ONLINE SAFETY POLICY

This policy is based on the SWGfl online safety policy template for schools as linked on the Northampton County Council website.

Scope of the Policy

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

The Education and Inspections Act 2006 empowers Headteachers to such extent as is reasonable, to regulate the behaviour of pupils when they are off the school site and empowers members of staff to impose disciplinary penalties for inappropriate behaviour. This is pertinent to incidents of online-bullying or other Online Safety incidents covered by this policy, which may take place outside of the school, but is linked to membership of the school. The 2011 Education Act increased these powers with regard to the searching for and of electronic devices and the deletion of data. In the case of both acts, action can only be taken over issues covered by the published Behaviour Policy.

Henry Chichele Primary School will deal with such incidents within this policy and associated behaviour and anti-bullying policies and will, where known, inform parents and carers of incidents of inappropriate Online Safety behaviour that take place out of school.

Roles and Responsibilities

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

Governors

Governors are responsible for the approval of the Online Safety Policy and for reviewing the effectiveness of the policy. This will be carried out by the Governors receiving regular information about online safety incidents and monitoring reports. A member of the Governing Board has taken on the role of Safeguarding Governor. The role of the Safeguarding Governor will include:

- regular meetings with the Online Safety Co-ordinator / Officer
- attendance at Online Safety Group meetings
- regular monitoring of online safety incident logs
- regular monitoring of filtering / change control logs
- reporting to relevant Governors meeting

Headteacher and Senior Leaders

- The Headteacher has a duty of care for ensuring the safety (including online safety) of members of the school community, though the day to day responsibility for online safety will be delegated to the online safety lead (Headteacher)
- The Headteacher and (at least) another member of the Senior Leadership Team should be aware of the procedures to be followed in the event of a serious online safety allegation being made against a member of staff. (See flow chart on dealing with online safety incidents – included in a later section – "Responding to incidents of misuse" and relevant Local Authority disciplinary procedures). Online Safety BOOST includes an 'Incident Response Tool' that outlines the steps (and forms to complete) any staff facing an issue, disclosure or report, need to follow. More information is available at: https://boost.swgfl.org.uk/
- The Headteacher is responsible for ensuring that relevant staff receive suitable training to enable them to carry out their online safety roles and to train other colleagues, as relevant.
- The Headteacher will ensure that there is a system in place to allow for monitoring and support of those in school who carry out the internal online safety monitoring role. This is to provide a safety net and also support to those colleagues who take on important monitoring roles.
- The Senior Leadership Team will receive regular monitoring reports from the Online Safety Lead.

Online Safety Lead

Is responsible for carrying out the following:

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

In the event of an Online Safety incident, the school will decide how best to manage it and the most appropriate action to take, including whether any investigation and sanctions will be the responsibility of the Online Safety Officer or another member of staff e.g. Headteacher, Senior Leader, Designated Safeguarding Lead, Class teacher or Key Stage Leader.

Network Manager

Henry Chichele Primary School has a managed computing service. It is managed by 'EasiPC Services Limited' based in Northampton. EasiPC is responsible for ensuring:

- That the School's technical infrastructure is secure and is not open to misuse or malicious attack.
- That the School meets required online safety technical requirements and any Northampton County Council Online Safety Policy's 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.
- 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 the School as necessary.
- That the use of the network, internet, remote access and email is regularly monitored in order that any misuse or attempted misuse can be reported to the Headteacher and *or* Online Safety Officer for investigation and potential action and or sanction.
- That monitoring software and systems are implemented and updated as agreed in the school and EasiPC contractual agreements.

Teaching and Support Staff

Are responsible for ensuring that:

- They have an up to date awareness of online safety matters and of the current school Online Safety Policy and practices.
- They have read, understood and signed the Staff Acceptable Use Policy.
- They report any suspected misuse or problem to the Headteacher, Senior Leader and or Online Safety Officer for investigation, and possible action and or sanction.
- All digital communications with pupils, parents and carers should be on a professional level and only carried out using official school systems.
- Online safety is embedded in all aspects of the curriculum and other activities.
- Pupils understand and follow the Online Safety Policy and acceptable use policies.
- Pupils have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations.
- They monitor the use of digital technologies, mobile devices, cameras etc. in lessons and other school activities (where allowed) and implement current policies with regard to these devices.
- In lessons where internet use is pre-planned pupils should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches.

Designated Safeguarding Lead

Should be trained in Online Safety issues and be aware of the potential for serious child protection and safeguarding issues to arise from:

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

The above list continues to be safeguarding issues, not technical issues. The use of technology however, provides additional means for safeguarding issues to develop.

