



Online safety policy template  
for schools

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## Introduction

### The online safety policy template

These school online safety policy templates are intended to help school leaders produce a suitable online safety policy document which will consider all current and relevant issues, in a whole school context, linking with other relevant policies, such as the safeguarding, behaviour and anti-bullying policies.

The requirement to ensure that learners are able to use the internet and related communications technologies appropriately and safely is addressed as part of the wider duty of care to which all who work in schools are bound. Schools must, through their online safety policy, meet their statutory obligations to ensure that learners are safe and are protected from potential harm, both on and off-site. The policy will also form part of the school's protection from legal challenge, relating to the use of digital technologies.

These policy templates suggest policy statements which, in the view of Welsh Government, would be essential in any school online safety policy, based on good practice. In addition there are a range of alternative statements that schools should consider and choose those that are most suitable, given their particular circumstances.

An effective school online safety policy must be tailored to the needs of each school and an important part of the process will be the discussion and consultation which takes place during the writing or review of the policy. This will help ensure that the policy is owned and accepted by the whole school community.

It is suggested that consultation in the production of this policy should involve:

- governors
- teaching staff and support staff
- learners
- community users and any other relevant groups.

Due to the ever-changing nature of digital technologies, it is best practice that the school reviews the online safety policy at least annually and, if necessary, more frequently in response to any significant new developments in the use of the technologies, new threats to online safety or incidents that have taken place.

Schools are subject to an increased level of scrutiny of their online safety practices by Estyn Inspectors during inspections, while the Counter Terrorism and Securities Act 2015 requires schools to ensure that children are safe from terrorist and extremist material on the internet.

Given the range of optional statements and guidance notes, this template document is much longer than the resulting policy is likely to be. It is intended that, while covering a complex and ever changing aspect of the work of the school, the resulting policy should be concise and easily understood, if it is to be effective and adopted by all.

The template uses a number of alternative terms, e.g. school. These need to be deleted as relevant. Within this template, sections which include information or guidance are shown in **BLUE**. It is anticipated that schools would remove these sections from their completed policy document, though this will be a decision for the group that produces the policy.

**Where sections are highlighted in BOLD text, it is strongly suggested that these should be an essential part of a school online safety policy.**

*Where sections in the template are written in ITALICS it is anticipated that schools would wish to carefully consider whether or not to include that section or statement in their completed policy.*

## Online safety policy template for schools

The first part of this document (approximately 25 pages) provides a template for an overall online safety policy for the school. The appendices contain acceptable use agreement templates and more detailed, specific policy templates. It will be for schools to decide which of these documents they choose to amend and adopt.

[Name of school]

# Online safety policy

This policy applies to all members of the school community (including staff, learners, volunteers, parents and carers, visitors, community users) who have access to and are users of school digital systems, both in and out of the school. It also applies to the use of personal digital technology on the school site (where allowed).

## Development/monitoring/review of this policy

This online safety policy has been developed by a working group/committee (or insert name of group) made up of: (delete/add as relevant)

- Headteacher/senior leaders
- Online safety officer/coordinator
- Staff – including practitioners/support staff/technical staff
- Governors
- Parents and carers
- Community users.

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

## Schedule for development/monitoring/review

This online safety policy was approved by the governing body/governors sub-committee on:	Insert date
The implementation of this online safety policy will be monitored by the:	Insert name of group/individual (suggested groups – online safety coordinator/officer/group, senior leadership team, other relevant group)
Monitoring will take place at regular intervals:	Insert time period (suggested to be at least once a year)
The governing body/governors sub-committee will receive a report on the implementation of the online safety policy generated by the monitoring group (which will include anonymous details of online safety incidents) at regular intervals:	Insert time period (suggested to be at least once a year)
The online safety policy will be reviewed annually, or more regularly in the light of any significant new developments in the use of the technologies, new threats to online safety or incidents that have taken place. The next anticipated review date will be:	Insert date
Should serious online safety incidents take place, the following external persons/agencies should be informed:	Insert names/titles of relevant persons/agencies, e.g. LA ICT manager, LA safeguarding officer, police

The school will monitor the impact of the policy using: (delete/add as relevant)

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

} If possible – may need the assistance of service provider

## Roles and responsibilities

The following section outlines the online safety roles and responsibilities of individuals<sup>1</sup> 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 *Governing Body/governor's sub-committee* receiving regular information about online safety incidents and monitoring reports. A member of the Governing Body should take on the role of online safety governor<sup>2</sup> to include:

- regular meetings with the online safety coordinator/officer
- regular monitoring of online safety incident logs
- regular monitoring of filtering change control logs and monitoring of filtering logs (where possible)
- reporting to relevant governors/sub-committee/meeting.

