

## **E-Safety Policy**

### **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 Bickley Park School's ICT systems, both in and out of the school. It also applies to all personally owned IT equipment used on school premises or on school business. It should be read in conjunction with existing school policies, including the Safeguarding and Child Protection Policy, the Bullying Policy, the Behaviour Policy and the Social Media Policy.

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 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 Online Safety behaviour that take place out of school.

### **Roles and Responsibilities**

The Headmaster has a duty of care for ensuring the safety (including online safety) of members of the school community, though the day to day responsibility for online safety will be delegated to the Online Safety Officer, Sara Marriott (Assistant Head Pastoral) and the online safety group. The online safety group comprises Geraldine Nuijens, James Smith and Sara Marriott.

The Online Safety Officer is responsible for:

- leading the Online Safety Group
- taking day to day responsibility for online safety issues and has a leading role in establishing and reviewing the school's 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 / relevant body
- liaising with school technical staff
- receiving reports of online safety incidents and creating a log of incidents to inform future online safety developments
- ensuring that all e-safety incidents are dealt with promptly and appropriately
- meeting regularly with the Online Safety Governor and reporting to the SLT termly and the governing body annually

Governors are responsible for the approval of the Online Safety Policy and for reviewing the effectiveness of the policy. Geraldine Nuijens has taken on the role of Online Safety Governor.

The Network Manager, James Smith, is responsible for ensuring that:

- the school's technical infrastructure is secure and is not open to misuse or malicious attack
- the school meets required online safety technical requirements and any Online Safety Policy / Guidance that may apply
- users may only access the networks and devices through a properly enforced password protection policy
- the filtering policy is applied and updated on a regular basis and that its implementation is not the sole responsibility of any single person
- he keeps up to date with online safety technical information in order to effectively carry out his online safety role and inform and update others as relevant
- the use of the network / internet / remote access / email is regularly monitored in order that any misuse / attempted misuse can be reported to the Headmaster and Online Safety Officer for investigation / action / sanction
- monitoring software / systems are implemented and updated as agreed in school policies.

The online safety group comprises Patrick Wenham, Sara Marriott, James Smith and Geraldine Nuijens.

### **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 E-Safety Policy and practices
- they have read, understood and signed the Staff Acceptable Use Policy
- they report any suspected misuse or problem to the Headmaster; and Online Safety Officer 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 this Online Safety Policy and ICT Acceptable Use Policy
- 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

**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
- cyber-bullying

## **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 is therefore an essential part of the school's online safety provision. Children and young people need the help and support of the school to recognise and avoid online safety risks and build their resilience.

Online safety is a focus in all areas of the curriculum and staff reinforce online safety messages across the curriculum. The online safety curriculum is broad, relevant and progressive and is delivered in the following ways:

- A planned online safety curriculum is part of ICT and PSHE lessons
- Key online safety messages are reinforced as part of a planned programme of assemblies and pastoral activities
- Pupils are taught in all lessons to be critically aware of the content they access on-line and be guided to validate the accuracy of information
- As boys progress through the school they are taught to acknowledge the source of information used and to respect copyright when using material accessed on the internet
- The school works to support pupils 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 are taught responsible use of ICT through lessons and in line with the ICT Acceptable Use Policy
- Staff act as good role models in their use of digital technologies, the internet and mobile devices
- Where boys are allowed to freely search the internet, staff are vigilant in monitoring the content of the websites pupils visit
- It is accepted that from time to time, for good educational reasons, pupils may need to research topics (eg racism, drugs, discrimination) that would normally result in internet searches being blocked. In such a situation, staff can request that the Technical Staff (or other relevant designated person) can temporarily remove those sites from the filtered list for the period of study. Any request to do so, should be auditable, with clear reasons for the need.

## **Education – Parents / Carers**

Many parents and carers have only a limited understanding of online safety risks and issues, yet they play an essential role in the education of their children and in the monitoring / regulation of the children's on-line behaviours. Parents may underestimate how often children and young people come across potentially harmful and inappropriate material on the internet and may be unsure about how to respond.

Bickley Park School will therefore seek to provide information and awareness to parents and carers through:

- Schoolpost updates
- High profile events / campaigns e.g. Safer Internet Day

- Reference to the relevant web sites / publications e.g. [www.saferinternet.org.uk/](http://www.saferinternet.org.uk/)  
<http://www.childnet.com/parents-and-carers>

### **Education & Training – Staff / Governors/ Volunteers**

It is essential that all staff receive online safety training and understand their responsibilities, as outlined in this policy. All new staff should receive online safety training as part of their induction programme, ensuring that they fully understand the schools E-Safety Policy, ICT Acceptable Use Policy and Social Media Policy.

### **Technical – infrastructure / equipment, filtering and monitoring**

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

- 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 Network Manager 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 school ICT system, used by the Network Manager (or other person) must also be available to the Hed of Computing 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 (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 should ensure that children are safe from terrorist and extremist material when accessing the internet
- The Network Manager regularly monitors the activity of users on the school technical systems and users are made aware of this in the ICT Acceptable Use Policy
- Users should report any actual/potential technical incident/security breach to the Network Manager who will liaise with the Assistant Head (Pastoral) as required
- 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.

- Staff are forbidden from downloading executable files and installing programmes on school devices. Any such procedure will be carried out by the Network Manager
- Personal data cannot be sent over the internet or taken off the school site unless safely encrypted or otherwise secured.

### **Mobile Technologies (including BYOD/BYOT)**

Mobile technology devices may be school owned/provided 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 policies including but not limited to the Safeguarding Policy, Behaviour Policy, Bullying Policy, ICT Acceptable Use Policy, Social Media Policy, and policies around theft or malicious damage. Teaching about the safe and appropriate use of mobile technologies is an integral part of the school's Online Safety education programme.

