



BUXLOW
Preparatory School

E-Safety Policy

Reviewed – September 2023

Date of next review – September 2024

Scope of the Policy

This policy applies to all members of the school community (including staff, pupils, 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 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 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. In the case of both acts, action can only be taken over issues covered by the school's 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.

Types of Risk


Children are subject to a variety of risks from use of mobile and smart technologies. Although efforts are made to ensure access is safe in school, the school is aware that many children may have unrestricted access to the internet via wifi and mobile networks at home.

The types of risk can be categorised into the 4Cs; Content, Contact, Conduct and Commerce. The resources below from CO:RE (Children Online Research and Evidence) offers clarification on these definitions, although refers to Commerce as Contract – the act of entering into an agreement with another party.

A new classification of online risk – the 4Cs

The new CO:RE 4Cs classification recognises that online risks arise when a child:

- engages with and/or is exposed to potentially harmful **CONTENT**;
- experiences and/or is targeted by potentially harmful **CONTACT**;
- witnesses, participates in and/or is a victim of potentially harmful **CONDUCT**;
- is party to and/or exploited by a potentially harmful **CONTRACT**.

	Content Child as recipient	Contact Child as participant	Conduct Child as actor	Contract Child as consumer
Aggressive	Violent, gory, graphic, racist, hateful and extremist content	Harassment, stalking, hateful behaviour, unwanted surveillance	Bullying, hateful or hostile peer activity e.g. trolling, exclusion, shaming	Identity theft, fraud, phishing, scams, gambling, blackmail, security risks
Sexual	Pornography (legal and illegal), sexualization of culture, body image norms	Sexual harassment, sexual grooming, generation and sharing of child sexual abuse material	Sexual harassment, non-consensual sexual messages, sexual pressures	Sextortion, trafficking for purposes of sexual exploitation, streaming child sexual abuse
Values	Age-inappropriate user-generated or marketing content, mis/disinformation	Ideological persuasion, radicalization and extremist recruitment	Potentially harmful user communities e.g. self-harm, anti-vaccine, peer pressures	Information filtering, profiling bias, polarisation, persuasive design
Cross-cutting	Privacy and data protection abuses, physical and mental health risks, forms of discrimination			

<https://core-evidence.eu/updates-the-4cs-of-online-risk/>

Roles and Responsibilities

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

Head and Senior Leaders

- The Head 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 Designated Safeguarding 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 disciplinary procedures).
- The Head and Senior Leaders are responsible for ensuring that the Designated safeguarding 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 Head 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 Designated Safeguarding Lead

Designated Safeguarding Lead

- takes day to day responsibility for online safety issues and has a leading role in establishing and reviewing the school online safety policies/documents
- ensures that all staff are aware of the procedures that need to be followed in the event of an online safety incident taking place.
- provides training and advice for staff
- liaises with the Local Authority
- liaises with school technical staff
- receives reports of online safety incidents and creates a log of incidents to inform future online safety developments,
- meets regularly with Head and DSL to discuss current issues, review incident logs and filtering/change control logs
- reports regularly to Senior Leadership Team
- The Online Safety Lead is the Headteacher

Teaching and Support Staff

Staff will sign the 'Staff Acceptable Use Agreement, and 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**
- **they report any suspected misuse or problem to the Head for investigation/action/sanction**
- **all digital communications with pupils/parents/carers should be on a professional level and only carried out using official school systems.**
- online safety issues are embedded in all aspects of the curriculum and other activities
- pupils understand and follow the Online Safety Policy and acceptable use policies
- pupils have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations
- they monitor the use of digital technologies, mobile devices, cameras, etc. in lessons and other school activities (where allowed) and implement current policies with regard to these devices
- in lessons where internet use is pre-planned pupils should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches

Designated Safeguarding Lead

Should be trained in online safety issues and be aware of the potential for serious child protection/safeguarding issues to arise from:

- sharing of personal data
- access to illegal/inappropriate materials
- inappropriate on-line contact with adults/strangers
- potential or actual incidents of grooming
- online-bullying

Pupils:

Pupils will sign the 'Pupil Acceptable Use Agreement', and;

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

Parents/carers

Parents will sign the 'Pupil Acceptable Use Agreement' as part of the welcome pack on joining the school, and annually when the school updates its information held on file.