Pupils:

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

Parents / Carers

Parents and Carers play a crucial role in ensuring that their children understand the need to use the internet and mobile devices in an appropriate way. Parents and carers will be encouraged to support the school in promoting good online safety practice and to follow guidelines on the appropriate use of:

- digital and video images taken at school events
- access to parents' sections of Arbor (Henry Chichele's on-line pupil records system)
- their children's personal devices in the school (where this is allowed).

Community Users

Community Users who access school internet and network as part of the wider school provision will be expected to sign a Community User AUA before being provided with access to school systems.

Policy Statements

Education – Pupils

Whilst regulation and technical solutions are very important, their use must be balanced by educating pupils to take a responsible approach. The education of pupils in online safety and digital literacy is therefore an

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

The online safety curriculum should be broad, relevant and provide progression, with opportunities for creative activities and will be provided in the following ways:

- A planned online safety curriculum should be provided as part of Computing and cross curricular lessons and should be regularly revisited. Henry Chichele use Purple Mash as our computing scheme of work and that integrates a progressive and age appropriate approach to online safety. https://www.purplemash.com/
- Key online safety messages should be reinforced as part of a planned programme of assemblies and the yearly Safer Internet Day activities.
- Pupils should be taught to be critically aware of the materials and content they access on-line and be guided to validate the accuracy of information.
- Pupils should be taught to acknowledge the source of information used and to respect copyright when using material accessed on the internet
- Pupils should be helped to understand the need for the pupil Acceptable Use Agreement and encouraged to adopt safe and responsible use both within and outside school / academy.
- Staff should act as good role models in their use of digital technologies, the internet and mobile devices in and around the school premises.
- 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 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 and Carers

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

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

- Curriculum activities
- H2H
- Safer Internet Day
- Reference to the relevant web sites via the Henry Chichele website.

Education & Training

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

- A planned programme of formal online safety training will be made available to staff. This will be regularly updated and reinforced on training days and through staff meetings for both teachers and support staff.
- All new staff should receive online safety training as part of their induction programme, ensuring that they fully understand the school's Online Safety Policy and Acceptable Use Agreements.
- The Online Safety Lead will receive regular updates through attendance at external training events (e.g. from SWGfL / LA / other relevant organisations) and by reviewing guidance documents released by relevant organisations.
- The Online Safety Lead will provide advice and guidance to individuals as required.

Training – Governors

Governors should take part in online safety training and awareness sessions, with particular importance for those who are members of any sub group involved in technology, online safety and safeguarding. This will be offered via participation in school training and information sessions for staff and attendance at assemblies and in lessons.

Technical – equipment, filtering and monitoring

It is the responsibility of the school to ensure that the managed service provider, EasiPC carries out all the online safety measures that would otherwise be the responsibility of the school, as suggested below.

The school will be responsible for ensuring that the school network is as safe and secure as is reasonably possible and that policies and procedures approved within this policy are implemented.

- HCPS 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 completed by EasiPC.
- 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 – see the Acceptable Use Policy for further details.
- All users of Purple Mash will be provided with a username and secure password by the Computing Co-ordinator who will keep an up to date record of users and their usernames. Users in Key Stage Two are responsible for the security of their username and password and will be taught how to change and manage their password. Users in Key Stage One are also issued individual passwords and will be progressively taught how to manage them at the discretion of the teaching staff.
- When requested, whole class logins to Purple Mash maybe be provided to teaching staff if it is considered necessary to support the needs of the children they are teaching.

- The “administrator” passwords for the school Computing systems, used by the Network Manager (or other person) must also be available to the Headteacher and or other nominated senior leader and kept in a secure place (e.g. school safe).
- EasiPC and or Mrs Griffiths, School Business Manager, is responsible for ensuring that software licence logs are accurate and up to date and that regular checks are made to reconcile the number of licences purchased against the number of software installations.
- Internet access is filtered for all users. Illegal content (child sexual abuse images) is filtered by the broadband or filtering provider by actively employing the Internet Watch Foundation CAIC list. Content lists are regularly updated and internet use is logged and regularly monitored.
- Internet filtering and monitoring should ensure that children are safe from terrorist and extremist material when accessing the internet. N.B. 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.
- The school has provided differentiated user-level filtering allowing different filtering levels for different groups of users – staff and pupils.
- EasiPC regularly monitor and record the activity of users on the school technical systems and users are made aware of this in the Acceptable Use Agreement.
- An agreed policy is in place for the provision of temporary access of “guests” (e.g. trainee teachers, supply teachers, visitors) onto the school systems – See the Acceptable Use Policy for further details.
- It is detailed in the Acceptable Use policy regarding the extent of personal use that users (staff, pupils and community users) and their family members are allowed on school devices that may be used out of school.

