



TMET IT Online Safety Policy Thurnby Mead Primary Academy

Policy Monitoring, Evaluation and Review

This policy is effective for all schools within The Mead Educational Trust, the Teaching School, the SCITT and all other activities under the control of the Trust and reporting to the Trust Board.

This policy should be read in conjunction with the Acceptable User Policy (AUP) (see Appendix 1 for AUP's linked to Key Stages as well as Staff and Parents), Online Safety Resources (see Appendix 2), Online Infringements and Sanctions (see Appendix 3), Safeguarding and Child Protection Policy, Anti-Bullying Policy, PSHE and Computing Policy,

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Version	Date	Author	Summary of Changes:
1.0	10/01/2016	J Howson & MPR	New Trust template policy
2.0	29/01/2020	GSM & MPR	Version 2 template
3.0	27/10/2020	NA	Amended review date to bring in line with ICT User Policy
4.0	26/01/2021	GSM & MPR	Additional clause for Online Learning & clarification on User Acceptable Use policies
5.0	10/01/2022	GSM & MPR	No major changes as per policy review. Added additional points under 4.3 regarding MFA/2FA
6.0	January 2023	GSM	Removal of Acceptable Use Policies to independent policies. Updated user actions severities.
7.0	January 2024	GSM	All references to academy changed to school. Safeguarding Trustee/Academy Councillor role clarification

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1. Introduction and Overview

1.1. Purpose

The purpose of this policy is to:

- Set out the key principles expected of all members of the school community with respect to the use of IT-based technologies.
- Safeguard and protect the children and staff.
- Assist school staff working with children to work safely and responsibly with the Internet and other IT and communication technologies and to monitor their own standards and practice.
- Set clear expectations of behaviour and/or codes of practice relevant to responsible use of the Internet for educational, personal or recreational use for the whole school community.
- Have clear structures to deal with online abuse such as online bullying [noting that these need to be cross referenced with other school policies].
- Ensure that all members of the school community are aware that unlawful or unsafe behaviour is unacceptable and that, where appropriate, disciplinary or legal action will be taken.
- Minimise the risk of misplaced or malicious allegations made against adults who work with pupils.

The main areas of risk for our school community can be summarised as follows:

Content

- Exposure to inappropriate content
- Lifestyle websites promoting harmful behaviours
- Hate content
- Content validation: how to check authenticity and accuracy of online content

Contact

- Grooming (sexual exploitation, radicalisation etc.)
- Online bullying in all forms
- Social or commercial identity theft, including passwords

Conduct

- Aggressive behaviours (bullying)
- Privacy issues, including disclosure of personal information
- Digital footprint and online reputation
- Health and well-being (amount of time spent online, gambling, body image)
- Sexting
- Copyright (little care or consideration for intellectual property and ownership)

1.2. Scope

This policy applies to all members of each school within The Mead Educational Trust, Teaching School, SCITT or Trust central offices (including staff, pupils, volunteers, parents/carers, visitors, community users)

who have access to and are users of Trust/School IT systems, both in and out of The Mead Educational Trust.

1.3. Roles and Responsibilities

Role	Key Responsibilities
Trust Executive Team	<ul style="list-style-type: none"> • The TMET Executive Team is responsible for the approval of the Online Safety Policy and for reviewing the effectiveness of the policy. • The executive team will receive information about significant online safety incidents along with monitoring reports; which include regular monitoring of online safety incident and filtering / change control logs
Principal	<ul style="list-style-type: none"> • Must be adequately trained in off-line and online safeguarding, in-line with statutory guidance and relevant Local Safeguarding Children Board (LSCB) guidance; • To lead a ‘safeguarding’ culture, ensuring that online safety is fully integrated with whole school safeguarding. • To take overall responsibility for online safety provision; • To take overall responsibility for data management and information security ensuring school’s relevant Local Safeguarding Children Board (LSCB) guidance • To be responsible for ensuring that all staff receive suitable training to carry out their safeguarding and online safety roles; • To be aware of procedures to be followed in the event of a serious online safety incident; • Ensure suitable ‘risk assessments’ undertaken so the curriculum meets the needs of students, including risk of children being radicalised; • To receive regular monitoring reports from the Online Safety Coordinator; • To ensure that there is a system in place to monitor and support staff who carry out internal online safety procedures; • To ensure Academy Councilors are regularly updated on the nature and effectiveness of the school’s arrangements for online safety; • To ensure school website includes relevant information.
School Online Safety Coordinator/ Designated Child Protection Lead (This may be the same person)	<ul style="list-style-type: none"> • Take day to day responsibility for online safety issues and a leading role in establishing and reviewing the school’s safety policy/documents • Promote an awareness and commitment to online safety throughout the school community; • Ensure that online safety education is embedded within the curriculum; • Liaise with Trust technical staff where appropriate; • To communicate regularly with SLT and the Academy Council to discuss current issues, review incident logs and filtering/change control logs; • To ensure that all staff are aware of the procedures that need to be followed in the event of an online safety incident; • To ensure that online safety incidents are logged as a safeguarding incident; • Facilitate training and advice for all staff; • Oversee any student surveys / feedback on online safety issues;

