

Online Safety Policy

Approved by: Governing Body Date: September 2022

Last reviewed on: September 2022

Next review due by: September 2023

Monitoring and review of this Policy

This online safety policy has been developed by a working group made up of:

- Headteacher and senior leaders
- Designated Safeguarding leads
- Staff including teachers, support staff, technical staff

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

Schedule for monitoring and review

The school will monitor the impact of the policy using:

- Logs of reported incidents
- Monitoring logs of internet activity (including sites visited)/filtering)
- Internal monitoring data for network activity
- Surveys/questionnaires of
 - o students
 - o parents/carers
 - o staff

Scope of the Policy

This policy applies to all members of the academy community (including staff, students, volunteers, parents/carers, visitors, community users) who have access to and are users of academy digital technology systems, both in and out of the academy.

The Education and Inspections Act 2006 empowers Headteachers to such extent as is reasonable, to regulate the behaviour of students when they are off the academy 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 academy, but is linked to membership of the academy. The 2011 Education Act increased these powers with regard to the searching for and of electronic devices and the deletion of data. Appendix B contains links to legislation pertinent to online safety and further information about the management of behaviour is found the Shenfield High School Behaviour policy.

The academy will deal with such incidents within this policy and associated behaviour and antibullying policies and will, where known, inform parents/carers of incidents of inappropriate online safety behaviour that take place out of school.

Roles and Responsibilities

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

Governors

Governors 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 as part of existing safeguarding updates and monitoring reports.

Headteacher and Senior Leaders

- The Headteacher has a duty of care for ensuring the safety (including online safety) of members of the school community, though the day to day responsibility for online safety will be delegated to the Safeguarding leads.
- The Headteacher and (at least) another member of the Senior Leadership Team should be aware of the procedures to be followed in the event of a serious online safety allegation being made against a member of staff. This is known as whistleblowing and details are found within the Staff Code of Conduct.
- The Headteacher and Senior Leaders are responsible for ensuring that the Safeguarding Leads and other relevant staff receive suitable training to enable them to carry out their online safety roles and to train other colleagues, as relevant.
- The Senior Leadership Team will receive regular monitoring reports from the DSLs

Safeguarding leads

- Takes day to day responsibility for online safety issues and has a leading role in establishing and reviewing the school online safety policies and 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. Details of incident procedure including Youth Produced Sexual Imagery (commonly known as sexting) is found in Appendix A
- Provides training and advice for staff
- Liaises with the Local Authority and other relevant bodies
- 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 Online Safety Governor to discuss current issues, review incident logs and filtering/change control logs
- Attends relevant meetings of Governors
- Reports regularly to Senior Leadership Team

IT Support

Those with technical responsibilities are responsible for ensuring:

- that the academy's technical infrastructure is secure and is not open to misuse or malicious attack
- that the academy meets required online safety technical requirements and any Local Authority 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 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 DSL for investigation/action/sanction
- that monitoring software/systems are implemented and updated as agreed in academy 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/academy online safety policy and practices
- they have read, understood and signed the staff acceptable use policy. Evidence of this is collected at the start of each academic year or as part of the new staff induction.
- they report any suspected misuse or problem to a DSLs for investigation
- all digital communications with students and parents/carers should be on a professional level and only carried out using official school systems. Further details are outlined in the acceptable use policy
- online safety issues are embedded in all aspects of the curriculum and other activities
- students understand and follow the Online Safety Policy and acceptable use policies
- students 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 students 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

Full details relating to expectations and responsibilities is located in Appendix D

Designated Safeguarding Leads

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

DSLs meet weekly to discuss the strategic requirements of providing an all through safeguarding net for our students and their families, and to provide support and professional challenge for each other. The opportunity is often taken to review case studies and to consider the learning aspects of these reviews, thereby keeping safeguarding direction current and with an appropriate amount of challenge. This includes matters of online safety and the monitoring the Online Safety Policy including the impact of initiatives.

