Ellon Academy

Online Safety Policy

March 2021

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Introduction

Technology is seen as a fundamental resource to support learning and teaching, as well as playing an important role in the everyday lives of children, young people and adults. In order to build the skills to better prepare our young people for lifelong learning and work, it is essential that we incorporate the use of technology into our curriculum. At Ellon Academy we are committed to ensuring that our pupils learn how to use digital technologies safely so that they:

- Are able to use digital technologies safely to support their learning
- Know how to use a range of digital technologies
- Are able to use digital technologies outside of school safely
- Are prepared for the constant evolution of technology and can adapt their skills for the future

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

It is important to emphasise that behavioural/safeguarding issues are not digital technology issues, simply that the technology provides additional means for behavioural/safeguarding issues to develop.

The school will deal with such issues in accordance with this policy and associated behaviour, anti-bullying and/or safeguarding policies. The school will also, where known, share information with parents/carers of issues of inappropriate online safety behaviour that take place out of school.

National Documentation/Legislation:

https://education.gov.scot/parentzone/Documents/BetterRelationships.pdf

https://education.gov.scot/education-scotland/scottish-education-system/policy-for-scottish-education/legislation/

Ellon Academy Anti-bullying policy:

http://ellonacademy.aberdeenshire.sch.uk/wp-content/uploads/2018/03/Ellon-Aademy-Anti-Bullying-Policy-2016.pdf

Ellon Academy Promoting Positive Relationships Policy:

http://ellonacademy.aberdeenshire.sch.uk/wp-content/uploads/2018/03/Ellon-Aademy-Promoting-Positive-Relationships-Policy-2018.pdf

Ellon Academy Mobile Phone Policy:

http://ellonacademy.aberdeenshire.sch.uk/wp-content/uploads/2018/03/Mobile-Phone-Policy-Dec-2013.pdf

Ellon Academy safeguarding Policy:

http://ellonacademy.aberdeenshire.sch.uk/wp-content/uploads/2021/03/Safeguarding-and-Child-Protection-Policy.pdf

Development/Monitoring/Review of this Policy

This online safety policy has been developed by the Ellon Academy E-Safety Group made up of:

- SLT member/s (Tracy Booth)
- child protection officer (Fraser McLachlan)
- teaching staff member (ICT and Digital Learning Impact Team members)
- guidance staff member (TBC)
- online safety co-ordinator (Lucy Moir) Chair
- parent / carer (Nick Topping and Karen Gray)
- technical support staff (where possible)
- community users (where appropriate)
- *pupil representation* – for advice and feedback. *Pupil voice is essential in the make up of the online safety group, but pupils would only be expected to take part in meetings where deemed relevant.* (Exec team members)

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 ECS Technology Development Manager (Aberdeenshire Council) on:	March 2021
The implementation of this online safety policy will be monitored by the:	HT, SLT (Responsibility for ICT), PT Digital Learning and the E-safety group
Monitoring will take place at regular intervals:	Yearly
The Authority 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:	At least 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:	March 2022
Should serious online safety incidents take place, the following external persons/agencies should be informed:	SLT informed before: Aberdeenshire Council (QIO) ECS Technology Development Manager Police Social Work Other relevant agency

The school will monitor the impact of the policy using:

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

Scope of the Policy

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

- Health and Wellbeing is one of the eight curricular areas in Curriculum for Excellence. Its substantial importance is reflected in its position at the center of the curriculum and at the heart of children's learning – as well as a central focus of the Scottish Attainment Challenge and the National Improvement Framework for Education. Along with literacy and numeracy it is one of the three core areas that are the responsibility of all staff in the school.

- Learning in Health and Wellbeing is designed to ensure that children and young people develop the knowledge and understanding, skills, capabilities and attributes which they need for mental, emotional, social and physical wellbeing now and in the future.

- Health and Wellbeing is also about the whole approach of the nursery, school, college or other setting. Children and young people should feel happy, safe, respected and included in the learning environment and all staff should be proactive in promoting positive relationships and behaviour in the classroom, playground, and wider learning community.
- Health and Wellbeing is also about the whole approach of the nursery, school, college or other setting. The ethos should support what children are learning and the climate – the behaviour that's modelled and encouraged – should reflect this.

