



# St Martin's Catholic Primary School Online Safety Policy



# Contents

St Martin's Catholic Primary School Online Safety Policy .....	0
Contents .....	1
<b>Roles and Responsibilities</b> .....	3
Policy Statements .....	6
Communications .....	12
Dealing with unsuitable/inappropriate activities .....	0
Responding to incidents of misuse .....	2
Illegal Incidents .....	0
Other Incidents .....	1
St Martin's actions & sanctions .....	0
Appendix .....	3
Staff (and Volunteer) Acceptable Use Policy Agreement Template .....	5
Responding to incidents of misuse – flow chart .....	7
Reporting Log .....	8
Training Needs Audit Log .....	9
Social Media Policy .....	10
Legislation .....	11



## Development/Monitoring/Review of this Policy

This online safety policy has been developed in consultation with staff and governors using what is considered best practice from the SWGfL.

### Schedule for Development/Monitoring/Review

This online safety policy was approved by the Governing Body	
The implementation of this online safety policy will be monitored by the online safety coordinators	<i>Catherine Ming – Headteacher (DSL) Hannah Williams – Computing Coordinator</i>
Monitoring will take place at regular intervals:	<i>Annually</i>
The Governing Body will receive a report on the implementation of the online safety policy generated by the monitoring group (which will include anonymous details of online safety incidents) at regular intervals:	<i>Once a year at summer FGB</i>
The online 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 online safety or incidents that have taken place. The next anticipated review date will be:	<i>September 2024</i>
Should serious online safety incidents take place, the following external persons/agencies should be informed:	<i>LA Safeguarding Officer, LADO, iCART, Police</i>

The school will monitor the impact of the policy using:

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

## Scope of the Policy

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

The Education and Inspections Act 2006 empowers Headteachers to such extent as is reasonable, to regulate the behaviour of pupils when they are out of school 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 St Martin's, but is linked to membership of the school. The 2011 Education Act increased these powers with regard to the searching for and of electronic devices and the deletion of data (see appendix for template policy). In the case of both acts, action can only be taken over issues covered by the published Behaviour Policy.

St Martin's will deal with such incidents within this policy and associated behaviour and anti-bullying policies and will, where known, inform parents/carers of incidents of inappropriate online safety behaviour that take place out of school.

## Roles and Responsibilities

The following section outlines the online safety roles and responsibilities of individuals and groups within St Martin's:

### 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 and monitoring reports. A member of the Governing Body has taken on the role of Online Safety Governor in their role as safeguarding governor. The role of the Online Safety Governor will include:

- regular meetings with the Online Safety Co-ordinators (including DSL)
- attendance at Online Safety Group meetings
- regular monitoring of online safety incident logs
- ensuring that the filtering and monitoring provision is reviewed and recorded at least annually
- reporting to relevant Governors 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, and will be responsible for the investigation and deciding the action/sanctions of any breach of the online safety policy
- The Headteacher and the Deputy headteacher 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. (see flow chart on dealing with online safety incidents – included in a later section – “Responding to incidents of misuse” and relevant Local Authority disciplinary procedures). More information is available at: <https://boost.swgfl.org.uk/>
- The Headteacher and Senior Leaders are responsible for ensuring that the Online Safety Lead 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 Headteacher and Senior Leaders will ensure that there is a system in place to allow for monitoring of incidents.
- The Senior Leadership Team will receive regular monitoring reports from the Online Safety Lead.

### Online Safety Lead

- 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
- 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 and monitoring logs/checks.
- attends relevant meetings of Governors
- reports regularly to Senior Leadership Team

## Technical staff

It is the responsibility of St Martin's to ensure that the managed service provider carries out all the online safety measures suggested below. It is also important that the managed service provider is fully aware of St Martin's online safety policy and procedures.

Those with technical responsibilities are responsible for ensuring:

- that the school's technical infrastructure is secure and is not open to misuse or malicious attack
- that St Martin's meets required online safety technical requirements and any Local Authority online safety policy that may apply.
- that users may only access the networks and devices through a properly enforced password protection policy
- the filtering and monitoring standards are applied and updated on a regular basis
- that they keep up to date with online safety technical information in order to effectively carry out their online safety role and to inform and update others as relevant
- that the use of the networks/internet/digital technologies is regularly monitored in order that any misuse/attempted misuse can be reported to the Headteacher for investigation/action/sanction
- that monitoring software and systems are implemented and updated as agreed in St Martin's 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 St Martin's online safety policy and practices
- they have read, understood and signed the staff acceptable use policy (AUP)
- they report any suspected misuse or problem to the Headteacher for investigation/action/sanction
- all digital communications with 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
- pupils have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations
- they monitor the use of digital technologies, mobile devices, cameras, etc. in lessons and other school activities (where allowed) and implement current policies with regard to these devices
- in lessons where internet use is pre-planned pupils should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches

## 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

## Online Safety Group

The Online Safety Group provides a consultative group that has wide representation from St Martin's community, with responsibility for issues regarding online safety and the monitoring the Online Safety Policy including the impact of initiatives. Depending on the size or structure of St Martin's this group may be part of the safeguarding group. The group will also be responsible for regular reporting to the *Governing Body*.

Members of the Online Safety Group will assist the Online Safety Lead with:

- the production/review/monitoring of the school online safety policy/documents.
- mapping and reviewing the online safety curricular provision – ensuring relevance, breadth and progression
- monitoring network/internet/monitoring and 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

## Pupils:

- are responsible for using St Martin's 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 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. St Martin's will take every opportunity to help parents understand these issues through parents' evenings, newsletters, letters, website, social media, parent workshops and information about national online safety campaigns. Parents and carers will be encouraged to support St Martin's 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 google classroom
- their children's personal devices in St Martin's (where this is allowed)

## Community Users

Community Users who access St Martin's systems or programmes as part of the wider St Martin's provision will be expected to sign a Community User AUA before being provided with access to St Martin's systems.



## Policy Statements

### Education – Pupils

Whilst regulation and technical solutions are very important, their use must be balanced by educating *pupils* to take a responsible approach. The education of *pupils* in online safety and 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.

In planning computing and online safety curriculum we have referred to:

- DfE Teaching Online Safety in Schools
- Education for a Connected World Framework
- SWGfL Project Evolve – online safety curriculum programme and resources

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/PHSE/other lessons and should be regularly revisited
- There is a focus online safety week in the Autumn term and St Martin's participate in days such as Safer Internet Day
- 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.
- 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 that Smoothwall has not blocked.
- Where pupils are allowed to freely search the internet, staff should be vigilant in monitoring the content of the websites the young people visit.
- It is accepted that from time to time, for good educational reasons, students may need to research topics (e.g. racism, drugs, discrimination) that would normally result in internet searches being blocked. In such a situation, staff can request that the Technical Staff (or other relevant designated person) can temporarily remove those sites from the filtered list for the period of study. Any request to do so, should be auditable, with clear reasons for the need.

