

ARNBROOK PRIMARY SCHOOL
2022/23
Online Safety Policy

Reviewed September 2021
Date of next review: September 2022

Introduction

The internet has undoubtedly become an integral part of our lives. Many people use the internet or internet services to perform daily tasks and it has certainly become an essential element in our ever-expanding technological age. We must recognise that the internet and its applications hugely impact upon all aspects of our life including school, business and social interactions. The internet is widely used in school by all staff and by children during taught sessions. It is the duty and responsibility of all staff to ensure that pupils are using the internet safely and responsibly in school and that they understand the importance of e-safety and how it can be applied to situations outside of school. The Computing Subject Leader has the responsibility for ensuring that all staff are aware of our E-Safety Policy and receive regular updates on its content

Purpose

This online safety policy is intended to help the whole school community consider all current and relevant issues, within Arnbrook Primary School's context. This policy is to be read in conjunction with other relevant policies, including:

- Child protection/safeguarding policy
- Behaviour and anti-bullying policy.
- Acceptable Use agreements
- Social Media Policy
- Children's Images Policy
- Code of Conduct
- Curriculum planning documentation

The requirement to ensure that children and young people are able to use the internet and related communications technologies appropriately and safely is addressed as part of our wider duty of care. Arnbrook Primary School is committed to ensuring it meets our statutory obligations, ensuring that children and young people are safe and are protected from potential harm, both within and outside the school. The policy forms part of the school's protection from legal challenge, relating to the use of digital technologies.

In England, schools/academies are subject to an increased level of scrutiny of their online safety practices. From 2015, additional duties under the Counter Terrorism and Securities Act 2015 require schools/academies to ensure that children are safe from terrorist and extremist material on the internet. Revised "Keeping Children Safe in Education" guidance obliges schools and colleges in England to "ensure appropriate filters and appropriate monitoring systems are in place. Children therefore are not able to access harmful or inappropriate material from the school IT system" however, Arnbrook Primary School is mindful that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding."

Due to the ever-changing nature of digital technologies this Online Safety Policy will be reviewed at least annually and, if necessary, more frequently in response to any significant new developments in the use of the technologies, new threats to online safety or incidents that have taken place.

Development/Monitoring/Review of this Policy

This online safety policy has been developed in association with:

- Headteacher/Principal and senior leaders
- Online Safety Officer/Coordinator
- Staff – including teachers, support staff, technical staff
- Governors/Board
- Parents and carers

The policy has subsequently been approved by Governance structures.

The school will monitor the impact of the policy using:

- Feedback from discussions with staff, pupils and parents
- Evidence from activities associated with monitoring the standards of teaching and learning and behaviour across the school
- Logs of reported incidents
- Monitoring logs of internet activity (including sites visited)/filtering
- Internal monitoring data for network activity
- Surveys/questionnaires of
 - pupils
 - parents/carers
 - staff

Scope of the policy

This policy applies to all members of Arnbrook Primary School (including staff, pupils, volunteers, parents/carers, visitors, community users) who have access to and are users of school IT systems, both inside and outside of 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 online-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 (see appendix for template policy). 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.

School will use online safeguarding reporting procedures to record incidents of concern.

Roles and Responsibilities

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

Governors/Board of Directors

Local Governors (where these are not in place Trustees) are responsible for the approval of the online safety policy and for reviewing the effectiveness of the policy. This will be carried out through focussed agenda items during local governing body meetings.

Headteacher/Principal and Senior Leaders

- The Headteacher has a duty of care for ensuring the safety (including e/online safety) of members of the school community, though the day to day responsibility for online safety will be delegated to the Computing Lead.
- The Headteacher and/or Designated Safeguarding Lead/s are 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 other Senior Leaders are responsible for ensuring *that* 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

Computing Lead

- Takes day-to-day responsibility for e-safety issues and has a leading role in establishing and reviewing the school policies for computing and e-safety.
- 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 school technical staff.
- Receives reports of e-safety incidents and creates a log of incidents to inform future e-safety developments.
- Reports regularly to the Head Teacher.