- Schools need to be aware that incidents of online bullying, or other online safety incidents covered by this policy may take place outside of the school, between children and young people who attend the school or between any members of the school community, including staff. The school and the local authority, in partnership with parents and carers need to decide how to deal with such incidents and make this clear in the policy. This will link closely with positive relationships and behaviour policy and anti-bullying policies. The policy should make clear how the school will involve parents and carers in relation to such incidents.

Roles and Responsibilities

The following section outlines the online safety roles and responsibilities of individuals and groups within Ellon Academy.

Aberdeenshire Council

The school will work very closely in partnership with officers from Aberdeenshire Council to ensure that the schools' policies and procedures are in line with local and national advice and inter-agency approaches to the care and wellbeing of children and young people.

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 PT Digital Learning.
- The Headteacher, Senior Leadership Team and QIO 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 flowchart, p18).
- The Headteacher and Senior Leaders are responsible for ensuring that the PT Digital Learning 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 Senior Leadership Team will receive regular monitoring reports from the PT Digital Learning.
- The SLT/PTG records incidents of online bullying through the school's SEEMiS recording system in line with local procedures
- The DHT(ICT Responsibilities)/PT Digital Learning maintains a log of incidents to inform future online safety developments
- The DHT(ICT Responsibilities)/PT Digital Learning meets with Learning Through Technologies team to discuss current issues

PT Digital Learning (Online Safety Officer)

- Leads the E - 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.
- Ensures they are up to date with national relationships and behaviour guidance and anti-bullying guidance
- Provides (or identifies sources of) training and advice for staff
- Liaises with SLT/Aberdeenshire ICT/ECS Technology Development Manager, when appropriate
- Liaises with school technical staff
- Receives reports of online safety incidents (serious incident form/GIRFEC/Child Protection) and creates a log of incidents to inform future online safety developments. PT Digital Learning attends regular meetings with PT Guidance colleagues.
- Meets regularly with relevant officer from the Local Authority to discuss current issues, review incident logs and if possible, filtering change control logs
- Attends relevant meetings of PTG/SLT/Authority
- reports regularly to headteacher / senior leadership team

Aberdeenshire Council ICT

Aberdeenshire Council is responsible for ensuring:

- That the school technical infrastructure is secure and is not open to misuse or malicious attack
- that the school meets (as a minimum) the required online safety technical requirements as identified by the local authority or other relevant body and also the 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 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 is regularly monitored in order that any misuse / attempted misuse can be reported to the Headteacher/DHT(ICT Responsibilities)/PT Digital Learning for investigation / action / sanction

Teaching and Support Staff

Are responsible for ensuring that:

- **They have read, understood and signed the staff acceptable use policy (AUP)**
- They have an up to date awareness of online safety matters and of the current school online safety policy and practices
- They report any suspected misuse or problem to the HT/DHT (ICT responsibilities)/PT Digital Learning for investigation/action/sanction
- All digital communications with students/pupils/parents/carers should be on a professional level and only carried out using official school systems
- Online safety issues are embedded in aspects of the curriculum and other activities using the refreshed curriculum guidance in the Technologies experiences and outcomes
- 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

DHT Pastoral Support (Child Protection Coordinator)

If an online safety incident involves a child protection concern, in the first instance the member of staff involved must report the Child Protection incident to DHT Pastoral Support immediately. The Child Protection Coordinator is 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
- On-line bullying

E - Safety Group

The E - Safety Group provides a consultative group that has wide representation from Ellon Academy 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 reporting to the HT/Aberdeenshire Council.