This team and others will assist with:

- the production/review/monitoring of the school online safety policy/documents.
- the production/review/monitoring of the school filtering policy and requests for filtering changes.
- mapping and reviewing the online safety/digital literacy curricular provision ensuring relevance, breadth and progression
- monitoring network/internet/filtering/incident logs
- consulting stakeholders including parents/carers and the students/pupils about the online safety provision
- monitoring improvement actions identified through use of the 360 degree safe self-review tool

Students

- are responsible for using the academy digital technology systems in accordance with the home school 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
- should understand the importance of adopting good online safety practice when using digital technologies out of school and realise that the academy'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 academy 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 and /literature. Parents and carers will be encouraged to support the academy in promoting and modelling good online safety practice and respectful digital citizenship 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 records
- following all guidance as outlined in the Home-school agreement

Policy Statements

Education – Students

The primary responsibly for online safety is first and foremost with the person making use of the technology. However, whilst regulation and technical solutions are very important, their use must be balanced by educating *students* to understand how to take a responsible approach. The education of *students* in online safety and digital literacy is therefore an essential part of the academy'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. Our curriculum around online safety encompasses the following:

- content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.
- contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and nonconsensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and
- commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (https://apwg.org/).

This is facilitated through:

- A planned online safety curriculum which is provided as part of Computer Science curriculum. Details of the curriculum are available on the academy website
- Key online safety messages are reinforced as part of a planned programme of assemblies and tutorial/pastoral activities. As well as forming part of the PSHE curriculum as appropriate.
- Students will 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 should will be material accessed on the internet
- Students will 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.
- Students are helped to understand the need for the student acceptable use agreement and encouraged to adopt safe and responsible use both within and outside academy. This is outlined in the first meet the tutor evening and revisited at least annually through tutors. Furthermore ongoing focus is achieved through the 3 strands of the behaviour policy; Respect, Ready, Responsibility.
- 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 are 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.
- It is accepted that from time to time, for good educational reasons, students may need to research topics (e.g. racism, drugs, and discrimination) that would normally result in internet searches being blocked. In such a situation, staff can request that the Technical Staff 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 & 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:

- Planned sessions 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 as part of the annual safeguarding audit and CPD portfolio review.
- All new staff receive online safety training as part of their induction programme, ensuring that they fully understand the academy online safety policy and acceptable use agreements.
- The safeguarding leads will receive regular updates through attendance at external training events and by reviewing guidance documents released by relevant organisations.
- This online safety policy and its updates will be presented to and discussed by staff in staff training sessions.
- The DSL will provide advice/guidance/training to individuals as required.

Training - Governors

Governors 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 Local Authority /National Governors Association/or other relevant organisation.

• Participation in academy training/information sessions for staff or parents. This may include attendance at assemblies/lessons).

Technical – infrastructure/equipment, filtering and monitoring

The academy will be responsible for ensuring that the academy 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 online safety responsibilities:

- Academy technical systems will be managed in ways that ensure that the academy meets recommended technical requirements
- There will be regular reviews and audits of the safety and security of academy technical systems
- Servers, wireless systems and cabling must be securely located and physical access restricted
- All users will have clearly defined access rights to academy technical systems and devices.
- All users will be provided with a username and secure password by IT SUPPORT who will keep an up to date record of users and their usernames. Users are responsible for the security of their username and password.
- IT Support are 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 academy has provided enhanced/differentiated user-level filtering
- Academy 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.
- 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 devices are protected by up to date virus software.
- There is provision of temporary access of "guests" (e.g. trainee teachers, supply teachers, visitors) onto the school systems.
 - 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 instant use of images that they have recorded themselves or downloaded from the internet. However, staff, parents/carers and students 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 students 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 students 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 academy events for their own personal use (as such use in 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 in the digital/video images.
- Staff and volunteers are allowed to take digital/video images to support educational aims, but
 must follow academy policies concerning the sharing, distribution and publication of those
 images. It is advised that those images should only be taken on academy provided equipment;
 the personal equipment of staff used for such purposes is discouraged and if used by necessity
 any images must be transferred to the academy network and deleted from the personal device.
- Care should be taken when taking digital/video images that students are appropriately dressed and are not participating in activities that might bring the individuals or the academy into disrepute.
- Students must not take, use, share, publish or distribute images of others without their permission
- Photographs published on the website, or elsewhere that include students will be selected carefully and will comply with good practice guidance on the use of such images.
- Students' full names will not be used anywhere on a website or blog, particularly in association with photographs.

