TEIGNMOUTH
Community School

EXETER ROAD

Online Safety Policy

This policy was adopted
by the Governors of TCS Exeter Road
on 5 July 2022

Contents

Development/Monitoring/Review of this Policy

This online safety policy has been developed by a working group/committee (or insert name of group) made up of: *(delete/add as relevant)*

- Headteacher and senior leaders
- Online Safety Officer/Coordinator
- Staff – including teachers, support staff, technical staff
- Governors/Board
- Parents and carers
- Community users

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

Schedule for Development/Monitoring/Review

This online safety policy was approved by the Board of Trustees/Governing Body/Governors Sub Committee on:	*Insert date*
The implementation of this online safety policy will be monitored by the:	*Online Safety Coordinator* *Senior Leadership Team,*
Monitoring will take place at regular intervals:	*Once a year*
The Board of Trustees/Governing Body/Governors Sub Committee 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:	*Once a year*
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:	*July 2023*
Should serious online safety incidents take place, the following external persons/agencies should be informed:	*Safeguarding Officer, Academy Group Officials, LADO, Police*

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
    - students
    - parents/carers
    - staff

Scope of the Policy

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

The Education and Inspections Act 2006 empowers Headteachers to such extent as is reasonable, to regulate the behaviour of students when they are off the *school* 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*, 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.

The *school* 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*.

Governors/Board of Trustees

Governors/Trustees 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/Trustees/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/Trustee*. The role of the Online Safety *Governor/Trustee* 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).
- *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 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 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 and MAT
- liaises with school technical staff
- receives reports of online safety incidents and creates a log of incidents to inform future online safety developments,
- meets regularly with Online Safety *Governor/Trustee* to discuss current issues, review incident logs and filtering/change control logs
- attends relevant meetings of *Governors/Trustees*
- reports regularly to Senior Leadership Team

Network Manager/Technical staff

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 the *school* meets required online safety technical requirements and any *Local Authority and MAT* 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*
- that they keep up to date with online safety technical information in order to effectively carry out their online safety role and to inform and update others as relevant

- that the use of the *network, internet and digital technologies* are regularly monitored in order that any misuse or attempted misuse can be reported to the *Headteacher and Senior Leaders; Online Safety Lead* for investigation, action and/or sanction
- *that monitoring software/systems are implemented and updated as agreed in school policies*

Teaching and Support Staff

Are responsible for ensuring that:

- **they have an up to date awareness of online safety matters and of the current *school* online safety policy and practices**
- **they have read, understood and signed the staff acceptable use policy/agreement (AUP/AUA)**
- **they report any suspected misuse or problem to the *Headteacher, Online Safety Lead and Network manager* for investigation**
- **all digital communications with students, pupils and 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 understand and follow the Online Safety Policy and acceptable use policies
- students have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations
- they monitor the use of digital technologies, mobile devices, cameras, etc. in lessons and other school activities (where allowed) and implement current policies with regard to these devices
- *in lessons where internet use is pre-planned students should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches*

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

These are safeguarding issues, not technical issues, simply that the technology provides additional means for safeguarding issues to develop.

Online Safety Group

The Online Safety Group provides a consultative group that has wide representation from the *school* community, with responsibility for issues regarding online safety and the monitoring the Online Safety Policy including the impact of initiatives. The group will also be responsible for regular reporting to the *Governing Body/Trustees*.

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

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

Students:

- **are responsible for using the *school* digital technology systems in accordance with the student 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. The *school* will take every opportunity to help parents understand these issues through *parents' evenings, newsletters, letters, website, social media and information about national and local online safety campaigns.* Parents and carers will be encouraged to support the *school* in promoting good online safety practice and to follow guidelines on the appropriate use of:

- digital and video images taken at school events
- access to parents' sections of the website

