

E-Safety Policy

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Development / Monitoring / Review of this Policy

This e-safety policy has been developed by the Senior Leadership team in conjunction with our IT support staff.

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

Schedule for Development / Monitoring / Review

| | |
|--|---------------------------------|
| This e-safety policy was approved by the <i>Governing Body</i> on: | Nov 2016 |
| The implementation of this e-safety policy will be monitored by the: | <i>Senior Management Team</i> |
| Monitoring will take place at regular intervals: | <i>Steve Bowers- IT Manager</i> |

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|--|---|
| The <i>Governing Body</i> will receive a report on the implementation of the e-safety policy: | <i>Every two years</i> |
| The E-Safety Policy will be reviewed every two years, or more regularly in the light of any significant new developments in the use of the technologies, new threats to e-safety or incidents that have taken place. The next anticipated review date will be: | <i>November 2018</i> |
| Should serious e-safety incidents take place, the following external persons / agencies should be informed: | <i>Grace Electronics & Oxfordshire community Churches</i> |

The school and IT team will monitor the impact of the policy using:

- Logs of reported incidents
- Monitoring logs of internet activity (including sites visited)
- Internal monitoring data for network activity

Scope of the Policy

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

The Education and Inspections Act 2006 empowers Principals to such extent as is reasonable, to regulate the behaviour of students / pupils when they are off the *school* site and empowers members of staff to impose disciplinary penalties for inappropriate behaviour. This is pertinent to incidents of cyber-bullying, or other e-safety incidents covered by this policy, which may take place outside of the school, but is linked to membership of the school. The 2011 Education Act increased these powers with regard to the searching for and of electronic devices and the deletion of data (see appendix for template policy). In the case of both acts, action can only be taken over issues covered by the 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 e-safety behaviour that take place out of school.

Roles and Responsibilities

The following section outlines the e-safety roles and responsibilities of individuals and groups within the *school*.

Governors:

Governors are responsible for the approval of the E-Safety Policy and for reviewing the effectiveness of the policy. This will be carried out by the *Governors* receiving regular information about e-safety incidents and monitoring reports from the SLT.

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Principal and Senior Leaders:

- The *Principal* has a duty of care for ensuring the safety (including e-safety) of members of the school community, though the day to day responsibility for e-safety will be delegated to the *IT team and teachers*.
- The Principal and (at least) another member of the Senior Management Team should be aware of the procedures to be followed in the event of a serious e-safety allegation being made against a member of staff. This is the same process as the complaints policy.

Network Manager / Technical staff:

The IT Manager & Technical Staff are responsible for ensuring:

- that the *school's* technical infrastructure is secure and is not open to misuse or malicious attack
- that the *school* meets required e-safety technical requirements.
- that users may only access the networks and devices through a properly enforced password protection policy, in which passwords are regularly changed
- that they keep up to date with e-safety technical information in order to effectively carry out their e-safety role and to inform and update others as relevant
- that the use of the *network, internet, remote access, email* is regularly monitored in order that any misuse / attempted misuse can be reported to the *Principal* for investigation
- *that monitoring software and systems are implemented and updated as agreed in school policies eg with regard to our duty to Preventing any radicalisation/extremism, by having strong filters*

Teaching and Support Staff

are responsible for ensuring that:

- they have an up to date awareness of e-safety matters and of the current *school* e-safety policy and practices
- they have read, understood and signed the Staff Acceptable Use Policy / Agreement (AUP)
- they report any suspected misuse or problem to the *Headteacher / Principal / Senior Leader* ; 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*
- e-safety issues are embedded in all aspects of the curriculum and other activities
- pupils understand and follow the e-safety 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

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- *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*

Safeguarding Designated Safeguarding Lead

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

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

Pupils:

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

Parents / Carers

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

- digital and video images taken at school events
- their children's personal devices in the school (where this is allowed)

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 e-safety is therefore an

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essential part of the school's e-safety provision. Children and young people need the help and support of the school to recognise and avoid e-safety risks and build their resilience.

E-safety should be a focus in all areas of the curriculum and staff should reinforce e-safety messages across the curriculum. The e-safety curriculum should be broad, relevant and provide progression, with opportunities for creative activities and will be provided in the following ways:

- A planned e-safety curriculum should be integrated as part of Computing / PHSE / other lessons and should be regularly revisited
- Key e-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
- *Students / 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*
- *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, students may need to research topics (eg racism, drugs, discrimination) that would normally result in internet searches being blocked. In such a situation, staff can request that the Technical Staff (or other relevant designated person) can temporarily remove those sites from the filtered list for the period of study. Any request to do so, should be auditable, with clear reasons for the need.*

Education – parents

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

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

- Newsletters
- Parents Evenings
- Individual consultations where issues arise

Education & Training – Staff / Volunteers

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

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- As part of safeguarding training, e-safety training will be made available to staff. This will be regularly updated and reinforced. An audit of the e-safety training needs of all staff will be carried out regularly.

Technical – infrastructure / equipment, filtering and monitoring

The school will be responsible for ensuring that the school infrastructure is as safe and secure as is reasonably possible and that policies and procedures approved within this policy are implemented. It will also need to ensure that the relevant people named in the above sections will be effective in carrying out their e-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 *our IT support technicians 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 90 days*.
- The “master” passwords for the school system, used by the Network Manager (or other person) must also be available to the *Principal* or other nominated senior leader and kept in a secure place
- Our IT support technician is responsible for ensuring that software licence logs are accurate and up to date and that regular checks are made to reconcile the number of licences purchased against the number of software installations
- Internet access is filtered for all users. Illegal content (child sexual abuse images) is filtered by the broadband or filtering provider. 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
- *The school has provided enhanced 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*
- 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.
- *Personal data will not be stored on removable media (eg memory sticks / CDs / DVDs) by school users. Personal data should not be sent over the internet or taken off the school site unless safely encrypted or otherwise secured. (see [School Personal Data Policy Template in the appendix for further detail](#))*

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 cyberbullying to take place. Digital images may remain available on the internet forever and may cause harm or embarrassment to individuals in the short or longer term. It is common for employers to carry out internet searches for information about potential and existing employees. 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.
- Parents 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 made publicly available on social networking sites, nor should parents / carers comment on any activities involving other *pupils* in the digital images.
- *Staff and volunteers are allowed to take digital images to support educational aims, but must follow school policies concerning the sharing, distribution and publication of those images.*
- *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*
- *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 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

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- Processed in accordance with the data subject's rights
- Secure
- Only transferred to others with adequate protection.