Communications

When using communication technologies, the school/academy considers the following as good practice:

- The official academy email service may be regarded as safe and secure and is monitored. Users should be aware that email communications are monitored. Staff and students should therefore use only the academy email service to communicate with others when in school, or on academy systems (e.g. by remote access).
- Users must immediately report, to a member of staff in accordance with the academy 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 or parents/carers (email, social media, chat, blogs, VLE 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 <u>must not</u> be used for these communications.

- Students 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 academy website and only official email addresses should be used to identify members of staff.

Monitoring of Public Social Media:

- As part of active social media engagement, it is considered good practice to pro-actively 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

APPENDIX A

Incidents

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

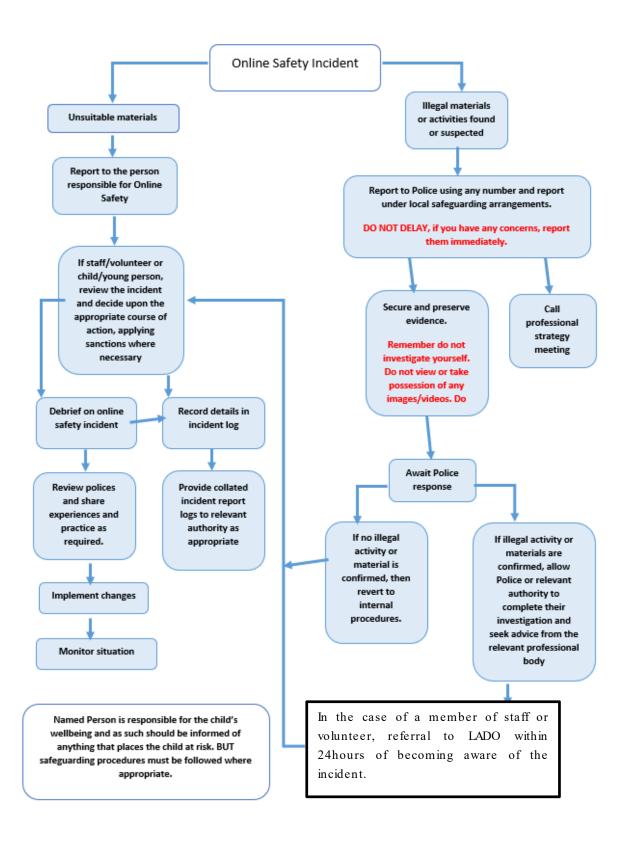
In the event of suspicion, all steps in this procedure should be followed:

- 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 agreed procedures as outlines in the Child Protection
 and Safeguarding Policy would be followed. Where necessary there will be referral to outside
 agencies.
- 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:
 - o incidents of 'grooming' behaviour
 - o the sending of obscene materials to a child
 - o adult material which potentially breaches the Obscene Publications Act
 - o criminally racist material
 - o promotion of terrorism or extremism
 - o offences under the Computer Misuse Act (see User Actions chart above)
 - o 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.

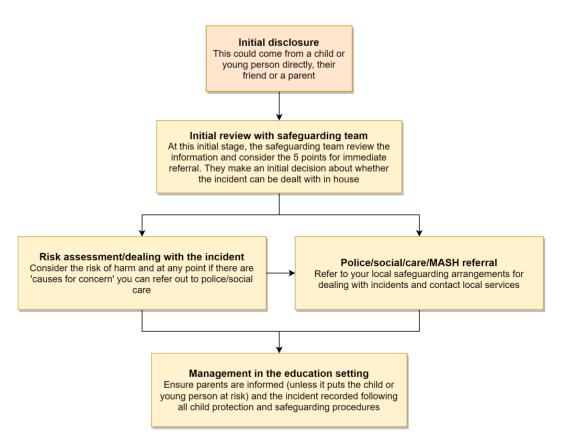
It is important that all of the above steps are taken as they will provide an evidence trail for the academy and possibly the police and demonstrate that visits to these sites were carried out for safeguarding purposes. The completed form should be retained by the group for evidence and reference purposes.

