



Online Safety Policy

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Policy Development & Consultation

Ladywood staff have contributed to the development of this policy during staff and curriculum meetings, and have been consulted throughout the process.

Background Information about the School

Ladywood is a mixed school pupils aged 4 - 11 years, who have complex learning difficulties. Our pupils come from a large, and very mixed area, and are transported to school by the local authority. At Ladywood we aim to provide all our children with a broad and relevant education. We do this in a positive environment that reflects our commitment to high expectations for all.

Philosophy

This document is a statement of the aims, principles and strategies for Online Safety at Ladywood School. The policy has been developed to give a clear view of how technology in the curriculum should encourage children to acquire and develop essential Computing skills for learning and life by providing each child with broad, balanced, relevant experiences which take account of the advances and increasing use of new technologies. Children should be motivated by interest, enjoyment, relevance and success.

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 parents/carers
 - o staff

Scope of the Policy

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

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/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 school/academy, but is linked to membership of the school/academy. 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.

The school/academy 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 the school/academy:

Board of Directors

Directors 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/directors/Sub Committee receiving regular information about online safety incidents and monitoring reports. A member of the Governing Body/Board has taken on the role of Online Safety Governor/Director (it is suggested that the role may be combined with that of the Child Protection/Safeguarding Governor).

The role of the Online Safety Director will include:

- regular meetings with the Online Safety Co-ordinator/officer
- attendance at Online Safety Group meetings
- regular monitoring of online safety incident logs
- regular monitoring of filtering/change control logs
- reporting to relevant Governors/Board/Committee/meeting

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 Online Safety Lead.
- 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. (see flow chart on dealing with online safety incidents – included in a later section – “Responding to incidents of misuse” and relevant Local Authority/MAT/other relevant body disciplinary procedures). Online Safety BOOST includes an ‘Incident Response Tool’ that outlines the steps (and forms to complete) any staff facing an issue, disclosure or report, need to follow. 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. Online Safety BOOST includes access to unlimited online webinar training – further details are at <https://boost.swgfl.org.uk/>
- The Headteacher and Senior Leaders will ensure that there is a system in place to allow for monitoring and support of those in school who carry out the internal online safety monitoring role. This is to provide a safety net and also support to those colleagues who take on important monitoring roles. (The school/academy will need to describe this and may wish to involve the Local Authority/MAT/other responsible body in this process)
- 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/MAT/relevant body
- liaises with school technical staff
- receives reports of online safety incidents and creates a log of incidents to inform future online safety developments, (Examples of suitable log sheets may be found later in this document). Online Safety BOOST includes access to

Whisper, an anonymous reporting app that installs onto a school website and extends the schools ability to capture reports from staff, children and parents <https://boost.swgfl.org.uk/>

- meets regularly with Online Safety Governor/Director to discuss current issues, review incident logs and filtering/change control logs
- attends relevant meetings of Governors/Directors
- reports regularly to Senior Leadership Team

(The school will need to decide how these incidents will be dealt with and whether the investigation/action/sanctions will be the responsibility of the Online Safety Lead or another member of staff e.g. Headteacher/Principal/Senior Leader/Designated Safeguarding Lead/Class teacher/Head of Year etc.)

Network Manager/Technical staff

It is the responsibility of the school/academy to ensure that Bolton Schools' ICT carries out all the online safety measures that would otherwise be the responsibility of the school technical staff, as suggested below. It is also important that the managed service provider is fully aware of the school/academy online safety policy and procedures.)

Those with technical responsibilities are responsible for ensuring:

- that the school's/academy's technical infrastructure is secure and is not open to misuse or malicious attack
- that the school/academy meets required online safety technical requirements and any Local Authority/MAT/other relevant body 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 policy is applied and updated on a regular basis and that its implementation is not the sole responsibility of any single person (see appendix "Technical Security Policy Template" for good practice)
- 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/Principal and Senior Leaders; Online Safety Lead (insert others as relevant) for investigation/action/sanction
- that monitoring software/systems are implemented and updated as agreed in school/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/agreement (AUP/AUA)
- they report any suspected misuse or problem to the Headteacher/Principal/Senior Leader/Online Safety Lead (insert others as relevant) for investigation/action/sanction
- all digital communications with students/pupils/parents/carers should be on a professional level and only carried out using official school systems
- online safety issues are embedded in all aspects of the curriculum and other activities
- students/pupils understand and follow the Online Safety Policy and acceptable use policies
- students/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 students/pupils should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches

Designated Safeguarding Lead/Designated Person/Officer

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

(N.B. it is important to emphasise that these are safeguarding issues, not technical issues, simply that the technology provides additional means for safeguarding issues to develop. Some schools may choose to combine the roles of Designated Safeguarding Lead and Online Safety Lead).