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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”.
- It has a Data Protection Policy
- 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 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 ever (in exceptional circumstances) 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

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:

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| | Staff & other adults | | | Students / Pupils | | | | |
|---|----------------------|--------------------------|----------------------------|-------------------|---------|--------------------------|-------------------------------|-------------|
| | Allowed | Allowed at certain times | Allowed for selected staff | Not allowed | Allowed | Allowed at certain times | Allowed with staff permission | Not allowed |
| Communication Technologies | | | | | | | | |
| Mobile phones may be brought to school | X | | | | | X | | |
| Use of mobile phones in lessons | | X | | | | | X | |
| Taking photos on mobile phones / cameras | | | X | X | | | | |
| Use of other mobile devices eg tablets, gaming devices | | X | | | | X | | |
| Use of personal email addresses in school, or on school network | | X | | 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
- 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, etc) must be professional in tone and content.
- *Whole class / group email addresses may be used at KS1, while students / pupils at KS2 and above will be provided with individual school email addresses for educational use.*
- *Pupils should be taught about e-safety issues, such as the risks attached to the sharing of personal details. They should also be taught strategies to deal with inappropriate communications and be reminded of the need to communicate appropriately when using digital technologies.*
- *Personal information should not be posted on the school website and only official email addresses should be used to identify members of staff.*

Social Media - Protecting Professional Identity

All schools, academies and local authorities 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, cyberbully, 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 limiting access to personal information:

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

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*
- Security settings on personal social media profiles are regularly checked to minimise risk of loss of personal information.
- Friend requests to personal accounts, from colleagues who are parents, are risk assessed with your line manager

The *school's* use of social media for professional purposes will be checked regularly by the IT technical staff to ensure compliance with the relevant policies.

Unsuitable / inappropriate 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 school or outside school when using school equipment or systems. The school policy restricts usage as follows:

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User Actions

| | | Acceptable | Acceptable at | Acceptable for nominated users | Unacceptable | Unacceptable and illegal |
|--|--|------------|---------------|--------------------------------|--------------|--------------------------|
| Users shall not visit Internet sites, make, post, download, upload, data transfer, communicate or pass on, material, remarks, proposals or comments that contain or relate to: | Child sexual abuse images –The making, production or distribution of indecent images of children. Contrary to The Protection of Children Act 1978 | | | | | X |
| | Grooming, incitement, arrangement or facilitation of sexual acts against children Contrary to the Sexual Offences Act 2003. | | | | | X |
| | Possession of an extreme pornographic image (grossly offensive, disgusting or otherwise of an obscene character) Contrary to the Criminal Justice and Immigration Act 2008 | | | | | X |
| | criminally racist material in UK – to stir up religious hatred (or hatred on the grounds of sexual orientation) - contrary to the Public Order Act 1986 | | | | | X |
| | pornography | | | | X | |
| | promotion of any kind of discrimination | | | | X | |
| | threatening behaviour, including promotion of physical violence or mental harm | | | | X | |
| | any other information which may be offensive to colleagues or breaches the integrity of the ethos of the 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 / academy | | | | | X | |
| Infringing copyright | | | | | X | |
| Revealing or publicising confidential or proprietary information (eg financial / personal information, databases, computer / network access codes and passwords) | | | | | X | |
| Creating or propagating computer viruses or other harmful files | | | | | X | |
| Unfair usage (downloading / uploading large files that hinders others in their use of the | | | | | X | |

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| | | | | | |
|--------------------------------------|--|---|--|---|--|
| internet) | | | | | |
| On-line gaming (educational) | | | | X | |
| On-line gaming (non educational) | | | | X | |
| On-line gambling | | | | X | |
| On-line shopping / commerce | | X | | | |
| File sharing | | X | | | |
| Use of social media | | X | | | |
| Use of messaging apps | | X | | | |
| Use of video broadcasting eg Youtube | | X | | | |

