



Ysgot Acrefair

*E-Safety Policy
February 2016*

Development / Monitoring / Review of this Policy

This e-Safety policy has been developed by the following

- *Headteacher / Senior Leaders*
- *ICT Co-ordinator*
- *Staff*
- *Governors*
- *Community users*

Consultation with the whole school community has taken place through a range of formal and informal meetings.

Schedule for Development / Monitoring / Review

This e-Safety policy was approved by the <i>Governing Body</i> on:	
The implementation of this e-Safety policy will be monitored by the:	<i>ICT co-ordinator</i>
Monitoring will take place at regular intervals:	<i>Termly</i>
The e-Safety Policy will be reviewed annually, or more regularly in the light of any significant new developments in the use of the technologies, new threats to e-Safety or incidents that have taken place. The next anticipated review date will be:	<i>Feb 2016</i>
Should serious e-Safety incidents take place, the following external persons / agencies should be informed:	

The school will monitor the impact of the policy using:

- *Logs of reported incidents*
- *Monitoring of lesson plans*
- *Lesson observations*
- *Monitoring logs of internet activity (including sites visited)*
- *Internal monitoring data for network activity*
- *Surveys / questionnaires of*
 - *students / pupils*
 - *parents / carers*
 - *staff*

Roles and Responsibilities

The following section outlines the e-Safety roles and responsibilities of individuals¹ and groups within the school :

Governors:

Governors are responsible for the approval of the e-Safety Policy and for reviewing the effectiveness of the policy. This will be carried out by the Governing body committee receiving regular information about any e-Safety incidents. A member of the Governing Body should take on the role of e-Safety Governor to include:

- *regular meetings with the e-Safety Co-ordinator / Officer*
- *regular monitoring of e-Safety incident logs*
- *regular monitoring of filtering / change control logs (where possible)*
- *reporting to relevant Governors / sub-committee / meeting*

Headteacher :

- The *Headteacher* has a duty of care for ensuring the safety (including e-Safety) of members of the school community, though the day to day responsibility for e-Safety may be delegated to the *ICT Co-ordinator*.
- The Headteacher and Senior Leadership Team / Senior Management Team should be aware of the procedures to be followed in the event of a serious e-Safety allegation being made against a member of staff.
- *The Headteacher and Senior Leaders are responsible for ensuring that the ICT Coordinator Officer and other relevant staff receive suitable training to enable them to carry out their e-Safety roles and to train other colleagues, as relevant.*
- *The 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 e-Safety monitoring role. This is to provide a safety net and also support to those colleagues who take on important monitoring roles.*

ICT Coordinator :

The *ICT Coordinator*

- takes day to day responsibility for e-Safety issues and has a leading role in establishing and reviewing the school e-Safety policies / documents
 - ensures that all staff are aware of the procedures that need to be followed in the event of an e-Safety incident taking place.
 - provides or identifies sources of training and advice for staff
 - liaises with the Local Authority
 - receives reports of e-Safety incidents and creates a log of incidents to inform future e-Safety developments.
 - meets with *e-Safety Governor* to discuss current issues, review incident logs and if possible, filtering / change control logs
 - reports regularly to Senior Leadership Team
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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 / AUA)
- they report any suspected misuse or problem to the Headteacher for investigation / action
- all digital communications with students / pupils / parents / carers should be on a professional level *and only carried out using official school systems*
- e-Safety issues are embedded in all aspects of the curriculum and other activities
- pupils understand and follow the e-Safety and acceptable use *agreements / 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 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

Pupils:

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

Parents / Carers

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

- digital and video images taken at school events
- access to parents' sections of the website / VLE and on-line student / pupil records

Policy Statements

Education – young people

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 e-Safety is therefore an essential part of the school's e-Safety provision. Children 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 / 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 PSE lessons.
- 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 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 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.
- Where pupils are allowed to freely search the internet, staff should be vigilant in monitoring the content of the websites the young people visit.

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,*
- *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>*

Technical – infrastructure / equipment, filtering and monitoring

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 will be provided with a username and secure password
- Users are responsible for the security of their username and password.
- Headteacher 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.

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 eg on social networking sites.*
- *In accordance with guidance from the Information Commissioner's Office, parents / carers are welcome to take videos and digital images of their children at school events for their own personal use (as such use is not covered by the Data Protection Act). To respect everyone's privacy and in some cases protection, these images should not be published / made publicly available on social networking sites, nor should parents / carers comment on any activities involving other students / 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 students / 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, particularly in association with photographs.*
- *Written permission from parents or carers will be obtained before photographs of pupils are published on the school website*

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.

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.

