Westminster Abbey Choir School

Online Safety Policy

Contents

Scope of the Policy

This policy applies to all members of the school community (including staff, pupils, volunteers, parents/carers and visitors who have access to and are users of school digital technology systems, both in and out of the school. It should be read in conjunction with the Acceptable Use Policies for pupils and staff. It was written taking into account guidance provided by Southwest Grid for Learning (SWGfL).

The Education and Inspections Act 2006 empowers Headteachers / Principals 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. Keeping Children Safe in Education 2020 (KCSIE) further emphasizes the school's responsibilities in these respects.

The school will deal with any incidents covered by this policy and associated behaviour making use of anti-bullying policies where appropriate and will, where known, inform parents/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' sub-committee responsible for policy review. Mr Robert Gullifer, the Nominated Governor for Safeguarding will:

- meet regularly with the headmaster
- regularly monitor any online safety incident logs
- report to relevant Governors meetings

Headmaster

- The Headmaster, as Deputy DSL has a duty of care for ensuring the safety (including online safety) of members of the school community alongside the Designated Safeguarding Lead.
- The Headmaster and (at least) another senior member of staff 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". SWGFL produce a very helpful tool to help staff manage such a situation. See https://boost.swgfl.org.uk/

- is responsible for ensuring that the use of the network / internet / email is regularly monitored in order that any misuse or attempted misuse can be reported to the Headmaster

- The Headmaster is responsible for ensuring that staff receive suitable training to enable them to carry out their online safety roles

Teacher in charge of IT

- leads the provision on online safety
- takes day to day responsibility for online safety issues and has a leading role in establishing and reviewing the school online safety procedures
- ensures that the filtering policy is applied and updated on a regular basis and that its implementation is not the sole responsibility of any single person
- ensures that 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 Abbey's IT technical staff
- receives reports of online safety incidents and creates a log of incidents to inform future online safety developments,
- meets regularly with the Headmaster to discuss current issues, review incident logs and filtering / change control logs

Abbey IT staff

Are responsible for ensuring:

- that the school's technical infrastructure is secure and is not open to misuse or malicious attack
- 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 addition, they advise on the selection of monitoring software systems

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 and understood the Staff Acceptable Use Policy (AUP)
- they report any suspected misuse or problem to the Headmaster for investigation / action / sanction
- all digital communications with pupils/parents/carers are on a professional level and only carried out using official school systems
- online safety issues are embedded in all relevant aspects of the curriculum and other activities
- pupils understand and follow the Online Safety Policy and the Acceptable Use Policy (AUP)

- 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

Designated Safeguarding Lead

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

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

Pupils

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

Parents

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

- digital and video images taken at school events
- access to parents' sections of the website

Policy Statements

Education – Pupils

Whilst regulation and technical solutions are very important, their use must be balanced by educating pupils to take a responsible approach. The education of pupils in online safety / digital literacy is therefore an essential part of the school's online safety provision. Children and young people need the help and support of the school to recognise and avoid online safety risks and build their resilience.

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

- A planned online safety curriculum will be provided as part of IT lessons and should be regularly revisited
- Key online safety messages will be reinforced as part of the programme of assemblies and tutorial / pastoral activities
- Pupils will be taught in all lessons to be critically aware of the materials / content they access online and be guided to validate the accuracy of information.
- Pupils should be taught to acknowledge the source of information used and to respect copyright when using material accessed on the internet
- Pupils should be supported in building resilience to radicalisation by providing a safe environment for debating controversial issues and helping them to understand how they can influence and participate in decision-making.
- Pupils should be helped to understand the need for the Pupil Acceptable Use Policy (AUP) and encouraged to adopt safe and responsible use both within and outside school.
- Staff should act as good role models in their use of digital technologies, the internet and mobile devices.
- In lessons where internet use is pre-planned, it is best practice that pupils should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches.
- Where pupils are allowed freely to search the internet, staff should be vigilant in monitoring the content of the websites the young people visit, ensuring that a filtered network is being used.
- It is accepted that from time to time, for good educational reasons, pupils may need to research topics (eg racism, drugs, discrimination) that would normally result in internet searches being blocked. In such a situation, staff can request that the Technical Staff (or other relevant designated person) can temporarily remove those sites from the filtered list for the period of study. Any request to do so, should be auditable, with clear reasons for the need.