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/local online safety campaigns/literature. 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:

- devices brought home for academic purposes
- cloud based storage and learning platforms.
- digital and video images taken at school events and posted to social media accounts.

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/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.

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**
- **Pupils should be taught in all lessons to be critically aware of the materials/content they access on-line and be guided to validate the accuracy of information.**
- **Pupils should be taught to acknowledge the source of information used and to respect copyright when using material accessed on the internet**
- **Pupils should be supported in building resilience to radicalisation by providing a safe environment for debating controversial issues and helping them to understand how they can influence and participate in decision-making.**
- Pupils should be helped to understand the need for the pupil 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
- Where pupils are allowed to freely search the internet, staff should be vigilant in monitoring the content of the websites the young people visit.
- It is accepted that from time to time, for good educational reasons, students may need to research topics (e.g. racism, drugs, discrimination) that would normally result in internet searches being blocked. In such a situation, staff can request that the Technical Staff (or other relevant designated person) can temporarily remove those sites from the filtered list for the period of study. Any request to do so, should be auditable, with clear reasons for the need.

Education – Parents/carers

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

The school 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 e.g. Safer Internet Day
- Reference to the relevant web sites/publications e.g.
 - [Safer Internet Guidance on children's phones](#)
 - [Age-specific advice from Internet Matters website](#)
 - [Animations from ThinkUKnow website](#)

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. To reflect the changing face of e-safety, staff undertake annual training.**
- **All new staff will complete online safety training as part of their induction programme, ensuring that they fully understand the school online safety policy and acceptable use agreements.**
- 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 Designated Safeguarding Lead (or other nominated person) will provide advice/guidance/training to individuals as required.

Technical – infrastructure/equipment, filtering and monitoring

The school 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:

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 google account. The password for these accounts will be set by the school and will not be changed by pupil or parents.**
- **Internet access is filtered for all users.** Illegal content (child sexual abuse images) is filtered by the broadband or filtering provider by actively employing the Internet Watch Foundation

CAIC list. Content lists are regularly updated and internet use is logged and regularly monitored. There is a clear process in place to deal with requests for filtering changes.

- **Internet filtering/monitoring should ensure that children are safe from terrorist and extremist material when accessing the internet.**
- The school has provided enhanced/differentiated user-level filtering
- 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 (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.
- Guests will be provided with temporary access to the school's internet provision should it be required, and their usage will be supervised and monitored according to the same expectations of other users.
- **The school acceptable use agreements for staff, pupils/students and parents/carers will give consideration to the use of mobile technologies**

	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	No	Yes	Yes
Internet access	Yes	Yes	Yes	n/a	Yes	Yes

Use of digital and video images

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

educate users about these risks and will implement policies to reduce the likelihood of the potential for harm:

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

- 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 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 personal data to personal devices except as in line with school policy
- access personal data sources and records only on secure password protected computers and other devices, ensuring that they are properly "logged-off" at the end of any session in which they are using personal data

Communications

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

Staff & other adults	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 the school	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 e.g. tablets, gaming devices	X				X			
Use of personal email addresses in school, or on school network	X							
Use of school 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 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.** Staff and pupils should therefore use only the school 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 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, social media, chat, blogs, VLE etc) must be professional in tone and content.** These communications may only take place on official (monitored) school 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 pupils at KS2 and above will be provided with individual school email addresses for educational use.
- 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 website and only official email addresses should be used to identify members of staff.