Online Safety Group

The Online Safety Group provides a consultative group that has wide representation from the school/academy 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 the school/academy this group may be part of the safeguarding group. The group will also be responsible for regular reporting to the Governing Body/Directors.

Members of the Online Safety Group (or other relevant group) will assist the Online Safety Lead (or other relevant person, as above) with:

- the production/review/monitoring of the school online safety policy/documents.
- the production/review/monitoring of the school filtering policy (if the school chooses to have one) 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

(Schools/academies will need to decide the membership of the Online Safety Group. It is recommended that the group should include representation from students/pupils and parents/carers). An Online Safety Group Terms of Reference Template can be found in the appendices

Students/Pupils:

- are responsible for using the school/academy digital technology systems in accordance with the student/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/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 school/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/literature. Parents and carers will be encouraged to support the school/academy in promoting good online safety practice and to follow guidelines on the appropriate use of:

- digital and video images taken at school events
- access to parents' sections of the website/Learning Platform and on-line student/pupil records
- their children's personal devices in the school/academy (where this is allowed)

Community Users

Community Users who access school/academy systems or programmes as part of the wider school/academy provision will be expected to sign a Community User AUA before being provided with access to school/academy systems. (A community users acceptable use agreement template can be found in the appendices.)

Education – Students/Pupils

Whilst regulation and technical solutions are very important, their use must be balanced by educating students/pupils to take a responsible approach. The

education of students/pupils in online safety/digital literacy is therefore an essential part of the school's/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.

In planning their online safety curriculum schools/academies may wish to refer 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: (statements will need to be adapted, depending on school/academy structure and the age of the students/pupils)

- A planned online safety curriculum should be provided as part of Computing/PHSE/other lessons and should be regularly revisited
- Key online safety messages should be reinforced as part of a planned programme of assemblies and tutorial/pastoral activities
- Students/pupils should be taught in all lessons to be critically aware of the materials/content they access on-line and be guided to validate the accuracy of information.
- Students/pupils should be taught to acknowledge the source of information used and to respect copyright when using material accessed on the internet
- Students/pupils should be 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. N.B. additional duties for schools/academies under the Counter Terrorism and Securities Act 2015 which requires schools to ensure that children are safe from terrorist and extremist material on the internet.
- Students/pupils should be helped to understand the need for the student/pupil acceptable use agreement and encouraged to adopt safe and responsible use both within and outside school/academy.
- Staff should act as good role models in their use of digital technologies, the internet and mobile devices
- in lessons where internet use is pre-planned, it is best practice that students/pupils should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches.
- Where students/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.

The school/academy will therefore seek to provide information and awareness to parents and carers through: (select/delete as appropriate)

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

Education – The Wider Community

The school will provide opportunities for local community groups/members of the community to gain from the school's/academy'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.
- The school 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 (possibly supporting the group in the use of Online Compass, an online safety self-review tool for groups such as these - www.onlinecompass.org.uk)

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. This will be regularly updated and reinforced. An audit of the online safety training needs of all staff will be carried out regularly. Online Safety BOOST includes unlimited online webinar training for all, or nominated, staff (<https://boost.swgfl.org.uk/>)
- All new staff should receive online safety training as part of their induction programme, ensuring that they fully understand the school/academy online safety policy and acceptable use agreements. Online

Safety BOOST includes an array of presentations and resources that can be presented to new staff (<https://boost.swgfl.org.uk/>)

- It is expected that some staff will identify online safety as a training need within the performance management process.
- The Online Safety Lead (or other nominated person) 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.
- This online safety policy and its updates will be presented to and discussed by staff in staff/team meetings/training sessions.
- The Online Safety Lead (or other nominated person) will provide advice/guidance/training to individuals as required. Online Safety BOOST includes an array of presentation resources that the Online Safety coordinator can access to deliver to staff <https://boost.swgfl.org.uk/> It includes presenter notes to make it easy to confidently cascade to all staff

Training – Governors/Directors

Governors/Directors 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/MAT/National Governors Association/or other relevant organisation (e.g. SWGfL).
- Participation in school/academy training/information sessions for staff or parents (this may include attendance at assemblies/lessons).

