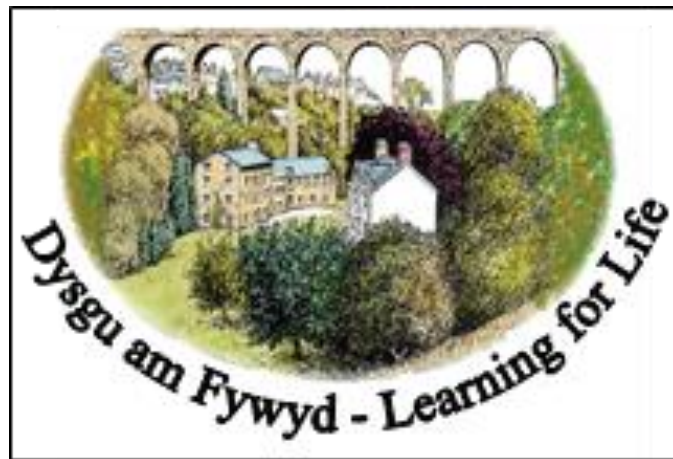


# *Maesycwmmwr Primary School*



## **e-Safety Policy**

## Policy Statements

### Education – young people

Whilst regulation and technical solutions are very important, their use must be balanced by educating *students / pupils* to take a responsible approach. The education of *students / pupils* in e-Safety is therefore an essential part of the school's e-Safety provision. Children and young people need the help and support of the school to recognise and avoid e-Safety risks and build their resilience.

e-Safety should be a focus in all areas of the curriculum and staff should reinforce e-Safety messages across the curriculum. The e-Safety curriculum should be broad, relevant and provide progression, with opportunities for creative activities and will be provided in the following ways.

- A planned e-Safety curriculum should be provided as part of ICT / Computing / PSE / Digital Literacy lessons or other lessons and should be regularly revisited
- Key e-Safety messages should be reinforced as part of a planned programme of assemblies.
- Students / pupils should be taught in all lessons to be critically aware of the materials / content they access on-line and be guided to validate the accuracy of information.
- Students / pupils should be taught to acknowledge the source of information used and to respect copyright when using material accessed on the internet
- Students / pupils should be helped to understand the need for the student / pupil Acceptable Use Agreement and encouraged to adopt safe and responsible use both within and outside school
- Staff should act as good role models in their use of digital technologies the internet and mobile devices
- in lessons where internet use is pre-planned, it is best practice that students / 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.

### Education – parents / carers

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

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

- Curriculum activities
- Letters, newsletters, web site, Twitter, VLE
- Parents / Carers evenings / sessions
- High profile events / campaigns eg Safer Internet Day
- Reference to the relevant web sites / publications eg <https://hwb.wales.gov.uk/>  
<http://www.childnet.com/parents-and-carers>

### Education – The Wider Community

The school will provide opportunities for local community groups / members of the community to gain from the school's e-Safety knowledge and experience. This may be offered through the following:

- Providing family learning courses in use of new digital technologies, digital literacy and e-Safety

- *e-Safety messages targeted towards grandparents and other relatives as well as parents.*

### Education & Training – Staff / Volunteers

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

- A planned programme of formal e-Safety training will be made available to staff. This will be regularly updated and reinforced. An audit of the e-Safety training needs of all staff will be carried out regularly.
- All new staff should receive e-Safety training as part of their induction programme, ensuring that they fully understand the school e-Safety policy and Acceptable Use Agreements.
- The e-Safety Coordinator / Officer (or other nominated person) will receive regular updates through attendance at external training events (eg from Consortium / SWGfL / LA / other relevant organisations) and by reviewing guidance documents released by relevant organisations.
- This e-Safety policy and its updates will be presented to and discussed by staff in staff / team meetings / INSET days.
- The e-Safety Coordinator / Officer (or other nominated person) will provide advice / guidance / training to individuals as required.

### Training – Governors

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

- Attendance at training provided by the Local Authority / National Governors Association / or other relevant organisation (eg SWGfL).
- Participation in school training / information sessions for staff or parents.

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

If the school has a managed ICT service provided by an outside contractor, it is the responsibility of the school to ensure that the managed service provider carries out all the e-Safety measures that would otherwise be the responsibility of the school, as suggested below. It is also important that the managed service provider is fully aware of the school e-Safety Policy / Acceptable Use Agreements. The school should also check their Local Authority / other relevant body policies on these technical issues if the service is not provided by the Authority.