### Education – Parents/carers

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

St Martin's will therefore seek to provide information and awareness to parents and carers through:

- Curriculum activities
- Letters, newsletters, web site, Google Classroom
- Parents/carers evenings
- Family learning Parent Workshops
- High profile events and campaigns e.g. Safer Internet Day
- Reference to the relevant web sites/publications/apps e.g. [swgfl.org.uk](http://www.swgfl.org.uk), [www.saferinternet.org.uk/](http://www.saferinternet.org.uk/), <http://www.childnet.com/parents-and-carers> (see appendix for further links/resources)

#### Education – The Wider Community

St Martin's will provide opportunities for local community groups/members of the community to gain from the school's online safety knowledge and experience. This may be offered through the following:

- *Providing family learning courses in use of new digital technologies, digital literacy and online safety*
- *Online safety messages targeted towards grandparents and other relatives as well as parents.*
- *St Martin's website will provide online safety information for the wider community*
- *Sharing their online safety expertise/good practice with other local schools*
- *Supporting community groups e.g. Early Years Settings, Childminders, youth/sports/voluntary groups to enhance their online safety provision*

#### Education & Training – Staff/Volunteers

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

- A planned programme of formal online safety training will be made available to staff. (<https://boost.swgfl.org.uk/>) This will be regularly updated and reinforced. An audit of the online safety training needs of all staff will be carried out regularly.
- All new staff should receive online safety training as part of their induction programme, ensuring that they fully understand St Martin's online safety policy and acceptable use agreements.
- It is expected that some staff will identify online safety as a training need within the performance management process.
- The Online Safety Lead will receive regular updates through attendance at external training events (e.g. from SWGfL/LA/other relevant organisations) and by reviewing guidance documents released by relevant organisations and will provide advice and training to individuals as required
- This online safety policy and its updates will be presented to and discussed by staff in staff training sessions.

#### Training – Governors

**Governors should take part in online safety training and awareness sessions**, with particular importance for those who are members of any group involved in 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 (e.g. SWGfL).
- Participation in St Martin's training/information sessions for staff or parents (this may include attendance at assemblies/lessons).



Technical – infrastructure/equipment, filtering and monitoring

St Martin’s has a managed ICT service provided by the LA. It is the responsibility of St Martin’s to ensure that the managed service provider carries out all the online safety measures that would otherwise be the responsibility of St Martin’s, as below. It is also important that the managed service provider is fully aware of St Martin’s online safety policy/acceptable use agreements.

St Martin’s will be responsible for ensuring that St Martin’s infrastructure/network is as safe and secure as is reasonably possible and that policies and procedures approved within this policy are implemented.

- St Martin’s technical systems will be managed in ways that ensure that St Martin’s meets recommended technical requirements
- There will be regular reviews and audits of the safety and security of St Martin’s technical systems
- Servers, wireless systems and cabling must be securely located and physical access restricted
- All users will have clearly defined access rights to St Martin’s technical systems and devices.
- 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.
- Internet filtering/monitoring should ensure that children are safe from terrorist and extremist material when accessing the internet.

### Mobile Technologies (including BYOD/BYOT)

Mobile technology devices may be school owned/provided or personally owned and might include: smartphone, tablet, notebook/laptop or other technology that usually has the capability of utilising the school’s wireless network. The device then has access to the wider internet which may include the school’s learning platform and other cloud based services such as email and data storage.

All users should understand that the primary purpose of the use mobile/personal devices in a school context is educational. The mobile technologies policy should be consistent with and inter-related to other relevant school policies including but not limited to the safeguarding policy, behaviour policy, bullying policy, acceptable use policy, and policies around theft or malicious damage. Teaching about the safe and appropriate use of mobile technologies should be an integral part of the school’s online safety education programme.

- **The school acceptable use agreements for staff, pupils/students and parents/carers will give consideration to the use of mobile technologies**
- **The school allows:**

	School Devices			Personal Devices		
	School owned for single user	School owned for multiple users	Authorised device <sup>1</sup>	Student owned	Staff owned	Visitor owned
Allowed in school	Yes	Yes	Yes	Yes from Y5 onwards	Yes	Yes
Full network access	Yes	Yes	Yes	No	No	No
Internet only				No	Yes	Yes
No network access				Yes		

<sup>1</sup> Authorised device – purchased by the pupil/family through a school-organised scheme. This device may be given full access to the network as if it were owned by the school.

## Use of digital and video images

The development of digital imaging technologies has created significant benefits to learning, allowing staff and pupils instant use of images that they have recorded themselves or downloaded from the internet. However, staff, parents/carers and pupils need to be aware of the risks associated with publishing digital images on the internet. Such images may provide avenues for online-bullying to take place. Digital images may remain available on the internet forever and may cause harm or embarrassment to individuals in the short or longer term. It is common for employers to carry out internet searches for information about potential and existing employees. The school will inform and educate users about these risks and will implement policies to reduce the likelihood of the potential for harm:

- When using digital images, staff should inform and educate pupils about the risks associated with the taking, use, sharing, publication and distribution of images. In particular they should recognise the risks attached to publishing their own images on the internet e.g. on social networking sites.
- Written permission from parents or carers will be obtained before photographs of students/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 St Martin's events for their own personal use (as such use is not covered by the Data Protection Act). To respect everyone's privacy and in some cases protection, these images should not be published/made publicly available on social networking sites, nor should parents/carers comment on any activities involving other pupils in the digital/video images.
- Staff and volunteers are allowed to take digital/video images to support educational aims, but must follow St Martin's policies concerning the sharing, distribution and publication of those images.
- 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.



## Data Protection

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

St Martin's must ensure that:

- it has a Data Protection Policy.
- it implements the data protection principles and is able to demonstrate that it does so through use of policies, notices and records.
- it has paid the appropriate fee Information Commissioner's Office (ICO) and included details of the Data Protection Officer (DPO).
- it has appointed an appropriate Data Protection Officer (DPO) who has a high level of understanding of data protection law and is free from any conflict of interest.
- it has an 'information asset register' in place and knows exactly what personal data it holds, where this data is held, why and which member of staff has responsibility for managing it
- the information asset register records the lawful basis for processing personal data (including, where relevant, how consent was obtained and refreshed). Where special category data is processed, an additional lawful basis will have also been recorded
- it will hold only the minimum personal data necessary to enable it to perform its function and it will not hold it for longer than necessary for the purposes it was collected for. The school should develop and implement a 'retention policy' to ensure there are clear and understood policies and routines for the deletion and disposal of data to support this. personal data held must be accurate and up to date where this is necessary for the purpose it is processed for. Have systems in place to identify inaccuracies, such as asking parents to check emergency contact details at suitable intervals
- it provides staff, parents, volunteers, teenagers and older children with information about how St Martin's looks after their data and what their rights are in a clear Privacy Notice
- procedures must be in place to deal with the individual rights of the data subject, e.g. one of the 8 data subject rights applicable is that of Subject Access which enables an individual to see to have a copy of the personal data held about them (subject to certain exceptions which may apply).
- data Protection Impact Assessments (DPIA) are carried out where necessary. For example, to ensure protection of personal data when accessed using any remote access solutions, or entering into a relationship with a new supplier (this may also require ensuring that data processing clauses are included in the supply contract or as an addendum)
- it has undertaken appropriate due diligence and has required data processing clauses in contracts in place with any data processors where personal data is processed.
- it understands how to share data lawfully and safely with other relevant data controllers.
- it [reports any relevant breaches to the Information Commissioner](#) within 72hrs of becoming aware of the breach in accordance with UK data protection law. It also reports relevant breaches to the individuals affected as required by law. In order to do this, it has a policy for reporting, logging, managing, investigating and learning from information risk incidents.