### Headteacher and senior leaders

- The headteacher has a duty of care for ensuring the safety (including online safety) of members of the school community, though the day to day responsibility for online safety may be delegated to the online safety coordinator/officer
- The headteacher and (at least) another member of the senior leadership team should be aware of the procedures to be followed in the event of a serious online safety allegation being made against a member of staff<sup>3</sup>
- The headteacher/senior leaders are responsible for ensuring that the online safety coordinator/officer and other relevant staff receive suitable training to enable them to carry out their online safety roles and to train other colleagues, as relevant
- The headteacher/senior leaders will ensure that there is a system in place to allow for monitoring and support of those in school who carry out the internal online safety monitoring role. This is to provide a safety net and also support to those colleagues who take on important monitoring roles
- The headteacher/senior leaders will receive regular monitoring reports from the online safety coordinator/officer

### Online safety coordinator/officer

**NOTE:** It is strongly recommended that each school should have a named member of staff with a day to day responsibility for online safety; some schools may choose to combine this with the designated senior person role. Schools may choose to appoint a person with a child welfare background, preferably with good knowledge and understanding of the new technologies, rather than a technical member of staff – but this will be the choice of the school.

The online safety coordinator/officer:

- leads the online safety group
- takes day to day responsibility for online safety issues and has a leading role in establishing and reviewing the school online safety policies/documents
- ensures that all staff are aware of the procedures that need to be followed in the event of an online safety incident taking place.
- provides (or identifies sources of) training and advice for staff
- liaises with the local authority/relevant body
- liaises with (school/local authority) technical staff

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<sup>1</sup> In a small school some of the roles described below may be combined, though it is important to ensure that there is sufficient 'separation of responsibility' should this be the case.

<sup>2</sup> It is suggested that the role may be combined with that of the Safeguarding Governor.

<sup>3</sup> See flow chart on dealing with online safety incidents – included in a later section – 'Responding to incidents of misuse' and relevant local authority HR/other relevant body disciplinary procedures.



## Online safety policy template for schools

- receives reports of online safety incidents<sup>4</sup> and creates a log of incidents to inform future online safety developments
- meets regularly with online safety governor to discuss current issues, review incident logs and if possible, filtering change control logs
- attends relevant meeting/sub-committee of governors
- reports regularly to headteacher/senior leadership team.

### Network manager/technical staff

**NOTE:** If the school has a managed ICT service provided by an outside contractor, it is the responsibility of the school to ensure that the managed service provider carries out all the online safety measures that would otherwise be the responsibility of the school technical staff, as suggested below. It is also important that the managed service provider is fully aware of the school online safety policy and procedures.

The network manager/technical staff (or local authority/managed service provider) is responsible for ensuring that:

- the *school* technical infrastructure is secure and is not open to misuse or malicious attack
- the school meets (as a minimum) the required online safety technical requirements as identified by the local authority or other relevant body and also the online safety policy/guidance that may apply
- users may only access the networks and devices through a properly enforced password protection policy, in which passwords are regularly changed
- they keep up-to-date with online safety technical information in order to effectively carry out their online safety role and to inform and update others as relevant
- the use of the *network/internet/learning platform/Hwb/remote access/e-mail* is regularly monitored in order that any misuse/attempted misuse can be reported to the *headteacher/senior leader; online safety coordinator/officer (insert others as relevant)* for investigation/action/sanction
- *(if present) monitoring software/systems are implemented and updated as agreed in school policies*
- *the filtering policy (if one exists), is applied and updated on a regular basis and its implementation is not the sole responsibility of any single person (see appendix 'Technical security policy template' for good practice).*

### Teaching and support staff

These individuals are responsible for ensuring that:

- they have an up-to-date awareness of online safety matters and of the current school online safety policy and practices
- they have read, understood and signed the staff acceptable use agreement (AUA)
- they report any suspected misuse or problem to the *headteacher/senior leader; online safety coordinator/officer (insert others as relevant)* for investigation/action
- all digital communications with learners/parents and carers should be on a professional level *and only carried out using official school systems*
- online safety issues are embedded in all aspects of the curriculum and other activities
- learners understand and follow the online safety and acceptable use agreements
- learners have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations
- they monitor the use of digital technologies, mobile devices, cameras, etc., in lessons and other school activities (where allowed) and implement current policies with regard to these devices

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<sup>4</sup> The school will need to decide how these incidents will be dealt with and whether the investigation/action will be the responsibility of the Online safety coordinator/officer or another member of staff, e.g. headteacher/senior leader/designated senior person/class teacher/head of year, etc.

## Online safety policy template for schools

- in lessons where internet use is pre-planned learners should be guided to sites checked as suitable for their use *and that processes are in place for dealing with any unsuitable material that is found in internet searches.*

### Designated senior person

**NOTE:** It is important to emphasise that these are safeguarding issues, not technical issues; the technology provides additional means for safeguarding issues to develop. Schools may choose to combine the role of designated senior person and online safety officer.

The designated senior person should be trained in online safety issues and be aware of the potential for serious safeguarding issues to arise from:

- sharing of personal data<sup>5</sup>
- access to illegal/inappropriate materials
- inappropriate online contact with adults/strangers
- potential or actual incidents of grooming
- online bullying.

If the roles of the designated senior person and the online safety officer are not combined, it is suggested that they work in collaboration due to the safeguarding issues often related to online safety.