Technical – infrastructure/equipment, filtering and monitoring

If the school has a managed ICT service provided by an outside contractor, it is the responsibility of the school to ensure that the managed service provider carries out all the online safety measures that would otherwise be the responsibility of the school/academy, as suggested below. It is also important that the managed service provider is fully aware of the school/academy online safety policy/acceptable use agreements. The school/academy should also check their Local Authority/MAT /other relevant body policies on these technical issues.

The school will be responsible for ensuring that the school/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: (schools/academies will have very different technical infrastructures and differing views as to how these technical issues will be handled – it is therefore essential that this section is fully discussed by a wide range of staff – technical, educational and administrative staff before these statements are agreed and added to the policy:)

- School technical systems will be managed in ways that ensure that the school/academy meets recommended technical requirements (these may be outlined in Local Authority/MAT/other relevant body policy and guidance)
- There will be regular reviews and audits of the safety and security of school technical systems

- Servers, wireless systems and cabling must be securely located and physical access restricted
- All users will have clearly defined access rights to school/academy technical systems and devices.
- The “master/administrator” passwords for the school/academy systems, used by the Network Manager (or other person) must also be available to the Headteacher or other nominated senior leader and kept in a secure place (e.g. school safe)
- The Computing Coordinator is responsible for ensuring that software licence logs are accurate and up to date and that regular checks are made to reconcile the number of licences purchased against the number of software installations (Inadequate licencing could cause the school to breach the Copyright Act which could result in fines or unexpected licensing costs)
- 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. (the school/academy will need to decide on the merits of external/internal provision of the filtering service – see appendix). There is a clear process in place to deal with requests for filtering changes (see appendix for more details)
- Internet filtering/monitoring should ensure that children are safe from terrorist and extremist material when accessing the internet. N.B. additional duties for schools/academies under the Counter Terrorism and Securities Act 2015 which requires schools/academies to ensure that children are safe from terrorist and extremist material on the internet. (see appendix for information on “appropriate filtering”).
- The school has provided enhanced/differentiated user-level filtering (allowing different filtering levels for different ages/stages and different groups of users – staff/pupils/students etc)
- School technical staff regularly monitor and record the activity of users on the school technical systems and users are made aware of this in the acceptable use agreement. (schools may wish to add details of the monitoring programmes that are used).
- An appropriate system is in place (to be described) for users to report any actual/potential technical incident/security breach to the relevant person, as agreed).
- Appropriate security measures are in place (schools/academies may wish to provide more detail) 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.
- An agreed policy is in place (to be described) for the provision of temporary access of “guests” (e.g. trainee teachers, supply teachers, visitors) onto the school systems.
- An agreed policy is in place (to be described) regarding the extent of personal use that users (staff/students/pupils/community users) and their family members are allowed on school devices that may be used out of school.

- An agreed policy is in place (to be described) that allows staff to/forbids staff from downloading executable files and installing programmes on school devices.
- An agreed policy is in place (to be described) regarding the use of removable media (e.g. memory sticks/CDs/DVDs) by users on school devices. Personal data cannot be sent over the internet or taken off the school site unless safely encrypted or otherwise secured. (see School Personal Data Policy Template in the appendix for further detail)

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.

In preparing a mobile technologies policy the school should consider possible issues and risks. These may include: security risks in allowing connections to your school network, filtering of personal devices, breakages and insurance, access to devices for all students, avoiding potential classroom distraction, network connection speeds, types of devices, charging facilities, total cost of ownership. A range of mobile technology implementations is possible

For further reading, please refer to " NEN Technical Strategy Guidance Note 5 – Bring your own device"

A more detailed Mobile Technologies Template Policy can be found in the appendix. The school may however choose to include these aspects of their policy in a comprehensive acceptable use agreement, rather than in a separate Mobile Technologies Policy. It is suggested that the school should in this overall policy document outline the main points from their agreed policy. A checklist of points to be considered is included below.