The school will be responsible for ensuring that the school infrastructure / 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 e-Safety responsibilities:

- School technical systems will be managed in ways that ensure that the school meets recommended technical requirements
- There will be regular reviews and audits of the safety and security of school technical systems
- Servers, wireless systems and cabling must be securely located and physical access restricted
- All users will have clearly defined access rights to school technical systems and devices.
- All users (Ks2) will be provided with a username and secure password by Miss K Toozer 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 *Headteacher / nominated senior leader* and kept in a secure place (eg school safe)
- Mr J Harris 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.
- An appropriate system is in place for users to report any actual / potential technical incident / security breach to the relevant person, as agreed).
- Appropriate security measures are in place to protect the servers, firewalls, routers, wireless systems, work stations, mobile devices etc from accidental or malicious attempts which might threaten the security of the school systems and data. These are tested regularly. The school infrastructure and individual workstations are protected by up to date virus software..
- An agreed policy is in place regarding the extent of personal use that users (staff) and their family members are allowed on school devices that may be used out of school.
- An agreed policy is in place regarding the use of removable media (eg memory sticks / CDs / DVDs) by users on school devices. Personal data cannot be sent over the internet or taken off the school site unless safely encrypted or otherwise secured.

### Use of digital and video images

The development of digital imaging technologies has created significant benefits to learning, allowing staff and students / pupils instant use of images that they have recorded themselves or downloaded from the internet. However, staff, parents / carers and students / 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 students / 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 eg on social networking sites.
- In accordance with guidance from the Information Commissioner’s Office, parents / carers are welcome to take 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 students / pupils in the digital images. Parents / Carers are not permitted to video school events.
- Staff 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 students / pupils are appropriately dressed and are not participating in activities that might bring the individuals or the school into disrepute.
- Students / pupils must not take, use, share, publish or distribute images of others without their permission

- *Photographs published on the website, or elsewhere that include students / pupils will be selected carefully and will comply with good practice guidance on the use of such images.*
- *Students' / 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 students / pupils are published on the school website*
- *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 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" and lawfully processed in accordance with the "Conditions for Processing".
- It has a Data Protection Policy
- It is registered as a Data Controller for the purposes of the Data Protection Act (DPA)
- Responsible persons are appointed / identified - 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 (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, in line with school policy (below) once it has been transferred or its use is complete

## Communications

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 students / 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.*
- *Whole class / group email addresses may be used at KS1, while students / pupils at KS2 and above will be provided with individual school email addresses for educational use.*
- *Students / 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.*

## Social Media - Protecting Professional Identity

With an increase in use of all types of social media for professional and personal purposes a policy that sets out clear guidance for staff to manage risk and behaviour online is essential. Core messages should include the protection of pupils, the school and the individual when publishing any material online. Expectations for teachers' professional conduct are set out by the General Teaching Council Wales (GTCW) but all adults working with children and young people must understand that the nature and responsibilities of their work place them in a position of trust and that their conduct should reflect this.

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. All staff working at any educational establishment are expected to demonstrate a professional approach and respect for pupils and their families and for colleagues and the learning setting.

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 students / pupils, parents / carers or school staff
- They do not engage in online discussion on personal matters relating to members of the school community
- Personal opinions should not be attributed to the school or local authority
- Security settings on personal social media profiles are regularly checked to minimise risk of loss of personal information.

The school's use of social media for professional purposes will be checked regularly by the senior risk officer and e-Safety committee to ensure compliance with the Social Media, Data Protection, Communications, Digital Image and Video Policies.

### Unsuitable / inappropriate activities

Some internet activity eg accessing child abuse images or distributing racist material is illegal and would obviously be banned from school and all other technical systems. Other activities eg 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 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	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	