Mobile Technologies

Mobile technology devices may be school owned and or provided or personally owned and might include: smartphone, tablet, notebook, laptop or other technology that usually has the capability of utilising the school’s wireless network. The device then has access to the wider internet which may include the school’s learning platform and other cloud based services such as email and data storage.

All users should understand that the primary purpose of the use mobile personal devices in a school context is educational. The mobile technologies policy should be consistent with and inter-related to other relevant school polices including but not limited to the Safeguarding Policy, Behaviour Policy, Bullying Policy, Acceptable Use Policy, and policies around theft or malicious damage. Teaching about the safe and appropriate use of mobile technologies should be an integral part of the school’s Online Safety education programme.

- The school Acceptable Use Agreements for staff, pupils and parents and carers gives consideration to the use of mobile technologies
- The school allows:

	School Devices			Personal Devices		
	School owned for single user	**School owned for multiple users**	**Authorised device[1]**	**Student owned**	**Staff owned**	**Visitor owned**
Allowed in school	*Yes*	*Yes*	*Yes*	Yes	Yes	Yes
Full network access	*Restricted to specific users*	*Restricted to specific users*	*No*	*No*	*No*	*No*
Internet only	*Yes*	*Yes*	*No*	*No*	*No*	*No*
Network access	*Yes*	*No*	*No*	*No*	*No*	*No*

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.

Personal Devices

- The school allows personal mobile phones to be brought onto school property. Pupil phones need to be switched off and handed in to the school office at the beginning of the day, before registration is taken. The phone must be CLEARLY labelled with the name of the pupil and is to be collected at the of the day after the school day is finished.
- No responsibility is accepted for any mobile device by the Henry Chichele Primary School, that is brought on to school property.
- Staff and visitor devices are allowed on school property but are not permitted to be used anywhere except the staff room.
- Personal mobiles are not allowed to be used for school business.
- No access to school internet is given. Personal data may be used on school property but this is subject to the rules and expectations as detailed in the Acceptable User Policy.
- No images may be taken on school property on any personal devices.

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, pupils, parents and carers 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 e.g. on social networking sites.

- Written permission from parents or carers will be obtained before photographs of pupils are published on the school website, social media and or local press.
- In accordance with guidance from the Information Commissioner's Office, parents and carers are welcome to take videos and digital images of their own children at school events for their own personal use (as such use in not covered by GDPR). To respect everyone's privacy and in some cases protection, these images **should not be published or made publicly available on social networking sites**, nor should parents and carers comment on any activities involving other pupils in the digital photos or video images.
- Staff and volunteers are allowed to take digital and 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 is not permitted for such purposes.
- Care should be taken when taking digital and 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 / pupils will be selected carefully and will comply with good practice guidance on the use of such images.
- Pupils' full names will not be used anywhere on a website or blog, particularly in association with photographs.
- Pupil's work can only be published with the permission of the pupil and parents or carers.

Data Protection

With effect from 25th May 2018, the data protection arrangements for the UK change following the European Union General Data Protection Regulation (GDPR) announced in 2016. As a result, schools are likely to be subject to greater scrutiny in their care and use of personal data.

Personal data will continue to be recorded, processed, transferred and made available according to the current data protection legislation.

The school must ensure that:

- It has paid the appropriate fee to the Information Commissioner's Office (ICO).

- It has appointed a Data Protection Officer (DPO). The school / academy may also wish to appoint a Data Manager and systems controllers to support the DPO.
- 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.
- Data held must be accurate and up to date. Inaccuracies are corrected without unnecessary delay.
- The lawful basis for processing personal data (including, where relevant, consent) has been identified and documented and details provided in a Privacy Notice. (see Privacy Notice section in the appendix)
- Where special category data is processed, a lawful basis and a separate condition for processing have been identified.
- Data Protection Impact Assessments (DPIA) are carried out.
- It has clear and understood arrangements for access to and the security, storage and transfer of personal data, including, where necessary, adequate contractual clauses or safeguards where personal data is passed to third parties e.g. cloud service providers.
- Procedures must be in place to deal with the individual rights of the data subject i.e. a Subject Access Requests to see all or a part of their personal data held by the data controller.
- There are clear and understood data retention policies and routines for the deletion and disposal of data.
- There is a policy for reporting, logging, managing and recovering from an information risk incident which recognises the requirement to report relevant data breaches to the ICO within 72 hours of the breach, where feasible.
- Consideration has been given to the protection of personal data when accessed using any remote access solutions.
- All staff receive data handling awareness and data protection training and are made aware of their responsibilities.