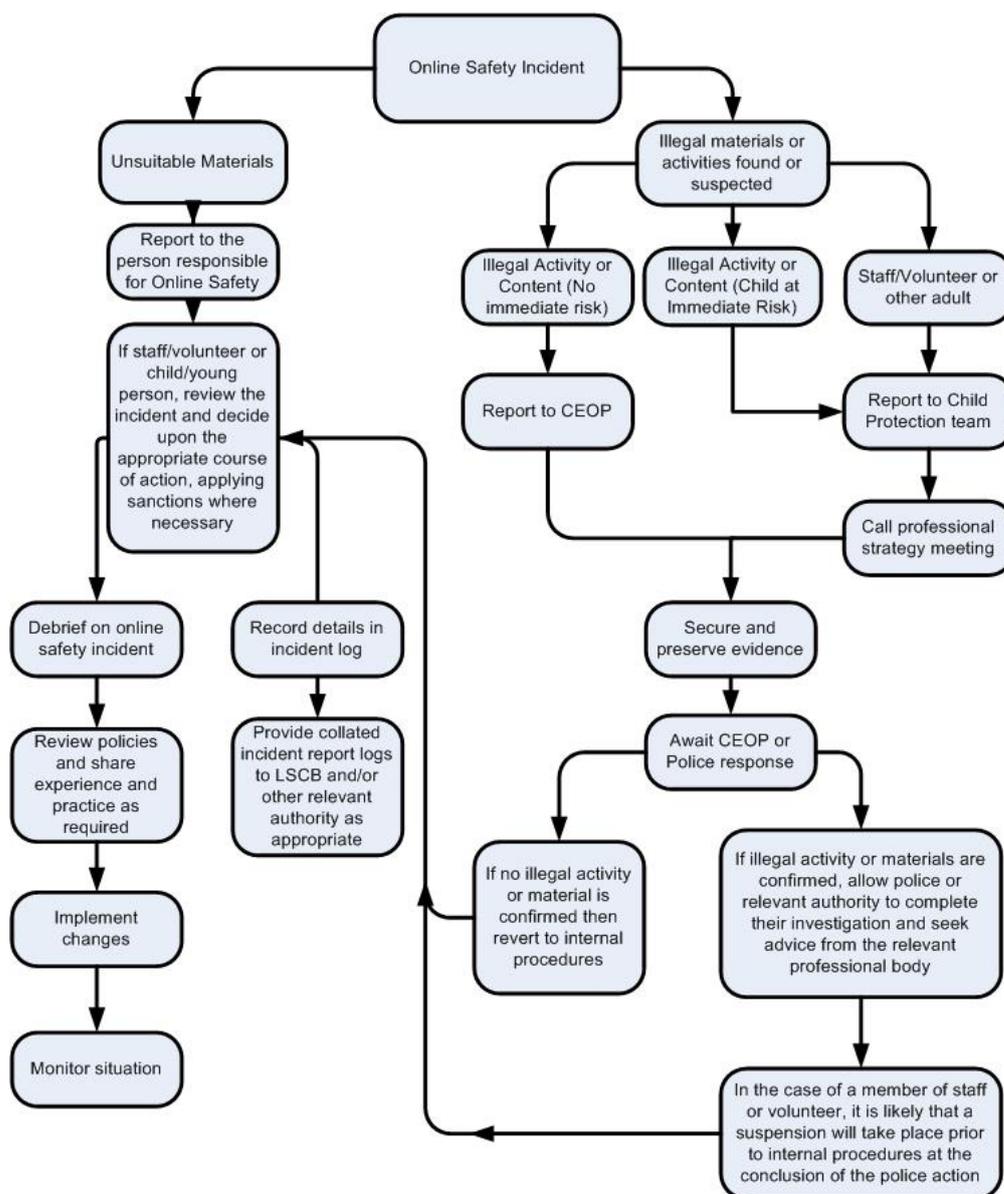
Responding to incidents of misuse

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

Illegal Incidents

This flow chart can be used as guidance to help any member of staff in handling an incident. Where it is uncertain who to report to, the Principal will be the point of contact as DSL. 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.

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Other Incidents

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

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

- Have more than one senior member of staff involved in this process. This is vital to protect individuals if accusations are subsequently reported.
- Conduct the procedure using a designated computer that will not be used by young people and if necessary can be taken off site by the police should the need arise. Use the same computer for the duration of the procedure.

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

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

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:

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Students / Pupils

Actions / Sanctions

| Incidents: | Refer to Principal | Refer to Head of Department / Head of Year / other | Refer to Headteacher / Principal | Refer to Police | Refer to technical support staff for action re filtering / security etc | Inform parents / carers | Removal of network / internet access rights | Warning | Further sanction eg detention / exclusion |
|---|--------------------|--|----------------------------------|-----------------|---|-------------------------|---|---------|---|
| Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on unsuitable / inappropriate activities). | X | X | X | X | X | X | X | | X |
| Unauthorised use of non-educational sites during lessons | X | | | | | | | | |
| Unauthorised use of mobile phone / digital camera / other mobile device | X | | | | X | X | | | |
| Unauthorised 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 student's / pupil's account | X | | | | X | X | | | |
| Attempting to access or accessing the school network, using the account of a member of staff | X | | | X | X | X | | | X |
| Corrupting or destroying the data of other users | X | | | X | X | X | | | X |
| Sending an email, text or message that is regarded as offensive, harassment or of a bullying nature | X | | | X | X | X | | | X |
| Continued infringements of the above, following previous warnings or sanctions | 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 | | | X |
| Using proxy sites or other means to subvert the school's filtering system | X | | | 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 | | | X |
| Receipt or transmission of material that infringes the copyright of another person or infringes the Data Protection Act | X | | | X | X | X | | | |

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Staff

| Incidents: | Refer to line manager | Refer to Headteacher / Principal | Refer to Police | Refer to Technical Support Staff for action re filtering etc | 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 | | | |
| Inappropriate personal use of the internet / social media / personal email | X | X | | | | |
| Unauthorised downloading or uploading of files | X | 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 | | | | |
| Careless use of personal data eg holding or transferring data in an insecure manner | X | 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 | | | X | |
| Using personal email / social networking / instant messaging / text messaging to carrying out digital communications with students / pupils | 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 / academy'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 | |
| Breaching copyright or licensing regulations | X | X | | | | |
| Continued infringements of the above, following previous warnings or sanctions | X | X | | | X | X |

School Policy - Pupil Acceptable Use Agreement – Secondary Pupils

As a Christian School we believe God sees and knows everything we do. Our first reason for behaving appropriately with digital technology is from the motivation of wanting to please God with our actions. Digital technologies have become integral to the lives of children and young people, both within schools and outside school. These technologies are powerful tools, which open up new opportunities for everyone. These technologies can stimulate discussion, promote creativity and stimulate awareness of context to promote effective learning, however they can be misused. Young people should have an entitlement to safe internet access at all times.

This Acceptable Use Policy is intended to ensure:

- that young people will be responsible users and stay safe while using the internet and other digital technologies for educational, personal and recreational use.
- that school systems and users are protected from accidental or deliberate misuse that could put the security of the systems and users at risk.

The school will try to ensure that *pupils* will have good access to digital technologies to enhance their learning and will, in return, expect the *pupils* to agree to be responsible users.

Acceptable Use Policy Agreement

I understand that I must use school ICT systems in a responsible way, to ensure that there is no risk to my safety or to the safety and security of the ICT systems and other users.

For my own personal safety:

- I understand that the *school* will monitor my use of the systems, devices and digital communications.
- I will keep my username and password safe and secure – I will not share it, nor will I try to use any other person's username and password. I understand that I should not write down or store a password where it is possible that someone may steal it.
- I will be aware of "stranger danger", when I am communicating on-line.
- I will not disclose or share personal information about myself or others when on-line (this could include names, addresses, email addresses, telephone numbers, age, gender, educational details, financial details etc)
- I will immediately report any unpleasant or inappropriate material or messages or anything that makes me feel uncomfortable when I see it on-line.

I understand that everyone has equal rights to use technology as a resource and:

- I understand that the *school* systems and devices are primarily intended for educational use and that I will not use them for personal or recreational use unless I have permission.
- I will not try (unless I have permission) to make large downloads or uploads that might take up internet capacity and prevent other users from being able to carry out their work.

E-Safety Policy

- I will not use the *school* systems or devices for on-line gaming, on-line gambling, internet shopping, file sharing, or video broadcasting (eg YouTube), unless I have permission of a member of staff to do so.

I will act as I expect others to act toward me:

- I will respect others' work and property and will not access, copy, remove or otherwise alter any other user's files, without the owner's knowledge and permission.
- I will be polite and responsible when I communicate with others, I will not use strong, aggressive or inappropriate language and I appreciate that others may have different opinions.
- I will not take or distribute images of anyone without their permission.

I recognise that the school has a responsibility to maintain the security and integrity of the technology it offers me and to ensure the smooth running of the school:

- I will only use my own personal devices (mobile phones / USB devices etc) in school if I have permission I understand that, if I do use my own devices in the *school*, I will follow the rules set out in this agreement, in the same way as if I was using school equipment.
- I understand the risks and will make every effort not to upload, download or access any materials which are illegal or inappropriate or may cause harm or distress to others, nor will I try to use any programmes or software that might allow me to bypass the filtering / security systems in place to prevent access to such materials.
- I will immediately report any damage or faults involving equipment or software, however this may have happened.
- I will not open any hyperlinks in emails or any attachments to emails, unless I know and trust the person / organisation who sent the email, or if I have any concerns about the validity of the email (due to the risk of the attachment containing viruses or other harmful programmes)
- I will not install or attempt to install or store programmes of any type on any school device, nor will I try to alter computer settings.