- If a maintained St Martin's, it must have a Freedom of Information Policy which sets out how it will deal with FOI requests.
- all staff receive data protection training at induction and appropriate refresher training thereafter. Staff undertaking particular data protection functions, such as handling requests under the individual's rights, will receive training appropriate for their function as well as the core training provided to all staff.

When personal data is stored on any mobile device or removable media the:

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

Staff must ensure that they:

- at all times take care to ensure the safe keeping of personal data, minimising the risk of its loss or misuse
- can recognise a possible breach, understand the need for urgency and know who to report it to within the school
- can help data subjects understand their rights and know how to handle a request whether verbal or written. Know who to pass it to in the school
- where personal data is stored or transferred on mobile or other devices (including USBs) these must be encrypted and password protected.
- will not transfer any St Martin's personal data to personal devices except as in line with school policy
- access personal data sources and records only on secure password protected computers and other devices, ensuring that they are properly "logged-off" at the end of any session in which they are using personal data



## Communications

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

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

When using communication technologies, St Martin's considers the following as good practice:

- The official St Martin's 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, the receipt of any communication that makes them feel uncomfortable, is offensive, discriminatory, threatening or bullying in nature and must not respond to any such communication.
- Any digital communication between staff and pupils or parents/carers (email, social media, chat, blogs, Google classroom etc) must be professional in tone and content.
- Personal information should not be posted on St Martin's website and only official email addresses should be used to identify members of staff.

## Social Media - Protecting Professional Identity

Expectations for teachers' professional conduct are set out in 'Teachers Standards 2012'.

All schools have a duty of care to provide a safe learning environment for pupils and staff. Schools 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 St Martin's liable to the injured party. Reasonable steps to prevent predictable harm must be in place.

St Martin's 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

St Martin's staff should ensure that:

- No reference should be made in social media to pupils, parents/carers or St Martin's 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
- Security settings on personal social media profiles are regularly checked to minimise risk of loss of personal information

When official St Martin's 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
- Systems for reporting and dealing with abuse and misuse
- Understanding of how incidents may be dealt with under St Martin's disciplinary procedures

Personal Use:

- Personal communications are those made via a personal social media accounts. In all cases, where a personal account is used which associates itself with St Martin's or impacts on the school, it must be made clear that the member of staff is not communicating on behalf of St Martin's 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
- St Martin's permits reasonable and appropriate access to private social media sites

### 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
- 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 St Martin's 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 St Martin's context, either because of the age of the users or the nature of those activities.

St Martin's believes that the activities referred to in the following section would be inappropriate in a St Martin's context and that users, as defined below, should not engage in these activities in/or outside St Martin's when using St Martin's equipment or systems. St Martin's 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,	Child sexual abuse images –The making, production or distribution of indecent images of children. Contrary to The Protection of Children Act 1978  N.B. Schools/academies should refer to guidance about dealing with self-generated images sexting – <a href="#">UKSIC Responding to and managing sexting incidents</a> and <a href="#">UKCIS – Sexting in schools and colleges</a>					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



proposals or comments that contain or relate to:	Criminally racist material in UK – to stir up religious hatred (or hatred on the grounds of sexual orientation) - contrary to the Public Order Act 1986					X
	Pornography					X
	Promotion of any kind of discrimination					X
	threatening behaviour, including promotion of physical violence or mental harm					X
	Promotion of extremism or terrorism					X
	Any other information which may be offensive to colleagues or breaches the integrity of the ethos of the school or brings the school into disrepute					X
Activities that might be classed as cyber-crime under the Computer Misuse Act:						
<ul style="list-style-type: none"> <li>• Gaining unauthorised access to school networks, data and files, through the use of computers/devices</li> <li>• Creating or propagating computer viruses or other harmful files</li> <li>• Revealing or publicising confidential or proprietary information (e.g. financial / personal information, databases, computer / network access codes and passwords)</li> <li>• Disable/Impair/Disrupt network functionality through the use of computers/devices</li> <li>• Using penetration testing equipment (without relevant permission)</li> </ul>						X
Using systems, applications, websites or other mechanisms that bypass the filtering or other safeguards employed by St Martin's						X
Revealing or publicising confidential or proprietary information (e.g. financial/personal information, databases, computer/network access codes and passwords)						X
Unfair usage (downloading/uploading large files that hinders others in their use of the internet)						X
Using school systems to run a private business						X
Infringing copyright						X
On-line gaming (educational)			X			
On-line gaming (non-educational)				X		