Education – Parents / 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 and 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:

- Letters, newsletters,
- Parents evenings / sessions
- High profile events / campaigns e.g. Safer Internet Day
- Reference to the relevant web sites / publications e.g. swgfl.org.uk www.saferinternet.org.uk/ http://www.childnet.com/parents-and-carers

Education & Training – Staff / Volunteers

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

- A programme of formal online safety training will be made available to staff.
- All new staff should receive basic online safety training as part of their induction programme, ensuring that they understand the school Online Safety Policy and Acceptable Use Policies.
- The Teacher in Charge of IT will receive regular updates through attendance at external training events (eg from SWGfL / LA or other relevant organisations) and by reviewing guidance documents released by relevant organisations.
- This Online Safety Policy and its updates will be presented to and discussed by staff in staff meetings / INSET days.

Technical – infrastructure / equipment, filtering and monitoring

The school will be responsible for ensuring that the infrastructure / network is as safe and secure as is reasonably possible and that policies and procedures approved within this policy are implemented. It will also need to ensure that the relevant people named in the above sections will be effective in carrying out their online safety responsibilities:

- School technical systems will be managed in ways that ensure that the school meets recommended technical requirements
- There will be regular reviews and audits of the safety and security of school technical systems
- Servers, wireless systems and cabling must be securely located and physical access restricted

- All users will have clearly defined access rights to school technical systems and devices.
- All users will be provided with a username and secure password by the Abbey's IT department who will keep an up-to-date record of users and their usernames. Users are responsible for the security of their username and password and staff will be required to change their passwords at pre-determined intervals.
- The Abbey IT staff are responsible for ensuring that software licence logs are accurate and up to date and that appropriate checks are made to reconcile the number of licences purchased against the number of software installations
- Internet access is filtered for all pupils. Illegal content (child sexual abuse images) is filtered by the broadband or filtering provider by actively employing the Internet Watch Foundation CAIC list.
- There is a clear process in place to deal with requests for filtering changes
- Internet filtering / monitoring should ensure that children are safe from terrorist and extremist material when accessing the internet.
- Abbey technical staff are able to monitor and record the activity of users on the school IT systems and users are made aware of this in the Acceptable Use Policy.
- An appropriate system is in place for users to report any actual / potential technical incident / security breach to the relevant person, as agreed.
- Appropriate security measures are in place to protect the servers, firewalls, routers, wireless systems, work stations, mobile devices etc from accidental or malicious attempts which might threaten the security of the school or Abbey systems and data. These are tested regularly. The school infrastructure and individual workstations are protected by up to date virus software.
- An agreed policy is in place that limits staff from downloading executable files and installing programs on school devices without permission.
- An agreed policy is in place regarding the use of removable media (eg memory sticks / CDs / DVDs) by users on school devices. Personal data should not be sent over the internet or taken off the school site unless safely encrypted or otherwise secured.

Mobile Technologies (including BYOD/BYOT)

The Abbey does not currently allow personally owned mobile devices to be connected to the school's wireless network.

Use of digital and video images – See also Policy S48: Use and storage of Images

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

- When using digital images, staff should inform and educate pupils about the risks associated with the taking, use, sharing, publication and distribution of images. In particular they should recognise the risks attached to publishing their own images on the internet e.g. on social networking sites.
- Written permission from parents or carers will be obtained before named photographs of pupils are published on the school website / social media / the press
- In accordance with guidance from the Information Commissioner's Office, parents/carers are welcome to take videos and digital images of their own children at school events for their personal use (as such use is not covered by the Data Protection Act), but always subject to any copyright or performance rights restrictions. To respect everyone's privacy and protection, these images should not be published / made publicly available on social networking sites, nor should parents/carers comment on any activities involving other pupils in the digital / video images.
- Staff and volunteers are allowed to take digital / video images to support educational aims, but must follow school policies concerning the sharing, distribution and publication of those images. See S48: Use and Storage of Images.
- Care should be exercised when taking digital / video images that pupils are appropriately dressed and are not participating in activities that might bring the individuals or the school into disrepute.
- Pupils must not take, use, share, publish or distribute images of others without their permission
- Photographs published on the website or elsewhere, that include pupils, will be selected carefully and will comply with good practice guidance on the use of such images.
- Pupils' full names will not be used anywhere on a website or blog, particularly in association with photographs unless express permission has been given by parents/carers.
- A pupil's work may only be published with the permission of the pupil and parents or carers.