Community Users

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

Policy Statements

Education – Students

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

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 and PHSE 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 should be taught in all lessons to be critically aware of the materials and content they access on-line and be guided to validate the accuracy of information.**
- **Students should be taught to acknowledge the source of information used and to respect copyright when using material accessed on the internet**
- **Students 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.**
- *Students should be helped to understand the need for the studentl acceptable use agreement and encouraged to adopt safe and responsible use both within and outside school.*
- *Staff should act as good role models in their use of digital technologies, the internet and mobile devices*
- *In lessons where internet use is pre-planned, it is best practice that students 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 are allowed to freely search the internet, staff should be vigilant in monitoring the content of the websites the young people visit.*

Education – Parents/carers

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

The school will therefore seek to provide information and awareness to parents and carers through

- *Curriculum activities*
- *Letters, newsletters, web site, Learning Platform*

- *Parents/carers evenings/sessions*
- *High profile events and campaigns e.g. Safer Internet Day*
- *Reference to the relevant web sites/publications e.g.* swgfl.org.uk, www.saferinternet.org.uk/, http://www.childnet.com/parents-and-carers

Education – The Wider Community

The school may 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.*
- *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, sport and /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. 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 the school 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 and 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 meetings and training sessions.*
- *The Online Safety Lead will provide advice, guidance and/or training to individuals as required.*

Training – Governors/Trustees

Governors/Trustees 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 and safeguarding. This may be offered in a number of ways:

- Attendance at training provided by the Local Authority or other relevant organisation.
- Participation in school training and information sessions for staff or parents

Technical – infrastructure/equipment, filtering and monitoring

The school will be responsible for ensuring that the school infrastructure 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:

- **School technical systems will be managed in ways that ensure that the school meets recommended technical requirements**.
- **There will be regular reviews and audits of the safety and security of school technical systems**
- **Servers, wireless systems and cabling must be securely located and physical access restricted**
- **All users will have clearly defined access rights to school technical systems and devices.**
- **All users will be provided with a username and secure password,. Users are responsible for the security of their username and password**.
- The "master/administrator" passwords for the school systems, used by the Network Manager must also be available to the *Headteacher* and kept in a secure place (e.g. school safe)
- IT support are responsible for ensuring that software licence logs are accurate and up to date and that regular checks are made to reconcile the number of licences purchased against the number of software installations.

- **Internet access is filtered for all users.** Illegal content (child sexual abuse images) is filtered by the broadband or filtering provider by actively employing the Internet Watch Foundation CAIC list. Content lists are regularly updated and internet use is logged and regularly monitored. There is a clear process in place to deal with requests for filtering changes.
- **Internet filtering and monitoring should ensure that children are safe from terrorist and extremist material when accessing the internet.**
- *The school has provided differentiated user-level filtering* for Staff, 6th Form students and students at Key stages 3 and 4
- *School technical staff regularly monitor and record the activity of users on the school technical systems and users are made aware of this in the acceptable use agreement.*
- *An appropriate system is in place* (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 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 for the provision of temporary access of "guests" (e.g. trainee teachers, supply teachers, visitors) onto the school systems.
- ***Personal data cannot be sent over the internet or taken off the school site unless safely encrypted or otherwise secured***.

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 polices 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[1]**	**Student owned**	**Staff owned**	**Visitor owned**
Allowed in school	*Yes*	*Yes*	*Yes*	*Yes/No[2]*	*Yes/No[2]*	*Yes/No[2]*
Full network access	*Yes*	*Yes*	*Yes*			
Internet only						
No network access						

Use of digital and video images

The development of digital imaging technologies has created significant benefits to learning, allowing staff and students instant use of images that they have recorded themselves or downloaded from the internet. However, staff, parents/carers and students need to be aware of the risks associated with publishing digital images on the internet.

[1] 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.

