



The Affinity Federation

Willenhall Community Primary School and **Whitmore Park** Primary School

e-Safety policy

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Schedule for Development / Monitoring / Review

This e-safety policy was approved by the Federated Governing Body on:	14/03/2016
The implementation of this e-safety policy will be monitored by the:	Jacqueline McGibney E-Safety Lead
Monitoring will take place at regular intervals:	at least once a year
The Federated Governing Body will receive a report on the implementation of the e-safety policy generated by the monitoring group (which will include anonymous details of e-safety incidents) at regular intervals:	to be at least once a year
The E-Safety 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 e-safety or incidents that have taken place. The next anticipated review date will be:	April 2017
Should serious e-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
- Surveys / questionnaires of
 - pupils
 - parents / carers
 - staff

1. Scope of the Policy

This policy applies to all members of the school community (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 Head teachers 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 e-safety 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. 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 / carers of incidents of inappropriate e-safety behaviour that take place out of school.

2. Roles and Responsibilities

The following section outlines the e-safety roles and responsibilities of individuals and groups within the school:

2.1. **Governors:**

Governors are responsible for the approval of the E-Safety Policy and for reviewing the effectiveness of the policy. This will be carried out by the Sub Committee receiving regular information about e-safety incidents and monitoring reports. A member of the Governing Body has taken on the role of E-Safety Governor. The role of the E-Safety Governor will include:

- regular meetings with the E-Safety Coordinator
- regular monitoring of e-safety incident logs
- regular monitoring of filtering / change control logs
- reporting to relevant Governors / Board / committee / meeting

2.2. **Headteacher and Senior Leaders:**

- The Head teacher has a duty of care for ensuring the safety (including e-safety) of members of the school community
- The Head teacher and (at least) another member of the Senior Leadership Team / Senior Management Team should be aware of the procedures to be followed in the event of a serious e-safety allegation being made against a member of staff.
- The Head teacher is responsible for ensuring that the E-Safety Coordinator and other relevant staff receive suitable training to enable them to carry out their e-safety roles and to train other colleagues, as relevant.

- The Head teacher will ensure that there is a system in place to allow for monitoring and support of those in school who carry out the internal e-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 E-Safety Co-ordinator.

2.3. E-Safety Coordinator:

- leads the e-safety committee
- takes day to day responsibility for e-safety issues and has a leading role in establishing and reviewing the school e-safety policies / documents
- ensures that all staff are aware of the procedures that need to be followed in the event of an e-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 e-safety incidents and creates a log of incidents to inform future e-safety developments,
- meets regularly with E-Safety Governor to discuss current issues, review incident logs and filtering / change control logs
- attends relevant meeting / committee of Governors
- reports regularly to Senior Leadership Team

2.4. Network Manager /IT Consultant:

The Network Manager and IT Consultant are 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 e-safety technical requirements and any Local Authority 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 e-safety technical information in order to effectively carry out their e-safety role and to inform and update others as relevant
- that the use of the network / internet / remote access / email is regularly monitored in order that any misuse / attempted misuse can be reported to the Head teacher and E-Safety Coordinator for investigation / action / sanction

2.5. Teaching and Support Staff

are responsible for ensuring that:

- they have an up to date awareness of e-safety matters and of the current school e-safety policy and practices

- they have read, understood and signed the Staff Acceptable Use Policy / Agreement (AUP)
- they report any suspected misuse or problem to the Head teacher or E-Safety Coordinator 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
- e-safety issues are embedded in all aspects of the curriculum and other activities
- pupils understand and follow the e-safety 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

2.6. Child Protection / Safeguarding Designated Person

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

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

2.7. E-Safety Groups at Either School

The E-Safety Groups will provide a consultative group that has wide representation from the school community, with responsibility for issues regarding e-safety and the monitoring the e-safety policy including the impact of initiatives.

Members of the E-safety Group will assist the E-Safety Coordinator with:

- the production / review / monitoring of the school e-safety policy / documents.
- mapping and reviewing the e-safety curricular provision - ensuring relevance, breadth and progression
- monitoring network / internet / incident logs
- consulting stakeholders - including parents / carers and the pupils about the e-safety provision
- monitoring improvement actions identified through use of the 360 degree safe self review tool and ensuring all staff receive the necessary appropriate training to enable them to comply with the policy

2.8. Pupils:

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

2.9. Parents / Carers

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

- digital and video images taken at school events
- their children's personal devices in the school

3. 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.**
- 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 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.
- Written permission from parents or carers will be obtained before photographs of pupils are published on the school website

3.1. 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.
- It has a Data Protection Policy
- It is registered as a Data Controller for the purposes of the Data Protection Act (DPA)
- Responsible persons are appointed - Senior Information Risk Officer (SIRO) and Information Asset Owners (IAOs)

- Risk assessments are carried out
- It has clear and understood arrangements for the security, storage and transfer of personal data
- Data subjects have rights of access and there are clear procedures for this to be obtained
- There are clear and understood policies and routines for the deletion and disposal of data
- There is a policy for reporting, logging, managing and recovering from information risk incidents
- There are clear Data Protection clauses in all contracts where personal data may be passed to third parties
- There are clear policies about the use of cloud storage / cloud computing which ensure that such data storage meets the requirements laid down by the Information Commissioner's Office.