Technical staff

The school, through the usage of an outside contractor, ensures that the managed service provider carries out a number of online safety measures. These include ensuring that:

- 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 MAT online safety policy/guidance that may apply.
- that 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
- 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 networks/internet/digital technologies is regularly monitored in order that any misuse/attempted misuse can be reported to the Headteacher, Designated Safeguarding Lead(s) and Senior Leaders; for investigation/action/sanction
- that monitoring software/systems are implemented and updated as agreed in school policies

Teaching and Support Staff

All 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/Computing Lead for investigation, action or sanction.
- All digital communications with pupils / parents / carers should be on a professional level and only carried out using the agreed school procedure.
- E-safety awareness is embedded in all aspects of the curriculum and other activities and is regularly revisited.
- 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.
- All pupils are aware of the course of action should they come across something worrying, a pop up or communication from an unknown source.

Designated Safeguarding Lead

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

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

Pupils:

- are responsible for using the school digital technology systems in accordance with the pupil acceptable use agreement
- 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 online-bullying.
- should understand the importance of adopting good online safety practice when using digital technologies out of school and realise that the school's online safety policy covers their actions out of school, if related to their membership of the school

Parents/carers

Parents/carers play a crucial role in ensuring that their children understand the need to use the internet/mobile devices in an appropriate way. The school will take every opportunity to help parents understand these issues through parents' evenings, newsletters, letters, website, social media and information about national/local online safety campaigns/literature. 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 and communication platforms
- their children's personal devices in the school (where this is allowed)

Policy Statements

Education – Pupils

Whilst regulation and technical solutions are very important, their use must be balanced by educating *pupils* to take a responsible approach. The education of *pupils* in online safety/digital literacy is therefore an essential part of 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 should reinforce online safety messages across the curriculum. The online safety curriculum at **[INSERT ACADEMY NAME HERE]** is broad, relevant and provides progression, with opportunities for creative activities. It will be provided in the following ways:

- A planned online safety curriculum is be provided as part of specific subjects, such as Computing and PHSE.
- Key online safety messages are reinforced as part of a planned programme of assemblies and tutorial/pastoral activities
- Pupils are 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 are taught to acknowledge the source of information used and to respect copyright when using material accessed on the internet
- Where possible pupils are supported to build resilience to factors such as 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 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 act as good role models in their use of digital technologies, the internet and mobile 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.
- Where pupils are allowed to freely search the internet, staff should be vigilant in monitoring the content of the websites the young people visit.
- It is accepted that from time to time, for good educational reasons, students may need to research topics (e.g. 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 online behaviours. Parents may underestimate how often children and young people come across potentially harmful and inappropriate material on the internet and may be unsure about how to respond.

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

- Curriculum activities
- Letters, newsletters, web site, Learning Platform
- Parents/carers evenings/sessions
- High profile events/campaigns e.g. Safer Internet Day
- Reference to the relevant web sites/publications

Education & Training – Staff/Volunteers

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

- A planned programme of formal online safety training will be made available to staff. This will be regularly updated and reinforced. An audit of the online safety training needs of all staff will be carried out regularly.
- All new staff should receive online safety training as part of their induction programme, ensuring that they fully understand the school/academy online safety policy and acceptable use agreements.
- It is expected that some staff will identify online safety as a training need within the performance management process.
- This online safety policy and its updates will be presented to and discussed by staff in staff/team meetings/training sessions.

Training – Governors/Directors

Governors/Directors should take part in online safety training/awareness sessions, with particular importance for those who are members of any group involved in technology/online safety/health and safety /safeguarding. This may be offered in a number of ways:

- Attendance at training provided by the MAT or an external provider
- Participation in school training/information sessions for staff or parents

Assessing Risks

[INSERT PRIMARY SCHOOL HERE] will take reasonable precautions to prevent access to inappropriate material on the internet through all devices. School recognises that there are a number of potential risks linked to content, contact and conduct:

Content

- Commercial – adverts, spam, sponsorships, personal information
- Aggressive – violent, harmful content
- Sexual – pornographic or unwelcome sexual content
- Values – bias, racist, misleading information or advice