Staff must ensure that they:

Take care at all times 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 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. When using communication technologies, the school considers the following as good practice:

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

Social Media - Protecting Professional Identity

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

The school provides the following measures to ensure reasonable steps are in place to minimise risk of harm to pupils, staff and the school through:

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

School staff should ensure that:

- No reference should be made in social media to pupils, parents 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:

- 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 the school or impacts on the school, it must be made clear that the member of staff is not communicating on behalf of the school with an appropriate disclaimer. Such personal communications are within the scope of this policy.
- Personal communications which do not refer to or impact upon the school are outside the scope of this policy.
- Where excessive personal use of social media in school is suspected, and considered to be interfering with relevant duties, disciplinary action may be taken.

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.

Dealing with unsuitable / inappropriate activities

Some internet activity e.g. accessing child abuse images or distributing racist material is illegal and would obviously be banned from school and all other technical systems. Other activities e.g. cyber-bullying would be banned and could lead to criminal prosecution. There are however a range of activities which may, generally, be legal but would be inappropriate in a school /academy context, either because of the age of the users or the nature of those activities.

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

User Actions		Acceptable	Acceptable at certain times	Acceptable for nominated	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 / academy					X	
Infringing copyright					X	
Revealing or publicising confidential or proprietary information (e.g. 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			

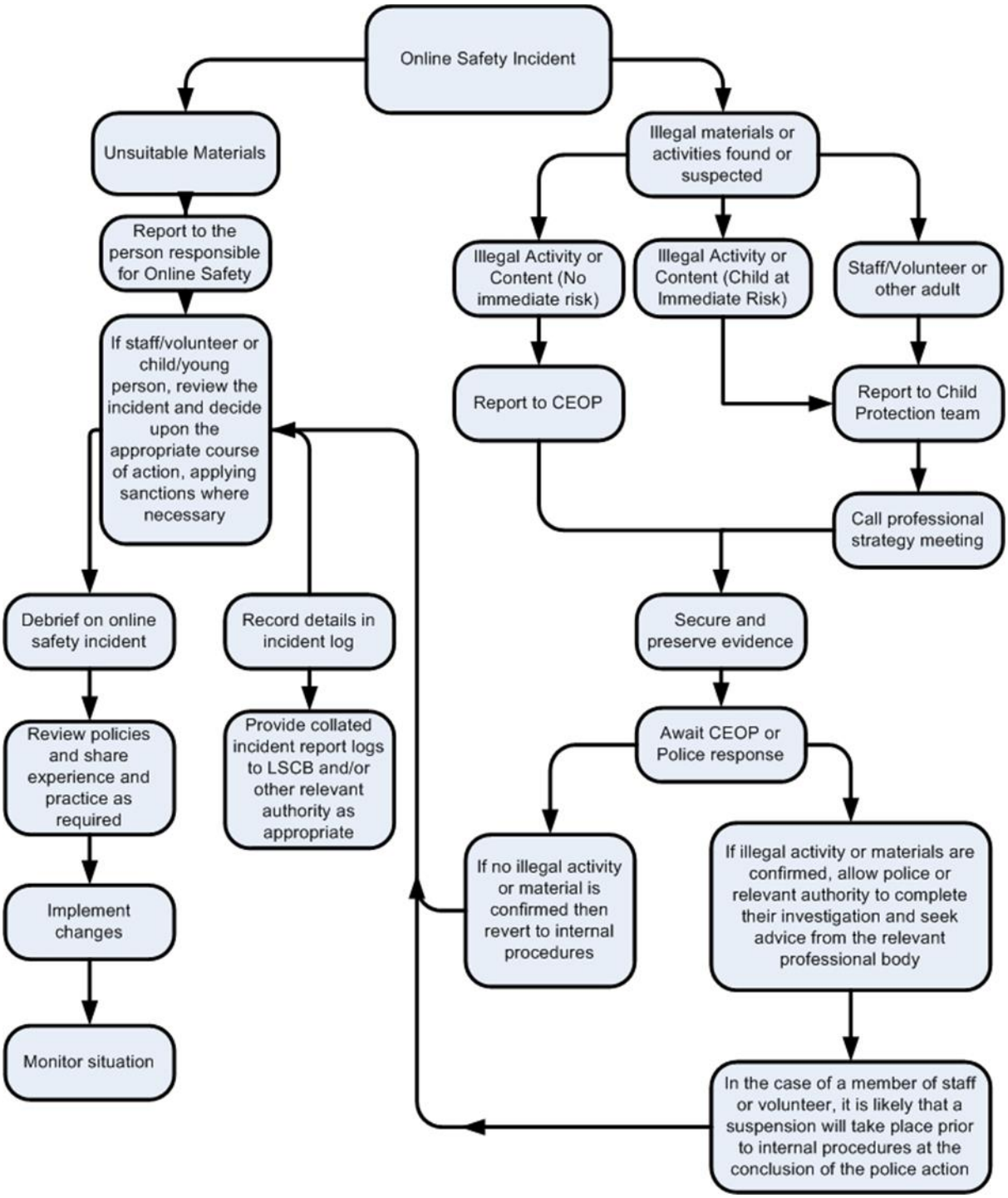
When an action has been agreed as ‘acceptable at certain times’ this is subject to it being linked to a learning intention and has been discussed and agreed with the wider school community.