Data Protection – See also Policy G06: Data Protection

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

The school will ensure that:

- It has a Data Protection Policy.
- It has paid the appropriate fee to the Information Commissioner's Office (ICO).
- It has appointed a Data Protection Controller (DPC).
- 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 will as far as is possible be accurate and up to date. Inaccuracies will be corrected without unnecessary delay.
- The lawful basis for processing personal data (including, where relevant, consent) has been identified and documented.
- 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 are 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 / data protection training and are made aware of their responsibilities.

Staff must ensure that they:

- At all times take care to ensure the safe keeping of personal data, minimising the risk of its loss or misuse.
- Use personal data only on secure password protected computers and other devices, ensuring that they are properly "logged-off" at the end of any session in which they are using personal data.

Communications

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

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

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

- The official school 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 generally use the school email service to communicate with others when in school, or on school systems (e.g. by remote access).

- Users must immediately report to the Headmaster – in accordance with the school policy – the receipt of any communication that makes them feel uncomfortable, is offensive, discriminatory, threatening or bullying in nature and must not respond to any such communication.
- Any digital communication between staff and pupils or parents/carers 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 will be provided with individual school email addresses for educational use.
- Pupils should be taught about online safety issues, such as the risks attached to the sharing of personal details. They should also be taught strategies to deal with inappropriate communications and be reminded of the need to communicate appropriately when using digital technologies.
- Personal information should not be posted on the school website and only official email addresses should be used to identify members of staff.

Social Media - Protecting Professional Identity

All schools have a duty of care to provide a safe learning environment for pupils and staff. Schools 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 gender, race or disability or who defame a third party may render the school liable to the injured party. Reasonable steps to prevent predictable harm must be in place.

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

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

School staff should ensure that:

- No reference is made in personal social media to pupils, parents/carers or school staff as members of the school community
- They do not engage in online discussion on personal matters relating to members of the school community
- Personal opinions are not be attributed to the school
- Security settings on personal social media profiles are regularly checked to minimise risk of loss of personal information

When official school social media accounts are established there should be:

- A process for approval by senior leaders
- Clear processes for the administration and monitoring of these accounts – involving at least two members of staff
- A code of behaviour for users of the accounts

Personal Use:

- Personal communications are those made via a personal social media account. In all cases, where a personal account is used which associates itself with the school or impacts on the school, it must be made clear that the member of staff is not communicating on behalf of the school with an appropriate disclaimer. Such personal communications are within the scope of this policy
- Personal communications which do not refer to or impact upon the school are outside the scope of this policy
- Where excessive personal use of social media in school is suspected and considered to be interfering with relevant duties, disciplinary action may be taken
- The school permits reasonable and appropriate access to private social media sites

Dealing with unsuitable / inappropriate activities

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

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

User Actions		Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
Users shall not visit Internet sites, make, post, download, upload, data transfer, communicate or pass on, material, remarks, proposals or comments that contain or relate to:	Child sexual abuse images –The making, production or distribution of indecent images of children. Contrary to The Protection of Children Act 1978					X
	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	