	<ul style="list-style-type: none"> • Liaise with the Local Authority and relevant agencies; • Is regularly updated in online safety issues and legislation, and be aware of the potential for serious child protection concerns.
Academy Councillor and TMET Safeguarding Trustee	<ul style="list-style-type: none"> • To ensure that the school has in place policies and practices to keep the children and staff safe online; • Review the implementation of the Trust Online Safety Policy and review the effectiveness of the policy; • To support the school in encouraging parents and the wider community to become engaged in online safety activities; • The role of the Academy Council/Safeguarding Councillor will include: regular review with the online safety coordinator, regular monitoring of online safety incident and filtering / change control logs. • The role of the TMET Safeguarding Trustee should review the implementation of the Online Safety policy across the Trust and therefore, review the implementation/changes of the filtering and monitoring platforms.
School Computing Curriculum Leader	<ul style="list-style-type: none"> • To oversee the delivery of the online safety element of the Computing curriculum.
Trust Head of IT Services	<ul style="list-style-type: none"> • To report online safety related issues that come to their attention, to the Online Safety Coordinator/Designated Safeguarding Lead; • To manage the Trust/School network and make sure that: • the Trust/School technical infrastructure is secure and is not open to misuse or malicious attack; • the school meets required online safety technical requirements; • school password policy is strictly adhered to and reset termly for all users; • access controls/encryption exist to protect personal and sensitive information held on school-owned devices; and • the Trust's policy on web filtering is applied/updated on a regular basis and that its implementation is not the sole responsibility of any single person. • Ensure the use of school technology, online platforms and email are regularly monitored and that any misuse/attempted misuse is reported to the online safety coordinator/Principal; • To ensure appropriate backup procedures and disaster recovery plans are in place; • To keep up-to-date documentation of the school disaster recovery plans • To ensure the school uses appropriate IT systems and services including, filtered Internet Service • To ensure that the IT Team is up to date with online safety technical information in order to effectively carry out the schools e-safety responsibilities

	<ul style="list-style-type: none"> • To ensure that monitoring systems are implemented and updated as agreed in the Trust/School policies • To ensure that users may only access the networks and devices through a properly enforced password protection policy, in which passwords are regularly changed
Data Managers / Administrators	<ul style="list-style-type: none"> • To ensure that the data they manage is accurate and up to date • To ensure best practice in information management. i.e. have appropriate access controls in place, that data is used, transferred and deleted in-line with data protection requirements
Teachers	<ul style="list-style-type: none"> • To embed online safety in the curriculum; • To supervise and guide pupils carefully when engaged in learning activities involving online technology (including, extra-curricular and extended school activities if relevant); • To ensure that pupils are fully aware of research skills and the need to avoid plagiarism and are fully aware of copyright regulations in relation to electronic content.
All staff, volunteers and contractors.	<ul style="list-style-type: none"> • To read, understand, sign and adhere to the academy staff Acceptable Use Agreement/Policy, and understand any updates annually. The AUP is signed by new staff on induction; • To report any suspected misuse or problem to the online safety coordinator; • To maintain an awareness of current online safety issues and guidance e.g. through CPD; • To model safe, responsible and professional behaviours in their own use of technology. • All digital communications with pupils / parents / carers should be on a professional level and only carried out using official Trust/School systems • 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
Pupils	<ul style="list-style-type: none"> • Read, understand, sign and adhere to the Pupil Acceptable Use Policy annually; • To understand the importance of reporting abuse, misuse or access to inappropriate materials; • To know what action to take if they or someone they know feels worried or vulnerable when using online technology; • To understand the importance of adopting safe behaviours and good online safety practice when using digital technologies out of the school • To have the opportunity to become digital leaders.
Parents/carers	<ul style="list-style-type: none"> • 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, letters and the school website. Parents and

	<p>carers will be encouraged to support the school in promoting good online safety practice and to follow guidelines on the appropriate use of:</p> <ul style="list-style-type: none"> • digital and video images taken at school events (as per Parent and Visitor Code of Conduct) • access to parents' sections of the website and online pupil records • their children's personal devices in the school (where this is allowed) • Other responsibilities include; • To read, understand and promote the school's Pupil Acceptable Use Agreement with their child/children; • To consult with the school if they have any concerns about their children's use of technology; • To support the school in promoting online safety and endorse the Parents' Acceptable Use Agreement which includes the pupils' use of the Internet and the school's use of photographic and video images.
<p>External groups including Parent groups</p>	<ul style="list-style-type: none"> • Any external individual/organisation will sign an Acceptable Use agreement prior to using technology or the Internet within the school; • To support the school in promoting online safety; • To model safe, responsible and positive behaviours in their own use of technology.

1.4. Communication:

The policy will be communicated to staff/pupils/community in the following ways:

- Policy to be posted on the school website/ staffroom/ classrooms.
- Policy to be part of school induction pack for new staff.
- Regular updates and training on online safety for all staff.
- Acceptable use agreements discussed with staff and pupils at the start of each year. Acceptable use agreements to be issued to whole school community, on entry to the school.

1.5. Handling Incidents:

- The school will take all reasonable precautions to ensure online safety.
- Staff and pupils are given information about infringements in use and possible sanctions.
- Online Safety Co-coordinator acts as first point of contact for any incident.
- Any suspected online risk or infringement is reported to Online Safety Coordinator that day.
- Any concern about staff misuse is always referred directly to the Principal, unless the concern is about the Principal in which case the complaint is referred to the Chair of Governors.

(See Appendix 3 & Section 9 - Online Safety Infringements and Sanctions)

2. Education and Curriculum

2.1. Pupil Online Safety Curriculum

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

- Has a clear, progressive online safety education programme as part of the Computing curriculum / PSHE and other curriculum areas as relevant. This covers a range of skills and behaviours appropriate to their age and experience;
- Plans online used carefully to ensure that these are age appropriate and support the learning objectives for specific curriculum areas;
- Key online safety messages will be reinforced as part of a planned programme of assemblies;
- Pupils should be supported in building resilience to radicalisation by providing a safe environment for debating controversial issues and helping them to understand how they can influence and participate in decision-making;
- Will remind pupils about their responsibilities through the student Acceptable Use Agreement(s);
- Ensures staff are aware of their responsibility to model safe and responsible behaviour in their own use of technology, e.g. use of passwords, logging-off, use of content, research skills, copyright;
- Ensures that staff and pupils understand issues around plagiarism; how to check copyright and also know that they must respect and acknowledge copyright/intellectual property rights;
- Ensure pupils only use school approved systems and publish within appropriately secure / age-appropriate environments;
- Where pupils are allowed to freely search the internet, staff should be vigilant in monitoring the content of the website's students visit;
- It is accepted that from time to time, for good educational reasons, pupils may need to research topics (e.g. racism, drugs, and discrimination) that would normally result in internet searches being blocked. In such a situation, staff can request that the IT support team can temporarily remove those sites from the filtered list for the period of study. Any request to do so, will be auditable, with clear reasons.