Contact

- Commercial – tracking, harvesting personal information
- Aggressive – being bullied, harassed or stalked
- Sexual – Meeting strangers, being groomed
- Values – self-harm, unwelcome persuasions

Conduct

- Commercial – illegal downloading, hacking, gambling, financial scams, terrorism
- Aggressive – bullying or harassing another
- Sexual – creating and uploading inappropriate material
- Values – providing misleading information or advice

The school ICT operating system security will be reviewed regularly in order to minimise potential risks occurring. Online safety now covers the safety issues associated with information systems and electronic communications as a whole. This not only encompasses the internet but all wireless electronic devices including mobile phones, games consoles, cameras, tablets and webcams. We must also consider the increasing mobility of access to digital technology through this range of mobile devices.

It is imperative to consider that the issues at hand are not because of the technology but the behaviour around how it is used. It is now a requirement for all schools to ensure that young people are able to use the internet and related communications technologies appropriately and safely.

“Technology offers unimaginable opportunities and is constantly evolving. Access is currently becoming universal and increasingly more mobile with pupils using technology at an ever earlier age” – Ofsted

It is therefore paramount that school recognises and are familiar with common risks and factors that could potentially be encountered.

Use of digital and video images

The development of digital imaging technologies has created significant benefits to learning, allowing staff and pupils instant use of images that they have recorded themselves or downloaded from the internet. However, staff, parents/carers and pupils need to be aware of the risks associated with publishing digital images on the internet. Such images may provide avenues for online-bullying to take place. Digital images may remain available on the internet forever and may cause harm or embarrassment to individuals in the short or longer term. It is common for employers to carry out internet searches for information about potential and existing employees. 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 will be obtained before photographs of 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/academy 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/academy 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.
- Student's/Pupil's work can only be published with the permission of the student/pupil and parents or carers.

Data Protection

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

The school will ensure that:

- it has a Data Protection Policy.
- it implements the data protection principles and is able to demonstrate that it does so through use of policies, notices and records.
- it has paid the appropriate fee Information Commissioner's Office (ICO) and included details of the Data Protection Officer (DPO).
- it has appointed an appropriate Data Protection Officer (DPO) who has a high level of understanding of data protection law and is free from any conflict of interest.
- it has an 'information asset register' in place and knows exactly what personal data it holds, where this data is held, why and which member of staff has responsibility for managing it
- the information asset register records the lawful basis for processing personal data (including, where relevant, how consent was obtained and refreshed). Where special category data is processed, an additional lawful basis will have also been recorded
- it will hold only the minimum personal data necessary to enable it to perform its function and it will not hold it for longer than necessary for the purposes it was collected for. The school should develop and implement a 'retention policy' to ensure there are clear and understood policies and routines for the deletion and disposal of data to support this. personal data held must be accurate and up to date where this is necessary for the purpose it is processed for. Have systems in place to identify inaccuracies, such as asking parents to check emergency contact details at suitable intervals
- it provides staff, parents, volunteers, teenagers and older children with information about how the school/academy looks after their data and what their rights are in a clear Privacy Notice

- procedures must be in place to deal with the individual rights of the data subject, e.g. one of the 8 data subject rights applicable is that of Subject Access which enables an individual to see to have a copy of the personal data held about them (subject to certain exceptions which may apply).
- data Protection Impact Assessments (DPIA) are carried out where necessary. For example, to ensure protection of personal data when accessed using any remote access solutions, or entering into a relationship with a new supplier (this may also require ensuring that data processing clauses are included in the supply contract or as an addendum)
- IT system security is ensured and regularly checked. Patches and other security essential updates are applied promptly to protect the personal data on the systems. Administrative systems are securely ring fenced from systems accessible in the classroom/to learners
- it has undertaken appropriate due diligence and has required data processing clauses in contracts in place with any data processors where personal data is processed.
- it understands how to share data lawfully and safely with other relevant data controllers.
- it [reports any relevant breaches to the Information Commissioner](#) within 72hrs of becoming aware of the breach in accordance with UK data protection law. It also reports relevant breaches to the individuals affected as required by law. In order to do this, it has a policy for reporting, logging, managing, investigating and learning from information risk incidents.
- it has a Freedom of Information Policy which sets out how it will deal with FOI requests.
- all staff receive data protection training at induction and appropriate refresher training thereafter. Staff undertaking particular data protection functions, such as handling requests under the individual's rights, will receive training appropriate for their function as well as the core training provided to all staff.