### Online safety group

The online safety group<sup>6</sup> provides a consultative group that has wide representation from the school community, with responsibility for issues regarding online safety and monitoring the online safety policy including the impact of initiatives. Depending on the size or structure of the school this group may be part of the safeguarding group. The group will also be responsible for regular reporting to senior leaders and the governing body.

Members of the online safety group (or other relevant group) will assist the online safety coordinator/officer (or other relevant person, as above) with:

- the production/review/monitoring of the school online safety policy/documents
- *the production/review/monitoring of the school filtering policy (if possible and if the school chooses to have one) and requests for filtering changes*
- mapping and reviewing the online safety education provision – ensuring relevance, breadth and progression
- monitoring network/internet/incident logs where possible
- consulting stakeholders – including parents/carers and the learners about the online safety provision
- monitoring improvement actions identified through use of the 360 degree safe Cymru self review tool.

An online safety group terms of reference template can be found in the appendices.

### Learners

These individuals:

- are responsible for using the school digital technology systems in accordance with the learner acceptable use agreement (this should include personal devices – where allowed)
- should have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations
- need to understand the importance of reporting abuse, misuse or access to inappropriate materials and know how to do so

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<sup>5</sup> See 'Personal data policy' in the Appendix..

<sup>6</sup> Schools will need to decide the membership of the online safety group. It is recommended that the group should include representation from learners and parents/carers.

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- 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 and carers

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 and carers understand these issues through *parents'/carers' evenings, newsletters, letters, website, Hwb, learning platform and information about national/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'/carers' sections of the website, Hwb, learning platform and online learner records
- their children's personal devices in the school (where this is allowed).

### Community users

Community users who access school systems/website/Hwb/learning platform as part of the wider school provision will be expected to sign a community user AUA before being provided with access to school systems. [A community users acceptable use agreement template can be found in the appendices \(A6\)](#)

## Policy statements

### Education – learners

While regulation and technical solutions are very important, their use must be balanced by educating learners to take a responsible approach. The education of learners in online safety is therefore an essential part of the school's online safety provision. Learners 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 and will be provided in the following ways (Note: statements will need to be adapted, depending on school structure and the age of the learners).

- **A planned online safety curriculum across a range of subjects, (e.g. ICT/PSE/DCF) and topic areas and should be regularly revisited.**
- **Key online safety messages should be reinforced as part of a planned programme of assemblies and tutorial/pastoral activities.**
- **Learners should be taught in all lessons to be critically aware of the materials/content they access online and be guided to validate the accuracy of information.**
- **Learners should be taught to acknowledge the source of information used and to respect copyright when using material accessed on the internet.**
- Learners 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. [Nb. additional duties for schools under the Counter Terrorism and Securities Act 2015 which requires schools to ensure that children are safe from terrorist and extremist material on the internet.](#)
- *Learners should be helped to understand the need for the learner acceptable use agreement and encouraged to adopt safe and responsible use both within and outside school.*
- *Staff should act as good role models in their use of digital technologies the internet and mobile devices.*

## Online safety policy template for schools

- *In lessons where internet use is pre-planned, it is best practice that learners 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 learners are allowed to freely search the internet, staff should be vigilant in monitoring the content of the websites the young people visit.*
- *It is accepted that from time to time, for good educational reasons, students may need to research topics, (e.g. racism, drugs, discrimination) that would normally result in internet searches being blocked. In such a situation, staff can request that the technical staff (or other nominated person) can temporarily remove those sites from the filtered list for the period of study. Any request to do so, should be auditable, with clear reasons for the need.*

### Education – parents and carers

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

The school will therefore seek to provide information and awareness to parents and carers through:  
(select/delete as appropriate)

- *curriculum activities*
- *letters, newsletters, web site, learning platform, Hwb*
- *parents and carers evenings/sessions*
- *high profile events/campaigns, e.g. Safer Internet Day*
- *reference to the relevant web sites/publications, e.g. [hwb.wales.gov.uk/](http://hwb.wales.gov.uk/) [www.saferinternet.org.uk/](http://www.saferinternet.org.uk/) [www.childnet.com/parents-and-carers](http://www.childnet.com/parents-and-carers) (see Appendix for further links/resources).*

### Education – the wider community

The school will provide opportunities for local community groups/members of the community to gain from the school's online safety knowledge and experience. This may be offered through the following:

- *providing family learning courses in use of new digital technologies, digital literacy and online safety*
- *online safety messages targeted towards grandparents and other relatives as well as parents.*
- *the school learning platform, Hwb, website will provide online safety information for the wider community*
- *supporting community groups, e.g. early years settings, childminders, youth/sports/voluntary groups to enhance their online safety [provision](#) (possibly supporting the group in the use of [Online Compass](#), an online safety self review tool - [www.onlinecompass.org.uk](http://www.onlinecompass.org.uk)).*