2.2. Staff, Academy Councillor and Volunteer training

This school:

- Makes regular training available to staff, Academy Councillors and volunteers, on online safety issues and the school online safety education program;
- Provides, as part of the induction process, all new staff [including those on university/college placement and work experience] with information and guidance on the Online Safety Policy and the school's Acceptable Use Agreements.
- The Designated Safeguarding Lead (or other nominated person) will provide advice / guidance / training to individuals as required.
- This Online Safety policy and its updates will be presented to and discussed by staff in staff meetings / INSET days

2.3. Parent awareness

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

- Letters, communication systems, website
- Parents' evenings

- High profile events / campaigns e.g. Safer Internet Day
- Reference to the relevant web sites and publications

3. Expected Conduct and Incident Management

3.1. Expected conduct

In this school all users:

- Are responsible for using the school IT and communication systems in accordance with the relevant Acceptable Use Agreements;
- Understand the significance of misuse or access to inappropriate materials and are aware of the consequences;
- Understand it is essential to report abuse, misuse or access to inappropriate materials and know how to do so;
- Understand the importance of adopting good online safety practice when using digital technologies in and out of the school;
- Know and understand school policies on the use of mobile and handheld devices including cameras.

3.2. Staff, volunteers and contractors

- Know to be vigilant in the supervision of children at all times, as far as is reasonable, and uses common-sense strategies in learning resource areas where older students have more flexible access;
- Know to take professional, reasonable precautions when working with pupils, previewing websites before use; using age-appropriate (student friendly) search engines where more open Internet searching is required with younger pupils.

3.3. Parents/Carers

- Should provide consent for pupils to use the Internet, as well as other technologies, as part of the online safety acceptable use agreement form;
- Should know and understand what the school's rules of appropriate use for the whole school community are and what sanctions result from misuse.

3.4. Incident Management

In this school:

- There is strict monitoring and application of the online safety policy and a differentiated and appropriate range of sanctions;
- All members of the school are encouraged to be vigilant in reporting issues, in the confidence that issues will be dealt with quickly and sensitively, through the school's escalation processes;
- Support is actively sought from other agencies as needed (e.g. UK Safer Internet Centre helpline, CEOP, Prevent Officer, Police, Internet Watch Foundation) in dealing with online safety issues;
- Monitoring and reporting of online safety incidents takes place and contributes to developments in policy and practice in online safety within the school;
- Parents/carers are specifically informed of online safety incidents involving young people for whom they are responsible;

- The Police will be contacted if one of our staff or pupils receives online communication that we consider is particularly disturbing or breaks the law;
- We will immediately refer any suspected illegal material to the appropriate authorities – Police, Internet Watch Foundation etc.

(See Section 9 & Appendix 3 - Online Safety Infringements and Sanctions)

4. Managing IT and Communication Systems

4.1. Internet access, security (including virus protection) and filtering

This school:

- Informs all users that Internet/email use is monitored;
- Has filtered secure broadband connectivity through HSO (Advanced IT Services Ltd)
- Ensures the school broadband access includes filtering appropriate to the age and maturity of pupils either directly through broadband provider or 3rd party solutions;
- Provides enhanced / differentiated user-level filtering through on-site and cloud based filtering systems;
- Works with the broadband connectivity and 3rd party filtering solution providers to ensure that filtering procedures are continually reviewed;
- Has a clear procedure for reporting breaches of filtering. All members of the school community (all staff and all pupils) will be aware of this procedure through acceptable use policies and training;
- Ensure that, if staff or pupils discover unsuitable sites, the URL will be reported to the school Online Safety Coordinator who will then record the incident and escalate the concern as appropriate;
- Has a filtering system which will block all sites on the Internet Watch Foundation (IWF) list;
- Ensures that changes to the school filtering procedures will be risk assessed by staff with educational and technical experience prior to any changes and where appropriate with consent from the Senior Leadership Team;
- The school Senior Leadership Team will ensure that regular checks are made to ensure that the filtering methods selected are effective;
- Ensures that any material that the school believes is illegal will be reported to appropriate agencies such as IWF, the Police or CEOP;
- Has an access strategy designed by educators to suit the age and curriculum requirements of the pupils, with advice from network managers;
- Ensures that changes to the filtering policies are updated by the Trust Head of IT Services as directed by the school Senior Leadership Team;
- Ensures that appropriate security measures are in place to protect the servers, firewalls, routers, wireless systems, workstations, mobile devices etc from accidental or malicious attempts which might threaten the security of the school/Trust systems and data. These are tested regularly. The school infrastructure and individual workstations are protected by up to date active virus/malware software.

- Forbids all users from downloading executable files and installing programmes on school owned devices without approval from IT Support and/or the Senior Leadership Team.
- Ensures network health through use of suitable anti-virus software;
- Uses DfE approved systems including DfE S2S, to send 'protect-level' sensitive / personal data over the Internet;
- Uses encrypted devices or secure remote access where staff need to access 'protect-level' (sensitive personal) data off-site.
- Ensures that servers, wireless systems and cabling are securely located and physical access restricted.

4.2. Network management (user access, backup)

This school:

- Uses individual, audited logins for all users (KS2 and above);
- Uses guest accounts occasionally for external or short-term visitors for temporary access to appropriate services;
- Uses teacher 'remote' management control tools for controlling workstations/viewing users/setting-up applications and Internet web sites, where useful;
- Has local network monitoring/auditing software installed;
- Has daily back-up of school data (admin and curriculum);
- Uses secure, 'Cloud' storage for data back-up that conforms to [DfE guidance](#);
- Uses storage of all data within the school which conforms to the EU and UK data protection requirements; Storage of data online, will conform to the [EU data protection directive](#) where storage is hosted within the EU.