[When personal data is stored on any mobile device or removable media the:](#)

- data must be encrypted and password protected.
- device must be password protected.
- device must be protected by up to date virus and malware checking software
- data must be securely deleted from the device, in line with school/academy policy (below) once it has been transferred or its use is complete.

[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
- can recognise a possible breach, understand the need for urgency and know who to report it to within the school
- can help data subjects understand their rights and know how to handle a request whether verbal or written. Know who to pass it to in the school
- will not transfer any school personal data to personal devices except as in line with school policy

- access personal data sources and records 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

Communications

A wide range of rapidly developing communications technologies has the potential to enhance learning. 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, social media, chat, blogs, etc) must be professional in tone and content. *These communications may only take place on official (monitored) school/academy systems. Personal email addresses, text messaging or social media must not be used for these communications.*
- *Whole class/group email addresses may be used at KS1, while pupils at KS2 and above may be provided with individual school/academy email addresses for educational use.*
- *Pupils should be taught about online safety issues, such as the risks attached to the sharing of personal details. They should also be taught strategies to deal with inappropriate communications and be reminded of the need to communicate appropriately when using digital technologies.*
- *Personal information should not be posted on the school/academy website and only official email addresses should be used to identify members of staff.*

Dealing with unsuitable/inappropriate activities

Some internet activity e.g. accessing child abuse images or distributing racist material is illegal and would obviously be banned from school/academy 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/academy context, either because of the age of the users or the nature of those activities.

The school/academy believes that the activities referred to in the following section would be inappropriate in a school/academy 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
	N.B. Schools/academies should refer to guidance about dealing with self-generated images sexting – UKSIC Responding to and managing sexting incidents and UKCIS – Sexting in schools and colleges					
	Grooming, incitement, arrangement or facilitation of sexual acts against children Contrary to the Sexual Offences Act 2003.					X
	Possession of an extreme pornographic image (grossly offensive, disgusting or otherwise of an obscene character) Contrary to the Criminal Justice and Immigration Act 2008					X
	Criminally racist material in UK – to stir up religious hatred (or hatred on the grounds of sexual orientation) - contrary to the Public Order Act 1986					X
	Pornography				X	
	Promotion of any kind of discrimination				X	
	threatening behaviour, including promotion of physical violence or mental harm				X	
	Promotion of extremism or terrorism				X	
	Any other information which may be offensive to colleagues or breaches the integrity of the ethos of the school or brings the school into disrepute				X	
Activities that might be classed as cyber-crime under the Computer Misuse Act:						
<ul style="list-style-type: none"> Gaining unauthorised access to school networks, data and files, through the use of computers/devices Creating or propagating computer viruses or other harmful files 						X