- The school acceptable use agreements for staff, pupils/students and parents/carers will give consideration to the use of mobile technologies
- The school allows: (the school should complete the table below to indicate which devices are allowed and define their access to school systems)

Aspects that the school may wish to consider and be included in their online safety policy, mobile technologies policy or acceptable use agreements:

School owned/provided devices:

- Who they will be allocated to

- Where, when and how their use is allowed – times/places/in school/out of school
- If personal use is allowed
- Levels of access to networks/internet (as above)
- Management of devices/installation of apps/changing of settings/monitoring
- Network/broadband capacity
- Technical support
- Filtering of devices
- Access to cloud services
- Data Protection
- Taking/storage/use of images
- Exit processes – what happens to devices/software/apps/stored data if user leaves the school
- Liability for damage
- Staff training

Personal devices:

- Which users are allowed to use personal mobile devices in school (staff/pupils/students/visitors)
- Restrictions on where, when and how they may be used in school
- Storage
- Whether staff will be allowed to use personal devices for school business
- Levels of access to networks/internet (as above)
- Network/broadband capacity
- Technical support (this may be a clear statement that no technical support is available)
- Filtering of the internet connection to these devices
- Data Protection
- The right to take, examine and search users devices in the case of misuse (England only) – N.B. this must also be included in the Behaviour Policy.
- Taking/storage/use of images
- Liability for loss/damage or malfunction following access to the network (likely to be a disclaimer about school responsibility).
- Identification/labelling of personal devices
- How visitors will be informed about school requirements
- How education about the safe and responsible use of mobile devices is included in the school online safety education programmes.

Use of digital and video images

The development of digital imaging technologies has created significant benefits to learning, allowing staff and students/pupils instant use of images that they have recorded themselves or downloaded from the internet. However, staff, parents/carers and students/pupils need to be aware of the risks associated with publishing digital images on the internet. Such images may provide avenues for 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: (select/delete as appropriate)

- When using digital images, staff should inform and educate students/pupils about the risks associated with the taking, use, sharing, publication and distribution of images. In particular they should recognise the risks attached to publishing their own images on the internet 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 (may be covered as part of the AUA signed by parents or carers at the start of the year - see parents/carers acceptable use agreement in the appendix)
- In accordance with guidance from the Information Commissioner's Office, parents/carers are welcome to take videos and digital images of their children at school/academy events for their own personal use (as such use is not covered by the Data Protection Act). To respect everyone's privacy and in some cases protection, these images should not be published/made publicly available on social networking sites, nor should parents/carers comment on any activities involving other students/pupils in the digital/video images.
- Staff and volunteers are allowed to take digital/video images to support educational aims, but must follow school policies concerning the sharing, distribution and publication of those images. Those images should only be taken on school/academy equipment; the personal equipment of staff should not be used for such purposes.
- Care should be taken when taking digital/video images that students/pupils are appropriately dressed and are not participating in activities that might bring the individuals or the school/academy into disrepute.
- Students/pupils must not take, use, share, publish or distribute images of others without their permission
- Photographs published on the website, or elsewhere that include students/pupils will be selected carefully and will comply with good practice guidance on the use of such images.
- Students'/Pupils' full names will not be used anywhere on a website or blog, particularly in association with photographs.
- Student's/Pupil's work can only be published with the permission of the student/pupil and parents or carers.

Data Protection

With effect from 25th May 2018, the data protection arrangements for the UK changed following the European Union General Data Protection Regulation (GDPR). As a result, schools are likely to be subject to greater scrutiny in their care and use of personal data. More detailed guidance is available in the appendices to this document. Schools/academies should ensure that they take account of policies and guidance provided by local authorities/MAT/other relevant bodies. For schools/academies that wish to carry out a more detailed review of their data protection policies and procedures SWGfL provides a self-review tool – 360data.org.uk

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

The school must ensure that:

- it has a Data Protection Policy. (see appendix for template 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. The school/academy may also wish to appoint a Data Manager and Systems Controllers to support the DPO
- 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 the school/academy looks after their data and what their rights are in a clear Privacy Notice (see Privacy Notice section in the appendix)
- 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 system security is ensured and regularly checked. Patches and other security essential updates are applied promptly to protect the personal data on the systems. Administrative systems are securely ring fenced from systems accessible in the classroom/to learners
- 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 school/academy, 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. (be sure to select devices that can be protected in this way)
- device must be protected by up to date virus and malware checking software
- data must be securely deleted from the device, in line with school/academy policy (below) once it has been transferred or its use is complete.

Staff must ensure that they: (schools/academies may wish to include more detail about their own data/password/encryption/secure transfer processes)

- 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 school/academy 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 (The school/academy will need to set its own policy as to whether data storage on removal media is allowed, even if encrypted – some organisations do not allow storage of personal data on removable devices.)