Members of the E - Safety Group will assist the PT Digital Learning/DHT (ICT Responsibilities) with:

- The production/review/monitoring of the school online safety policy/documents in line with local anti-bullying policies
- The reporting of school filtering issues/concerns and requests for filtering changes.
- Mapping and reviewing the online safety/digital literacy curricular provision – ensuring relevance, breadth and progression using the refreshed curriculum guidance in the Technologies experiences and outcomes (in consultation with FH ICT and Enterprise, PTG and PT Curriculum)
- Monitoring network/internet/filtering/incident logs where possible
- Consulting stakeholders – including parents/carers and the pupils about the online safety provision
- Monitoring improvement actions identified through use of the 360degree safe Scotland self-review tool

Pupils

- Are responsible for using Ellon Academy'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 online bullying incidents, 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 Ellon Academy's online safety policy covers their actions out of school, if related to their membership of the school

Parents/carers

Parents/carers play a crucial role in ensuring that their children understand the need to use the internet/mobile devices in an appropriate way protect their privacy and keep themselves safe. The school will take every opportunity to help parents understand these issues through parents' information evenings, newsletters, letters, website, social media and information about national/local online safety documentation. Parents and carers will be encouraged to support the school in promoting good online safety practice, to act as good role models and to follow guidelines on the appropriate use of:

- Digital and video images taken at school events
- Access to parents' sections of the website/Learning Platform and on-line pupil records
- Their children's personal devices in the school (where this is allowed)
- www.respectme.org.uk

Community Users

Community Users who access Ellon Academy systems or programmes as part of the wider school provision will be expected to sign a Community User AUP before being provided with access to school systems.

Designated Getting it right for every child - Named Persons:

Getting it right for every child is the national approach in Scotland that puts the rights and wellbeing of children and young people at the heart of services that support them and provides a framework within which services can offer the right help, at the right time, from the right people.

The Getting it right for every child approach includes making available a Named Person for every child, from birth, until they reach 18, or beyond if they are still in school.

The approach builds on good practice by making a clear point of contact available for all children and young people, usually via the Health Visitor or a promoted teacher for children in school. In schools, the role of Named Person will be taken forward by these individuals as an integrated part of their existing duties: offering advice or support relevant to their expertise, or helping access support from others. It is national policy for local authorities to make the Named Person service available as an entitlement, but there is no obligation for children and young people or parents to accept any offer of advice or support from the Named Person.

Policy Statements

Education - children / young people

Whilst regulation and technical solutions are very important, their use must be balanced by educating children / young people to take a responsible approach. The education of children / young people in online safety is therefore an essential part of the school's online safety provision. They need the help and support of the school to recognise and avoid online safety risks and build their resilience and know who they can speak to when things go wrong.

Under Curriculum for Excellence, all adults who work in schools have a responsibility to support and develop mental, emotional, social and physical wellbeing. Online safety should be a focus in all areas of the curriculum and staff should reinforce online safety messages across all subject areas. 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 as part of year group assemblies and across a range of subjects, (e.g. Business Education / Personal and Social Education other lessons) should be regularly revisited
- Key online safety messages should be reinforced as part of a planned programme of assemblies and tutorial/pastoral activities. The emphasis in such messages should be on pupils learning to protect themselves and respect others. As appropriate the planned programme should help pupils understand what Digital Citizenship means and how it relates to the roles and responsibilities outlined in the school's promoting positive relationships policy
- Pupils should be taught in all lessons to be critically aware of the materials/content they access online 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 learner acceptable use policy 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 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 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, pupils 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 ICT staff 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 and carers

Some parents and carers may 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
- Newsletters, website, emails
- Parents and carers evenings / sessions
- High profile events/campaigns for example Safer Internet Day
- Reference to the relevant web sites / publications, e.g. 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
- Supporting community groups, e.g. early years settings, childminders, youth/sports/voluntary groups to enhance their online safety provision (possibly supporting the group in the use of Online Compass, an online safety self review tool - www.onlinecompass.org.uk)

Education and 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 all staff. This will be regularly updated and reinforced. An audit of the online safety training needs of all staff will be carried out regularly. It is expected that some staff will identify online safety as a training need.
- 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 policies.
- The PT Digital learning will receive regular updates through attendance at external training events, (e.g. from SWGfL / local authority/ 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 / INSET days.
- The PT Digital Learning will provide advice / guidance / training to individuals as required.