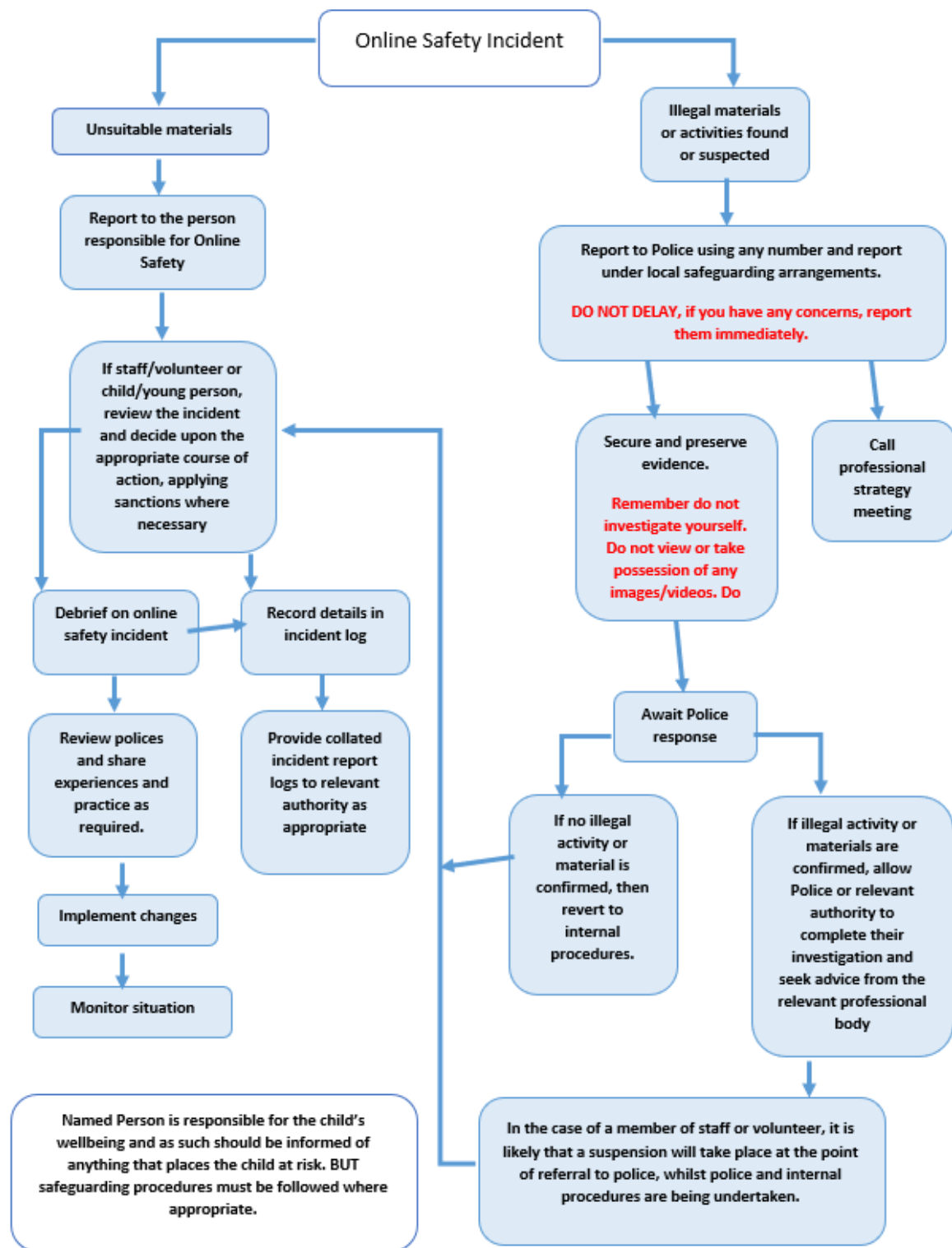
<ul style="list-style-type: none"> Revealing or publicising confidential or proprietary information (e.g. financial / personal information, databases, computer / network access codes and passwords) Disable/Impair/Disrupt network functionality through the use of computers/devices Using penetration testing equipment (without relevant permission) 					
Using systems, applications, websites or other mechanisms that bypass the filtering or other safeguards employed by the school/academy				X	
Revealing or publicising confidential or proprietary information (e.g. financial/personal information, databases, computer/network access codes and passwords)				X	
Unfair usage (downloading/uploading large files that hinders others in their use of the internet)				X	
Using school systems to run a private business				X	
Infringing copyright				X	
On-line gaming (educational)				X	
On-line gaming (non-educational)				X	
On-line gambling				X	
On-line shopping/commerce				X	
Use of PERSONAL social media				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. Incidents might involve illegal or inappropriate activities (see “User Actions” above).

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 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
 - offences under the Computer Misuse Act (see User Actions chart above)
 - other criminal conduct, activity or materials
 -
- **Isolate the computer in question as best you can. Any change to its state may hinder a later police investigation.**

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