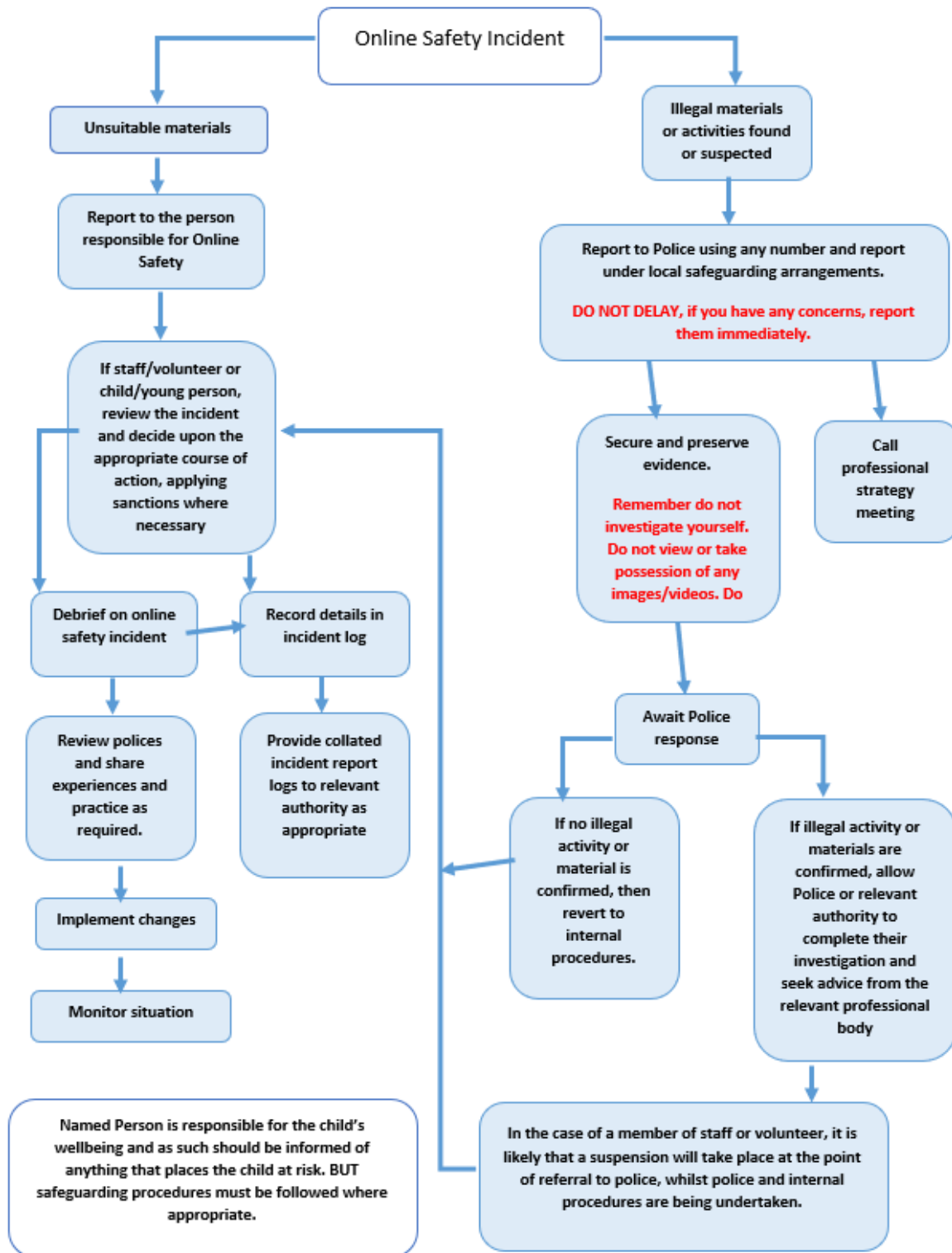
On-line gambling				X	
On-line shopping/commerce			X		
File sharing			X		
Use of social media			X		
Use of messaging apps			X		
Use of video broadcasting e.g. Youtube			X		

### 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 St Martin's community will be responsible users of digital technologies, who understand and follow St Martin's policy. However, there may be times when infringements of the policy could take place, through careless or irresponsible or, very rarely, through deliberate misuse.

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

- Have more than one senior member of staff involved in this process. This is vital to protect individuals if accusations are subsequently reported.
- Conduct the procedure using a designated computer that will not be used by young people and if necessary can be taken off site by the police should the need arise. Use the same computer for the duration of the procedure.
- It is important to ensure that the relevant staff should have appropriate internet access to conduct the procedure, but also that the sites and content visited are closely monitored and recorded (to provide further protection).
- Record the URL of any site containing the alleged misuse and describe the nature of the content causing concern. It may also be necessary to record and store screenshots of the content on the machine being used for investigation. These may be printed, signed and attached to the form (except in the case of images of child sexual abuse – see below)
- Once this has been completed and fully investigated the group will need to judge whether this concern has substance or not. If it does, then appropriate action will be required and could include the following:
  - Internal response or discipline procedures
  - Involvement by Local Authority/Academy Group or national/local organisation (as relevant).
  - Police involvement and/or action
- **If content being reviewed includes images of child abuse, then the monitoring should be halted and referred to the Police immediately. Other instances to report to the police would include:**
  - incidents of 'grooming' behaviour
  - the sending of obscene materials to a child
  - adult material which potentially breaches the Obscene Publications Act
  - criminally racist material
  - promotion of terrorism or extremism
  - offences under the Computer Misuse Act (see User Actions chart above)
  - other criminal conduct, activity or materials
- **Isolate the computer in question as best you can. Any change to its state may hinder a later police investigation.**

It is important that all of the above steps are taken as they will provide an evidence trail for St Martin's 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.



## St Martin's actions & sanctions

It is more likely that St Martin's 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:

### Actions/Sanctions

Pupil Incidents	Refer to class teacher	Refer to DHT/ AHT	Refer to Headteacher	Refer to Police	Refer to technical support staff for action filtering/security etc.	Inform parents/carers	Removal of network/internet access rights	Warning	Further sanction e.g. exclusion
<b>Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on unsuitable/inappropriate activities).</b>		X	X	X		X			
Unauthorised use of non-educational sites during lessons	X								
Unauthorised/inappropriate use of mobile phone/digital camera/other mobile device	X	X							
Unauthorised/inappropriate use of social media/ messaging apps/personal email	X	X							
Unauthorised downloading or uploading of files	X	X							
Allowing others to access St Martin's network by sharing username and passwords	X	X				X			
Attempting to access or accessing St Martin's network, using another pupil's account	X	X	X					X	

Attempting to access or accessing St Martin's network, using the account of a member of staff	X	X	X		X	X	X		
Corrupting or destroying the data of other users	X	X	X		X	X	X		
Sending an email, text or message that is regarded as offensive, harassment or of a bullying nature	X	X				X		X	
Continued infringements of the above, following previous warnings or sanctions			X			X			X
Actions which could bring St Martin's into disrepute or breach the integrity of the ethos of the school			X			X		X	X
Using proxy sites or other means to subvert the school's filtering system			X		X	X			
Accidentally accessing offensive or pornographic material and failing to report the incident	X	X						X	
Deliberately accessing or trying to access offensive or pornographic material		X	X			X			X
Receipt or transmission of material that infringes the copyright of another person or infringes the Data Protection Act		X	X						

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

Copies of the more detailed template policies and agreements, contained in the appendix, can be downloaded from:

[SWGfL Online Safety Policy Templates](#)

## Acknowledgements

SWGfL would like to acknowledge the contribution of a wide range of individuals and organisations whose policies, documents, advice and guidance have contributed to the development of the online safety policy templates and of the 360 degree safe online safety self-review tool.

Copyright of these template policies is held by SWGfL. Schools/academies and other educational institutions are permitted free use of the Template Policies for the purposes of policy writing, review and development. Any person or organisation wishing to use the document for other purposes should seek consent from SWGfL ([onlinesafety@swgfl.org.uk](mailto:onlinesafety@swgfl.org.uk)) and acknowledge its use.

Every effort has been made to ensure that the information included in this document is accurate, as at the date of publication in January 2020. However, SWGfL cannot guarantee its accuracy, nor can it accept liability in respect of the use of the material.