Technical - infrastructure/equipment, filtering and monitoring

The school will work closely with their local authority to ensure that the school's digital 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 username and secure password by Aberdeenshire ICT who will keep an up to date record of users and their usernames. Users are responsible for the security of their username and password and will be required to change their password every (insert period).
- The "master/administrator" passwords for the school digital systems, used by the network manager (or other person) must also be available to the headteacher or other nominated senior leader and kept in a secure place, (e.g. school safe)
- Aberdeenshire ICT 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 (e.g. child sexual abuse; extreme pornography; criminally racist or terrorist content) 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 should ensure that children are safe from terrorist and extremist material when accessing the internet. Additional duties for schools under the Counter Terrorism and Securities Act 2015 which requires schools to ensure that children are safe from terrorist and extremist material on the internet. (see appendix for information on "appropriate filtering").
- Where possible, school or local authority 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 policy.
- The school has (if possible) provided enhanced / differentiated user-level filtering
- 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 school systems and data. These are tested regularly. The school 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", (e.g. trainee teachers, supply teachers, visitors) onto the school systems.
- An agreed policy is in place regarding the extent of personal use that users (staff/children / young people/community users) and their family members are allowed on school devices that may be used out of school.
- An agreed policy is in place that allows staff to/forbids staff from downloading executable files and installing programmes on school devices.
- An agreed policy is in place regarding the use of removable media (eg memory sticks / CDs / DVDs) by users on school devices. Personal data cannot be sent over the internet or taken off the school site unless safely encrypted or otherwise secured.

Mobile technologies

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 learning platform and other cloud based services such as email and data storage.

All users should understand that the primary purpose of the use of 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 those for safeguarding, behaviour, anti-bullying, acceptable use, and policies around theft or malicious damage. Teaching about the safe and appropriate use of mobile technologies should be an integral part of the school's online safety education programme.

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

For further reading, please refer to “Bring your own device: a guide for schools” by Alberta Education available at: http://education.alberta.ca/admin/technology/research.aspx and to the “NEN Technical Strategy Guidance Note 5 – Bring your own device” - http://www.nen.gov.uk/bring-your-own-device-byod/

- The school or local authority acceptable use policys for staff, pupils, parents and carers will give consideration to the use of mobile technologies
- The school allows:

	School Devices			Personal Devices		
	School owned for individual use	School owned for multiple users	Authorised device[1]	Owned by pupils	Staff owned	Visitor owned
Allowed in school	Yes	Yes	Yes	Yes[2]	Yes[8]	Yes[8]
Full network access	Yes	Yes	Yes	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 pupils instant use of images that they have recorded themselves or downloaded from the internet. However, staff, parents and 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, eg., on social networking sites.
- 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.
- 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/made publicly available on social networking sites, nor should parents / carers comment on any activities involving other pupils in the digital / video images.
- *Care should be taken when taking digital/video images that children / young people 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.

[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

- The full names of pupils 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 pupils are published on the school website

Data Protection

Personal data will be recorded, processed, transferred and made available according to the Data Protection laws in force at the time this document is signed. Until May 2018 this will be 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.

The school 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.
- Correct permissions (from parents / carers and pupils) are gained for use of data as relevant under current legislation
- It is aware of who the Data Controller within the Local Authority is
- a responsible person (from senior leadership team) is identified as having overall responsibility for ensuring that the school complies with authority guidance and /or Data Protection Act in their handling of data, and who identifies and responds to risks related to handling of personal data; 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 school policy (below) once it has been transferred or its use is complete

Communications

This is an area of rapidly developing technologies and uses. Schools will need to discuss and agree how they intend to implement and use these technologies, e.g. some schools do not allow pupils to use mobile phones in lessons, while others identify educational potential and allow their use.

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

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

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

- The official school/local authority 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, chat, learning platform, 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. Teaching staff should note that the General Teaching Council for Scotland has a Code of Professionalism and Conduct which all teachers are expected to adhere to. The code sets out the key principles and values for registered teachers in Scotland and Part 1 of the Code states the key features of the Professionalism of teachers and maintaining trust in the profession. One of the features is that registered teaches are mindful that social networking can blur the professional boundary between teacher and pupil and to avoid inappropriate communication (including via social networking) with young people under 18 years of age.

- Pupils 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

The school provides the following measures to ensure reasonable steps are in place to minimise risk of harm to 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 and 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 or local authority
- 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:

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

School use of social media for professional purposes will be checked regularly by a nominated senior leader and online safety group to ensure compliance with the social media, data protection, communications, digital image and video policies.