When using the internet for research or recreation, I recognise that:

- I should ensure that I have permission to use the original work of others in my own work
- Where work is protected by copyright, I will not try to download copies (including music and videos)
- When I am using the internet to find information, I should take care to check that the information that I access is accurate, as I understand that the work of others may not be truthful and may be a deliberate attempt to mislead me.

I understand that I am responsible for my actions, both in and out of school:

- I understand that the *school* also has the right to take action against me if I am involved in incidents of inappropriate behaviour, that are covered in this agreement, when I am out of school and where they involve my membership of the school community (examples would be cyber-bullying, use of images or personal information).

E-Safety Policy

- I understand that if I fail to comply with this Acceptable Use Policy Agreement, I will be subject to disciplinary action. This may include loss of access to the school network / internet, detentions, suspensions, contact with parents and in the event of illegal activities involvement of the police.

Please complete the sections on the next page to show that you have read, understood and agree to the rules included in the Acceptable Use Agreement. If you do not sign and return this agreement, access will not be granted to school systems and devices.

Pupil Acceptable Use Agreement Form

This form relates to the *student / pupil* Acceptable Use Agreement, to which it is attached.

Please complete the sections below to show that you have read, understood and agree to the rules included in the Acceptable Use Agreement. If you do not sign and return this agreement, access will not be granted to school ICT systems.

I have read and understand the above and agree to follow these guidelines when:

- I use the *school* systems and devices (both in and out of school)
- I use my own devices in the *school* (when allowed) eg mobile phones, kindle, gaming devices USB devices, cameras etc
- I use my own equipment out of the school in a way that is related to me being a member of this *school* communicating with other members of the school, accessing school email etc..

Name of Student / Pupil

Group / Class

Signed

Date

E-Safety Policy

Pupil Acceptable Use Policy Agreement Template – for younger pupils (Foundation / KS1)

This is how we stay safe when we use computers:

- I will ask a teacher or suitable adult if I want to use the computers
- I will only use activities that a teacher or suitable adult has told or allowed me to use.
- I will take care of the computer and other equipment
- I will ask for help from a teacher or suitable adult if I am not sure what to do or if I think I have done something
- I will tell a teacher or suitable adult if I see something that upsets me on the screen.
- I know that if I break the rules I might not be allowed to use a computer.

Signed (child):.....

Signed (parent):

Parent / Carer Acceptable Use Agreement

As a Christian School we believe God sees and knows everything we do. Our first reason for behaving appropriately with digital technology is from the motivation of wanting to please God with our actions. Digital technologies have become integral to the lives of children and young people, both within schools and outside school. These technologies are powerful tools, which open up new opportunities for everyone. These technologies can stimulate discussion, promote creativity and stimulate awareness of context to promote effective learning, however they can be misused. Young people should have an entitlement to *safe* internet access at all times.

This Acceptable Use Policy is intended to ensure:

- that young people will be responsible users and stay safe while using the internet and other communications technologies for educational, personal and recreational use.
- that school systems and users are protected from accidental or deliberate misuse that could put the security of the systems and users at risk.
- that parents and carers are aware of the importance of e-safety and are involved in the education and guidance of young people with regard to their on-line behaviour.
- that the parents do not use or broadcast digital images of school pupils without permission

The school will try to ensure that *pupils* will have good access to digital technologies to enhance their learning and will, in return, expect the *pupils* to agree to be responsible users. A copy of the Pupil Acceptable Use Policy is attached to this permission form, so that parents / carers will be aware of the school expectations of the young people in their care.

E-Safety Policy

Parents are requested to sign the permission form below to show their support of the school in this important aspect of the school's work.

Permission Form

Parent / Carers Name Pupil Name

As the parent / carer of the above *pupils*, I give permission for my son / daughter to have access to the internet and to ICT systems at school.

I know that my son / daughter has signed or will sign an Acceptable Use Agreement at an appropriate age and has received, or will receive, appropriate e-safety education to help them understand the importance of safe use of technology and the internet – both in and out of school.

I understand that the school will take every reasonable precaution, including monitoring and filtering systems, to ensure that young people will be safe when they use the internet and ICT systems. I also understand that the school cannot ultimately be held responsible for the nature and content of materials accessed on the internet and using mobile technologies.

I understand that my son's / daughter's activity on the ICT systems will be monitored and that the school will contact me if they have concerns about any possible breaches of the Acceptable Use Policy.

I will encourage my child to adopt safe use of the internet and digital technologies at home and will inform the school if I have concerns over my child's e-safety.

Signed Date

Use of Digital / Video Images

The use of digital / video images plays an important part in learning activities. Pupils and members of staff may use digital cameras to record evidence of activities in lessons and out of school. These images may then be used in presentations in subsequent lessons.

Images may also be used to celebrate success through their publication in newsletters, on the school website and occasionally in the public media,

The school will comply with the Data Protection Act and request parents / carers permission before taking images of members of the school. We will also ensure that when images are published that the young people can not be identified by the use of their names.

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.

Parents / carers are requested to sign the permission form below to allow the school to take and use images of their children and for the parents / carers to agree

E-Safety Policy

Digital / Video Images Permission Form

Parent / Carers Name

Student / Pupil Name

As the parent / carer of the above *pupil*, I agree to the school taking and using digital / video images of my child / children. I understand that the images will only be used to support learning activities or in publicity that reasonably celebrates success and promotes the work of the school.

Yes / No

I agree that if I take digital or video images at, or of, – school events which include images of children, other than my own, I will abide by these guidelines in my use of these images.

Yes / No

Signed

Date

Use of Cloud Systems Permission Form

The school uses Google Apps for Education for *pupils / students* and staff. This permission form describes the tools and pupil / student responsibilities for using these services.

The following services are available to each *pupil / student* and hosted by Google as part of the school's online presence in Google Apps for Education:

Mail - an individual email account for school use managed by the school

Calendar - an individual calendar providing the ability to organize schedules, daily activities, and assignments

Docs - a word processing, spreadsheet, drawing, and presentation toolset that is very similar to Microsoft Office

Sites - an individual and collaborative website creation tool

Using these tools, *pupils / students* collaboratively create, edit and share files and websites for school related projects and communicate via email with other pupils / students and members of staff. These services are entirely online and available 24/7 from any Internet-connected computer. Examples of student use include showcasing class projects, building an electronic portfolio of school learning experiences, and working in small groups on presentations to share with others.

