St Luke Academies Trust

On-line Safety Policy

Presented to Directors: **November 2017**

Adopted by Directors: **December 2017**

Review date: **December 2019**

Our Vision

The vision of St Luke Academies Trust is to develop each of its schools as welcoming and inclusive communities, where faith is nurtured, excellence in learning is achieved and pupils are inspired to serve others, following the example of Jesus.

We aspire to follow the Church's mission; to make Christ known to all people, placing Christ and the teaching of the Catholic Church at the centre of people's lives.

The expectation of the Trust Board is that the work of all members of St Luke Academies Trust is based on trust, collaboration and respect, with all members and their contributions equally valued.

Development / Monitoring / Review of this Policy

This online safety policy has been developed by a working group / committee made up of: Head Teachers, ICT leads across the school and Governors

- 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 Directors:*	December 2017
The implementation of this online safety policy will be monitored by the:	*SLT, Online safety lead, Governors, DSL*
Monitoring will take place at regular intervals:	*Annually (unless particular issues arise)*
The *Board of Directors / 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:	*Annually (unless particular issues arise)*
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:	December 2018
Should serious online safety incidents take place, the following external persons / agencies should be informed:	*Police, reported to website via CEOPS.*

The school will monitor the impact of the policy using:

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

Scope of the Policy

This policy applies to all members of Our Lady's community (including staff, pupils, volunteers, parents / carers, visitors, community users) who have access to and are users of Our Lady's ICT 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 pupils 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 cyber-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. 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 Our Lady's:

Governors:

Governors are responsible for the agreement of the online safety policy following approval by the Board of Directors and for reviewing the effectiveness of the policy. This will be carried out by the *Governors* receiving regular information about online safety incidents and monitoring reports. A member of the *Governing Body* has taken on the role of Online Safety (alongside Safeguarding/Child Protection) The role of the Online Safety *Governor* will include:

- *regular meetings with the Online safety Co-ordinator*
- *regular monitoring of online safety incident logs*
- *regular monitoring of filtering / change control logs*
- *reporting to relevant Governors*

Headteacher and Senior Leaders:

- **The *Headteacher* has a duty of care for ensuring the safety (including online safety) of members of the** Our Lady's **school community**, though the day to day responsibility for online safety will be delegated to the Online safety *Co-ordinator*.
- **The Headteacher and (at least) another member of the Senior Leadership Team / Senior Management 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.**
- *The Headteacher / Senior Leaders are responsible for ensuring that the Online safety Coordinator 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 / Senior Leaders will ensure that there is a system in place to allow for monitoring and support of those in Our Lady's 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 Co-ordinator.*

Online safety Coordinator / Officer:

- leads the online safety committee
- takes day to day responsibility for online safety issues and has a leading role in establishing and reviewing the Our Lady's 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 / relevant body
- liaises with Our Lady's school technical staff
- receives reports of online safety incidents and creates a log of incidents to inform future online safety developments.

- meets regularly with online safety *Governor* to discuss current issues, review incident logs and filtering / change control logs
- attends relevant meeting / committee of *Governors*
- reports regularly to Senior Leadership Team

Network Manager / Technical staff:

The *Network Manager / Technical Staff / Co-ordinator for ICT / Computing* is responsible for ensuring:

- **that Our Lady's *school's* technical infrastructure is secure and is not open to misuse or malicious attack**
- **that the Our Lady's meets required online safety technical requirements and any *Local Authority / 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, in which passwords are regularly changed**
- *the filtering policy (if it has one), 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 / Virtual Learning Environment / remote access / email* is regularly monitored in order that any misuse / attempted misuse can be reported to the *Headteacher / Principal / Senior Leader; Online safety Coordinator / Officer* for investigation / action / 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 Our Lady of Walsingham *online safety* policy and practices**
- **they have read, understood and signed the Staff Acceptable Use Policy / Agreement (AUP)**
- **they report any suspected misuse or problem to the *Headteacher* all digital communications with students / pupils / parents / carers should be on a professional level** *and only carried out using office school systems*
- online safety issues are embedded in all aspects of the curriculum and other activities
- students / pupils understand and follow the online safety 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 Our Lady's 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*

