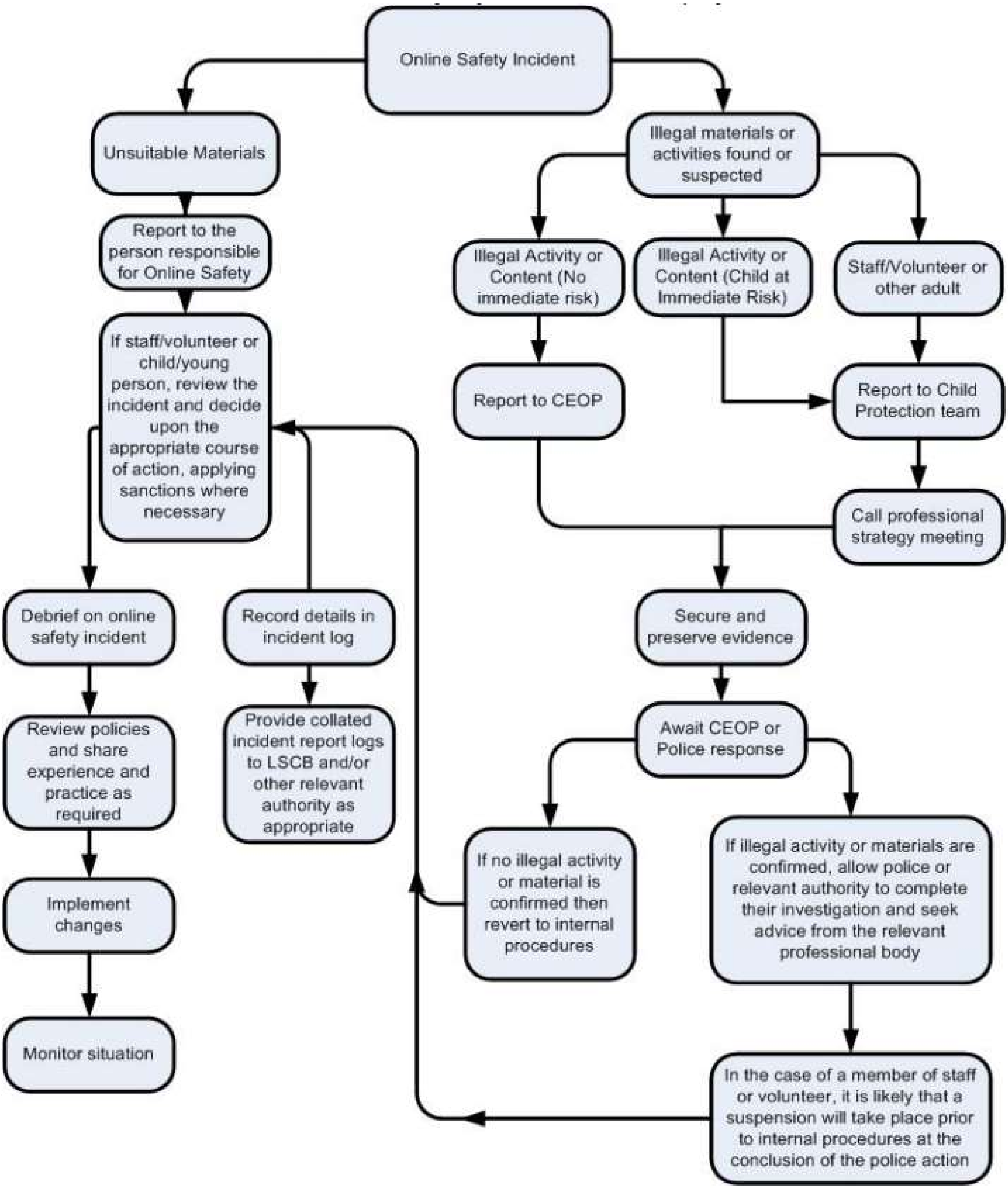
- No reference should be made in social media to pupils, parents and carers or school staff.
- They do not engage in online discussion on personal matters relating to members of the school community.
- Personal opinions should not be attributed to the school or local authority.
- Security settings on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

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.

Responding to incidents of misuse

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.


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
Review policies and share experience and practice as required
Implement changes
Monitor situation
Record details in incident log
Provide collated incident report logs to LSCB and/or other relevant authority as appropriate
Illegal materials or activities found or suspected
Illegal Activity or Content (No immediate risk)
Illegal Activity or Content (Child at Immediate Risk)
Staff/Volunteer or other adult
Report to CEOP
Report to Child Protection team
Call professional strategy meeting
Secure and preserve evidence
Await CEOP or 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 prior to internal procedures at the conclusion of the police action

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.

More than one senior member of staff / volunteer is 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.

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 the school's Behaviour Policy.