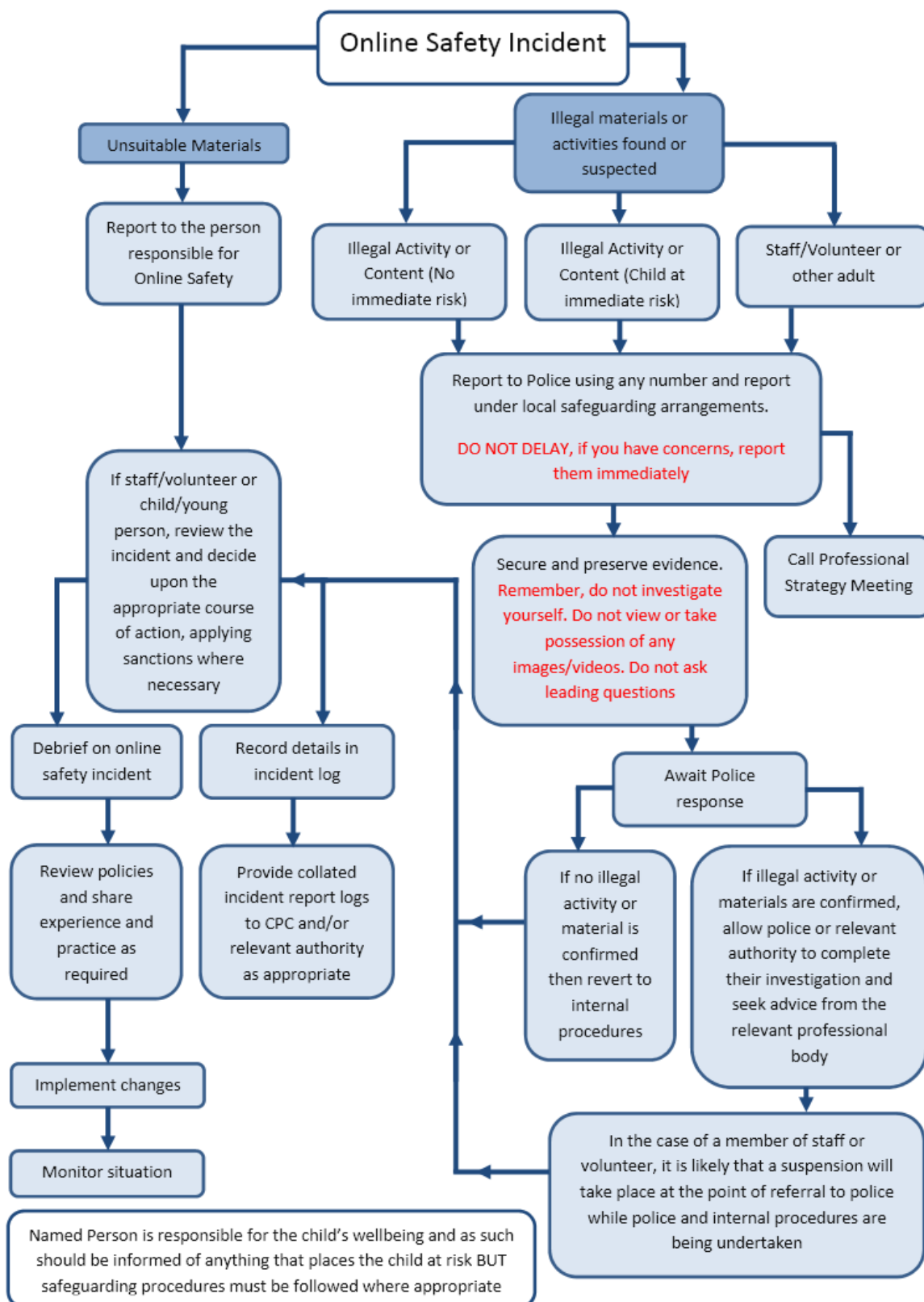
	any other information which may be offensive to colleagues or breaches the integrity of the ethos of the school or brings the school into disrepute				X	
	Using school systems to run a private business				X	
	Using systems, applications, websites or other mechanisms that bypass the filtering or other 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	
	Un-fair usage (downloading / uploading large files that hinders others in their use of the internet)				X	
	On-line gaming (educational)					
	On-line gaming (non educational)					
	On-line gambling					
	On-line shopping / commerce					
	File sharing					
	Use of social media					
	Use of messaging apps					
	Use of video broadcasting eg Youtube					

### 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 / 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 safeguarding purposes. The completed form should be retained by the group for evidence and reference purposes.

### School Actions

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:

## Students / Pupils

## Actions

Incidents:	Refer to class teacher / tutor	Refer to Head of Department / Head of Year	Refer to Headteacher / other Principal	Refer to Police	Refer to technical support staff for action re filtering / security etc	Inform parents / carers	Removal of network / internet access rights	Warning	Further sanction eg 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									
Unauthorised use of mobile phone / digital camera / other mobile device									
Unauthorised use of social media / messaging apps / personal email									
Unauthorised downloading or uploading of files									
Allowing others to access school network by sharing username and passwords									
Attempting to access or accessing the school network, using another student's / pupil's account									
Attempting to access or accessing the school network, using the account of a member of staff									
Corrupting or destroying the data of other users									
Sending an email, text or message that is regarded as offensive, harassment or of a bullying nature									
Continued infringements of the above, following previous warnings or sanctions									
Actions which could bring the school into disrepute or breach the integrity of the ethos of the school									
Using proxy sites or other means to subvert the school's filtering system									
Accidentally accessing offensive or pornographic material and failing to report the incident									
Deliberately accessing or trying to access offensive or pornographic material									
Receipt or transmission of material that infringes the copyright of another person or infringes the Data Protection Act									

## Staff

## Actions

Incidents:	Refer to line manager	Refer to Headteacher Principal	Refer to Local Authority / HR	Refer to Police	Refer to Technical Support Staff for action re filtering	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				
Inappropriate personal use of the internet / social media / personal email								
Unauthorised downloading or uploading of files								
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								
Careless use of personal data eg holding or transferring data in an insecure manner								
Deliberate actions to breach data protection or network security rules								
Corrupting or destroying the data of other users or causing deliberate damage to hardware or software								
Sending an email, text or message that is regarded as offensive, harassment or of a bullying nature								
Using personal email / social networking / instant messaging / text messaging to carrying out digital communications with students / pupils								
Actions which could compromise the staff member's professional standing								
Actions which could bring the school into disrepute or breach the integrity of the ethos of the school								
Using proxy sites or other means to subvert the school's filtering system								
Accidentally accessing offensive or pornographic material and failing to report the incident								
Deliberately accessing or trying to access offensive or pornographic material								
Breaching copyright or licensing regulations								
Continued infringements of the above, following previous warnings or sanctions								