Child Protection / Safeguarding 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
- cyber-bullying

Online safety Group

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

Members of the *online safety Group* (or other relevant group) will assist the *Online safety Coordinator* with:

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

Students / pupils:

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

Parents / Carers

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

- digital and video images taken at *OUR LADY'S* school events
- access to parents' sections of the website and on-line pupil records
- their children's personal devices in the *OUR LADY'S* (where this is allowed)

Community Users

Community Users who access *OUR LADY'S* systems / website as part of the wider *OUR LADY'S* provision will be expected to sign a Community User Acceptable Use Agreement before being provided with access to *OUR LADY'S* systems.

Policy Statements

Education – pupils

Whilst regulation and technical solutions are very important, their use must be balanced by educating *pupils* to take a responsible approach. The education of *pupils* in online safety is therefore an essential part of the *OUR LADY'S*'s online

safety provision. Children and young people need the help and support of the *OUR LADY'S* 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 / 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 helped to understand the need for the student / pupil Acceptable Use Agreement and encouraged to adopt safe and responsible use both within and outside OUR LADY'S.*
- *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 (eg 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 on-line behaviours. Parents may underestimate how often children and young people come across potentially harmful and inappropriate material on the internet and may be unsure about how to respond.
OUR LADY'S will therefore seek to provide information and awareness to parents and carers through:

- *Curriculum activities*
- *Letters, newsletters, web site*
- *Parents / Carers evenings / sessions*
- *High profile events / campaigns eg Safer Internet Day*
- *Reference to the relevant web sites / publications eg www.swgfl.org.uk* www.saferinternet.org.uk/ http://www.childnet.com/parents-and-carers

Education – The Wider Community

OUR LADY'S will provide opportunities for local community groups / members of the community to gain from OUR LADY'S '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 Our Lady's website will provide online safety information for the wider community*
- *Supporting community groups eg Early Years Settings, Childminders, youth / sports / voluntary groups to enhance their online safety provision.*

Education & Training – Staff / Volunteers

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

- **A planned programme of formal online safety training will be made available to staff. 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** *OUR LADY'S* **online safety policy and Acceptable Use Agreements.**
- *The Online safety Coordinator will receive regular updates through attendance at external training events*
- *This Online safety policy and its updates will be presented to and discussed by staff in staff / team meetings / INSET days.*
- *The Online safety Coordinator will provide advice / guidance / training to individuals as required.*

Training – Governors

Governors should take part in online safety training / awareness sessions, with particular importance for those who are members of any sub committee / group involved in technology / online safety / health and safety / child protection. This may be offered in a number of ways:

- Attendance at training provided by the Local Authority / National Governors Association / or other relevant organisation (eg SWGfL).
- Participation in *OUR LADY'S* training / information sessions for staff or parents (this may include attendance at assemblies / lessons).

Technical – infrastructure / equipment, filtering and monitoring

OUR LADY'S will be responsible for ensuring that the school infrastructure / network is as safe and secure as is reasonably possible and that policies and procedures approved within this policy are implemented. It will also need to ensure that the relevant people named in the above sections will be effective in carrying out their online safety responsibilities:

- *OUR LADY'S* **technical systems will be managed in ways that ensure that** *OUR LADY'S* **meets recommended technical requirements** (these may be outlined in Local Authority / other relevant body policy and guidance)
- **There will be regular reviews and audits of the safety and security of** *OUR LADY'S* **technical systems**
- **Servers, wireless systems and cabling must be securely located and physical access restricted**
- **All users will have clearly defined access rights to** *OUR LADY'S* **technical systems and devices.**
- **All users** (at KS2 and above) **will be provided with a username and secure password. Users are responsible for the security of their username and password** *and will be required to change their password every year.*
- **The "master / administrator" passwords for the Our Lady's ICT system, 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 (eg Our Lady's safe)**
- *OUR LADY'S Technical assistant* **is responsible for ensuring that software licence logs are accurate and up to date and that regular checks are made to reconcile the number of licences purchased against the number of software installations.**
- **Internet access is filtered for all users.** 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.
- *OUR LADY'S has provided enhanced / differentiated user-level filtering* (allowing different filtering levels for different ages / stages and different groups of users – staff / pupils / students etc)
- *Our Lady's / technical staff regularly monitor and record the activity of users on OUR LADY'S technical systems and users are made aware of this in the Acceptable Use Agreement.*
- *An appropriate system is in place 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 *OUR LADY'S* systems and data. These are tested regularly. Our Lady's infrastructure and individual workstations are protected by up to date virus software.
- An agreed policy is in place for the provision of temporary access of "guests" (eg trainee teachers, supply teachers, visitors) onto the Our Lady's systems.
- *An agreed policy is in place regarding the extent of personal use that users (staff / students / pupils / community users) and their family members are allowed on Our Lady's devices that may be used out of Our Lady's.*
- *An agreed policy is in place that allows staff to / forbids staff from downloading executable files and installing programmes on Our Lady's devices.*
- *An agreed policy is in place regarding the use of removable media (eg memory sticks / CDs / DVDs) by users on Our Lady's devices. Personal data cannot be sent over the internet or taken off the Our Lady's site unless safely encrypted or otherwise secured.*

Bring Your Own Device (BYOD)

The educational opportunities offered by mobile technologies are being expanded as a wide range of devices, software and online services become available for teaching and learning, within and beyond the classroom. This has led to the exploration by schools of users bringing their own technologies in order to provide a greater freedom of choice and usability. However, there are a number of online safety considerations for BYOD that need to be reviewed prior to implementing such a policy. Use of BYOD should not introduce vulnerabilities into existing secure environments. Considerations will need to include; levels of secure access, filtering, data protection, storage and transfer of data, mobile device management systems, training, support, acceptable use, auditing and monitoring. This list is not exhaustive and a BYOD policy should be in place and reference made within all relevant policies.

- Our Lady's has a set of clear expectations and responsibilities for all users
- Our Lady's adheres to the Data Protection Act principles
- All users are provided with and accept the Acceptable Use Agreement
- All network systems are secure and access for users is differentiated
- Where possible these devices will be covered by the Our Lady's's normal filtering systems, while being used on the premises
- All users will use their username and password and keep this safe
- Mandatory training is undertaken for all staff
- Students / Pupils receive training and guidance on the use of personal devices
- Regular audits and monitoring of usage will take place to ensure compliance
- Any device loss, theft, change of ownership of the device will be reported as in the BYOD policy
- Any user leaving the Our Lady's will follow the process outlined within the BYOD policy

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 cyberbullying to take place. Digital images may remain available on the internet forever and may cause harm or embarrassment to individuals in the short or longer term. It is common for employers to carry out internet searches for information about potential and existing employees. Our Lady's will inform and educate users about these risks and will implement policies to reduce the likelihood of the potential for harm:

- **When using digital images, staff should inform and educate pupils about the risks associated with the taking, use, sharing, publication and distribution of images. In particular they should recognise the risks attached to publishing their own images on the internet eg on social networking sites.**

- In accordance with guidance from the Information Commissioner's Office, parents / carers are welcome to take videos and digital images of their children at Our Lady's events for their own personal use (as such use in not covered by the Data Protection Act). To respect everyone's privacy and in some cases protection, these images should not be published / made publicly available on social networking sites, nor should parents / carers comment on any activities involving other *students / pupils* in the digital / video images.
- *Staff and volunteers are allowed to take digital / video images to support educational aims, but must follow Our Lady's policies concerning the sharing, distribution and publication of those images. Those images should only be taken on Our Lady's 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 Our Lady's 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.*
- *Written permission from parents or carers will be obtained before photographs of students / pupils are published on the Our Lady's website.*
- *Student's / Pupil's work can only be published with the permission of the student / pupil and parents or carers.*

Data Protection

Personal data will be recorded, processed, transferred and made available according to the Data Protection Act 1998 which states that personal data must be:

- Fairly and lawfully processed
- Processed for limited purposes
- Adequate, relevant and not excessive
- Accurate
- Kept no longer than is necessary
- Processed in accordance with the data subject's rights
- Secure
- Only transferred to others with adequate protection.