The Personal Data Advice and Guidance in the appendix provides more detailed information on the school's/academy's responsibilities and on good practice.

Communications

This is an area of rapidly developing technologies and uses. Schools/academies will need to discuss and agree how they intend to implement and use these technologies e.g. some schools do not allow

students/pupils to use mobile phones in lessons, while others recognise their educational potential and allow their use. This section may also be influenced by the age of the students/pupils. The table has been left blank for school/academy to choose its own responses.

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:

The school may also wish to add some of the following policy statements about the use of communications technologies, in place of, or in addition to the above table:

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

- The official school email service may be regarded as safe and secure and is monitored. Users should be aware that email communications are monitored. Staff and students/pupils should therefore use only the school/academy email service to communicate with others when in school, or on school systems (e.g. by remote access).
- Users must immediately report, to the nominated person – in accordance with the school/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. (Online Safety BOOST includes an anonymous reporting app Whisper – <https://boost.swgfl.org.uk/>)
- Any digital communication between staff and students/pupils 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 must not be used for these communications.
- Whole class/group email addresses may be used at KS1, while students/pupils at KS2 and above will be provided with individual school/academy email addresses for educational use. (Schools/academies may choose to use group or class email addresses for younger age groups e.g. at KS1)
- Students/pupils 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 school/academy website and only official email addresses should be used to identify members of staff.

Social Media - Protecting Professional Identity

With an increase in use of all types of social media for professional and personal purposes a policy that sets out clear guidance for staff to manage risk and behaviour online is essential. Core messages should include the protection of pupils, the school/academy and the individual when publishing any material

online. Expectations for teachers' professional conduct are set out in 'Teachers Standards 2012'. Ofsted's online safety inspection framework reviews how a school/academy protects and educates staff and pupils in their use of technology, including the measures that would be expected to be in place to intervene and support should a particular issue arise. Schools/academies are increasingly using social media as a powerful learning tool and means of communication. It is important that this is carried out in a safe and responsible way.

A more detailed Social Media Template Policy can be found in the appendix. The school/academy may however choose to include these aspects of their policy in a comprehensive acceptable use agreement, rather than in a separate Social Media Policy. It is suggested that the school/academy should, in this overall policy document, outline the main points from their agreed policy. A checklist of points to be considered is included below.

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

The school/academy 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. Online Safety BOOST includes unlimited webinar training on this subject: <https://boost.swgfl.org.uk/>
- Clear reporting guidance, including responsibilities, procedures and sanctions
- Risk assessment, including legal risk

School staff should ensure that:

- No reference should be made in social media to students/pupils, parents/carers or school/academy 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 /academy or local authority/MAT
- Security settings on personal social media profiles are regularly checked to minimise risk of loss of personal information

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

- A process for approval by senior leaders
- Clear processes for the administration and monitoring of these accounts – involving at least two members of staff
- A code of behaviour for users of the accounts, including
- Systems for reporting and dealing with abuse and misuse

- Understanding of how incidents may be dealt with under school/academy 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 the school/academy or impacts on the school/ academy, it must be made clear that the member of staff is not communicating on behalf of the school/academy 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
- The school/academy 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/academy'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. Online Safety BOOST includes Reputation Alerts that highlight any reference to the school/academy in online media (newspaper or social media for example) <https://boost.swgfl.org.uk/>)

Dealing with unsuitable/inappropriate activities

Some internet activity e.g. accessing child abuse images or distributing racist material is illegal and would obviously be banned from school/academy and all other technical systems. Other activities e.g. cyber-bullying would be banned and could lead to criminal prosecution. There are however a range of activities which may, generally, be legal but would be inappropriate in a school/academy context, either because of the age of the users or the nature of those activities.

The school/academy believes that the activities referred to in the following section would be inappropriate in a school/academy context and that users, as defined below, should not engage in these activities in/or outside the school/academy when using school/academy equipment or systems. The school/academy policy restricts usage as follows:

(The school should agree its own responses and place the ticks in the relevant columns, in the table above. They may also wish to add additional text to the column(s) on the left to clarify issues. The last section of the table has been left blank for schools/academies to decide their own responses)

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). Online Safety BOOST includes a comprehensive and interactive ‘Incident Management Tool’ that steps staff through how to respond, forms to complete and action to take when managing reported incidents (<https://boost.swgfl.org.uk/>)

Illegal Incidents

If there is any suspicion that the web site(s) concerned may contain child abuse images, or if there is any other suspected illegal activity, refer to the right hand side of the Flowchart (below and appendix) for responding to online safety incidents and report immediately to the police.