To ensure the network is used safely, this school:

- Ensures staff read and sign that they have understood the school's online safety Policy. Following this, they are set-up with Internet, email access and network access. Online access to service is through a unique, audited username and password;
- Gives pupils their own unique username and password (KS2 and above) which gives them access to the Internet and other services;
- Makes clear that no one should log on as another user and makes clear that pupils should never be allowed to log-on or use teacher and staff logins;
- Has set-up the network with a shared work area for pupils and one for staff. Staff and pupils are shown how to save work and access work from these areas;
- Requires all users to log off when they have finished working or are leaving the computer unattended;
- Ensures all equipment owned by the school and/or connected to the network has up to date virus protection;
- Makes clear that staff are responsible for ensuring that any computer or laptop loaned to them by the school, is used primarily to support their professional responsibilities;
- Maintains equipment to ensure Health and Safety is followed;
- Does not allow any outside agencies to access our network remotely except where there is a clear professional need and then access is audited restricted and is only through approved systems;

- Has a clear disaster recovery system in place that includes a secure, remote off site back up of data;
- Uses secure data transfer; this includes DfE secure S2S website for all CTF files sent to other schools;
- Ensures that all pupil level data or personal data sent over the Internet is encrypted or only sent within the approved secure system;
- Has a wireless network that has been secured to industry standard Enterprise security level /appropriate standards suitable for educational use;
- Ensures that all IT and communications systems are installed professionally and regularly reviewed to ensure they meet health and safety standards.

4.3. Password policy

All staff have their own unique username and private passwords to access school systems. Staff are responsible for keeping their password(s) private.

This school:

- Makes it clear that staff and pupils must always keep their passwords private and must not share with others. If a password is compromised the school should be notified immediately;
- Requires staff to use STRONG passwords;
- Requires staff to change their passwords into the Trust System and MIS (i.e. Bromcom) twice a year.
- Requires all staff using trust/school systems to use multi factor authentication wherever possible;
- Monitors cloud based systems for potentially dangerous logins, mitigating the risk through Multifactor authentication challenges, physical location restrictions and lockout policies.

4.4. Responsibilities:

All users (adults and pupils KS2 and above) will have responsibility for the security of their username and password, must not allow other users to access the systems using their log on details and must immediately report any suspicion or evidence that there has been a breach of security. KS1 pupils will make use of a single “class login” which will be monitored by the staff members responsible for the pupils at that point in time.

The management of password security will be the responsibility of the Trust Systems Manager.

Passwords for new users, and replacement passwords for existing users can be allocated by the IT Support team. Any changes carried out must be notified to the member of staff responsible for issuing and coordinating password security (above).

4.4.1. Training/Awareness:

It is essential that users are made aware of the need to keep passwords secure, and the risks attached to unauthorised access/data loss. This should apply to even the youngest of users, even if class logons are being used.

Members of staff will be made aware of the school’s password security procedures:

- at induction;

- through the school's Online Safety Policy and procedures;
- through the Acceptable Use Agreement;

Pupils will be made aware of the school's password security procedures:

- in ICT and/or Online Safety lessons
- through the Acceptable Use Agreement

The following rules apply to the use of passwords:

- the last four passwords cannot be re-used;
- the password should be a minimum of 8 characters long and must include three of – uppercase character, lowercase character, number, special character;
- 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);
- requests for password changes should be authenticated to ensure that the new password can only be passed to the genuine user.

The “master/administrator” passwords for the school ICT system, used by the Trust Systems Manager must also be available to the Principal or other nominated senior leader and kept in a secure place (e.g. school safe). Alternatively, where the system allows more than one “master/administrator” log-on, the Principal or other nominated senior leader should be allocated those master/administrator rights. The school should never allow one user to have sole administrator access.

4.4.2. Audit/Monitoring/Reporting/Review:

The Trust Head of IT Services will ensure that full records are kept of:

- User IDs and requests for password changes;
- User logons;
- Security incidents related to this Policy and procedures.

In the event of a serious security incident, the Police may request and will be allowed access to passwords used for encryption. Local Authority Auditors also have the right of access to passwords for audit investigation purposes.

User lists, IDs and other security related information must be given the highest security classification and stored in a secure manner. These records will be reviewed by the central Trust team at regular intervals.

4.5. E-mail

The Trust:

- Provides staff with an email account for their professional use, and personal email should be through a separate account;
- Uses anonymous or group e-mail addresses, for example info@tmet.uk;
- Will contact the Police if one of our staff or pupils receives an e-mail that we consider is particularly disturbing or breaks the law;

- Will ensure that email accounts are maintained and up to date;
- Will use a number of technologies to help protect users and systems in the school;
- Expects staff to only use official school provided email accounts to communicate with pupils and parents, as approved by the Senior Leadership Team;
- Does not permit the forwarding of chain messages;
- The official school email service may be regarded as safe and secure and is monitored. Staff and pupils should therefore use only the school email service to communicate with others when in school, or on school systems (e.g. by remote access);
- Users need to be aware that email communications may be monitored.

4.5.1. Emailing Personal, Sensitive, Confidential or Classified Information

- Assess whether the information can be transmitted by other secure means before using email - emailing confidential data is not recommended and should be avoided where possible;
- The use of Hotmail, BT Internet, G-mail or any other Internet based webmail service for sending emails containing sensitive information is not permitted;
- Where your conclusion is that email must be used to transmit such data:
 - Obtain express consent from your manager to provide the information by email;
 - Exercise caution when sending the email and always follow these checks before releasing the email:
 - Verify the details, including accurate email address, of any intended recipient of the information;
 - Verify (by phoning) the details of a requestor before responding to email requests for information;
 - Do not copy or forward the email to any more recipients than is absolutely necessary.
 - Do not send the information to any person whose details you have been unable to separately verify (usually by phone);
 - Send the information as an encrypted document attached to an email;
 - Provide the encryption key or password by a separate contact with the recipient(s);
 - Do not identify such information in the subject line of any email;
 - Request confirmation of safe receipt.