The school believes that use of the tools significantly adds to your child's educational experience.

As part of the Google terms and conditions we are required to seek your permission for your child to have a Google Apps for Education account:

E-Safety Policy

Parent / Carers Name

Student / Pupil Name

As the parent / carer of the above *student / pupil*, I agree to my child using the school using Google Apps for Education.

Yes / No

Signed

Date

Pupil Acceptable Use Agreement

On the following pages we have copied, for the information of parents and carers, the Pupil Acceptable Use Agreement.

.Staff (and Volunteer) Acceptable Use Policy Agreement Template

School Policy

As a Christian School we believe God sees and knows everything we do. Our first reason for behaving appropriately with digital technology is from the motivation of wanting to please God with our actions. Digital technologies have become integral to the lives of children and young people, both within schools and outside school. These technologies are powerful tools, which open up new opportunities for everyone. These technologies can stimulate discussion, promote creativity and stimulate awareness of context to promote effective learning, however they can be misused. Young people should have an entitlement to safe internet access at all times.

This Acceptable Use Policy is intended to ensure:

- that staff and volunteers will be responsible users and stay safe while using the internet and other communications technologies for educational, personal and recreational use.
- that school ICT systems and users are protected from accidental or deliberate misuse that could put the security of the systems and users at risk.
- that staff are protected from potential risk in their use of ICT in their everyday work.

The school will try to ensure that staff and volunteers will have good access to ICT to enhance their work, to enhance learning opportunities for *pupils* learning and will, in return, expect staff and volunteers to agree to be responsible users.

E-Safety Policy

Acceptable Use Policy Agreement

I understand that I must use school ICT systems in a responsible way, to ensure that there is no risk to my safety or to the safety and security of the ICT systems and other users. I recognise the value of the use of ICT for enhancing learning and will ensure that pupils receive opportunities to gain from the use of ICT. I will, where possible, educate the young people in my care in the safe use of ICT and embed e-safety in my work with young people.

For my professional and personal safety:

- I understand that the *school* will monitor my use of the ICT systems, email and other digital communications.
- I understand that the rules set out in this agreement also apply to use of school ICT systems (eg laptops, email, VLE etc) out of school, and to the transfer of personal data (digital or paper based) out of school
- I understand that the school ICT systems are primarily intended for educational use and that I will only use the systems for personal or recreational use within the policies and rules set down by the school.
- I will not disclose my username or password to anyone else, nor will I try to use any other person's username and password. I understand that I should not write down or store a password where it is possible that someone may steal it.
- I will immediately report any illegal, inappropriate or harmful material or incident, I become aware of, to the appropriate person.

I will be professional in my communications and actions when using *school* ICT systems:

- I will not access, copy, remove or otherwise alter any other user's files, without their express permission.
- I will communicate with others in a professional manner, I will not use aggressive or inappropriate language and I appreciate that others may have different opinions.
- I will ensure that when I take and / or publish images of others I will do so with their permission and in accordance with the school's policy on the use of digital / video images. I will not use my personal equipment to record these images, unless I have permission to do so. Where these images are published (eg on the school website / VLE) it will not be possible to identify by name, or other personal information, those who are featured.
- I will only use chat and social networking sites in school in accordance with the school's policies
- I will only communicate with pupils and parents / carers using official school systems. Any such communication will be professional in tone and manner
- I will not engage in any on-line activity that may compromise my professional responsibilities.

E-Safety Policy

The school has the responsibility to provide safe and secure access to technologies and ensure the smooth running of the *school*:

- When I use my mobile devices (PDAs / laptops / mobile phones / USB devices etc) in school, I will follow the rules set out in this agreement, in the same way as if I was using *school* equipment. I will also follow any additional rules set by the *school* about such use. I will ensure that any such devices are protected by up to date anti-virus software and are free from viruses.
- I will not use personal email addresses on the school ICT systems without permission.
- I will not open any hyperlinks in emails or any attachments to emails, unless the source is known and trusted , or if I have any concerns about the validity of the
- I will ensure that my data is regularly backed up, in accordance with relevant school policies.
- I will not try to upload, download or access any materials which are illegal (child sexual abuse images, criminally racist material, adult pornography covered by the Obscene Publications Act) or inappropriate or may cause harm or distress to others. I will not try to use any programmes or software that might allow me to bypass the filtering / security systems in place to prevent access to such materials.
- I will not try (unless I have permission) to make large downloads or uploads that might take up internet capacity and prevent other users from being able to carry out their work.
- I will not install or attempt to install programmes of any type on a machine, or store programmes on a computer, nor will I try to alter computer settings, unless this is allowed in school policies
- I will not disable or cause any damage to school equipment, or the equipment belonging to others.
- I will only transport, hold, disclose or share personal information about myself or others, as outlined in the School Policy. Where digital personal data is transferred outside the secure local network, it must be encrypted. Paper based Protected and Restricted data must be held in lockable storage.
- I understand that data protection policy requires that any staff or pupil data to which I have access, will be kept private and confidential, except when it is deemed necessary that I am required by law or by school policy to disclose such information to an appropriate authority.
- I will immediately report any damage or faults involving equipment or software, however this may have happened.

When using the internet in my professional capacity or for school sanctioned personal use:

- I will ensure that I have permission to use the original work of others in my own work
- Where work is protected by copyright, I will not download or distribute copies (including music and videos).

E-Safety Policy

I understand that I am responsible for my actions in and out of the *school*:

- I understand that this Acceptable Use Policy applies not only to my work and use of school ICT equipment in school, but also applies to my use of school ICT systems and equipment off the premises and my use of personal equipment on the premises or in situations related to my employment by the school
- I understand that if I fail to comply with this Acceptable Use Policy Agreement, I could be subject to disciplinary action. This could result in a warning, a suspension, referral to Governors and in the event of illegal activities the involvement of the police.

I have read and understand the above and agree to use the school ICT systems (both in and out of school) and my own devices (in school and when carrying out communications related to the school) within these guidelines.

Staff / Volunteer Name

Signed

Date

School Technical Security Policy (including passwords)

Introduction

Effective technical security depends not only on technical measures, but also on appropriate policies and procedures and on good user education and training. The school will be responsible for ensuring that the *school infrastructure / network* is as safe and secure as is reasonably possible and that:

- users can only access data to which they have right of access
- no user should be able to access another's files (other than that allowed for monitoring purposes within the school's policies).
- access to personal data is securely controlled in line with the school's personal data policy
- logs are maintained of access by users and of their actions while users of the system
- there is effective guidance and training for users
- there are regular reviews and audits of the safety and security of school computer systems
- there is oversight from senior leaders and these have impact on policy and practice.