Other Incidents

It is hoped that all members of the school/academy community will be responsible users of digital technologies, who understand and follow school/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 appropriate action will be required and could include the following:
 - o Internal response or discipline procedures
 - o Involvement by Local Authority/Academy Group or national/local organisation (as relevant).
 - o 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:
 - 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 school/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.

School/academy actions & sanctions

It is more likely that the school/academy 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: (the school/academy will need to agree upon its own responses and place the ticks in the relevant columns. They may also wish to add additional text to the column(s) on the left to clarify issues. Schools/academies have found it useful to use the charts below at staff meetings/training sessions).

Corrupting or destroying the data of other users

Allowing others to access school network by sharing username and passwords or attempting to access or accessing the school network, using another person's account

Careless use of personal data e.g. holding or transferring data in an insecure manner

Deliberate actions to breach data protection or network security rules

Corrupting or destroying the data of other users or causing deliberate damage to hardware or software

Sending an email, text or message that is regarded as offensive, harassment or of a bullying nature

Using personal email/social networking/instant messaging/text messaging to carrying out digital communications with students/pupils

Actions which could compromise the staff member's professional standing

Actions which could bring the school/academy into disrepute or breach the integrity of the ethos of the school/academy

Using proxy sites or other means to subvert the school's/academy's filtering system

Accidentally accessing offensive or pornographic material and failing to report the incident

Deliberately accessing or trying to access offensive or pornographic material

Breaching copyright or licensing regulations

Continued infringements of the above, following previous warnings or sanctions

Strategies for Teaching

Teaching styles will be adapted to allow pupils to observe, explore and discover, and so enhance the developmental process. No single style of teaching will suit all activities. Teaching will include :-

- Differentiated approaches to match age, ability, attainments, interests and experiences of the pupils.
- Appropriate content being selected.
- Pupils being encouraged to use their abilities to problem solve, gather information and acquire new skills.
- Social interaction and co-operation being fostered and reinforced through group teaching sessions.
- Teaching the class as a whole on some occasions.
- Pupils working individually sometimes.
- Pupils receiving one to one guidance when necessary.
- Pupils being offered challenges through the careful analysis of previous attainment and well matched tasks and activities.
- Through organisation of teaching and learning environment, pupils will be given opportunity to generalise their learning in a variety of situations and contexts
- Development of a high quality learning environment including displays, learning walls, book corners and outside areas etc.

Strategies for Learning

Effective Learning will take place via :-

- Pupils will take an active part in lessons.
- Pupils and teachers will have a sense of purpose.
- All staff will have positive expectations of pupils.
- Good use will be made of the opportunities to consolidate skills and use will be made of the knowledge that pupils have acquired.
- Pupils will be encouraged to think and communicate about their learning.

- Pupils will be encouraged to develop self-control.
- Independent working will be encouraged wherever possible.
- Pupils being given opportunities to work alone, in pairs, in groups and as part of a team.

Assessment, Recording & Reporting

The procedure for assessment, recording & reporting will be in line with school practice for the whole curriculum.

Resources will be purchased by the subject manager on an annual basis. Staff are encouraged to notify the subject manager of their needs.

Ethnicity & Equal Opportunities

Our policy is designed to be culturally appropriate and inclusive of all children. We will aim to avoid any form of racism, sexism and stereotyping.

Community Links

The emphasis is upon learning within the home, school and community. Pupils will be given the opportunity to transfer knowledge, skills, attitudes and concepts that they have learnt to other situations. Some pupils are offered time learning in other settings, e.g. mainstream schools, museums, nurseries. Social inclusion is encouraged wherever possible. Opportunities are created for the pupils to develop awareness of other cultures.

Partnership with Parents

At Ladywood, we strive to build and maintain an atmosphere of mutual respect and dialogue in which the needs of children are paramount. We believe firmly in the need for involvement of parents and carers in the education of their children at Ladywood.

Monitoring the Policy

The Governing Body is responsible for ensuring that the school complies with legislation, and that this policy and its related procedures and strategies are implemented

Dissemination of the Policy

Headteacher, governors, all staff members and health professionals will have access to this policy. Copies are available in school for parents on request.