© South West Grid for Learning Trust Ltd 2020





# Appendices

- Staff (and Volunteer) Acceptable Use Policy Agreement Template .....5
- Responding to incidents of misuse – flow chart.....7
- Reporting Log.....8
- Training Needs Audit Log.....9
- Social Media Policy..... 10
- Legislation..... 11



# Staff (and Volunteer) Acceptable Use Policy Agreement Template

Sections that include advice or guidance are written in **BLUE**. It is anticipated that schools/academies will remove these sections from their final document. Schools should review and amend the contents of this agreement to ensure that it is consistent with their online safety policy and other relevant school policies. Due to the number of optional statements and the advice/guidance sections included in this template, it is anticipated that the final AUP will be more concise.

## School Policy

New technologies have become integral to the lives of children and young people in today's society, both within schools/academies and in their lives outside school. The internet and other digital information and communications technologies are powerful tools, which open up new opportunities for everyone. These technologies can stimulate discussion, promote creativity and stimulate awareness of context to promote effective learning. They also bring opportunities for staff to be more creative and productive in their work. All users should have an entitlement to safe access to the internet and digital technologies at all times.

## 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 St Martin's 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/pupils* 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/pupils 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 St Martin's 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 (*schools/academies should amend this section in the light of their policies which relate to the use of school systems and equipment 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. (*schools should amend this section in the light of their policies which relate to the personal use, by staff and volunteers, of school systems*)
- 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 St Martin's 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. (*schools/academies should amend this section to take account of their policy on access to social networking and similar sites*)
- I will only communicate with students/pupils and parents/carers using official school systems. Any such communication will be professional in tone and manner. (*schools should amend this section to take account of their policy on communications with students/pupils and parents/carers. Staff should be made aware of the risks attached to using their personal email addresses/mobile phones/social networking sites for such communications*)
- 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 St Martin's:

- 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 *St Martin's* equipment. I will also follow any additional rules set by St Martin's about such use. I will ensure that any such devices are protected by up to date anti-virus software and are free from viruses. ([schools/academies should amend this section in the light of their policies which relate to the use of staff devices](#))
- I will not use personal email addresses on St Martin's ICT systems. ([schools/academies should amend this section in the light of their email policy – some schools/academies will choose to allow the use of staff personal email addresses on the premises](#)).
- 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 St Martin's 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 St Martin's policies. ([schools/academies should amend this section in the light of their policies on installing programmes/altering settings](#))
- I will not disable or cause any damage to St Martin's equipment, or the equipment belonging to others.
- I will only transport, hold, disclose or share personal information about myself or others, as outlined in St Martin's/LA 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/pupil 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 St Martin's 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 St Martin's:

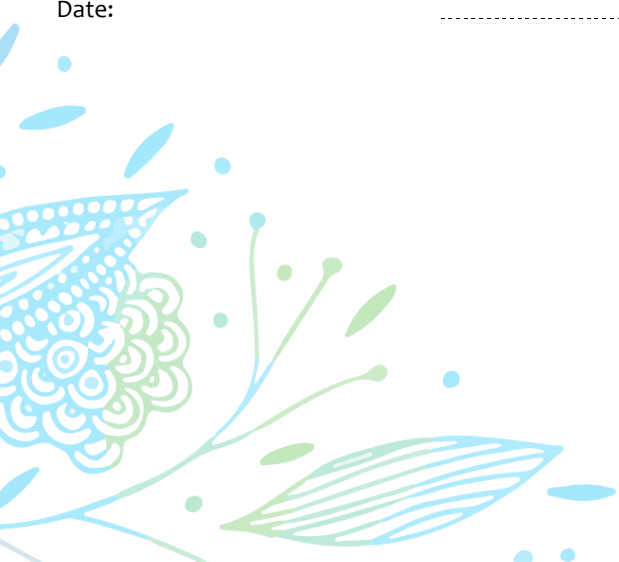
- I understand that this acceptable use policy applies not only to my work and use of St Martin's digital technology equipment in school, but also applies to my use of St Martin's systems and equipment off the premises and my use of personal equipment on the premises or in situations related to my employment by St Martin's
- I understand that if I fail to comply with this acceptable use agreement, I could be subject to disciplinary action. This could include ([schools/academies should amend this section to provide relevant sanctions as per their behaviour policies](#)) a warning, a suspension, referral to Governors/directors 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.

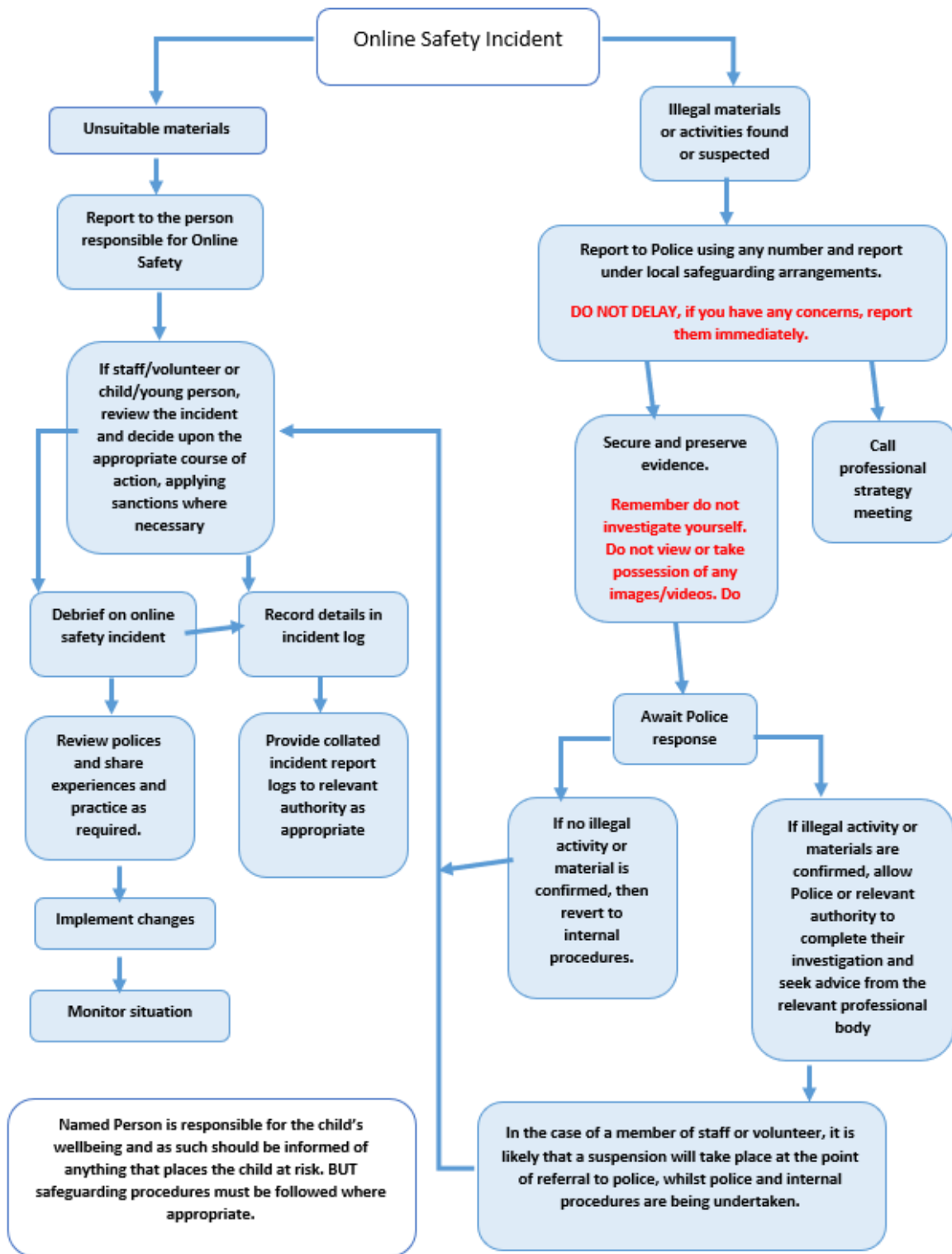
Staff/Volunteer Name: .....