Responding to incidents of misuse

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

Illegal Incidents

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



Other Incidents

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

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

- Have more than one senior member of staff involved in this process. This is vital to protect individuals if accusations are subsequently reported.
- Conduct the procedure using a designated computer that will not be used by young people and if necessary can be taken off site by the police should the need arise. Use the same computer for the duration of the procedure.
- It is important to ensure that the relevant staff should have appropriate internet access to conduct the procedure, but also that the sites and content visited are closely monitored and recorded (to provide further protection).
- Record the URL of any site containing the alleged misuse and describe the nature of the content causing concern. It may also be necessary to record and store screenshots of the content on the machine being used for investigation. These may be printed, signed and attached to the form (except in the case of images of child sexual abuse – see below)
- Once this has been completed and fully investigated the group will need to judge whether this concern has substance or not. If it does, then appropriate action will be required and could include the following:
    - Internal response or discipline procedures
    - Involvement by Local Authority 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 & 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:

	Actions / Sanctions								
Students / Pupils Incidents	Refer to class teacher	Refer to members of SLT	Refer to Headteacher	Refer to Police	Refer to technical support staff for action re filtering / security etc.	Inform parents / carers	Removal of network / internet access rights	Warning	Further sanction eg detention / exclusion
Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on unsuitable / inappropriate activities).		X	X	X					
Unauthorised use of non-educational sites during lessons	X					X	X	X	
Unauthorised / inappropriate use of mobile phone / digital camera / other mobile device		X	X	X	X	X	X	X	X
Unauthorised / inappropriate use of social media / messaging apps / personal email		X	X	X		X			X
Unauthorised downloading or uploading of files		X				X	X	X	X
Allowing others to access school network by sharing username and passwords						X	X	X	
Attempting to access or accessing the school / academy network, using another student's / pupil's account	X	X				X	X	X	X
Attempting to access or accessing the school / academy 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
Actions which could bring the school / academy into disrepute or breach the integrity of the ethos of the school		X	X	X		X			

	Actions / Sanctions							
Staff Incidents	Refer to line manager	Refer to Headteacher	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 that could contravene Teacher Standards		X	X	X				
Unauthorised downloading or uploading of files	X				X	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			X		X	X
Careless use of personal data e.g. holding or transferring data in an insecure manner		X			X	X	X	X
Deliberate actions to breach data protection or network security rules		X	X	X	X			
Corrupting or destroying the data of other users or causing deliberate damage to hardware or software		X			X	X	X	X
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	X			X	X
Actions which could compromise the staff member's professional standing		X	X	X				X
Actions which could bring the school / academy into disrepute or breach the integrity of the ethos of the school / academy		X	X	X			X	X

Using proxy sites or other means to subvert the school's / academy's filtering system		X	X	X				X
Accidentally accessing offensive or pornographic material and failing to report the incident		X	X		X			X
Deliberately accessing or trying to access offensive or pornographic material		X	X	X	X		X	X
Breaching copyright or licensing regulations		X						X
Continued infringements of the above, following previous warnings or sanctions		X	X				X	X

Please note that any of the above advised actions can be amended or escalated at the discretion of the Headteacher and or the Senior Leadership Team.

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This Online Safety policy has been written in conjunction with SWGfL as indicated on the Northampton County Council website.