Responsibilities

The management of technical security will be the responsibility of Grace Electronics

Technical Security

Policy statements

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 will receive guidance and training and will be effective in carrying out their 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
- Appropriate security measures are in place to protect the servers, firewalls, switches, routers, wireless systems, work stations, mobile devices etc from accidental or malicious attempts which might threaten the security of the school systems and data.
- Responsibilities for the management of technical security are clearly assigned to appropriate and well trained staff
- All users will have clearly defined access rights to school technical systems.

Password Security

A safe and secure username / password system is essential if the above is to be established and will apply to all school technical systems, including networks, devices and email

E-Safety Policy

Policy Statements

- All users will have clearly defined access rights to school technical systems and devices. Details of the access rights available to groups of users will be recorded by the Network Manager (or other person) and will be reviewed, by the senior management team.
- **All school networks and systems will be protected by secure passwords that are regularly changed**
- **The “master / administrator” passwords for the school systems, used by the technical staff must also be available to the *Headteacher / Principal* or other nominated senior leader and kept in a secure place eg school safe. Consideration should also be given to using two factor authentication for such accounts.**

Staff passwords:

- **All staff users will be provided with a username and password** by our IT support technician who will keep an up to date record of users and their usernames.
- The password must not include proper names or any other personal information about the user that might be known by others
- the account should be “locked out” following six successive incorrect log-on attempts
- temporary passwords e.g. used with new user accounts or when users have forgotten their passwords, shall be enforced to change immediately upon the next account log-on
- passwords shall not be displayed on screen, and shall be securely hashed (use of one-way encryption)
- passwords should be different for different accounts, to ensure that other systems are not put at risk if one is compromised and should be different for systems used inside and outside of school
- should be changed at least every 60 to 90 days
- should not re-used for 6 months and be significantly different from previous p the last four passwords cannot be re-used asswords created by the same user.
- should be different for different accounts, to ensure that other systems are not put at risk if one is compromised
- should be different for systems used inside and outside of school

School Personal Data Handling Policy

Introduction

Schools and their employees should do everything within their power to ensure the safety and security of any material of a personal or sensitive nature

It is the responsibility of all members of the school community to take care when handling, using or transferring personal data that it cannot be accessed by anyone who does not:

- have permission to access that data, and/or
- need to have access to that data.

Data breaches can have serious effects on individuals and / or institutions concerned, can bring the school into disrepute and may well result in disciplinary action, criminal prosecution and fines imposed by the Information Commissioners Office for the school and the individuals involved. Particularly, all transfer of data is subject to risk of loss or contamination.

Anyone who has access to personal data must know, understand and adhere to this policy, which brings together the legal requirements contained in relevant data protection legislation and relevant regulations and guidance.

Policy Statements

The school 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".

Personal Data

The school and individuals will have access to a wide range of personal information and data. The data may be held in a digital format or on paper records. Personal data is defined as any combination of data items that identifies an individual and provides specific information about them, their families or circumstances. This will include:

- Personal information about members of the school community – including *pupils / students*, members of staff and parents / carers eg names, addresses, contact details, legal guardianship contact details, health records, disciplinary records
- Curricular / academic data eg class lists, pupil / student progress records, reports, references
- Professional records eg employment history, taxation and national insurance records, appraisal records and references
- Any other information that might be disclosed by parents / carers or by other agencies working with families or staff members.

E-Safety Policy

Responsibilities

The school's Secretary will keep up to date with current legislation and guidance and will determine and take responsibility for the school's information risk policy and risk assessment. Everyone in the school has the responsibility of handling protected or sensitive data in a safe and secure manner.

Governors are required to comply fully with this policy in the event that they have access to personal data, when engaged in their role as a Governor.

Registration

The school is registered as a Data Controller on the Data Protection Register held by the Information Commissioner.

Information to Parents / Carers – the “Privacy Notice”

In order to comply with the fair processing requirements of the DPA, the school will inform parents / carers of all pupils of the data they collect, process and hold on the pupils / students, the purposes for which the data is held and the third parties (eg LA, DfE, etc) to whom it may be passed. This privacy notice will be passed to parents / carers through the parent handbook.

Training & awareness

All staff will receive data handling awareness / data protection training and will be made aware of their responsibilities, as described in this policy through: [\(schools should amend or add to as necessary\)](#)

- Induction training for new staff
- Staff meetings / briefings / Inset
- Day to day support and guidance from Information Asset

Risk Assessments

Information risk assessments will be carried out by Information Asset Owners to establish the security measures already in place and whether they are the most appropriate and cost effective. The risk assessment will involve:

- Recognising the risks that are present;
- Judging the level of the risks (both the likelihood and consequences); and
- Prioritising the risks.

Risk assessments are an ongoing process and should result in the completion of an Information Risk Actions Form (example below):

| Risk ID | Information Asset affected | Information Asset Owner | Protective Marking (Impact Level) | Likelihood | Overall risk level (low, medium, high) | Action(s) to minimise risk |
|---------|----------------------------|-------------------------|-----------------------------------|------------|--|----------------------------|
| | | | | | | |
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The school will ensure that all school staff, independent contractors working for it, and delivery partners, comply with restrictions applying to the access to, handling and storage of data classified as Protect, Restricted or higher. Unmarked material is considered 'unclassified'. The term 'UNCLASSIFIED' or 'NON' or 'NOT PROTECTIVELY MARKED' may be used to indicate positively that a protective marking is not needed.

All documents (manual or digital) that contain protected or restricted data will be labelled clearly with the Impact Level shown in the header and the Release and Destruction classification in the footer.

Users must be aware that when data is aggregated the subsequent impact level may be higher than the individual impact levels of the original data. Combining more and more individual data elements together in a report or data view increases the impact of a breach. A breach that puts students / pupils at serious risk of harm will have a higher impact than a risk that puts them at low risk of harm. Long-term significant damage to anyone's reputation has a higher impact than damage that might cause short-term embarrassment.

Release and destruction markings should be shown in the footer eg. "Securely delete or shred this information when you have finished using it".

Schools will need to review the above section with regard to LA policies (where relevant), which may be more specific, particularly in the case of HR records.

Secure Storage of and access to data

The school will ensure that ICT systems are set up so that the existence of protected files is hidden from unauthorised users and that users will be assigned a clearance that will determine which files are accessible to them. Access to protected data will be controlled according to the role of the user. Members of staff will not, as a matter of course, be granted access to the whole management information system.

All users will use strong passwords which must be changed regularly, currently every half-term. User passwords must never be shared.

Personal data may only be accessed on machines that are securely password protected. Any device that can be used to access data must be locked if left (even for very short periods) and set to auto lock if not used for five minutes.