Signed: .....

Date: .....



# Responding to incidents of misuse – flow chart



# Reporting Log

Group: .....

Date	Time	Incident	Action Taken		Incident Reported By	Signature
			What?	By Whom?		

# Training Needs Audit Log

Group: .....

Relevant training the last 12 months	Identified Training Need	To be met by	Cost	Review Date

# Social Media Policy

Social media (e.g. Facebook, Twitter,) is a broad term for any kind of online platform which enables people to directly interact with each other.

St Martin's recognises the numerous benefits and opportunities which a social media presence offers. Staff, parents/carers and pupils/students are actively encouraged to find creative ways to use social media. However, there are some risks associated with social media use, especially around the issues of safeguarding, bullying and personal reputation. This policy aims to encourage the safe use of social media by St Martin's, its staff, parents, carers and children.

Managing your personal use of Social Media:

- "Nothing" on social media is truly private
- Social media can blur the lines between your professional and private life. Don't use St Martin's logo and/or branding on personal accounts
- Check your settings regularly and test your privacy
- Keep an eye on your digital footprint
- Keep your personal information private
- Regularly review your connections – keep them to those you want to be connected to
- When posting online consider; Scale, Audience and Permanency of what you post
- If you want to criticise, do it politely.
- Take control of your images – do you want to be tagged in an image? What would children or parents say about you if they could see your images?
- Know how to report a problem

## Managing St Martin's social media accounts

The Do's

- Check with a senior leader before publishing content that may have controversial implications for the school
- Use a disclaimer when expressing personal views
- Make it clear who is posting content
- Use an appropriate and professional tone
- Be respectful to all parties
- Ensure you have permission to 'share' other peoples' materials and acknowledge the author
- Express opinions but do so in a balanced and measured manner
- Think before responding to comments and, when in doubt, get a second opinion
- Seek advice and report any mistakes using the school's reporting process
- Consider turning off tagging people in images where possible

The Don'ts

- Don't make comments, post content or link to materials that will bring St Martin's into disrepute
- Don't publish confidential or commercially sensitive material
- Don't breach copyright, data protection or other relevant legislation
- Consider the appropriateness of content for any audience of St Martin's accounts, and don't link to, embed or add potentially inappropriate content
- Don't post derogatory, defamatory, offensive, harassing or discriminatory content
- Don't use social media to air internal grievances

## Acknowledgements

With thanks to Rob Simmonds of Well Chuffed Comms ([wellchuffedcomms.com](http://wellchuffedcomms.com)) and Chelmsford College for allowing the use of their policies in the creation of this policy.

# Legislation

Schools should be aware of the legislative framework under which this online safety policy and guidance has been produced. It is important to note that in general terms an action that is illegal if committed offline is also illegal if committed online. It is recommended that legal advice is sought in the advent of an online safety issue or situation.

## Computer Misuse Act 1990

This Act makes it an offence to:

- Erase or amend data or programs without authority;
- Obtain unauthorised access to a computer;
- “Eavesdrop” on a computer;
- Make unauthorised use of computer time or facilities;
- Maliciously corrupt or erase data or programs;
- Deny access to authorised users.

School/academies may wish to view the National Crime Agency website which includes information about [“Cyber crime – preventing young people from getting involved”](#). Each region in England (& Wales) has a Regional Organised Crime Unit (ROCU) Cyber-Prevent team that works with schools to encourage young people to make positive use of their cyber skills. There is a useful [summary of the Act on the NCA site](#).

## Data Protection Act 1998

This protects the rights and privacy of individual’s data. To comply with the law, information about individuals must be collected and used fairly, stored safely and securely and not disclosed to any third party unlawfully. The Act states that person data must be:

- Fairly and lawfully processed.
- Processed for limited purposes.
- Adequate, relevant and not excessive.
- Accurate.
- Not kept longer than necessary.
- Processed in accordance with the data subject’s rights.
- Secure.
- Not transferred to other countries without adequate protection.

## The Data Protection Act 2018:

Updates the 1998 Act, incorporates the General Data Protection Regulations (GDPR) and aims to:

- Facilitate the secure transfer of information within the European Union.
- Prevent people or organisations from holding and using inaccurate information on individuals. This applies to information regarding both private lives or business.
- Give the public confidence about how businesses can use their personal information.
- Provide data subjects with the legal right to check the information businesses hold about them. They can also request for the data controller to destroy it.
- Give data subjects greater control over how data controllers handle their data.
- Place emphasis on accountability. This requires businesses to have processes in place that demonstrate how they’re securely handling data.
- Require firms to keep people’s personal data safe and secure. Data controllers must ensure that it is not misused.
- Require the data user or holder to register with the Information Commissioner.

All data subjects have the right to:

- Receive clear information about what you will use their data for.
- Access their own personal information.
- Request for their data to be revised if out of date or erased. These are known as the right to rectification and the right to erasure
- Request information about the reasoning behind any automated decisions, such as if computer software denies them access to a loan.
- Prevent or query about the automated processing of their personal data.



## Freedom of Information Act 2000

The Freedom of Information Act gives individuals the right to request information held by public authorities. All public authorities and companies wholly owned by public authorities have obligations under the Freedom of Information Act. When responding to requests, they have to follow a number of set procedures.

## Communications Act 2003

Sending by means of the Internet a message or other matter that is grossly offensive or of an indecent, obscene or menacing character; or sending a false message by means of or persistently making use of the Internet for the purpose of causing annoyance, inconvenience or needless anxiety is guilty of an offence liable, on conviction, to imprisonment. This wording is important because an offence is complete as soon as the message has been sent: there is no need to prove any intent or purpose.