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 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	
	any other information which may be offensive to colleagues or breaches the integrity of the ethos of the school or brings the school into disrepute				X	
Using school systems to run a private business				X		

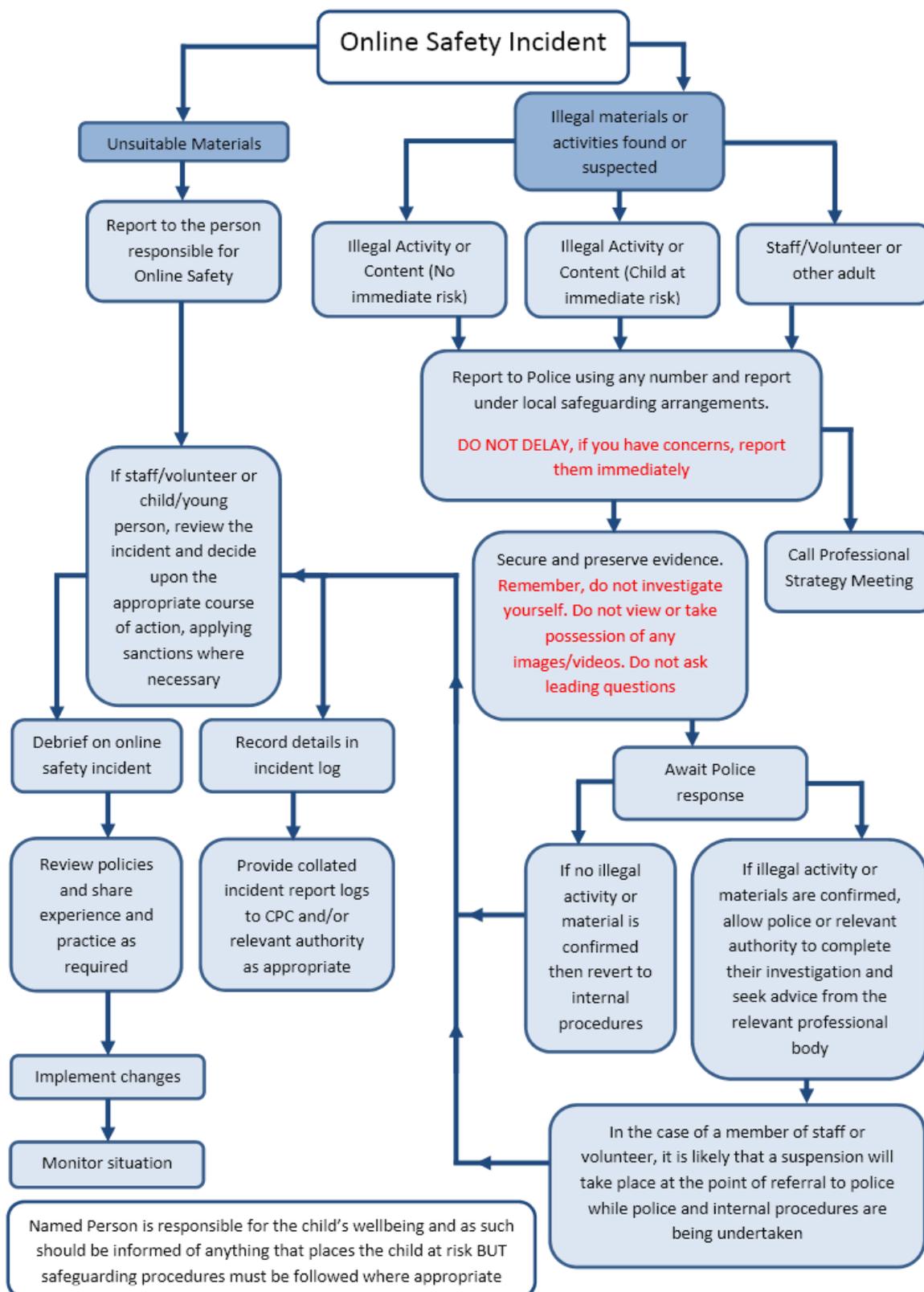
Using systems, applications, websites or other mechanisms that bypass the filtering or other safeguards employed by the school				X	
Infringing copyright				X	
Revealing or publicising confidential or proprietary information (eg financial / personal information, databases, computer / network access codes and passwords)				X	
Creating or propagating computer viruses or other harmful files				X	
Unfair usage (downloading / uploading large files that hinders others in their use of the internet)				X	
On-line gaming (educational)		X			
On-line gaming (non educational)			X		
On-line gambling					X
On-line shopping / commerce				X	
File sharing	X				
Use of social media					x
Use of messaging apps			x		
Use of video broadcasting eg 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. 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.