Social Media - Protecting Professional Identity

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

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 pupils, 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 /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 social media accounts are established there should be:

- An understanding of behaviour for users of the accounts
- Systems for reporting and dealing with abuse and misuse

- Understanding of how incidents may be dealt with under school 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 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/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.

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
	N.B. Schools/academies should refer to guidance about dealing with self-generated images/sexting – UKSIC Responding to and managing sexting incidents and UKCIS – Sexting in schools and colleges					
	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	
Activities that might be classed as cyber-crime under the Computer Misuse Act:	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	
	<ul style="list-style-type: none"> Gaining unauthorised access to school networks, data and files, through the use of computers/devices Creating or propagating computer viruses or other harmful files 					X

- 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)

N.B. Schools/academies will need to decide whether these should be dealt with internally or by the police. Serious or repeat offences should be reported to the police. Under the Cyber-Prevent agenda the National Crime Agency has a remit to prevent young people becoming involved in cyber-crime and harness their activity in positive ways – further information [here](#)

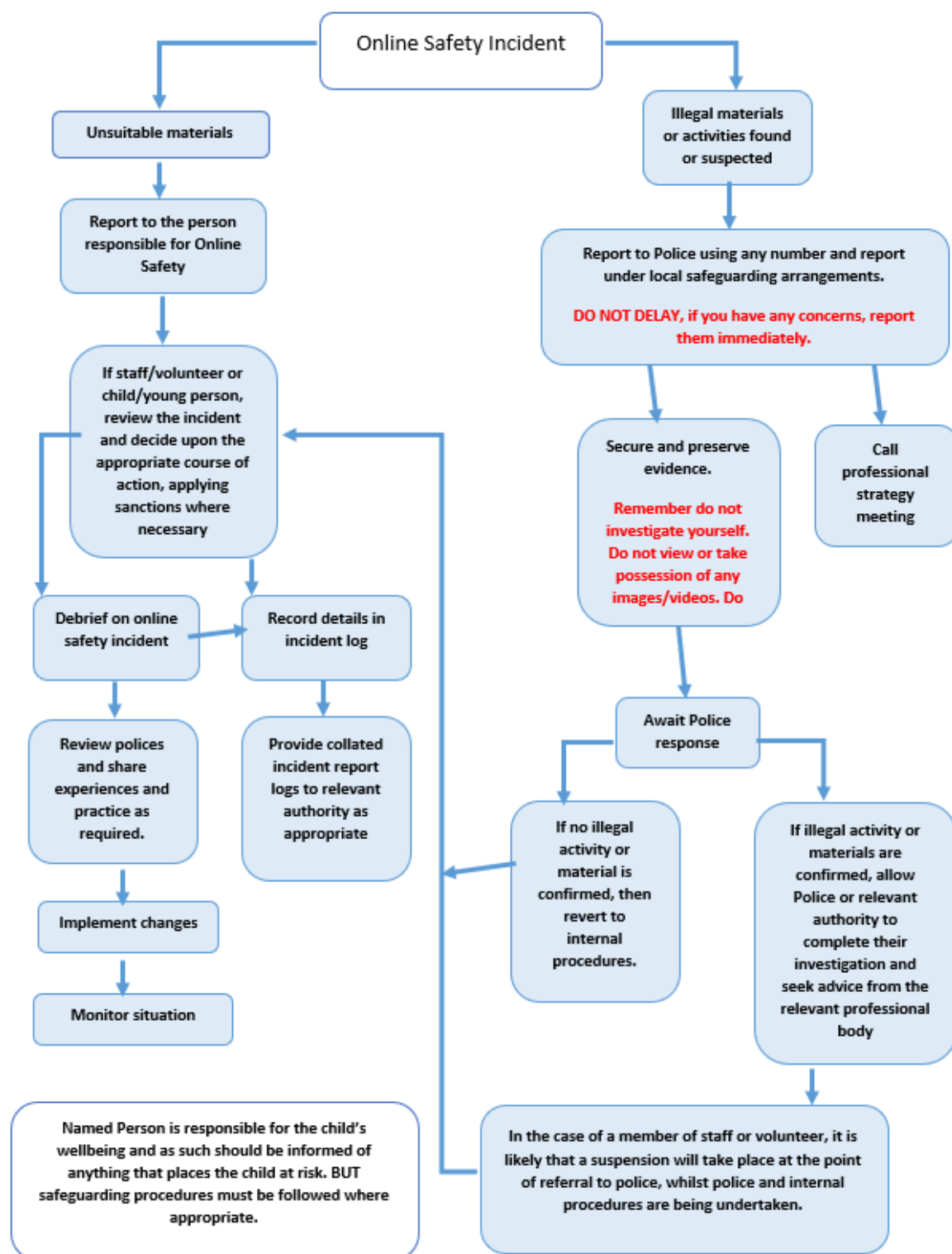
Using systems, applications, websites or other mechanisms that bypass the filtering or other safeguards employed by the school				X	
Revealing or publicising confidential or proprietary information (e.g. financial/personal information, databases, computer/network access codes and passwords)				X	
Unfair 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	
On-line gaming (educational)		X			
On-line gaming (non-educational)			X		
On-line gambling				X	
On-line shopping/commerce		X			
File sharing		X			
Use of social media		X			
Use of messaging apps		X			
Use of video broadcasting e.g. Youtube		X			