### Education and training – staff/volunteers

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

- **a planned programme of formal online safety training will be made available to staff. This will be regularly updated and reinforced. An audit of the online safety training needs of all staff will be carried out regularly. It is expected that some staff will identify online safety as a training need within the performance management process**
- **all new staff should receive online safety training as part of their induction programme, ensuring that they fully understand the school online safety policy and acceptable use agreements.**
- *the online safety coordinator/officer (or other nominated person) will receive regular updates through attendance at external training events, (e.g. from Consortium/SWGfL/LA/other relevant organisations) and by reviewing guidance documents released by relevant organisations*
- *this online safety policy and its updates will be presented to and discussed by staff in staff/team meetings/INSET days*

## Online safety policy template for schools

- *the online safety coordinator/officer (or other nominated person) will provide advice/guidance/training to individuals as required.*

### Training – governors

**Governors should take part in online safety training/awareness sessions**, with particular importance for those who are members of any sub-committee/group involved in technology/online safety/health and safety/safeguarding. This may be offered in a number of ways such as:

- attendance at training provided by the local authority/National Governors Association/or other relevant organisation, (e.g. SWGfL)
- participation in school training/information sessions for staff or parents [\(this may include attendance at assemblies/lessons\)](#).

### Technical – infrastructure/equipment, filtering and monitoring

If the school has a managed ICT service provided by an outside contractor, it is the responsibility of the school to ensure that the managed service provider carries out all the online safety measures that would otherwise be the responsibility of the school, as suggested below. It is also important that the managed service provider is fully aware of the school online safety policy/acceptable use agreements. The school should also check their local authority/other relevant body policies on these technical issues if the service is not provided by the authority.

The school will be responsible for ensuring that the school infrastructure/network is as safe and secure as is reasonably possible and that policies and procedures approved within this policy are implemented. It will also need to ensure that the relevant people named in the above sections will be effective in carrying out their online safety responsibilities: [\(schools will have very different technical infrastructures and differing views as to how these technical issues will be handled – it is therefore essential that this section is fully discussed by a wide range of staff – technical, educational and administrative staff before these statements are agreed and added to the policy\)](#) A more detailed technical security policy template can be found in the Appendix.

- **School technical systems will be managed in ways that ensure that the school meets recommended technical requirements** [\(these may be outlined in local authority/other relevant body policy and guidance\)](#).
- 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.
- Good practice in preventing loss of data from ransomware attacks requires a rigorous and verified back-up routine, including the keeping of copies off-site.
- **All school networks and system will be protected by secure passwords.**
- **The master account passwords for the school systems should be kept in a secure place, e.g. school safe. Consideration should also be given to using two factor authentication for such accounts** [\(further guidance is available in the 'Technical security policy template' in the Appendix\)](#).
- **All users have clearly defined access rights to school technical systems and devices. Details of the access rights available to groups of users will be recorded by the Network Manager (or other person) and will be reviewed, at least annually, by the online safety group** [\(or other group\)](#).
- **All users (adults and learners) 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.**
- **Passwords must not be shared with anyone.**
- **All users will be provided with a username and password** by [xxxxx \(insert name or title\)](#) who will keep an up to date record of users and their usernames [\(see section on password generation in 'Technical security policy template' in the Appendix\)](#).
- **Passwords should be long. Good practice highlights that passwords over 12 characters in length are more difficult to crack. Passwords generated by using a combination of unconnected words that are over 16 characters long are extremely difficult to crack. Password length trumps any other special requirements such as uppercase/lowercase letters, number**



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**and special characters. Passwords should be easy to remember, but difficult to guess or crack.**

- **Records of learner usernames and passwords for Foundation Phase learners can be kept in an electronic or paper-based form, but they must be securely kept when not required by the user.** *Password complexity in foundation phase should be reduced (for example 6 character maximum) and should not include special characters. Where external systems have different password requirements the use of random words or sentences should be encouraged.*
- Password requirements for learners at Key Stage 2 and above should increase as learners progress through school.
- *(Insert name or role)* is responsible for ensuring that software licence logs are accurate and up-to-date and that regular checks are made to reconcile the number of licences purchased against the number of software installations *(inadequate licencing could cause the school to breach the Copyright Act which could result in fines or unexpected licensing costs)*.
- Internet access is filtered for all users. Illegal content (child sexual abuse images) is filtered by the broadband or filtering provider by actively employing the Internet Watch Foundation CAIC list. Content lists are regularly updated and internet use is logged and regularly monitored. *(The school will need to decide on the merits of external/internal provision of the filtering service – see Appendix)*. There is a clear process in place to deal with requests for filtering changes *(see Appendix for more details)*.
- *The school has (if possible) provided enhanced/differentiated user-level filtering* (allowing different filtering levels for different ages/stages and different groups of users: staff/learners, etc.).
- Internet filtering should ensure that children are safe from terrorist and extremist material when accessing the internet. *N.b. additional duties for schools under the Counter Terrorism and Securities Act 2015 which requires schools to ensure that children are safe from terrorist and extremist material on the internet (see Appendix for information on ‘appropriate filtering/monitoring’)*.
- Where possible, school technical staff regularly monitor and record the activity of users on the school technical systems and users are made aware of this in the acceptable use agreement. *(schools may wish to add details of the monitoring programmes that are used)*.
- An appropriate system is in place *(to be described)* for users to report any actual/potential technical incident/security breach to the relevant person, as agreed).
- Appropriate security measures are in place *(schools may wish to provide more detail which may need to be provided by the service provider)* to protect the servers, firewalls, routers, wireless systems, work stations, mobile devices, etc., from accidental or malicious attempts which might threaten the security of the school systems and data. These are tested regularly. The school infrastructure and individual workstations are protected by up to date virus software.
- An agreed policy is in place *(to be described)* for the provision of temporary access of ‘guests’, (e.g. trainee teachers, supply teachers, visitors) onto the school systems.
- An agreed policy is in place *(to be described)* regarding the extent of personal use that users (staff/learners/community users) and their family members are allowed on school devices that may be used out of school.
- An agreed policy is in place *(to be described)* that allows staff to/forbids staff from downloading executable files and installing programmes on school devices.