All storage media must be stored in an appropriately secure and safe environment that avoids physical risk, loss or electronic degradation.

Personal data can only be stored on school equipment (this includes computers and portable storage media (where allowed)). Private equipment (ie owned by the users) must not be used for the storage of personal data.

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

- the data must be encrypted and password protected,

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- the device must be password protected (many memory sticks / cards and other mobile devices cannot be password protected),
- the device must offer approved virus and malware checking software (memory sticks will not provide this facility, most mobile devices will not offer malware protection), and
- 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.

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

The school has clear policy and procedures for the automatic backing up, accessing and restoring all data held on school systems, including off-site backups. (the school will need to set its own policy, relevant to its physical layout, type of ICT systems etc)

The school has clear policy and procedures for the use of “Cloud Based Storage Systems” (for example dropbox, google apps and google docs) and is aware that data held in remote and cloud storage is still required to be protected in line with the Data Protection Act. The school will ensure that it is satisfied with controls put in place by remote / cloud based data services providers to protect the data. (see appendix for further information and the ICO Guidance: http://www.ico.org.uk/for_organisations/guidance_index/~media/documents/library/Data_Protection/Practical_application/cloud_computing_guidance_for_organisations.ashx)

As a Data Controller, the school is responsible for the security of any data passed to a “third party”. Data Protection clauses will be included in all contracts where data is likely to be passed to a third party.

All paper based Protected and Restricted (or higher) material must be held in lockable storage, whether on or off site.

The school recognises that under Section 7 of the DPA, <http://www.legislation.gov.uk/ukpga/1998/29/section/7> data subjects have a number of rights in connection with their personal data, the main one being the right of access. Procedures are in place to deal with Subject Access Requests i.e. a written request to see all or a part of the personal data held by the data controller in connection with the data subject. Data subjects have the right to know: if the data controller holds personal data about them; a description of that data; the purpose for which the data is processed; the sources of that data; to whom the data may be disclosed; and a copy of all the personal data that is held about them. Under certain circumstances the data subject can also exercise rights in connection with the rectification; blocking; erasure and destruction of data.

Secure transfer of data and access out of school

The school recognises that personal data may be accessed by users out of school, or transferred to the LA or other agencies. In these circumstances:

- Users may not remove or copy sensitive or restricted or protected personal data from the school or authorised premises without permission and unless the media is encrypted and password protected and is transported securely for storage in a secure location (see earlier section – LA / school policies may forbid such transfer);
- Users must take particular care that computers or removable devices which contain personal data must not be accessed by other users (eg family members) when out of school
- When restricted or protected personal data is required by an authorised user from outside the organisation’s premises (for example, by a member of staff to work from their home),

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they should preferably have secure remote access to the management information system or learning platform;

- If secure remote access is not possible, users must only remove or copy personal or sensitive data from the organisation or authorised premises if the storage media, portable or mobile device is encrypted and is transported securely for storage in a secure location;
- Users must protect all portable and mobile devices, including media, used to store and transmit personal information using approved encryption software; and
- Particular care should be taken if data is taken or transferred to another country, particularly outside Europe, and advice should be taken from the local authority (if relevant) in this event. (nb. to carry encrypted material is illegal in some countries)

Disposal of data

The school will comply with the requirements for the safe destruction of personal data when it is no longer required.

The disposal of personal data, in either paper or electronic form, must be conducted in a way that makes reconstruction highly unlikely. Electronic files must be securely overwritten, in accordance with government guidance and other media must be shredded, incinerated or otherwise disintegrated for data.

Audit Logging / Reporting / Incident Handling

It is good practice, as recommended in the “Data Handling Procedures in Government” document that the activities of data users, in respect of electronically held personal data, will be logged and these logs will be monitored by responsible individuals.

The audit logs will be kept to provide evidence of accidental or deliberate data security breaches – including loss of protected data or breaches of an acceptable use policy, for example.

The school has a policy for reporting, managing and recovering from information risk incidents, which establishes:

- a “responsible person” for each incident;
- a communications plan, including escalation procedures;
- and results in a plan of action for rapid resolution; and
- a plan of action of non-recurrence and further awareness raising.

All significant data protection incidents must be reported through the SIRO to the Information Commissioner’s Office based upon the local incident handling policy and communication plan.

Use of technologies and Protective Marking

The following provides a useful guide:

| | The information | The technology | Notes on Protect Markings (Impact Level) |
|--|-----------------|----------------|--|
|--|-----------------|----------------|--|

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| | | | |
|--|--|---|--|
| <p>School life and events</p> | <p>School terms, holidays, training days, the curriculum, extra-curricular activities, events, displays of pupils work, lunchtime menus, extended services, parent consultation events</p> | <p>Common practice is to use publically accessible technology such as school websites or portal, emailed newsletters, subscription text services</p> | <p>Most of this information will fall into the NOT PROTECTIVELY MARKED (Impact Level 0) category.</p> |
| <p>Learning and achievement</p> | <p>Individual pupil / student academic, social and behavioural achievements, progress with learning, learning behaviour, how parents can support their child’s learning, assessments, attainment, attendance, individual and personalised curriculum and educational needs.</p> | <p>Typically schools will make information available by parents logging on to a system that provides them with appropriately secure access, such as a Learning Platform or portal, or by communication to a personal device or email account belonging to the parent.</p> | <p>Most of this information will fall into the PROTECT (Impact Level 2) category. There may be students/ pupils whose personal data requires a RESTRICTED marking (Impact Level 3) or higher. For example, the home address of a child at risk. In this case, the school may decide not to make this pupil / student record available in this way.</p> |
| <p>Messages and alerts</p> | <p>Attendance, behavioural, achievement, sickness, school closure, transport arrangements, and other information that it may be important to inform or contact a parent about as soon as possible. This may be particularly important when it is necessary to contact a parent concerning information that may be considered too sensitive to make available using other online means.</p> | <p>Email and text messaging are commonly used by schools to contact and keep parents informed. Where parents are frequently accessing information online then systems e.g. Learning Platforms or portals, might be used to alert parents to issues via “dashboards” of information, or be used to provide further detail and context.</p> | <p>Most of this information will fall into the PROTECT (Impact Level 1) category. However, since it is not practical to encrypt email or text messages to parents, schools should not send detailed personally identifiable information. General, anonymous alerts about schools closures or transport arrangements would fall into the NOT PROTECTIVELY MARKED (Impact Level 0) category.</p> |

Appendices: Additional issues / documents related to Personal Data Handling in Schools:

Use of Cloud Services

Many schools now use cloud hosted services. This section is designed to help you to understand your obligations and help you establish the appropriate policies and procedures when considering switching from locally-hosted services to cloud-hosted services.