Pupils:

Pupils are taught about the online safety and 'netiquette' of using e-mail both in school and at home.

Staff:

Staff will use the e-mail systems for professional purposes;

Access in school to external personal email accounts may be blocked;

Never use email to transfer staff or student personal data. 'Protect-level' data should never be transferred by email. If there is no secure file transfer solution available for the situation, then the data / file must be protected with security encryption.

4.6. School website / Teaching School / SCITT

The Principal or Executive Team, supported by the Academy Council, takes overall responsibility to ensure that the website content is accurate, and the quality of presentation is maintained;

The school website complies with statutory DFE requirements;

Most material is the school's own work; where other's work is published or linked to, we credit the sources used and state clearly the author's identity or status;

Photographs published on the web do not have full names attached. We do not use pupils' names when saving images in the file names or in the tags when publishing to the school website.

4.7. Cloud Environments

Uploading of information on the school's online learning space is shared between different staff members according to their responsibilities e.g. all class teachers upload information in their class areas;

Photographs and videos uploaded to the school's online environment will only be accessible by members of the school community;

In the school, pupils are only able to upload and publish within school approved 'Cloud' systems.

4.8. Home Learning Systems (please refer to the TMET Acceptable Use for Home Learning Policy)

Home learning platforms are monitored using Trust/School systems and strictly for work use only;

Uploading of information, files and resources to the Trust online learning platform is accessible by staff members according to their responsibilities.

Restrictions and procedures have been introduced to reduce the risk of cyber threats whilst using the Home Learning platform – staff guidance is regularly circulated on best practices;

The Trust and respective Academies reserve the right to disable users access to Remote Learning platforms in the event of misuse, investigation or other appropriate scenarios;

All staff, pupils & other temporary users should read and accept the TMET Acceptable Use for Home Learning policy prior to use of Home Learning platforms (Microsoft Teams).

4.9. Social networking

4.9.1. Staff, Volunteers and Contractors

Staff should refer to the Trust's **Social Media Policy**.

Staff are instructed to always keep professional and private communication separate;

Teachers are instructed not to run social network spaces for pupil use on a personal basis or to open up their own spaces to their pupils, but to use the school's preferred system for such communications.

4.9.2. Pupils

Are taught about social networking, acceptable behaviours and how to report misuse, intimidation or abuse through our online safety curriculum work;

Are required to sign and follow our [age appropriate] Pupil Acceptable Use Agreement.

4.9.3. Parents

Parents are reminded about social networking risks and protocols through our parental Acceptable Use Agreement and additional communications materials when required;

Are reminded that they need to ask permission before uploading photographs, videos or any other information about other people.

4.10. CCTV

Please refer to the Trust's **CCTV Policy**.

We have CCTV in the school as part of our site surveillance for staff and pupil safety. The use of CCTV is clearly signposted. We will not reveal any recordings without appropriate permission;

We use specialist lesson recording equipment on occasions as a tool to share best teaching practice. We do not reveal any such recordings outside of the staff and will not use for any other purposes.

4.11. Disposal of Redundant ICT Equipment

All redundant ICT equipment will be disposed of through an authorised agency. This should include a written receipt for the item including an acceptance of responsibility for the destruction of any personal data.

All redundant ICT equipment that may have held personal data will have the storage media overwritten multiple times to ensure the data is irretrievably destroyed. Or if the storage media has failed it will be physically destroyed. We will only use authorised companies who will supply a written guarantee that this will happen.

Disposal of any ICT equipment will conform to:

- The Waste Electrical and Electronic Equipment Regulations 2006
- The Waste Electrical and Electronic Equipment (Amendment) Regulations 2007
- Environment Agency Guidance (WEEE) [Click here to access](#)
- ICO Guidance - Data Protection Act 1998 [Click here to access](#)
- Electricity at Work Regulations 1989

The school will maintain a comprehensive inventory of all its ICT equipment including a record of disposal.

The school's disposal record will include:

Date item disposed of;

Authorisation for disposal, including:

verification of software licensing

any personal data likely to be held on the storage media*

How it was disposed of e.g. waste, gift, sale

Name of person and/or organisation who received the disposed item

* if personal data is likely to be held the storage media will be over written multiple times or 'scrubbed' to ensure the data is irretrievably destroyed.

Any redundant ICT equipment being considered for sale/gift will have been subject to a recent electrical safety check and hold a valid PAT certificate.

5. Data Security - Management Information System access and data transfer

5.1. Strategic and operational practices

At this school:

The Principal is the Senior Information Risk Officer (SIRO);

Staff are clear who are the key contact(s) for key school information (the Information Asset Owners) are. We have listed the information and information asset owners;

We ensure staff know who to report any incidents where data protection may have been compromised;

All staff are DBS checked and records are held in a single central record.

5.2. Technical Solutions

Staff have secure area(s) on the network to store sensitive files;

We require staff to log-out of systems when leaving their computer, but also enforce lock-out after 10 minutes' idle time;

All servers are in lockable locations and managed by DBS-checked staff;

Details of all school-owned hardware will be recorded in a hardware inventory;

Details of all school-owned software will be recorded in a software inventory;

Disposal of any equipment will conform to [The Waste Electrical and Electronic Equipment Regulations 2006](#) and/or [The Waste Electrical and Electronic Equipment \(Amendment\) Regulations 2007](#). [Further information](#) can be found on the Environment Agency website;

Where any protected or restricted data has been held we get a certificate of secure deletion for any server that once contained personal data;

We are using secure file deletion software.

6. Equipment and Digital Content

6.1. Mobile Devices (mobile phones, tablets and other mobile devices)

Mobile devices brought into school are entirely at the staff member, pupil's and parent's or visitor's own risk. The school/Trust accepts no responsibility for the loss, theft or damage of any phone or handheld device brought into school;

Mobile devices are not permitted to be used in certain areas within the school site, e.g. changing rooms and toilets.