Our Lady's must ensure that:

- **It will hold the minimum personal data necessary to enable it to perform its function and it will not hold it for longer than necessary for the purposes it was collected for.**
- **Every effort will be made to ensure that data held is accurate, up to date and that inaccuracies are corrected without unnecessary delay.**
- **All personal data will be fairly obtained in accordance with the "Privacy Notice" and lawfully processed in accordance with the "Conditions for Processing".**
- **It has a Data Protection Policy**
- **It is registered as a Data Controller for the purposes of the Data Protection Act (DPA)**
- Responsible persons are appointed / identified - Senior Information Risk Officer (SIRO) and Information Asset Owners (IAOs)
- Risk assessments are carried out
- It has clear and understood arrangements for the security, storage and transfer of personal data
- Data subjects have rights of access and there are clear procedures for this to be obtained
- There are clear and understood policies and routines for the deletion and disposal of data
- There is a policy for reporting, logging, managing and recovering from information risk incidents
- There are clear Data Protection clauses in all contracts where personal data may be passed to third parties
- There are clear policies about the use of cloud storage / cloud computing which ensure that such data storage meets the requirements laid down by the Information Commissioner's Office.

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.**

- **Use personal data 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.**
- **Transfer data using encryption and secure password protected devices.**

When personal data is stored on any portable computer system, memory stick or any other removable media:

- the data must be encrypted and password protected
- the device must be password protected
- the device must offer approved virus and malware checking software
- the data must be securely deleted from the device, in line with Our Lady's policy once it has been transferred or its use is complete

Communications

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

	Staff & other adults	Students / Pupils

Communication Technologies	Allowed	Allowed at certain times	Allowed for selected staff	Not allowed	Allowed	Allowed at certain times	Allowed with staff permission	Not allowed
Mobile phones may be brought to Our Lady's		X					X	
Use of mobile phones in lessons			X	X				
Use of mobile phones in social time		X		X				
Taking photos on mobile phones / cameras			X	X				
Use of other mobile devices eg tablets, gaming devices		X		X				
Use of personal email addresses in Our Lady's , or on Our Lady's network		X		X				
Use of Our Lady's email for personal emails			X	X				
Use of messaging apps		X		X				
Use of social media		X		X				
Use of blogs		X		X				

When using communication technologies the Our Lady's considers the following as good practice:

- **The official *Our Lady's* email service may be regarded as safe and secure and is monitored. Users should be aware that email communications are monitored.** *Staff and pupils should therefore use only the Our Lady's email service to communicate with others when in Our Lady's , or on Our Lady's systems (eg by remote access).*
- **Users must immediately report, to the nominated person – in accordance with the Our Lady's 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 pupils or parents / carers (email, chat, VLE etc) must be professional in tone and content.** *These communications may only take place on official (monitored) Our Lady's 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 Our Lady's email addresses for educational use.*
- *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 Our Lady's website and only official email addresses should be used to identify members of staff.*

Social Media - Protecting Professional Identity

All schools and local authorities have a duty of care to provide a safe learning environment for pupils and staff. Our Lady's and local authorities could be held responsible, indirectly for acts of their employees in the course of their employment. Staff members who harass, cyberbully, discriminate on the grounds of sex, race or disability or who defame a third party

may render the or local authority liable to the injured party. Reasonable steps to prevent predictable harm must be in place.

Our Lady's provides the following measures to ensure reasonable steps are in place to minimise risk of harm to pupils, staff and the Our Lady's through limiting access to personal information:

- Training to include: acceptable use; social media risks; checking of settings; data protection; reporting issues.
- Clear reporting guidance, including responsibilities, procedures and sanctions
- Risk assessment, including legal risk

Our Lady's staff should ensure that:

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

The *school's* use of social media for professional purposes will be checked regularly by the senior risk officer and online safety committee to ensure compliance with the Social Media, Data Protection, Communications, Digital Image and Video Policies.