### **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.
- Written permission from parents or carers is sought on joining the school allowing photographs of pupils to be used for marketing purposes.
- 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

## **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.

Bickley Park School will 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)
- 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 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

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 (many memory sticks / cards and other mobile devices cannot 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

### **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.

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/or outside the school when using school equipment or systems. The school policy restricts usage as follows:

## User Actions

		Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
Users shall not visit Internet sites, make, post, download, upload, data transfer, communicate or pass on, material, remarks, proposals or comments that contain or relate to:	Child sexual abuse images –The making, production or distribution of indecent images of children. Contrary to The Protection of Children Act 1978					X
	Grooming, incitement, arrangement or facilitation of sexual acts against children Contrary to the Sexual Offences Act 2003.					X
	Possession of an extreme pornographic image (grossly offensive, disgusting or otherwise of an obscene character) Contrary to the Criminal Justice and Immigration Act 2008					X
	Criminally racist material in UK – to stir up religious hatred (or hatred on the grounds of sexual orientation) - contrary to the Public Order Act 1986					X
	Pornography				X	
	Promotion of any kind of discrimination				X	
	Threatening behaviour, including promotion of physical violence or mental harm				X	
	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	
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 / academy				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		

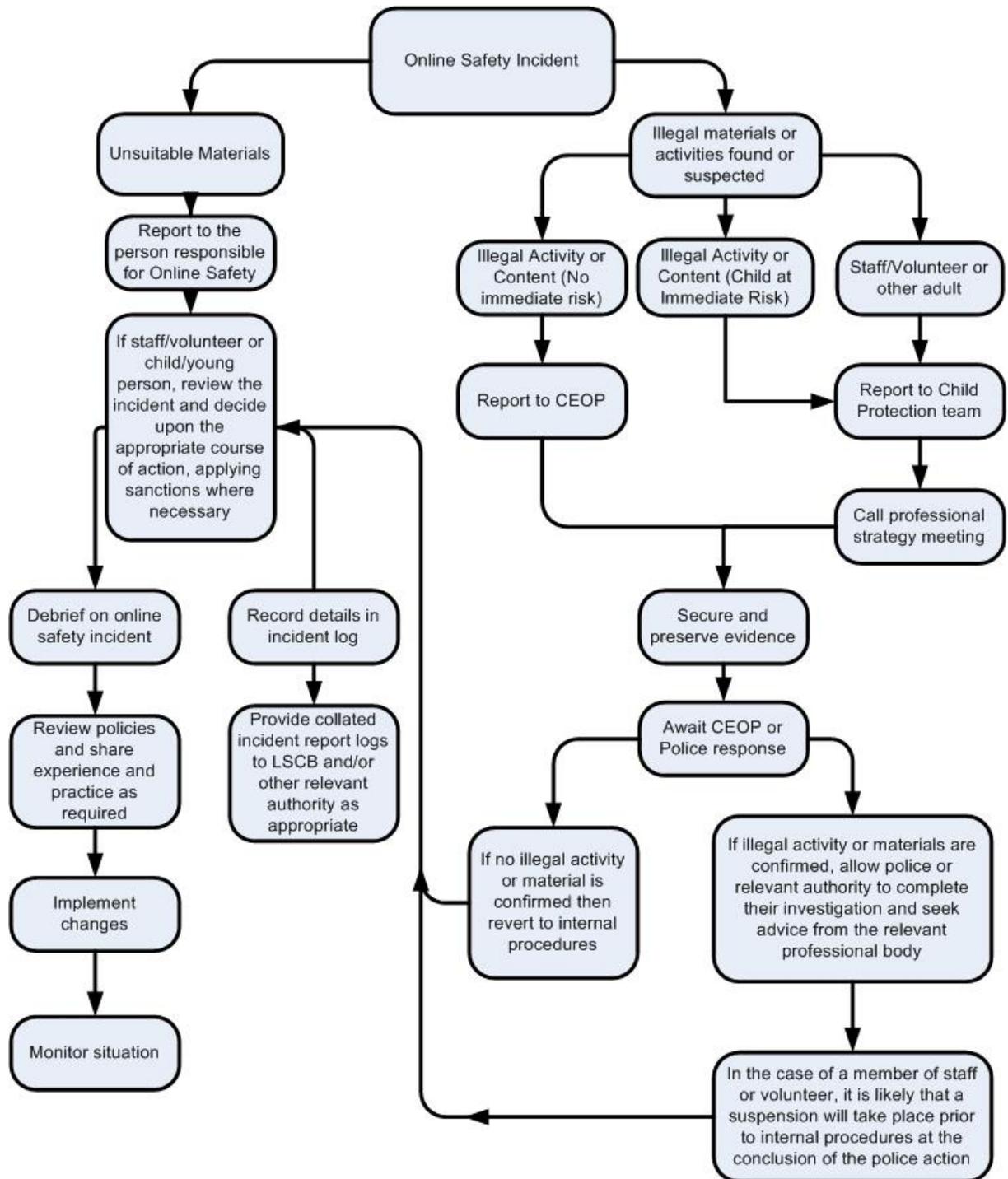
Unfair usage (downloading / uploading large files that hinders others in their use of the internet)				X	
On-line gaming (educational)				X	
On-line gaming (non-educational)				X	
On-line gambling				X	
On-line shopping / commerce				X	
File sharing			X		
Use of social media ( <i>Except for nominated users</i> )				X	
Use of messaging apps ( <i>Except for nominated users</i> )				X	
Use of video broadcasting e.g. Youtube			X		

### **Responding to incidents of misuse**

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

## Illegal Incidents

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



## Other Incidents

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

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

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

<b>Author</b>	SM	
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