An agreed policy is in place *(to be described)* regarding the use of removable media (e.g. memory sticks/CDs/DVDs) by users on school devices. Personal data cannot be sent over the internet or taken off the school site unless safely encrypted or otherwise secured. *(See school personal data policy template in the appendix for further detail.)*

## Mobile technologies

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

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All users should understand that the primary purpose of the use of mobile/personal devices in a school context is educational. The mobile technologies policy should be consistent with and inter-related to other relevant school policies including but not limited to those for safeguarding, behaviour, anti-bullying, acceptable use, and policies around theft or malicious damage. Teaching about the safe and appropriate use of mobile technologies should be an integral part of the school's online safety education programme.

In preparing a mobile technologies policy the school should consider possible issues and risks. These may include:

- security risks in allowing connections to your school network
- filtering of personal devices
- breakages and insurance
- access to devices for all learners
- avoiding potential classroom distraction
- network connection speeds, types of devices
- charging facilities
- total cost of ownership.

A range of mobile technology implementations is possible.

For further reading, please refer to the *NEN Technical Strategy Guidance Note 5 – Bring your own device* - [/www.nen.gov.uk/advice/bring-your-own-device-byod](http://www.nen.gov.uk/advice/bring-your-own-device-byod)

A more detailed mobile technologies policy template can be found in the Appendix. The school may however choose to include these aspects of their policy in a comprehensive acceptable use agreement, rather than in a separate mobile technologies policy. It is suggested that the school should in this overall policy document outline the main points from their agreed policy. A checklist of points to be considered is included below.

- The school acceptable use agreements for staff, learners, parents and carers will give consideration to the use of mobile technologies.
- The school allows: (the school should complete the table below to indicate which devices are allowed and define their access to school systems).

	School devices			Personal devices		
	School owned for individual use	School owned for multiple users	Authorised device <sup>7</sup>	Student owned	Staff owned	Staff owned
Allowed in school				Yes/No <sup>8</sup>	Yes/No <sup>8</sup>	Yes/No <sup>8</sup>
Full network access						
Internet only						
No network access						

Aspects that the school may wish to consider and include in their online safety policy, mobile technologies policy or acceptable use agreements include the following:

### **School owned/provided devices:**

- Who they will be allocated to.
- Where, when and how their use is allowed – times/places/in/out of school.

<sup>7</sup> Authorised device – purchased by the learner/family through a school-organised scheme. This device may be given full access to the network as if it were owned by the school.

<sup>8</sup> The school should add below any specific requirements about the use of mobile/personal devices in school.

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- If personal use is allowed.
- Levels of access to networks/internet (as above).
- Management of devices/installation of apps/changing of settings/monitoring.
- Network/broadband capacity.
- Technical support.
- Filtering of devices.
- Access to cloud services.
- Data protection.
- Taking/storage/use of images.
- Exit processes, what happens to devices/software/apps/stored data if user leaves the school.
- Liability for damage.
- Staff training.

### Personal devices

- Which users are allowed to use personal mobile devices in school (staff/learners/visitors).
- Restrictions on where, when and how they may be used in school.
- Storage.
- Whether staff will be allowed to use personal devices for school business.
- Levels of access to networks/internet (as above).
- Network/broadband capacity.
- Technical support (this may be a clear statement that no technical support is available).
- Filtering of the internet connection to these devices.
- Data protection.
- Taking/storage/use of images.
- Liability for loss/damage or malfunction following access to the network (likely to be a disclaimer about school responsibility).
- Identification/labelling of personal devices.
- How visitors will be informed about school requirements.
- How education about the safe and responsible use of mobile devices is included in the school online safety education programmes.