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.



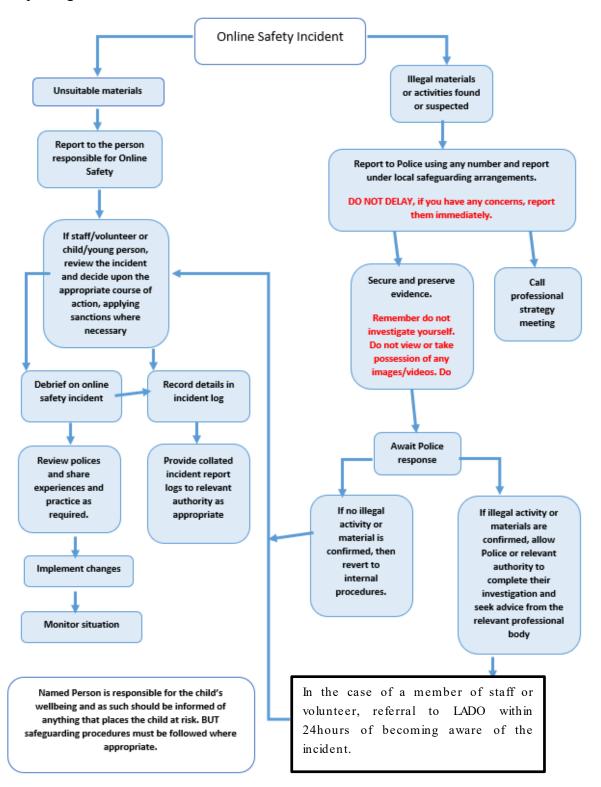
Guidance for responding to Youth Produced Sexual Imagery. Taken from *Sharing nude and semi-nudes:* Advice for education settings working with children and young people. Responding to incidents and safeguarding children and young people (UK Council for Child Internet Safety 2020). Which updated the previous guidance - Sexting in schools and colleges, responding to incidents, and safeguarding young people, guidance from the UK Council for Child Internet Safety (2016)



"Where there are abusive and/or aggravating factors, incidents should always be referred to the police through the Multi-Agency Safeguarding Hub" – pg 14

An immediate referral to police and/or children's social services will be made if:

- 1. The incident involves and adult
- 2. There is reason to believe that a child or young person have been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, owing to special educational needs)
- 3. What is known about the images or video suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- 4. The images involves sexual acts and any pupil in the images or videos is under 13
- 5. There is reason to believe a children or young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example, they are presenting as suicidal or self-harming



APPENDIX B

Staff (and Volunteer) Acceptable Use Policy Agreement Template

This acceptable use policy is intended to ensure:

- that staff and volunteers will be responsible users and stay safe while using the internet and other communications technologies for educational, personal and recreational use.
- that academy systems and users are protected from accidental or deliberate misuse that could put the security of the systems and users at risk.
- that staff are protected from potential risk in their use of technology in their everyday work.

The school will try to ensure that staff and volunteers will have good access to digital technology to enhance their work, to enhance learning opportunities for students learning and will, in return, expect staff and volunteers to agree to be responsible users.

Acceptable Use Policy Agreement

I understand that I must use school systems in a responsible way, to ensure that there is no risk to my safety or to the safety and security of the systems and other users. I recognise the value of the use of digital technology for enhancing learning and will ensure that students receive opportunities to gain from the use of digital technology. I will, where possible, educate the young people in my care in the safe use of digital technology and embed online safety in my work with young people.

For my professional and personal safety:

- I understand that the academy will monitor my use of the school digital technology and communications systems.
- I understand that the rules set out in this agreement also apply to use of these technologies (e.g. laptops, email, VLE etc.) out of school, and to the transfer of personal data (digital or paper based) out of school
- I understand that the school digital technology systems are primarily intended for educational use and that I will only use the systems for personal or recreational use within the policies and rules set down by the school.
- I will not disclose my username or password to anyone else, nor will I try to use any other person's username and password. I understand that I should not write down or store a password where it is possible that someone may steal it.
- I will immediately report any illegal, inappropriate or harmful material or incident, I become aware of, to the appropriate person.

