



#### MISSION STATEMENT

Faith is the heartbeat of our school, as we walk with Jesus through life. St Mary's provides a safe, happy, positive place to learn, where everyone is encouraged to reach their full potential. By showing respect, love and care to each other, without exception, everyone is valued in our school family.

*This policy should be read in conjunction with Acceptable use of the internet policy, ICT policy, Child-Protection, Safeguarding, Data Protection and Anti-Bullying Policies.*

## Online Safety

### **“Growing Together in Knowledge, Faith and love”**

#### **Roles and Responsibilities**

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

#### **Governors**

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

- regular meetings with the Online Safety Co-ordinator
- attendance at Online Safety Group meetings
- regular monitoring of online safety incident logs
- regular monitoring of filtering / change control logs
- reporting at Governing Body meetings

#### **Headteacher and Senior Leaders**

- The Headteacher has a duty of care for ensuring the safety (including online safety) of members of the school community.
- The Headteacher and all members of the Senior Leadership Team are aware of the procedures to be followed in the event of a serious online safety allegation being made

against a member of staff. (see flow chart on dealing with online safety incidents – included in a later section – “Responding to incidents of misuse”.

- The Headteacher and Senior Leaders are responsible for ensuring that all staff receive suitable training to enable them to carry out their online safety roles, 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 who carry out the internal online safety monitoring role, through its service agreement with NCI Technologies. 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 Online Safety Officer / Lead.

## **Online Safety Officer**

This is the Designated Safeguarding Lead. Their responsibilities include:

- leads the Online Safety Group
- takes day to day responsibility for online safety issues and has a leading role in establishing and reviewing the school online safety policies / documents
- ensures that all staff are aware of the procedures that need to be followed in the event of an online safety incident taking place.
- provides training and advice for staff
- liaises with the Local Authority and Plymouth CAST MAT
- liaises with school technical staff
- receives reports of online safety incidents and creates a log of incidents to inform future online safety developments,
- meets regularly with the Online Safety Governor to discuss current issues, review incident logs and filtering
- attends relevant governor meetings
- reports regularly to the Senior Leadership Team

## **Network Manager / Technical staff**

The school has a managed ICT service provided by an outside contractor, NCI Technologies. It is the responsibility of the school to ensure that the managed service provider carries out all the online safety measures that would otherwise be the responsibility of the school technical staff.

The Network Manager / Technical Staff / Co-ordinator for ICT / Computing is 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 online 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 (if it has one), 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 network / internet / remote access / email is regularly monitored in order that any misuse / attempted misuse can be reported to the Headteacher for investigation / action / sanction
- that monitoring software / systems are implemented and updated as agreed in school policies

## **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 Online Safety Policy and practices
- Are up to date with e-safety training
- they have read, understood and signed the Staff Acceptable Use Policy / Agreement (AUP)
- they report any suspected misuse or problem to the *Headteacher or Senior Leaders* for investigation / action / sanction
- all digital communications with students / 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 the Online Safety Policy and acceptable use policies
- they monitor the use of digital technologies, mobile devices, cameras etc in lessons and other school activities
- 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
- 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 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 / Learning Platform and on-line student / pupil records
- their children's personal devices in the school
- Supervising online learning

## **Policy Statements**

### **Education – Curriculum**

E-Safety education will be provided in the following ways:

- A planned e-safety programme should be provided as part of the Computing Curriculum and should be regularly revisited – this will cover both the use of ICT and new technologies in school and outside school
  - Key e-safety messages should be reinforced as part of a planned programme of assemblies PSHE circle time activities
  - 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
  - Pupils should be helped to understand the need for the pupil AUP and encouraged to adopt safe and responsible use of ICT, the internet and mobile devices both within and outside school
- MISSION STATEMENT Faith is the heartbeat of our school, as we walk with Jesus through life. St Mary's provides a safe, happy, positive place to learn, where everyone is encouraged to reach their full potential. By showing respect, love and care to each other, without exception, everyone is valued in our school family.
- Pupils should be taught to acknowledge the source of information used and to respect copyright when using material accessed on the internet
  - Rules for use of ICT systems and the internet will be posted in all networked rooms
  - Staff should act as good role models in their use of ICT, the internet and mobile devices E-safety should be a focus in all areas of the curriculum and staff should reinforce e-safety messages in the use of ICT across the curriculum.
  - 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.
  - 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

Pupils should be taught to acknowledge the source of information used and to respect copyright when using material accessed on the internet.