No images or videos should be taken on mobile devices without the prior consent of the person or people concerned;

The recording, taking and sharing of images, video and audio on any personal mobile device is to be avoided, except where it has been explicitly agreed by the Principal. Such authorised use is to be recorded. All mobile device use is to be open to monitoring scrutiny and the Principal is able to withdraw or restrict authorisation for use at any time, if it is deemed necessary;

The school reserves the right to search the content of any mobile devices on the school premises where there is a reasonable suspicion that it may contain illegal or undesirable material, including pornography, violence or bullying.

6.1.1. Pupils' use of personal devices

Thurnby Mead allows children in year 6 to bring mobile devices to school if they walk home alone. Mobile phones are kept securely at the office and collected by the child at the end of the school day.

If a pupil needs to contact his or her parents or carers, they will be allowed to use the school phone. Parents are advised not to contact their child via their mobile phone during the school day, but to contact the school office;

If a pupil breaches the school policy, then the device will be confiscated and will be held in a secure place in the school office. Mobile devices will be released to parents or carers in accordance with the school policy.

Phones and devices must not be taken into examinations. Pupils found in possession of a mobile device during an exam will be reported to the appropriate examining body. This may result in the pupil's withdrawal from either that examination or all examinations;

Pupils will be instructed in safe and appropriate use of mobile phones and personally-owned devices and will be made aware of boundaries and consequences.

6.1.2. Staff use of personal devices

Staff are not permitted to use their own mobile phones or devices in a professional capacity, such as for contacting children, young people or their families within or outside of the setting;

Staff will be issued with a school phone where contact with pupils, parents or carers is required, for instance for off-site activities;

Mobile Phones and personally-owned devices will be switched off or switched to 'silent' mode. Bluetooth communication should be 'hidden' or switched off and mobile phones or personally-owned devices will not be used during teaching periods unless permission has been granted by a member of the senior leadership team in emergency circumstances;

Staff should not use personally-owned devices, such as mobile phones or cameras, to take photos or videos of students and will only use work-provided equipment for this purpose;

In an emergency where a staff member doesn't have access to a school-owned device, they should use their own device and hide (by inputting 141) their own mobile number for confidentiality purposes and then report the incident with the Principal / Designated Officer;

If a member of staff breaches the school policy then disciplinary action may be taken.

Staff may use their phones during break times. If a staff member is expecting a personal call they may leave their phone with the school office to answer on their behalf, or seek specific permissions to use their phone at other than their break times.

6.2. Storage, Syncing and Access

The device is accessed with a school owned account

The device has a school created account and all apps and file use are in line with this policy. No personal elements may be added to this device;

PIN access to the device must always be known by the Trust Systems Manager, or possible to reset through Trust management systems;

The device is accessed with a personal account

If personal accounts are used for access to a school owned mobile device, staff must be aware that school use will be synced to their personal cloud, and personal use may become visible in the school and in the classroom;

PIN access to the device must always be known by the network manager;

Exit process – when the device is returned the staff member must log in with personal ID so that the device can be Factory Reset and cleared for reuse (if applicable);

6.3. Digital images and video

(Add information as necessary)

In this Trust:

We gain parent/carer permission for use of digital photographs or video involving their child as part of the Media Consent form when their daughter/son joins the school **(amend as necessary i.e. annually/Bromcom set to request consent)**;

We do not identify pupils in online photographic materials or include the full names of pupils in the credits of any published school produced video materials/DVDs;

Staff sign the school's Acceptable Use Policy and this includes a clause on the use of mobile phones/personal equipment for taking pictures of pupils;

If specific pupil photos (not group photos) are used on the school web site, in the prospectus or in other high profile publications the school will obtain individual parental or pupil permission for its long term, high profile use;

Pupils are taught about how images can be manipulated in their online safety education programme and also taught to consider how to publish for a wide range of audiences which might include governors, parents or younger children as part of their computing scheme of work;

Pupils are advised to be very careful about placing any personal photos on any 'social' online network space. They are taught to understand the need to maintain privacy settings so as not to make public, personal information;

Pupils are taught that they should not post images or videos of others without their permission. We teach them about the risks associated with providing information with images (including the name of the file), that reveals the identity of others and their location. We teach them about the need to keep their data secure and what to do if they are subject to bullying or abuse.

7. Communications

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

	Staff & other adults				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 the school	x						x	
Use of mobile phones in lessons				x				x
Use of mobile phones in social time	x							x
Taking photos on mobile phones / cameras				x				x
Use of other mobile devices e.g. tablets, gaming devices	x				x			
Use of personal email addresses in school, or on school/Trust 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/Trust email service may be regarded as safe and secure and is monitored. Users should be aware that email communications are monitored. Staff and pupils should therefore use only the school email service to communicate with others when on the school network, or on school systems (e.g. by remote access).
- Pupils must immediately report to their teacher, and staff to the Principal, 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 must be professional in tone and content. These communications may only take place on official 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
- Whole class / group email addresses may be used at KS1, while pupils at KS2 and above will be provided with individual school email addresses (in some instances only network accounts – no email account) for educational use.

8. Social Media - Protecting Professional Identity

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:

- Training to include: acceptable use; social media risks; checking of settings; data protection; reporting issues; phishing
- 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 other 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

The school's use of social media for professional purposes will be checked regularly by the Online Safety Coordinator to ensure compliance with the school/Trust policies.