## Malicious Communications Act 1988

It is an offence to send an indecent, offensive, or threatening letter, electronic communication or other article to another person.

## Regulation of Investigatory Powers Act 2000

It is an offence for any person to intentionally and without lawful authority intercept any communication. Monitoring or keeping a record of any form of electronic communications is permitted, in order to:

- Establish the facts;
- Ascertain compliance with regulatory or self-regulatory practices or procedures;
- Demonstrate standards, which are or ought to be achieved by persons using the system;
- Investigate or detect unauthorised use of the communications system;
- Prevent or detect crime or in the interests of national security;
- Ensure the effective operation of the system.
- Monitoring but not recording is also permissible in order to:
- Ascertain whether the communication is business or personal;
- Protect or support help line staff.
- The school reserves the right to monitor its systems and communications in line with its rights under this act.

## Trade Marks Act 1994

This provides protection for Registered Trade Marks, which can be any symbol (words, shapes or images) that are associated with a particular set of goods or services. Registered Trade Marks must not be used without permission. This can also arise from using a Mark that is confusingly similar to an existing Mark.

## Copyright, Designs and Patents Act 1988

It is an offence to copy all, or a substantial part of a copyright work. There are, however, certain limited user permissions, such as fair dealing, which means under certain circumstances permission is not needed to copy small amounts for non-commercial research or private study. The Act also provides for Moral Rights, whereby authors can sue if their name is not included in a work they wrote, or if the work has been amended in such a way as to impugn their reputation. Copyright covers materials in print and electronic form, and includes words, images, and sounds, moving images, TV broadcasts and other media (e.g. YouTube).

## Telecommunications Act 1984

It is an offence to send a message or other matter that is grossly offensive or of an indecent, obscene or menacing character. It is also an offence to send a message that is intended to cause annoyance, inconvenience or needless anxiety to another that the sender knows to be false.

## Criminal Justice & Public Order Act 1994

This defines a criminal offence of intentional harassment, which covers all forms of harassment, including sexual. A person is guilty of an offence if, with intent to cause a person harassment, alarm or distress, they:

- Use threatening, abusive or insulting words or behaviour, or disorderly behaviour; or
- Display any writing, sign or other visible representation, which is threatening, abusive or insulting, thereby causing that or another person harassment, alarm or distress.

## Racial and Religious Hatred Act 2006

This Act makes it a criminal offence to threaten people because of their faith, or to stir up religious hatred by displaying, publishing or distributing written material which is threatening. Other laws already protect people from threats based on their race, nationality or ethnic background.

## Protection from Harassment Act 1997

A person must not pursue a course of conduct, which amounts to harassment of another, and which he knows or ought to know amounts to harassment of the other. A person whose course of conduct causes another to fear, on at least two occasions, that violence will be used against him is guilty of an offence if he knows or ought to know that his course of conduct will cause the other so to fear on each of those occasions.

## Protection of Children Act 1978

It is an offence to take, permit to be taken, make, possess, show, distribute or advertise indecent images of children in the United Kingdom. A child for these purposes is anyone under the age of 18. Viewing an indecent image of a child on your computer means that you have made a digital image. An image of a child also covers pseudo-photographs (digitally collated or otherwise). A person convicted of such an offence may face up to 10 years in prison

## Sexual Offences Act 2003

A grooming offence is committed if you are over 18 and have communicated with a child under 16 at least twice (including by phone or using the Internet) it is an offence to meet them or travel to meet them anywhere in the world with the intention of committing a sexual offence. Causing a child under 16 to watch a sexual act is illegal, including looking at images such as videos, photos or webcams, for your own gratification. It is also an offence for a person in a position of trust to engage in sexual activity with any person under 18, with whom they are in a position of trust. (Typically, teachers, social workers, health professionals, connexions staff fall in this category of trust). Any sexual intercourse with a child under the age of 13 commits the offence of rape.

## Public Order Act 1986

This Act makes it a criminal offence to stir up racial hatred by displaying, publishing or distributing written material which is threatening. Like the Racial and Religious Hatred Act 2006 it also makes the possession of inflammatory material with a view of releasing it a criminal offence. Children, Families and Education Directorate page 38 April 2007.

## Obscene Publications Act 1959 and 1964

Publishing an “obscene” article is a criminal offence. Publishing includes electronic transmission.

## Human Rights Act 1998

This does not deal with any particular issue specifically or any discrete subject area within the law. It is a type of “higher law”, affecting all other laws. In the school context, human rights to be aware of include:

- The right to a fair trial
- The right to respect for private and family life, home and correspondence
- Freedom of thought, conscience and religion
- Freedom of expression
- Freedom of assembly
- Prohibition of discrimination
- The right to education

These rights are not absolute. The school is obliged to respect these rights and freedoms, balancing them against those rights, duties and obligations, which arise from other relevant legislation.

## The Education and Inspections Act 2006

Empowers Headteachers, to such extent as is reasonable, to regulate the behaviour of students/pupils when they are off the school site and empowers members of staff to impose disciplinary penalties for inappropriate behaviour.

## The Education and Inspections Act 2011

Extended the powers included in the 2006 Act and gave permission for Headteachers (and nominated staff) to search for electronic devices. It also provides powers to search for data on those devices and to delete data.

[http://www.education.gov.uk/schools/pupilsupport/behaviour/behaviourpolicies/fo076897/screening-searching-and-confiscation\)](http://www.education.gov.uk/schools/pupilsupport/behaviour/behaviourpolicies/fo076897/screening-searching-and-confiscation)

## The Protection of Freedoms Act 2012

Requires schools to seek permission from a parent/carer to use Biometric systems

## The School Information Regulations 2012

Requires schools to publish certain information on its website:

<https://www.gov.uk/guidance/what-maintained-schools-must-publish-online>

## Serious Crime Act 2015

Introduced new offence of sexual communication with a child. Also created new offences and orders around gang crime (including CSE)

## Criminal Justice and Courts Act 2015

Revenge porn – as it is now commonly known – involves the distribution of private and personal explicit images or video footage of an individual without their consent, with the intention of causing them embarrassment and distress. Often revenge porn is used maliciously to shame ex-partners. Revenge porn was made a specific offence in the Criminal Justice and Courts Act 2015. The Act specifies that if you are accused of revenge porn and found guilty of the criminal offence, you could be prosecuted and face a sentence of up to two years in prison.