Staff must ensure that they:

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

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

- the data must be encrypted and password protected
- the device must be password protected
- the device must offer approved virus and malware checking software
- the data must be securely deleted from the device once it has been transferred or its use is complete

Data held on portable devices must be transferred over to either the admin or curriculum server as soon as it is reasonably possible to do so. All data must then be deleted off the portable device.

4. Communications

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

Communication Technologies	Staff & other adults				Pupils			
	Allowed	Not allowed	Allowed at certain times	Allowed for selected staff	Not allowed	Allowed (securely stored)	Allowed at certain times	Allowed with staff permission
Mobile phones may be brought to school			X			X		
Use of mobile phones in lessons		X			X			
Use of mobile phones in social time	X				X			
Taking photos on mobile phones / cameras		X			X			
Use of other mobile devices e.g. tablets, gaming devices	X					X		
Use of personal email addresses in school, or on school network	X				X			
Use of school email for personal emails		X			X			
Use of messaging apps				X	X			
Use of social media				X	X			
Use of blogs								

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.** Staff should therefore use only the school email service to communicate with others when in school, or on school systems (e.g. by remote access).
- **Users must immediately report, to the nominated person - in accordance with the school policy, the receipt of any communication that makes them feel uncomfortable, is offensive, discriminatory, threatening or bullying in nature and must not respond to any such communication.**
- **Any digital communication between staff and pupils or parents / carers (email, chat, VLE etc) must be professional in tone and content.** These communications may only take place on official (monitored) school systems. Personal email addresses, text messaging or social media must not be used for these communications.
- Pupils should be taught about e-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 school website and only official email addresses should be used to identify members of staff.

4.1. Social Media - Protecting Professional Identity

The schools 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 / 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.

4.2. Unsuitable / inappropriate activities

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

User Actions		Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
Users shall not visit	Child sexual abuse images -The making, production or distribution of indecent images of children. Contrary to The Protection of Children Act 1978					X
Internet sites, make, post,	Grooming, incitement, arrangement or facilitation of sexual acts against children Contrary to the Sexual Offences Act 2003.					X
download, upload, data transfer,	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
communicate or pass on, material, remarks, proposals or comments that contain or relate to:	criminally racist material in UK - to stir up religious hatred (or hatred on the grounds of sexual orientation) - contrary to the Public Order Act 1986					X
	pornography				X	
	promotion of any kind of discrimination				X	
	threatening behaviour, including promotion of physical violence or mental harm				X	
	any other information which may be offensive to colleagues or breaches the integrity of the ethos of the school or brings the school into disrepute				X	
Using school systems to run a private business					X	
Using systems, applications, websites or other mechanisms that bypass the filtering or other safeguards employed by the school					X	
Infringing copyright					X	
Revealing or publicising confidential or proprietary information (eg financial / personal information, databases, computer / network access codes and passwords)					X	
Creating or propagating computer viruses or other harmful files					X	
Unfair usage (downloading / uploading large files that hinders others in their use of the internet)					X	
On-line gaming (educational)					X	
On-line gaming (non educational)					X	
On-line gambling					X	
On-line shopping / commerce					X	
File sharing			X			
Use of social media					X	
Use of messaging apps			X			
Use of video broadcasting e.g. YouTube			X			

5. 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 (see “User Actions” above).

5.1. 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, report immediately to the police.

5.2. Other Incidents

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

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

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

- adult material which potentially breaches the Obscene Publications Act
- criminally racist material
- other criminal conduct, activity or materials
- **Isolate the computer in question as best you can. Any change to its state may hinder a later police investigation.**

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

5.3. School Actions & Sanctions

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

5.4. Pupils

Incidents:	Refer to class teacher /	Deputy Head or School Business Manager	Refer to Head teacher	Refer to Police	Refer to IT Consultant for action re filtering / security etc	Inform parents / carers	Removal of network / internet access rights	Warning	Further sanction e.g. detention / exclusion
Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on unsuitable / inappropriate activities).		X	X	X					
Unauthorised use of non-educational sites during lessons			X						
Unauthorised use of mobile phone / digital camera / other mobile device		X	X						
Unauthorised use of social media / messaging apps / personal email		X	X						
Unauthorised downloading or uploading of files		X	X						
Allowing others to access school network by sharing username and passwords	X	X	X						
Attempting to access or accessing the school network, using another student's / pupil's account	X	X	X						
Attempting to access or accessing the school network, using the account of a member of staff		X	X						
Corrupting or destroying the data of other users		X	X						
Sending an email, text or message that is regarded as offensive, harassment or of a bullying nature		X	X			X			
Continued infringements of the above, following previous warnings or sanctions		X	X						
Actions which could bring the school into disrepute or breach the integrity of the ethos of the school		X	X			X			
Using proxy sites or other means to subvert the school's / academy's filtering system			X						
Accidentally accessing offensive or pornographic material and failing to report the incident			X			X			
Deliberately accessing or trying to access offensive or pornographic material			X	X		X			
Receipt or transmission of material that infringes the copyright of another person or infringes the Data Protection Act		X	X	X		X			

5.5. Staff

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