9. Online Safety Infringements & Sanctions

9.1. 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 / 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	

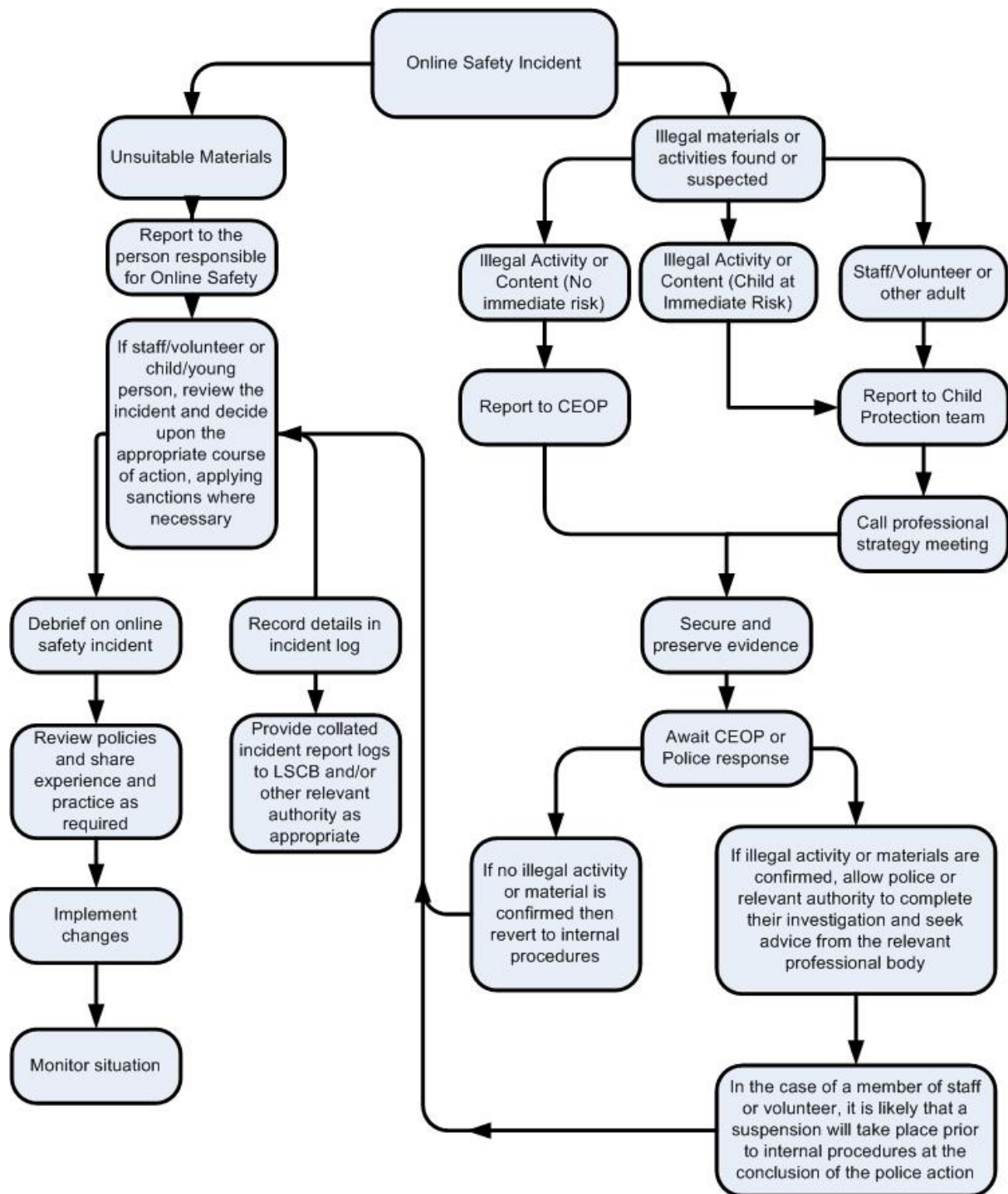
Using systems, applications, websites or other mechanisms that bypass the filtering or other safeguards employed by the school				X	
Infringing copyright				X	
Revealing or publicising confidential or proprietary information (eg financial / personal information, databases, computer / network access codes and passwords)				X	
Creating or propagating computer viruses or other harmful files				X	
Unfair usage (downloading / uploading large files that hinders others in their use of the internet)				X	
Online gaming (educational)			X		
Online gaming (non-educational)				X	
Online gambling				X	
Online shopping / commerce		X			
File sharing			X		
Use of social media		X			
Use of messaging apps		X			
Use of video broadcasting e.g. Youtube		X			

9.2. 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).

9.3. 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.



9.4. School / Teaching School / SCITT / Trust Offices Actions & Sanctions

Students/Pupils Incidents

It is intended that incidents of misuse will be dealt with through normal behaviour / disciplinary procedures with the appropriate action(s)/sanction(s), as listed below which will be dependent on the nature of the incident and could include a combination of any of the following:

- Refer to class teacher / tutor
- Refer to Head of Department / 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 e.g. detention

Examples of Students / Pupils Incidents could include but are not limited to the following:

- Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on unsuitable / inappropriate activities).
- Unauthorised use of non-educational sites during lessons
- Unauthorised / inappropriate use of mobile phone / digital camera / other mobile device
- Unauthorised / inappropriate use of social media / messaging apps / personal email
- Unauthorised downloading or uploading of files
- Allowing others to access school network by sharing username and passwords
- Attempting to access or accessing the school network, using another student's / pupil's account
- Attempting to access or accessing the school network, using the account of a member of staff
- Corrupting or destroying the data of other users
- Sending an email, text or message that is regarded as offensive, harassment or of a bullying nature
- Continued infringements of the above, following previous warnings or sanctions
- Actions which could bring the school into disrepute or breach the integrity of the ethos of the school
- Using proxy sites or other means to subvert the school's filtering system
- Accidentally accessing offensive or pornographic material and failing to report the incident
- Deliberately accessing or trying to access offensive or pornographic material
- Receipt or transmission of material that infringes the copyright of another person or infringes the Data Protection Act

Staff Incidents

It is intended that incidents of misuse will be dealt with through disciplinary procedures with the appropriate action(s)/sanction(s), as listed below which will be dependent on the nature of the incident and could include a combination of any of the following:

- Refer to line manager
- Refer to Headteacher Principal
- Refer to Local Authority / HR
- Refer to Police
- Refer to Technical Support Staff for action re filtering etc.
- Warning
- Suspension
- Disciplinary action