Unsuitable / inappropriate activities

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

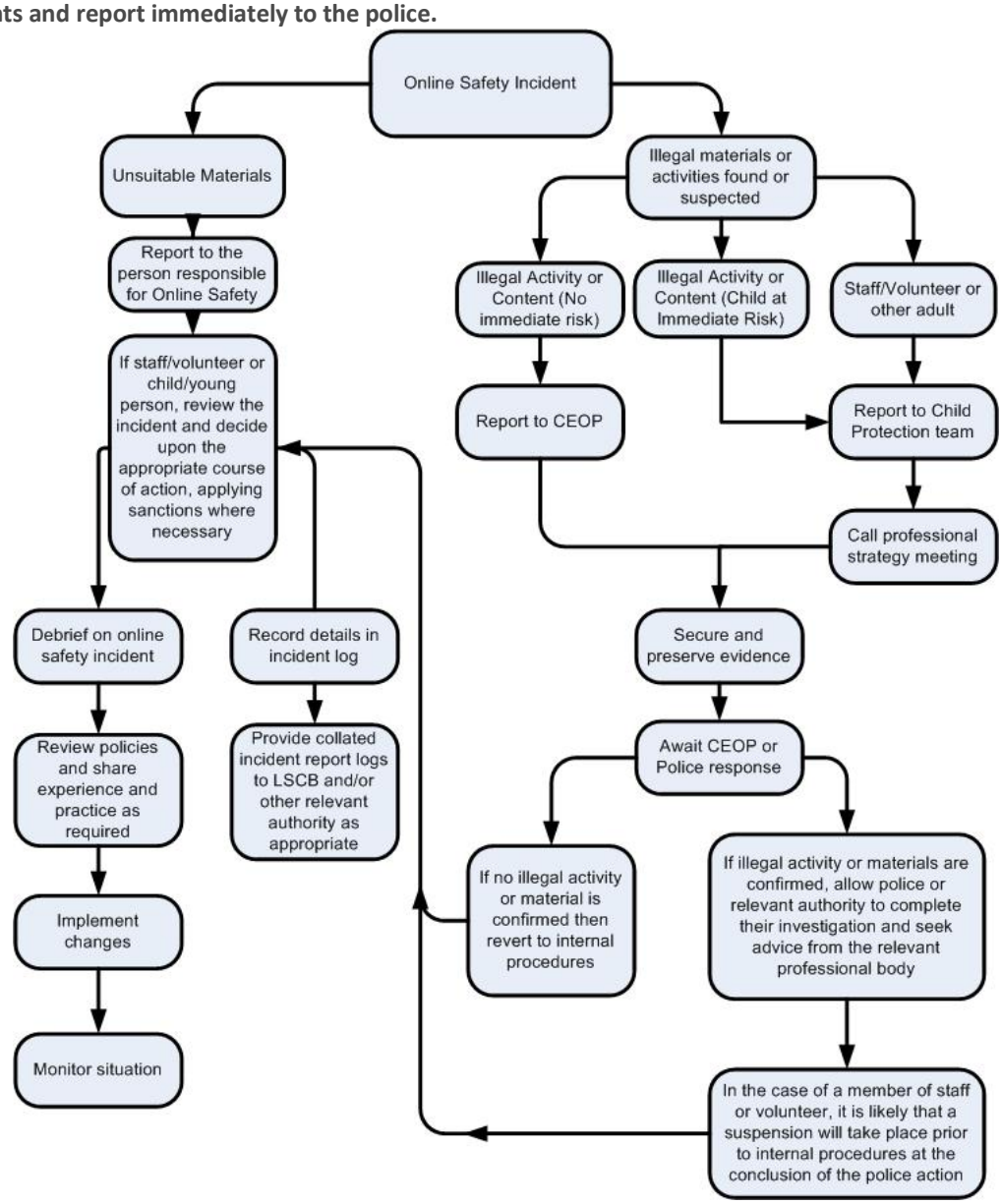
User Actions		Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
Users shall not visit Internet sites, make, post, download, upload, data transfer, communicate or pass on, material, remarks, proposals or comments that contain or relate to:	Child sexual abuse images –The making, production or distribution of indecent images of children. Contrary to The Protection of Children Act 1978					X
	Grooming, incitement, arrangement or facilitation of sexual acts against children Contrary to the Sexual Offences Act 2003.					X
	Possession of an extreme pornographic image (grossly offensive, disgusting or otherwise of an obscene character) Contrary to the Criminal Justice and Immigration Act 2008					X
	criminally racist material in UK – to stir up religious hatred (or hatred on the grounds of sexual orientation) - contrary to the Public Order Act 1986					X
	pornography				X	
	promotion of any kind of discrimination				X	
	threatening behaviour, including promotion of physical violence or mental harm				X	
	any other information which may be offensive to colleagues or breaches the integrity of the ethos of the Our Lady's school or brings the Our Lady's school into disrepute				X	
Using Our Lady's school systems to run a private business					X	
Using systems, applications, websites or other mechanisms that bypass the filtering or other safeguards employed by the Our Lady's school / academy					X	
Infringing copyright					X	
Revealing or publicising confidential or proprietary information (eg financial / personal information, databases, computer / network access codes and passwords)					X	
Creating or propagating computer viruses or other harmful files					X	
Unfair usage (downloading / uploading large files that hinders others in their use of the internet)					X	
On-line gaming (educational)			X			
On-line gaming (non educational)					X	
On-line gambling					X	
On-line shopping / commerce			X			
File sharing					X	
Use of social media			X			
Use of messaging apps					X	
Use of video broadcasting eg Youtube			X			