### Use of digital and video images

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

- **When using digital images, staff should inform and educate learners 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.**
- In accordance with guidance from the Information Commissioner's Office, parents/carers are welcome to take videos and digital images of their children at school events for their own personal use (as such use is not covered by the Data Protection Act). To respect everyone's privacy and in some cases protection, these images should not be published/made publicly available on social networking sites, nor should parents/carers comment on any activities involving other *learners* 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. Those*



## Online safety policy template for schools

*images should only be taken on school equipment; the personal equipment of staff should not be used for such purposes.*

- *Care should be taken when taking digital/video images that learners are appropriately dressed and are not participating in activities that might bring the individuals or the school into disrepute.*
- *Learners must not take, use, share, publish or distribute images of others without their permission*
- *Photographs published on the website, or elsewhere that include learners will be selected carefully and will comply with good practice guidance on the use of such images.*
- *Learners' full names will not be used anywhere on a website or blog, particularly in association with photographs.*
- *Written permission from parents or carers will be obtained before photographs of learners are published on the school website (may be covered as part of the AUA signed by parents or carers at the start of the year - see parents and carers acceptable use agreement in the Appendix).*
- *Learners' work can only be published with the permission of the learner and parents or carers.*

### Data protection

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

The school must ensure that:

- **it has a Data Protection Policy. (see appendix for template policy)**
- **it implements the data protection principles and is able to demonstrate that it does so.**
- **it has paid the appropriate fee Information Commissioner's Office (ICO)**
- **it has appointed an appropriate Data Protection Officer (DPO) who has a high level of understanding of data protection law and is free from any conflict of interest.** The school may also wish to appoint a Data Manager and Systems Controllers to support the DPO
- **it has an 'information asset register' in place and knows exactly what personal data it holds, where, why and which member of staff has responsibility for managing it**
- **the information asset register lists the lawful basis for processing personal data (including, where relevant, consent). Where special category data is processed, an additional lawful basis will have also been listed**
- **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. The school should develop and implement a 'retention schedule' to support this**
- **data held must be accurate and up to date where this is necessary for the purpose you hold it for. Have systems in place to identify inaccuracies, such as asking parents to check emergency contact details at suitable intervals**
- **it provides staff, parents, volunteers, teenagers and older children with information about how the school looks after their data and what their rights are in a clear Privacy Notice (see Privacy Notice section in the appendix)**
- **procedures must be in place to deal with the individual rights of the data subject, e.g. one of the dozen rights applicable is that of Subject Access which enables an individual to see to have a copy of the personal data held about them**
- **data Protection Impact Assessments (DPIA) are carried out where necessary. For example, to ensure protection of personal data when accessed using any remote access solutions, or entering into a relationship with a new supplier**
- **IT system security is ensured and regularly checked. Patches and other security essential updates are applied promptly to protect the personal data on the systems. Administrative systems are securely ring fenced from systems accessible in the classroom/to learners**

## Online safety policy template for schools

- it has undertaken appropriate due diligence and has GDPR compliant contracts in place with any data processors
- it understands how to share data lawfully and safely with other relevant data controllers. In Wales, schools should consider using the [Wales Accord on Sharing Personal Information](#) toolkit to support regular data sharing between data controllers
- there are clear and understood policies and routines for the deletion and disposal of data
- it [reports any relevant breaches to the Information Commissioner](#) within 72hrs of becoming aware of the breach as required by law. It also reports relevant breaches to the individuals affected as required by law. In order to do this it has a policy for reporting, logging, managing, investigating and learning from information risk incidents.
- If a maintained school, it must have a Freedom of Information Policy which sets out how it will deal with FOI requests.
- all staff receive data protection training at induction and appropriate refresher training thereafter. Staff undertaking particular data protection functions, such as handling requests under the individual's rights, will receive training appropriate for their function as well as the core training provided to all staff.

When personal data is stored on any mobile device or removable media the:

- data must be encrypted and password protected.
- device must be password protected. (be sure to select devices that can be protected in this way)
- device must be protected by up to date virus and malware checking software
- data must be securely deleted from the device, in line with school policy (below) once it has been transferred or its use is complete.

Staff must ensure that they: (schools may wish to include more detail about their own data/password/encryption/secure transfer processes)

- at all times take care to ensure the safe keeping of personal data, minimising the risk of its loss or misuse
- can recognise a possible breach, understand the need for urgency and know who to report it to within the school
- can help data subjects understand their rights and know how to handle a request whether verbal or written. Know who to pass it to in the school
- only use encrypted mobile devices (including USBs) for personal data, particularly when it is about children
- will not transfer any school personal data to personal devices except as in line with school policy
- use personal data only on secure password protected computers and other devices, ensuring that they are properly "logged-off" at the end of any session in which they are using personal data
- transfer data using encryption and secure password protected devices.

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

The Personal Data Advice and Guidance in the appendix (B2) provides more detailed information on the school's responsibilities and on good practice.

## Communication technologies

This is an area of rapidly developing technologies and uses. Schools will need to discuss and agree how they intend to implement and use these technologies, e.g. few schools allow learners to use mobile phones in lessons, while others identify educational potential and allow their use. This section may also be influenced by the age of the learners. The table has been left blank for school to choose its own responses.

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 and other adults			Learners				
	Allowed	Allowed at certain times	Allowed for selected staff	Not allowed	Allowed	Allowed at certain times	Allowed with staff permission	Not allowed
Mobile phones may be brought to school								
Use of mobile phones 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 e-mail addresses in school, or on school network								
Use of school e-mail for personal e-mails								
Use of messaging apps								
Use of social media								
Use of blogs								

The school may also wish to add some of the following policy statements about the use of communications technologies, in place of, or in addition to the above table.