Staff Incidents could include but are not limited to the following:

- Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on unsuitable / inappropriate activities).
- Inappropriate personal use of the internet / social media / personal email
- Unauthorised downloading or uploading of files

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

Appendix 1 - Online Safety Infringements and Sanctions
Online Safety Infringements and Sanctions

PUPIL	
Category A infringements	Possible Sanctions:
<ul style="list-style-type: none"> • Use of non-educational sites during lessons • Unauthorised use of email • Unauthorised use of mobile phone (or other new technologies) in lessons e.g. to send texts to friends • Use of unauthorised instant messaging / social networking sites 	<ul style="list-style-type: none"> • Refer to class teacher • Escalate to: • Phase Leader/Learning Mentor/DSL
Category B infringements	Possible Sanctions:
<ul style="list-style-type: none"> • Continued use of non-educational sites during lessons after being warned • Continued unauthorised use of email after being warned • Continued unauthorised use of mobile phone (or other new technologies) after being warned • Continued use of unauthorised instant messaging / chatrooms, social networking sites, NewsGroups • Use of File sharing software e.g. Napster, Vanbasco, BitTorrent, LiveWire, etc. • Trying to buy items over online • Accidentally corrupting or destroying others' data without notifying a member of staff of it • Accidentally accessing offensive material and not logging off or notifying a member of staff of it 	<ul style="list-style-type: none"> • Refer to class teacher • Phase Leader/Learning Mentor/DSL • Escalate to: • removal of Internet access rights for a period / removal of phone until end of day / contact with parent]
Category C infringements	Possible Sanctions:

<ul style="list-style-type: none"> • Deliberately corrupting or destroying someone's data, violating privacy of others or posts inappropriate messages, videos or images on a social networking site. • Sending an email or MSN message that is regarded as harassment or of a bullying nature (one-off) • Trying to access offensive or pornographic material (one-off) • Purchasing or ordering of items online • Transmission of commercial or advertising material • Continued sending of emails or MSN messages regarded as harassment or of a bullying nature after being warned • Deliberately creating accessing, downloading or disseminating any material deemed offensive, obscene, defamatory, racist, homophobic or violent • Receipt or transmission of material that infringes the copyright of another person or infringes the conditions of the Data Protection Act, revised 1988 • Bringing the school name into disrepute 	<ul style="list-style-type: none"> • Refer to Class teacher /Phase Leader/DSL/Principal / removal of Internet and/or Learning Platform access rights for a period • Escalate to: • contact with parents / removal of equipment • Other safeguarding actions • if inappropriate web material is accessed: • Ensure appropriate technical support filters the site • Refer to Principal / Contact with parents • Other possible safeguarding actions: • Secure and preserve any evidence • Inform the sender's e-mail service provider. • Liaise with relevant service providers/ instigators of the offending material to remove • Report to Police / CEOP where child abuse or illegal activity is suspected
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(How will infringements be handled? If the Online-Safety Policy has been infringed, the final decision on the sanction is with the school's senior management.)

STAFF	
Category A infringements (Misconduct)	Possible Sanctions:
<ul style="list-style-type: none"> Excessive use of Internet for personal activities not related to professional development e.g. online shopping, personal email, instant messaging etc. Use of personal data storage media (e.g. USB memory sticks) without considering access and appropriateness of any files stored. Not implementing appropriate safeguarding procedures. Any behaviour on the World Wide Web that compromises the staff members professional standing in the school and community. Misuse of first level data security, e.g. wrongful use of passwords. Breaching copyright or license e.g. installing unlicensed software on network. 	<ul style="list-style-type: none"> Referred to line manager / Principal Escalate to: Principal Warning given
Category B infringements (Gross Misconduct)	Possible Sanctions:
<ul style="list-style-type: none"> Serious misuse of, or deliberate damage to, any school / Council computer hardware or software; Any deliberate attempt to breach data protection or computer security rules; Deliberately creating, accessing, downloading and disseminating any material deemed offensive, obscene, defamatory, racist, homophobic or violent; Receipt or transmission of material that infringes the copyright of another person or infringes the conditions of the Data Protection Act, revised 1988; Bringing the school name into disrepute 	<ul style="list-style-type: none"> Referred to Principal / Academy Councillors; Other safeguarding actions: Remove the PC to a secure place to ensure that there is no further access to the PC or laptop. Instigate an audit of all ICT equipment by an outside agency, such as the school's ICT managed service providers - to ensure there is no risk of pupils accessing inappropriate materials in the school. Identify the precise details of the material. Escalate to: report to LA /LSCB, Personnel, Human resource.

<p>If a member of staff commits an exceptionally serious act of gross misconduct</p> <p>The member of staff should be instantly suspended. Normally though, there will be an investigation before disciplinary action is taken for any alleged offence. As part of that the member of staff will be asked to explain their actions and these will be considered before any disciplinary action is taken.</p>	<ul style="list-style-type: none"> • Report to Police / CEOP where child abuse or illegal activity is suspected.
<p>The school are likely to involve external support agencies as part of these investigations e.g. an ICT technical support service to investigate equipment and data evidence, the Local Authority Human Resources team.</p>	
<p>Child abuse images found</p> <p>In the case of Child abuse images being found, the member of staff should be immediately suspended and the Police should be called.</p> <p>Anyone may report any inappropriate or potentially illegal activity or abuse with or towards a child online to the Child Exploitation and Online Protection (CEOP):</p> <p>http://www.ceop.gov.uk/reporting_abuse.html</p>	

How will staff and students be informed of these procedures?

- They will be fully explained and included within the school's online-safety acceptable use agreement form;
- Pupils will be taught about responsible and acceptable use and given strategies to deal with incidents so they can develop unacceptable behaviours.
- Pupils will sign an age appropriate online-safety / acceptable use agreement form;
- The school's online-safety policy will be made available and explained to parents, and parents will sign an acceptance form when their child starts at the school.
- Information on reporting abuse / bullying etc. will be made available by the school for pupils,