Responding to incidents of misuse

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

Illegal Incidents

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



Other Incidents

It is hoped that all members of 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 investigating. This is vital to protect individuals if accusations are subsequently reported.
- 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.

School 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 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:

Pupils Incidents	Refer to class teacher/	Refer to Head	Refer to Police	Refer to technical support staff for action re security etc.	Inform parents	Removal of internet access rights	Warning	Further sanction e.g. detention/e xclusion
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
Unauthorised use of non-educational sites during lessons	X	X			X	X		
Unauthorised/inappropriate use of device	X	X			X	X		
Unauthorised/inappropriate use of social media/messaging apps/personal email	X	X			X	X		
Unauthorised downloading or uploading of files	X	X		X	X	X		

Corrupting or destroying the data of other users	X	X			X	X		
Sending an email, text or message that is regarded as offensive, harassment or of a bullying nature	X	X			X	X		
Continued infringements of the above, following previous warnings or sanctions	X	X			X	X	X	X
Actions which could bring the school into disrepute or breach the integrity of the ethos of the school	X	X			X	X		
Using proxy sites or other means to subvert the school's/academy's filtering system	X	X			X	X		
Accidentally accessing offensive or pornographic material and failing to report the incident	X	X		X	X	X	X	X
Deliberately accessing or trying to access offensive or pornographic material	X	X		X	X	X	X	X

Staff Incidents	Refer to Head	Refer to Local Authority	Refer to Police	Refer to Technical Support Staff for action re security 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		
Inappropriate personal use of the internet/social media/personal email	X	X			X		
Unauthorised downloading or uploading of files	X						
Careless use of personal data e.g. holding or transferring data in an insecure manner	X						
Deliberate actions to breach data protection or network security rules	X			X			

Corrupting or destroying the data of other users or causing deliberate damage to hardware or software	X				X		
Sending an email, text or message that is regarded as offensive, harassment or of a bullying nature	X				X		
Using personal email/social networking/instant messaging/text messaging to carrying out digital communications with pupils	X	X			X		
Actions which could compromise the staff member's professional standing	X				X		
Actions which could bring the school into disrepute or breach the integrity of the ethos of the school	X				X		
Using proxy sites or other means to subvert the school's filtering system	X				X		
Accidentally accessing offensive or pornographic material and failing to report the incident	X	X			X		
Deliberately accessing or trying to access offensive or pornographic material	X	X	X	X	X	X	X
Breaching copyright or licensing regulations	X			X	X		
Continued infringements of the above, following previous warnings or sanctions	X	X		X	X	X	