What policies and procedures should be put in place for individual users of cloud-based services?

The school is ultimately responsible for the contract with the provider of the system, so check the terms and conditions carefully; below is a list of questions that you may want to consider when selecting a cloud services provider; indeed you may want to contact any potential provider and ask them for responses to each of the following:

- How often is the data backed up?

- Does the service provider have a clear process for you to recover data?
- Who owns the data that you store on the platform?
- How does the service provider protect your privacy?
- Who has access to the data?
- Is personal information shared with anyone else? Look out for opt in/opt out features
- Does the service provider share contact details with third party advertisers? Or serve users with ads?
- What steps does the service provider take to ensure that your information is secure?
- Is encryption used? Is https used as default or is there an option to use this? Two step verification?
- How will your data be protected? Look out for features that will keep your information safe and secure including Anti-spam, Anti-Virus and Anti-malware...
- How reliable is the system? Look out for availability guarantees.
- What level of support is offered as part of the service? Look out for online and telephone support, service guarantees

SWGfL provides a useful summary of these issues in a document that has been written with the support of Google and Microsoft:

<http://www.swgfl.org.uk/News/Content/News-Articles/Cloud-based-products-and-services>

The document focusses on Google Apps for Education and Microsoft 365, but poses important considerations if a school is considering services from another provider.

Parental permission for use of cloud hosted services

Schools that use cloud hosting services (eg. Google Aps for Education) may be required to seek parental permission to set up an account for pupils / students.

Google Apps for Education services -

http://www.google.com/apps/intl/en/terms/education_terms.html requires a school to obtain 'verifiable parental consent'. Normally, schools will incorporate this into their standard acceptable use consent forms sent to parents each year (see suggested wording on "Parent / Carer Acceptable Use Agreement Template").

A template form has been added to the Parents & Carers Acceptable User Template elsewhere in these Template Policies.

Privacy and Electronic Communications

Schools should be aware that the Privacy and Electronic Communications Regulations have changed and that they are subject to these changes in the operation of their websites.

Freedom of Information Act Advice

All schools (including Academies, which were previously exempt) must have a Freedom of Information Policy which sets out how it will deal with FOI requests. In this policy the school should:

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- Delegate to the Headteacher / Principal day-to-day responsibility for FOIA policy and the provision of advice, guidance, publicity and interpretation of the school's policy.
- Consider designating an individual with responsibility for FOIA, to provide a single point of reference, coordinate FOIA and related policies and procedures, take a view on possibly sensitive areas and consider what information and training staff may need.
- Consider arrangements for overseeing access to information and delegation to the appropriate governing body.
- Proactively publish information with details of how it can be accessed through a Publication Scheme (see Model Publication Scheme below) and review this annually.
- Ensure that a well managed records management and information system exists in order to comply with requests.
- Ensure a record of refusals and reasons for refusals is kept, allowing the school to review its access policy on an annual basis.

Model Publication Scheme

The Information Commissioners Office provides schools with a model publication scheme which they could complete. This was revised in 2009. The school's publication scheme should be reviewed annually.

Guidance on the model publication scheme can be found at:

http://www.ico.gov.uk/for_organisations/freedom_of_information/guide/publication_scheme.aspx

The Schools Model Publication Scheme Template is available from:

http://www.ico.gov.uk/upload/documents/library/freedom_of_information/detailed_specialist_guides/schools_england_mps_final.pdf

Guidance and a Model Publication Scheme for Academies can be found at:

<http://www.education.gov.uk/schools/leadership/typesofschools/academies/open/a00205178/freedom-of-information-guide-for-academies>

Further Guidance

ICO guidance can be found at the following link - including a pdf version - updated in September 2012:

http://www.ico.gov.uk/for_organisations/freedom_of_information/guide.aspx

DfE guidance that is specific to Academies can be found at:

<http://www.education.gov.uk/aboutdfe/foi/disclosuresaboutschoools/a0076171/academies-and-freedom-of-information>

<http://www.education.gov.uk/schools/leadership/typesofschools/academies/open/a00205178/freedom-of-information-guide-for-academies>

Appendix - DfE Guidance on the wording of the Privacy Notice

PRIVACY NOTICE TEMPLATE

for

*Pupils in Schools, Alternative Provision and Pupil Referral Units
and Children in Early Years Settings*

(This is suggested text which can be amended to suit local needs and circumstances)

Privacy Notice - Data Protection Act 1998

We (**Name of school**) are a data controller for the purposes of the Data Protection Act. We collect information from you and may receive information about you from your previous school and the Learning Records Service. We hold this personal data and use it to:

- Support your teaching and learning;
- Monitor and report on your progress;
- Provide appropriate pastoral care, and
- Assess how well your school is doing.

This information includes your contact details, national curriculum assessment results, attendance information and personal characteristics such as your ethnic group, any special educational needs and relevant medical information. If you are enrolling for post 14 qualifications we will be provided with your unique learner number (ULN) by the Learning Records Service and may also obtain from them details of any learning or qualifications you have undertaken.

In addition for Secondary and Middle deemed Secondary Schools

Once you are aged 13 or over, we are required by law to pass on certain information to providers of youth support services in your area. This is the local authority support service for young people aged 13 to 19 in England. We must provide both your and your parent's/s' name(s) and address, and any further information relevant to the support services' role. However, if you are over 16, you (or your parent(s)) can ask that no information beyond names, address and your date of birth be passed to the support service. Please inform *the school office* if you wish to opt-out of this arrangement. For more information about young peoples' services, please go to the Directgov Young People page at www.direct.gov.uk/en/YoungPeople/index.htm or the LA website shown above.

We will not give information about you to anyone outside the school without your consent unless the law and our rules allow us to.

We are required by law to pass some information about you to the Local Authority and the Department for Education (DfE)

We are required by law to pass some information about you to the Department for Education (DfE) and, in turn, this will be available for the use(s) of the Local Authority.

If you want to see a copy of the information about you that we hold and/or share, please contact the school office.

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If you require more information about how the Local Authority (LA) and/or DfE store and use your information, then please go to the following websites:

<http://www.education.gov.uk/researchandstatistics/datatdatam/b00212337/datause>

If you are unable to access these websites we can send you a copy of this information. Please contact the LA:

<https://www.oxfordshire.gov.uk/cms/content/requesting-copy-your-personal-information>

Public Communications Unit, Department for Education
Sanctuary Buildings, Great Smith Street, London
SW1P 3BT

Website: www.education.gov.uk

email: <http://www.education.gov.uk/help/contactus>

Telephone: 0370 000 2288