Responding to incidents of misuse

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

Illegal Incidents

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



Other Incidents

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

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

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

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

Our Lady's Actions & Sanctions

It is more likely that the school 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 Our Lady's 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:

Students / Pupils

Actions / Sanctions

Incidents:	Refer to class teacher / tutor	Refer to Head of Department / Head of Year / other	Refer to Headteacher / Principal	Refer to Police	Refer to technical support staff for action re filtering / security etc	Inform parents / carers	Removal of network / internet access rights	Warning	Further sanction eg detention / exclusion
Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on unsuitable / inappropriate activities).		X	X	X					
Unauthorised use of non-educational sites during lessons	X		X		X		X	X	X
Unauthorised use of mobile phone / digital camera / other mobile device	X		X			X		X	X
Unauthorised use of social media / messaging apps / personal email	X		X		X	X	X	X	X
Unauthorised downloading or uploading of files	X		X		X	X	X	X	X
Allowing others to access Our Lady's network by sharing username and passwords	X		X		X	X	X	X	X
Attempting to access or accessing the Our Lady's network, using another student's / pupil's account	X		X		X	X	X	X	X
Attempting to access or accessing the Our Lady's network, using the account of a member of staff	X		X		X	X	X	X	X
Corrupting or destroying the data of other users	X		X	X	X	X	X	X	X
Sending an email, text or message that is regarded as offensive, harassment or of a bullying nature	X		X	X		X	X	X	X
Continued infringements of the above, following previous warnings or sanctions	X		X	X	X	X	X	X	X
Actions which could bring the Our Lady's into disrepute or breach the integrity of the ethos of the Our Lady's	X		X	X		X	X	X	X
Using proxy sites or other means to subvert the Our Lady's school's / academy's filtering system	X		X	X	X	X	X	X	X
Accidentally accessing offensive or pornographic material and failing to report the incident	X		X		X	X		X	
Deliberately accessing or trying to access offensive or pornographic material	X		X	X	X	X	X	X	X
Receipt or transmission of material that infringes the copyright of another person or infringes the Data Protection Act	X		X	X	X	X	X	X	X

Staff

Actions / Sanctions

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