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

- **the official school e-mail service may be regarded as safe and secure and is monitored. Users should be aware that e-mail communications are monitored.** *Staff and learners should therefore use only the school email service to communicate with others when in school, or on school systems (e.g. by remote access)*
- **users must immediately report to the nominated person – in accordance with the school policy – the receipt of any communication that makes them feel uncomfortable, is offensive, discriminatory, threatening or bullying in nature and must not respond to any such communication**
- **any digital communication between staff and learners or parents/carers (e-mail, chat, learning platform, etc.) must be professional in tone and content.** *These communications may only take*

## Online safety policy template for schools

*place on official (monitored) school systems. Personal e-mail addresses, text messaging or social media must not be used for these communications*

- *whole class/group e-mail addresses may be used at Foundation Stage, while learners at Key Stage 2 and above will be provided with individual school e-mail addresses for educational use. (Schools may choose to use group or class e-mail addresses for younger age groups, e.g. at Foundation Stage)*
- *learners 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 e-mail addresses should be used to identify members of staff*

### **Social media**

With an increase in use of all types of social media for professional and personal purposes a policy that sets out clear guidance for staff to manage risk and behaviour online is essential. Core messages should include the protection of learners, the school and the individual when publishing any material online.

Expectations for teachers' professional conduct are set out by the General Teaching Council Wales (GTCW) but all adults working with children and young people must understand that the nature and responsibilities of their work place them in a position of trust and that their conduct should reflect this.

All schools and local authorities have a duty of care to provide a safe learning environment for learners 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, bully online, discriminate on the grounds of sex, race or disability or who defame a third party may render the school or local authority liable to the injured party. Reasonable steps to prevent predictable harm must be in place. All staff working at any educational establishment are expected to demonstrate a professional approach and respect for learners and their families and for colleagues and the learning setting.

The school provides the following measures to ensure reasonable steps are in place to minimise risk of harm to learners through:

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

School staff should ensure that:

- no reference should be made in social media to learners, parents and carers or school staff
- they do not engage in online discussion on personal matters relating to members of the school community
- personal opinions should not be attributed to the school or local authority
- security settings on personal social media profiles are regularly checked to minimise risk of loss of personal information.

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

- a process for approval by senior leaders
- clear processes for the administration and monitoring of these accounts – involving at least two members of staff
- a code of behaviour for users of the accounts
- systems for reporting and dealing with abuse and misuse
- understanding of how incidents may be dealt with under school disciplinary procedures.

## Online safety policy template for schools

### Personal use

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

### Monitoring of public social media

- As part of active social media engagement, it is considered good practice to pro-actively monitor the Internet for public postings about the school..
- The school should effectively respond to social media comments made by others according to a defined policy or process.

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

[The social media policy template in Appendix B4 provides more detailed guidance on the school's responsibilities and on good practice.](#)

### Unsuitable/inappropriate activities

Some internet activity such as accessing child abuse images or distributing racist material is illegal and would obviously be banned from school and all other technical systems. Other activities such as online 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 out of, school when using school equipment or systems. The school policy restricts usage as follows.

User actions		Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
Users shall not visit internet sites, make, post, download, upload, data transfer, communicate or pass on, material, remarks, proposals or comments that contain or relate to:	child sexual abuse images – the making, production or distribution of indecent images of children, contrary to The Protection of Children Act 1978					X
	grooming, incitement, arrangement or facilitation of sexual acts against children Contrary to the Sexual Offences Act 2003					X
	possession of an extreme pornographic image (grossly offensive, disgusting or otherwise of an obscene character), contrary to the Criminal Justice and Immigration Act 2008					X
	criminally racist material in UK – to stir up religious hatred (or hatred on the grounds of sexual orientation) - contrary to the Public Order Act 1986					X
	pornography				X	
	promotion of any kind of discrimination				X	
	threatening behaviour, including promotion of physical violence or mental harm				X	

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	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, (e.g. financial/personal information, databases, computer/network access codes and passwords)					X	
Creating or propagating computer viruses or other harmful files					X	
Unfair usage (downloading/uploading large files that hinders others in their use of the internet)					X	
Online gaming (educational)						
Online gaming (non educational)						
Online gambling						
Online shopping/commerce						
File sharing						
Use of social media						
Use of messaging apps						
Use of video broadcasting, e.g. YouTube						

(The school should agree its own responses and place the ticks in the relevant columns, in the table above. They may also wish to add additional text to the column(s) on the left to clarify issues. The last section of the table has been left blank for schools to decide their own responses).