[2] The school should add below any specific requirements about the use of mobile/personal devices in school

Such images may provide avenues for online-bullying to take place. Digital images may remain available on the internet forever and may cause harm or embarrassment to individuals in the short or longer term. It is common for employers to carry out internet searches for information about potential and existing employees. The school will inform and educate users about these risks and will implement policies to reduce the likelihood of the potential for harm:

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

Data Protection

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.**
- **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 the school 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 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 <u>reports any relevant breaches to the Information Commissioner</u> 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.**
- **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 school 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 understands 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 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

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

- **The official *school* email service may be regarded as safe and secure and is monitored. Users should be aware that email communications are monitored.**
- **Users must immediately report, to the nominated person – in accordance with the school policy, the receipt of any communication that makes them feel uncomfortable, is offensive, discriminatory, threatening or bullying in nature and must not respond to any such communication.**
- **Any digital communication between staff and students or parents/carers (email, social media, chat, blogs, VLE etc) must be professional in tone and content.**
- **Students should be taught about online safety issues, such as the risks attached to the sharing of personal details. They should also be taught strategies to deal with inappropriate communications and be reminded of the need to communicate appropriately when using digital technologies.**
- **Personal information should not be posted on the school website and only official email addresses should be used to identify members of staff.**

Social Media - Protecting Professional Identity

All schools, academies, MATs and local authorities have a duty of care to provide a safe learning environment for pupils and staff. The school provides the following measures to ensure reasonable steps are in place to minimise risk of harm to pupils, staff and the school through:

- Ensuring that personal information is not published
- Training is provided including: acceptable use; social media risks; checking of settings; data protection; reporting issues.
- Clear reporting guidance, including responsibilities, procedures and sanctions
- Risk assessment, including legal risk

School staff should ensure that:

- No reference should be made in social media to students, parents/carers or school staff
- They do not engage in online discussion on personal matters relating to members of the school community
- Personal opinions should not be attributed to the *school, MAT* or local authority.
- Security settings on personal social media profiles are regularly checked to minimise risk of loss of personal information

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 or impacts on the school, it must be made clear that the member of staff is not communicating on behalf of the school with an appropriate disclaimer. Such personal communications are within the scope of this policy
- Personal communications which do not refer to or impact upon the school are outside the scope of this policy
- Where excessive personal use of social media in school is suspected, and considered to be interfering with relevant duties, disciplinary action may be taken
- *The school 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 school and all other technical systems. Other activities e.g. cyber-bullying would be banned and could lead to criminal prosecution. There are however a range of activities which may, generally, be legal but would be inappropriate in a school context, either because of the age of the users or the nature of those activities.

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

User Actions		Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
Users shall not visit Internet sites, make, post, download, upload, data transfer, communicate or pass on, material, remarks, proposals or comments that contain or relate to:	Child sexual abuse images –The making, production or distribution of indecent images of children. Contrary to The Protection of Children Act 1978					X
	Grooming, incitement, arrangement or facilitation of sexual acts against children Contrary to the Sexual Offences Act 2003.					X
	Possession of an extreme pornographic image (grossly offensive, disgusting or otherwise of an obscene character) Contrary to the Criminal Justice and Immigration Act 2008					X
	Criminally racist material in UK – to stir up religious hatred (or hatred on the grounds of sexual orientation) - contrary to the Public Order Act 1986					X
	Pornography				X	
	Promotion of any kind of discrimination				X	
	threatening behaviour, including promotion of physical violence or mental harm				X	
	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: • Gaining unauthorised access to school networks, data and files, through the use of computers/devices • Creating or propagating computer viruses or other harmful files • Revealing or publicising confidential or proprietary information (e.g. financial / personal information, databases, computer / network access codes and passwords) • Disable/Impair/Disrupt network functionality through the use of computers/devices • Using penetration testing equipment (without relevant permission)						X

Using systems, applications, websites or other mechanisms that bypass the filtering or other safeguards employed by the school				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	