## **Education – Pupils/Students**

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

- A planned online safety curriculum should be provided as part of Computing / PSHE and should be regularly revisited
- Key online safety messages should be reinforced as part of a planned programme of assemblies and pastoral activities
- 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
- Pupils should be taught to acknowledge the source of information used and to respect copyright when using material accessed on the internet
- Pupils should be supported 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 should be 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 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 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 (eg racism, drugs, and 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,
- Parents / Carers evenings / sessions
- High profile events / campaigns e.g. Safer Internet Day
- Reference to the relevant websites / publications
- Online learning resources with log ins and passwords

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

The school has a managed ICT service provided by an outside contractor, NCI Technologies. It is the responsibility of the school to ensure that the managed service provider carries out all the online safety measures that would otherwise be the responsibility of the school.

The school will be responsible for ensuring that NCI ensures 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 in the above sections will be effective in carrying out their online 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 adult users will be provided with a username and secure password by NCI Technologies, who will keep an up to date record of users and their usernames. Users are responsible for the security of their username and password. Pupil users will be issued with class usernames and passwords.
- Documents stored on the school's Google drive has two step authentication and is managed by Magika through Plymouth Cast.
- The "master / administrator" passwords for the school ICT systems, used by the Network Manager must also be available to the Headteacher and kept in a secure place
- NCI Technologies 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 / monitoring should ensure that children are safe from terrorist and extremist material when accessing the internet.
- The school has provided enhanced / differentiated user-level filtering

- School technical staff regularly monitor and record the activity of users on the school technical systems and users are made aware of this in the Acceptable Use Agreement.
- 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 for the provision of temporary access of “guests” (eg trainee teachers, supply teachers, visitors) onto the school systems, including access to online pupil registers.
- An agreed policy is in place regarding the extent of personal use that users (staff / students / pupils / community users) and their family members are allowed on school devices that may be used out of school.
- An agreed policy is in place that allows staff to / forbids staff from downloading executable files and installing programmes on school devices.
- 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 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 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 events for their own personal use (as such use not covered by the Data Protection Act). To respect everyone’s privacy and in some cases protection, these images must 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 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.
- Pupil's work can only be published with the permission of the pupil and parents or carers.
- During the Covid-19 pandemic, teachers will deliver live lessons via Google classroom. Parents should supervise pupils and follow the online safety policy. All live lessons will be of the teacher modelling work and those pupils accessing lessons at home should turn their cameras off. Any footage taken of lessons will not include footage of children attending school.

## **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 has paid the appropriate fee to the Information Commissioner's Office (ICO).
- It has appointed a Data Protection Officer (DPO).
- 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.
- Data held must be accurate and up to date. Inaccuracies are corrected without unnecessary delay.
- The lawful basis for processing personal data (including, where relevant, consent) has been identified and documented and details provided in a Privacy Notice.
- Where special category data is processed, a lawful basis and a separate condition for processing have been identified.
- Data Protection Impact Assessments (DPIA) are carried out.
- It has clear and understood arrangements for access to and the security, storage and transfer of personal data, including, where necessary, adequate contractual clauses or safeguards where personal data is passed to third parties e.g. cloud service providers.
- Procedures must be in place to deal with the individual rights of the data subject i.e. a Subject Access Requests to see all or a part of their personal data held by the data controller.
- There are clear and understood data retention policies and routines for the deletion and disposal of data.
- There is a policy for reporting, logging, managing and recovering from an information risk incident which recognises the requirement to report relevant data breaches to the ICO within 72 hours of the breach, where feasible.
- Consideration has been given to the protection of personal data when accessed using any remote access solutions.
- All schools / academies must have a Freedom of Information Policy which sets out how it will deal with FOI requests.



- All staff receive data handling awareness / data protection training and are made aware of their responsibilities.

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.
- Do not use personal portable computer systems, memory sticks or any other removable media.

### **Communications**

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

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

### **Social Media - Protecting Professional Identity**

All schools, academies, MATs and local authorities have a duty of care to provide a safe learning environment for pupils and staff. Schools/academies, MATs and local authorities could be held responsible, indirectly for acts of their employees in the course of their employment. Staff members who harass, engage in online bullying, discriminate on the grounds of sex, race or disability or who defame a third party may render the *school / academy* or local authority / MAT 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:

- Ensuring that personal information is not published

- Training is provided including: 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 / MAT
- Security settings on personal social media profiles are regularly checked to minimise risk of loss of personal information

When official school social media accounts are established there should be:

- A process for approval by senior leaders
- Clear processes for the administration and monitoring of these accounts – involving at least two members of staff
- A code of behaviour for users of the accounts, including
- Systems for reporting and dealing with abuse and misuse
- Understanding of how incidents may be dealt with under school disciplinary procedures