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. online bullying/hate crime 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 out of, 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	
Using 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 school					X	
Infringing copyright					X	

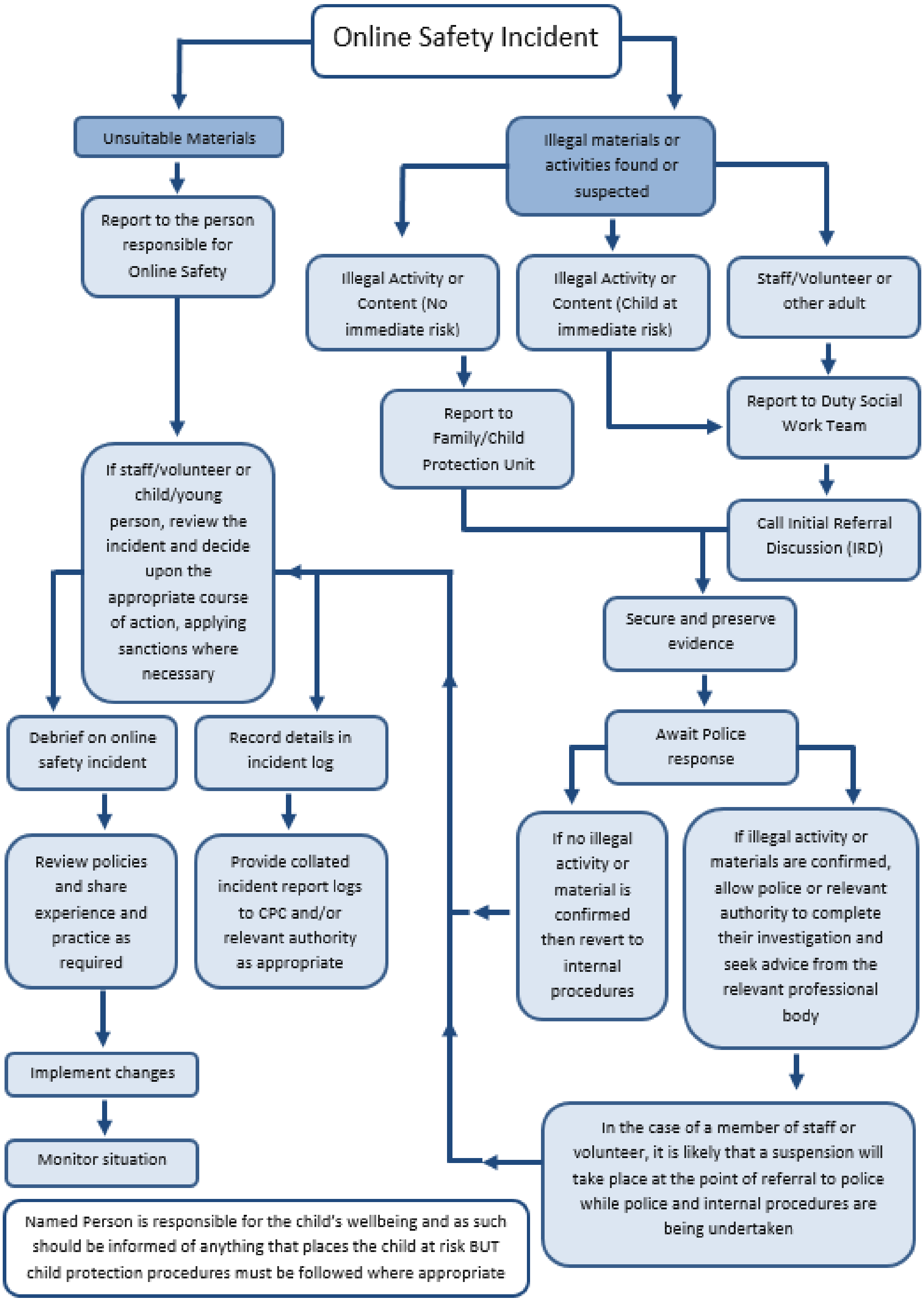
Revealing or publicising confidential or proprietary information (eg financial / personal information, databases, computer / network access codes and passwords)				X	
Creating or propagating computer viruses or other harmful files				X	
Unfair usage (downloading / uploading large files that hinders others 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 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 website(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 (p18) for responding to online safety incidents and report immediately to the police.