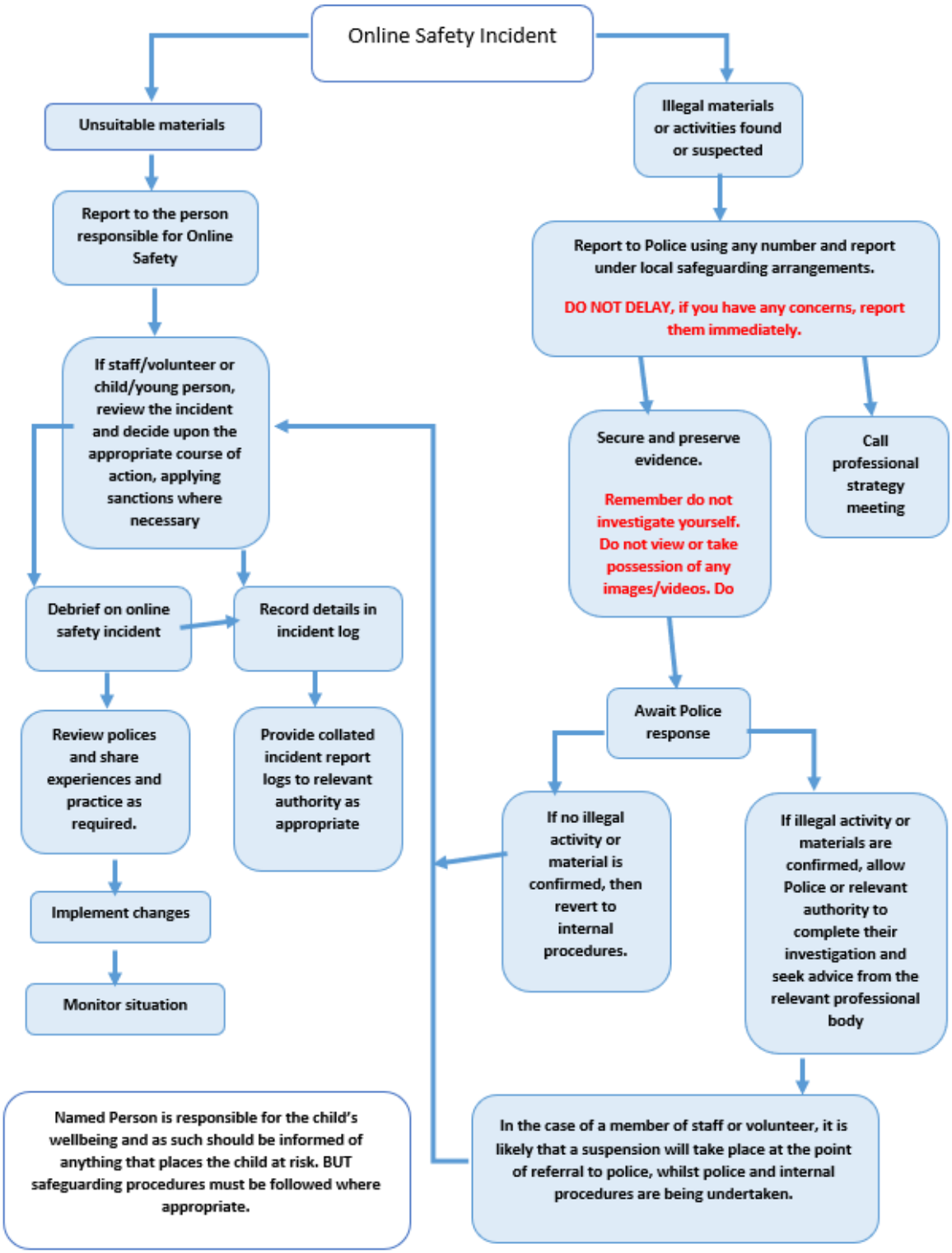
For student users, the school will refer to the behaviour policy for any incidents that include the use of technology and make decisions based on the details of each situation. Please refer to the behaviour policy for information on measures and action that can be used at the school's discretion.

Responding to incidents of misuse

This guidance is intended for use when staff need to manage incidents that involve the use of online services. It encourages a safe and secure approach to the management of the incident. Incidents might involve illegal or inappropriate activities (see "User Actions" above).

Illegal Incidents

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



Other Incidents

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

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

- Have more than one senior member of staff 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 the *school* and possibly the police and demonstrate that visits to these sites were carried out for safeguarding purposes. The completed form should be retained by the group for evidence and reference purposes.

POLICY RECORD

Date	Nature of Change	Reviewed By	Next Review Date
05.07.2022	Reviewed and updated.	Michael Feeney Steve Murphy SLT, Exeter Road	No later than July 2023