I will be professional in my communications and actions when using academy systems:

- I will not access, copy, remove or otherwise alter any other user's files, without their express permission.
- I will communicate with others in a professional manner, I will not use aggressive or inappropriate language and I appreciate that others may have different opinions.
- I will ensure that when I take and/or publish images of others I will do so with their permission and in accordance with the school's policy on the use of digital/video images. I will not use my personal equipment to record these images, unless I have permission to do so. Where these images are published (e.g. on the school website/VLE) it will not be possible to identify by name, or other personal information, those who are featured.
- I will only use social networking sites in school in accordance with the school's policies.
- I will only communicate with students and parents/carers using official school systems. Any such communication will be professional in tone and manner.

• I will not engage in any on-line activity that may compromise my professional responsibilities.

The school and the local authority have the responsibility to provide safe and secure access to technologies and ensure the smooth running of the academy:

- When I use my mobile devices in school, I will follow the rules set out in this agreement, in the same way as if I was using academy equipment. I will also follow any additional rules set by the academy about such use. I will ensure that any such devices are protected by up to date anti-virus software and are free from viruses.
- I will not use personal email addresses on the academy ICT systems.
- I will not open any hyperlinks in emails or any attachments to emails, unless the source is known and trusted, or if I have any concerns about the validity of the email (due to the risk of the attachment containing viruses or other harmful programmes)
- I will ensure that my data is regularly backed up, in accordance with relevant academy policies.
- I will not try to upload, download or access any materials which are illegal (child sexual abuse images, criminally racist material, terrorist or extremist material, adult pornography covered by the Obscene Publications Act) or inappropriate or may cause harm or distress to others. I will not try to use any programmes or software that might allow me to bypass the filtering/security systems in place to prevent access to such materials.
- I will not try (unless I have permission) to make large downloads or uploads that might take up internet capacity and prevent other users from being able to carry out their work.
- I will not install or attempt to install programmes of any type on a machine, or store programmes on a computer, nor will I try to alter computer settings, unless this is allowed in school/academy policies.
- I will not disable or cause any damage to academy equipment, or the equipment belonging to others.
- I will only transport, hold, disclose or share personal information about myself or others, as outlined in the Academy Personal Data Policy (or other relevant policy). Where digital personal data is transferred outside the secure local network, it must be encrypted. Paper based documents containing personal data must be held in lockable storage.
- I understand that data protection policy requires that any staff or student data to which I have access, will be kept private and confidential, except when it is deemed necessary that I am required by law or by academy policy to disclose such information to an appropriate authority.
- I will immediately report any damage or faults involving equipment or software, however this may have happened.

When using the internet in my professional capacity or for school sanctioned personal use:

- I will ensure that I have permission to use the original work of others in my own work
- Where work is protected by copyright, I will not download or distribute copies (including music and videos).

I understand that I am responsible for my actions in and out of the academy:

- I understand that this acceptable use policy applies not only to my work and use of academy digital technology equipment in school, but also applies to my use of academy systems and equipment off the premises and my use of personal equipment on the premises or in situations related to my employment by the academy
- My use of social media and online spaces should not cause questions to be raised about my ability to safeguard young people. Nor should my online behaviour, either by action or inaction, cause any disrepute to the academy.

- Current stakeholders in the school will not be accepted onto any private social media accounts. (Caution should be given to 'accepting' former stakeholders based on the understanding that such actions potentially raise questions as to when such a 'relationship' was formed and why.
- Social Media will not be used for the purpose of group chats with students.
- I understand that if I fail to comply with this acceptable use agreement, I could be subject to disciplinary action. This could include a warning, a suspension, referral to Governors and/or the Local Authority and in the event of illegal activities the involvement of the police.

I have read and understand the above and agree to use the school digital technology systems (both in and out of school) and my own devices (in school and when carrying out communications related to the school) within these guidelines.

Signed:	
Staff/Volunteer Name:	
The user agreement as outlin	ned above refers to current and ex Shenfield staff/volunteers