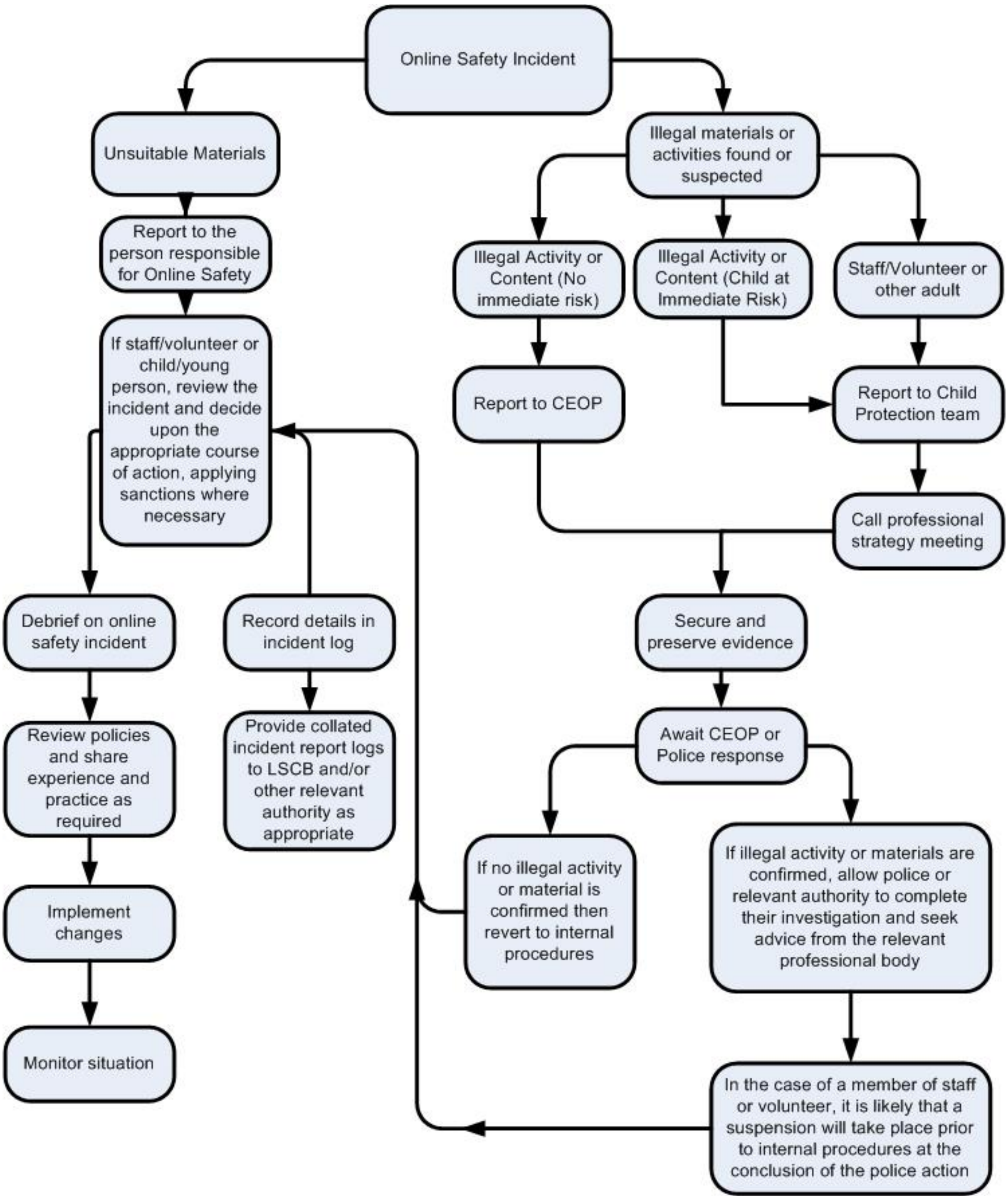
User Actions	Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
Using school systems to run a private business				X	
Using systems, applications, websites or other mechanisms that bypass the filtering or other safeguards employed by the school				X	
Infringing copyright				X	
Revealing or publicising confidential or proprietary information (eg financial / personal information, databases, computer / network access codes and passwords)				X	
Creating or propagating computer viruses or other harmful files				X	
Unfair usage (downloading / uploading large files that hinders others in their use of the internet)				X	
On-line gaming (educational)		X			
On-line gaming (non-educational)		X			
On-line gambling				X	
On-line shopping / commerce		X			
File sharing			X		
Use of social media			X		
Use of messaging apps			X		
Use of video broadcasting e.g. Youtube				X	

Responding to incidents of misuse

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

Illegal Incidents

If there is any suspicion that the 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) for responding to online safety incidents and report immediately to the police.


Online Safety Incident
Unsuitable Materials
Report to the person responsible for Online Safety
If staff/volunteer or child/young person, review the incident and decide upon the appropriate course of action, applying sanctions where necessary
Debrief on online safety incident
Review policies and share experience and practice as required
Implement changes
Monitor situation
Record details in incident log
Provide collated incident report logs to LSCB and/or other relevant authority as appropriate
Illegal materials or activities found or suspected
Illegal Activity or Content (No immediate risk)
Illegal Activity or Content (Child at Immediate Risk)
Staff/Volunteer or other adult
Report to CEOP
Report to Child Protection team
Call professional strategy meeting
Secure and preserve evidence
Await CEOP or Police response
If no illegal activity or material is confirmed then revert to internal procedures
If illegal activity or materials are confirmed, allow police or relevant authority to complete their investigation and seek advice from the relevant professional body
In the case of a member of staff or volunteer, it is likely that a suspension will take place prior to internal procedures at the conclusion of the police action

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:

- Ensure that more than one senior member of staff is 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
    - 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.