Online Safety Incident
Unsuitable Materials
Report to the person responsible for Online Safety
Illegal materials or activities found or suspected
Illegal Activity or Content (No immediate risk)
Illegal Activity or Content (Child at immediate risk)
Staff/Volunteer or other adult
Report to Family/Child Protection Unit
Report to Duty Social Work Team
Call Initial Referral Discussion (IRD)
If staff/volunteer or child/young person, review the incident and decide upon the appropriate course of action, applying sanctions where necessary
Secure and preserve evidence
Await Police response
Debrief on online safety incident
Record details in incident log
Review policies and share experience and practice as required
Provide collated incident report logs to CPC and/or relevant authority as appropriate
If no illegal activity or material is confirmed then revert to internal procedures
If illegal activity or materials are confirmed, allow police or relevant authority to complete their investigation and seek advice from the relevant professional body
Implement changes
Monitor situation
In the case of a member of staff or volunteer, it is likely that a suspension will take place at the point of referral to police while police and internal procedures are being undertaken
Named Person is responsible for the child's wellbeing and as such should be informed of anything that places the child at risk BUT child protection procedures must be followed where appropriate

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, 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 children / 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
    - promotion of terrorism or extremism
    - 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.

School actions

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 agreed 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:

- Discussions with pupil/pupils and Principal Teacher of Guidance/PT Digital Learning
- Referral to DHT House is appropriate
- Discussions with parents/carers
- Agreed school sanctions – (these many include a short/long term internet ban, short-term mainstream withdrawal from class, after school work session, warning of exclusion, exclusion.)

Pupil and Staff Incidents

	Actions / Sanctions								
Pupil incidents	Refer to class teacher	Refer to Principal Teacher faculty	Refer to Headteacher / DHT (ICT) /PT Digital	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 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	X			
Unauthorised use of non-educational sites during lessons	X						X	X	
Unauthorised / inappropriate use of mobile phone / digital camera / other mobile device	X							X	
Unauthorised / inappropriate use of social media / messaging apps / personal email	X						X	X	
Unauthorised downloading or uploading of files	X						X	X	
Allowing others to access school network by sharing username and passwords	X		X					X	
Attempting to access or accessing the school network, using another pupils account	X		X						
Attempting to access or accessing the school network, using the account of a member of staff			X			X		X	
Corrupting or destroying the data of other users	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
Actions which could bring the school into disrepute or breach the integrity of the ethos of the school		X	X			X			
Using proxy sites or other means to subvert the school's filtering system			X		X	X			

Accidentally accessing offensive or pornographic material and failing to report the incident			X		X				
Deliberately accessing or trying to access offensive or pornographic material			X	X	X	X			
Receipt or transmission of material that infringes the copyright of another person or infringes the Data Protection Act			X						

Actions / Sanctions

Staff 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				
Inappropriate personal use of the internet / social media / personal email	X							
Unauthorised downloading or uploading of files	X							
Allowing others to access school network by sharing username and passwords or attempting to access or accessing the school network, using another person's account		X			X	X		
Careless use of personal data e.g. holding or transferring data in an insecure manner	X	X				X		
Deliberate actions to breach data protection or network security rules	X	X				X		
Corrupting or destroying the data of other users or causing deliberate damage to hardware or software	X	X				X		X
Sending an email, text or message that is regarded as offensive, harassment or of a bullying nature	X	X				X		

Using personal email / social networking / instant messaging / text messaging to carrying out digital communications with children / young people	X	X				X		
Actions which could compromise the staff member’s professional standing	X	X				X		
Actions which could bring the school into disrepute or breach the integrity of the ethos of the school	X	X				X		
Using proxy sites or other means to subvert the school’s filtering system	X	X	X		X			
Accidentally accessing offensive or pornographic material and failing to report the incident	X	X	X			X		
Deliberately accessing or trying to access offensive or pornographic material	X	X				X		X
Breaching copyright or licensing regulations	X	X						
Continued infringements of the above, following previous warnings or sanctions							X	X