#### **Personal Use:**

- Personal communications are those made via personal social media accounts. In all cases, where a personal account is used which associates itself with the school or impacts on the school, it must be made clear that the member of staff is not communicating on behalf of the school with an appropriate disclaimer. Such personal communications are within the scope of this policy
- Personal communications which do not refer to or impact upon the school are outside the scope of this policy
- Where excessive personal use of social media in school is suspected, and considered to be interfering with relevant duties, disciplinary action may be taken

#### **Monitoring of Public Social Media**

- As part of active social media engagement, it is considered good practice to proactively monitor the Internet for public postings about the school
- The school should effectively respond to social media comments made by others according to a defined policy or process

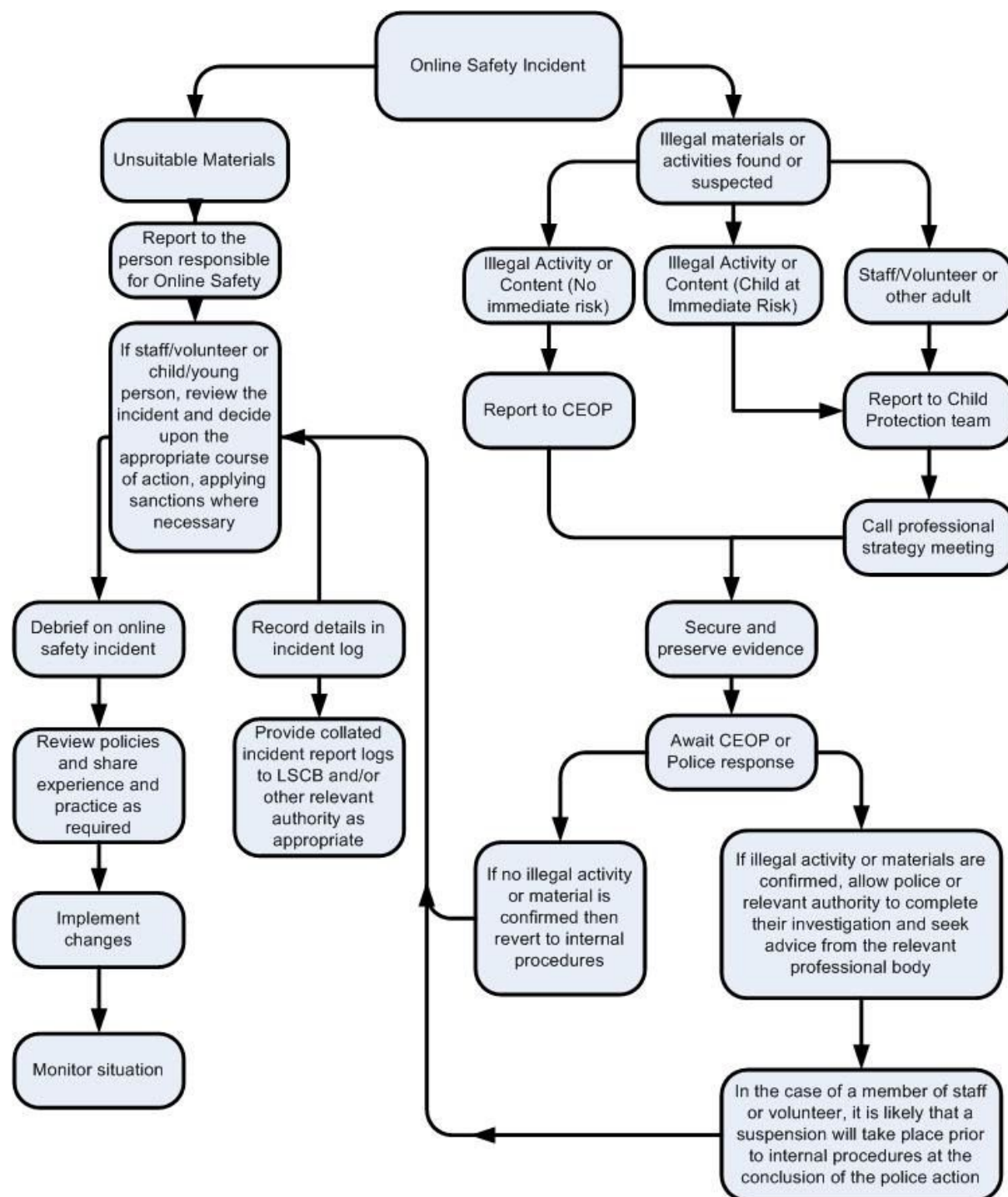
The school's use of social media for professional purposes will be checked regularly by the senior risk officer and Online Safety Group to ensure compliance with the school policies.

#### **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 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 flow chart shows the steps taken when any incidents occur:



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