For further guidance or support please contact the [Revenge Porn Helpline](#)



## Links to other organisations or documents

The following links may help those who are developing or reviewing a school online safety policy and creating their online safety provision:

### UK Safer Internet Centre

Safer Internet Centre – <https://www.saferinternet.org.uk/>

South West Grid for Learning - <https://swgfl.org.uk/products-services/online-safety/>

Childnet – <http://www.childnet-int.org/>

Professionals Online Safety Helpline - <http://www.saferinternet.org.uk/about/helpline>

Revenge Porn Helpline - <https://revengepornhelpline.org.uk/>

Internet Watch Foundation - <https://www.iwf.org.uk/>

Report Harmful Content - <https://reportharmfulcontent.com/>

### CEOP

CEOP - <http://ceop.police.uk/>

ThinkUKnow - <https://www.thinkuknow.co.uk/>

### Others

LGfL – [Online Safety Resources](#)

Kent – [Online Safety Resources page](#)

INSAFE/Better Internet for Kids - <https://www.betterinternetforkids.eu/>

UK Council for Internet Safety (UKCIS) - <https://www.gov.uk/government/organisations/uk-council-for-internet-safety>

Netsmartz - <http://www.netsmartz.org/>

### Tools for Schools

Online Safety BOOST – <https://boost.swgfl.org.uk/>

360 Degree Safe – Online Safety self-review tool – <https://360safe.org.uk/>

360Data – online data protection self-review tool: [www.360data.org.uk](http://www.360data.org.uk)

SWGfL Test filtering - <http://testfiltering.com/>

UKCIS Digital Resilience Framework - <https://www.gov.uk/government/publications/digital-resilience-framework>

### Bullying/Online-bullying/Sexting/Sexual Harassment

Enable – European Anti Bullying programme and resources - <http://enable.eun.org/>

SELMA – Hacking Hate - <https://selma.swgfl.co.uk>

Scottish Anti-Bullying Service, Respectme - <http://www.respectme.org.uk/>

Scottish Government - Better relationships, better learning, better behaviour - <http://www.scotland.gov.uk/Publications/2013/03/7388>

DfE - Cyberbullying guidance -

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/374850/Cyberbullying\\_Advice\\_for\\_Headteachers\\_and\\_School\\_Staff\\_121114.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/374850/Cyberbullying_Advice_for_Headteachers_and_School_Staff_121114.pdf)

Childnet – Cyberbullying guidance and practical PSHE toolkit:

<http://www.childnet.com/our-projects/cyberbullying-guidance-and-practical-toolkit>

[Childnet – Project deSHAME – Online Sexual Harrassment](#)

[UKSIC – Sexting Resources](#)

Anti-Bullying Network – <http://www.antibullying.net/cyberbullying1.htm>

[Ditch the Label – Online Bullying Charity](#)

[Diana Award – Anti-Bullying Campaign](#)

### Social Networking

Digizen – [Social Networking](#)

UKSIC - [Safety Features on Social Networks](#)

[Children's Commissioner, TES and Schillings – Young peoples' rights on social media](#)

## Curriculum

SWGfL Evolve - <https://projectevolve.co.uk>

[UKCCIS – Education for a connected world framework](#)

Teach Today – [www.teachtoday.eu/](http://www.teachtoday.eu/)

Insafe - [Education Resources](#)

## Data Protection

[360data - free questionnaire and data protection self review tool](#)

[ICO Guides for Education \(wide range of sector specific guides\)](#)

[DfE advice on Cloud software services and the Data Protection Act](#)

[IRMS - Records Management Toolkit for Schools](#)

[NHS - Caldicott Principles \(information that must be released\)](#)

[ICO Guidance on taking photos in schools](#)

[Dotkumo - Best practice guide to using photos](#)

## Professional Standards/Staff Training

[DfE – Keeping Children Safe in Education](#)

[DfE - Safer Working Practice for Adults who Work with Children and Young People](#)

[Childnet – School Pack for Online Safety Awareness](#)

[UK Safer Internet Centre Professionals Online Safety Helpline](#)

## Infrastructure/Technical Support

[UKSIC – Appropriate Filtering and Monitoring](#)

[SWGfL Safety & Security Resources](#)

Somerset - [Questions for Technical Support](#)

NCA – [Guide to the Computer Misuse Act](#)

NEN – [Advice and Guidance Notes](#)

## Working with parents and carers

[Online Safety BOOST Presentations - parent's presentation](#)

[Vodafone Digital Parents Magazine](#)

[Childnet Webpages for Parents & Carers](#)

[Get Safe Online - resources for parents](#)

[Teach Today - resources for parents workshops/education](#)

[Internet Matters](#)

## Prevent

[Prevent Duty Guidance](#)

[Prevent for schools – teaching resources](#)

[NCA – Cyber Prevent](#)

[Childnet – Trust Me](#)

Further links can be found at the end of the UKSIC [Education for a Connected World Framework](#)

## Glossary of Terms

<b>AUP/AUA</b>	Acceptable Use Policy/Agreement – see templates earlier in this document
<b>CEOP</b>	Child Exploitation and Online Protection Centre (part of National Crime Agency, UK Police, dedicated to protecting children from sexual abuse, providers of the Think U Know programmes.
<b>CPD</b>	Continuous Professional Development
<b>FOSI</b>	Family Online Safety Institute
<b>ICO</b>	Information Commissioners Office
<b>ICT</b>	Information and Communications Technology
<b>INSET</b>	In Service Education and Training
<b>IP address</b>	The label that identifies each computer to other computers using the IP (internet protocol)
<b>ISP</b>	Internet Service Provider
<b>ISPA</b>	Internet Service Providers' Association
<b>IWF</b>	Internet Watch Foundation
<b>LA</b>	Local Authority
<b>LAN</b>	Local Area Network
<b>MAT</b>	Multi Academy Trust
<b>MIS</b>	Management Information System
<b>NEN</b>	National Education Network – works with the Regional Broadband Consortia (e.g. SWGfL) to provide the safe broadband provision to schools across Britain.
<b>Ofcom</b>	Office of Communications (Independent communications sector regulator)
<b>SWGfL</b>	South West Grid for Learning Trust – the Regional Broadband Consortium of SW Local Authorities – is the provider of broadband and other services for schools and other organisations in the SW
<b>TUK</b>	Think U Know – educational online safety programmes for schools, young people and parents.
<b>UKSIC</b>	UK Safer Internet Centre – EU funded centre. Main partners are SWGfL, Childnet and Internet Watch Foundation.
<b>UKCIS</b>	UK Council for Internet Safety
<b>VLE</b>	Virtual Learning Environment (a software system designed to support teaching and learning in an educational setting,
<b>WAP</b>	Wireless Application Protocol

A more comprehensive glossary can be found at the end of the UKCIS [Education for a Connected World Framework](#)

Copyright of the SWGfL School Online Safety Policy Templates is held by SWGfL. Schools and other educational institutions are permitted free use of the templates. Any person or organisation wishing to use the document for other purposes should seek consent from SWGfL and acknowledge its use.

Every reasonable effort has been made to ensure that the information included in this template is accurate, as at the date of publication in January 2020. However, SWGfL cannot guarantee its accuracy, nor can it accept liability in respect of the use of the material whether in whole or in part and whether modified or not. Suitable legal/professional advice should be sought if any difficulty arises in respect of any aspect of this new legislation or generally to do with school conduct or discipline.