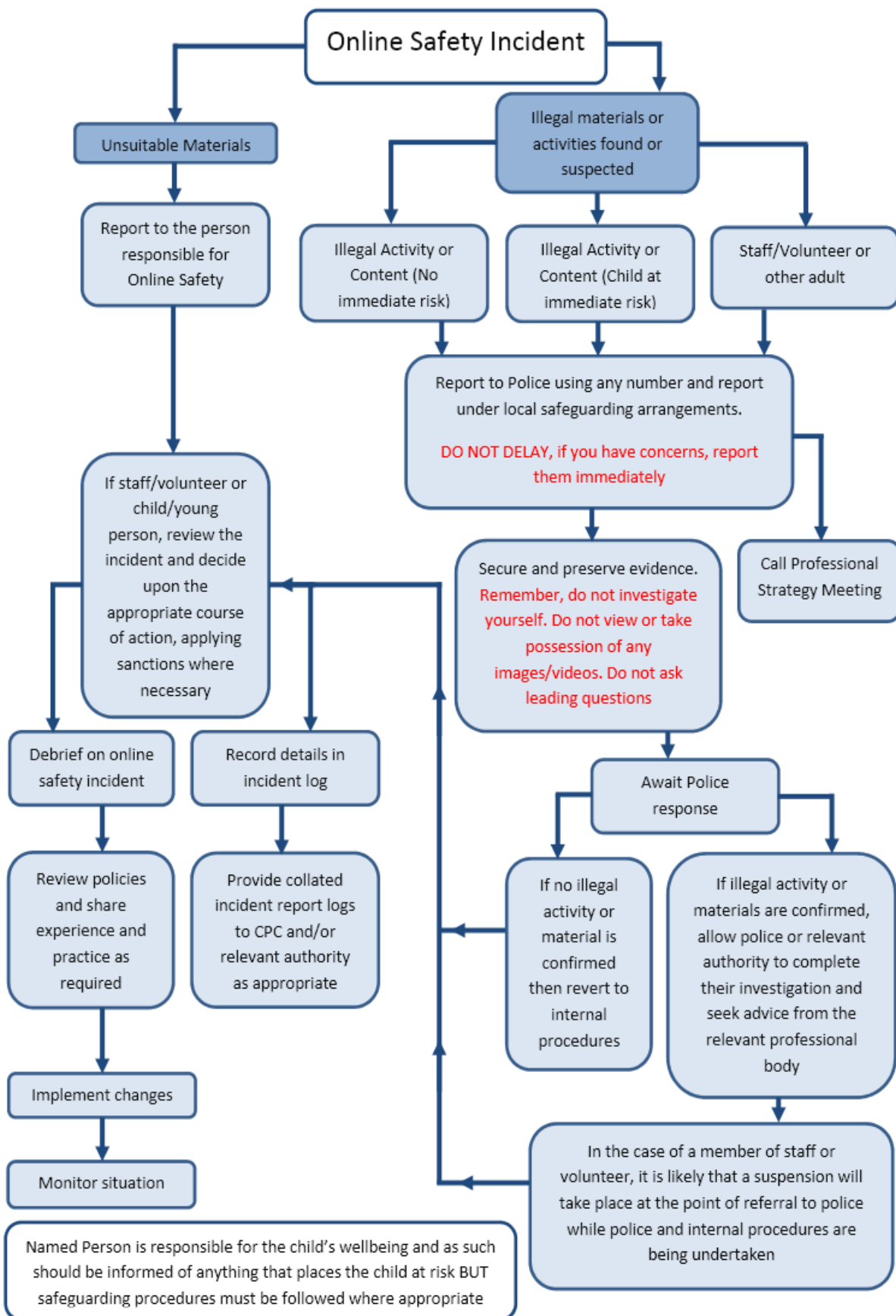
## Responding to incidents of misuse

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

### Illegal incidents

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

## Online safety policy template for schools





## Online safety policy template for schools

### Other incidents

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

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

- Have more than one senior member of staff/volunteer involved in this process. This is vital to protect individuals if accusations are subsequently reported.
- Conduct the procedure using a designated computer that will not be used by learners and if necessary can be taken off site by the police should the need arise. Use the same computer for the duration of the procedure.
- It is important to ensure that the relevant staff should have appropriate internet access to conduct the procedure, but also that the sites and content visited are closely monitored and recorded (to provide further protection).
- Record the URL of any site containing the alleged misuse and describe the nature of the content causing concern. It may also be necessary to record and store screenshots of the content on the machine being used for investigation. These may be printed, signed and attached to the form (except in the case of images of child sexual abuse – see below).
- Once this has been completed and fully investigated the group will need to judge whether this concern has substance or not. If it does then appropriate action will be required and could include the following:
  - internal response or discipline procedures
  - involvement by local authority or national/local organisation (as relevant).
  - police involvement and/or action
- **If content being reviewed includes images of child abuse then the monitoring should be halted and referred to the police immediately. Other instances to report to the police would include:**
  - incidents of 'grooming' behaviour
  - the sending of obscene materials to a child
  - adult material which potentially breaches the Obscene Publications Act
  - criminally racist material
  - promotion of terrorism or extremism
  - other criminal conduct, activity or materials.
- Isolate the computer in question as best you can. Any change to its state may hinder a later police investigation.

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

### School actions

It is more likely that the school will need to deal with incidents that involve inappropriate rather than illegal misuse. It is important that any incidents are dealt with as soon as possible in a proportionate manner, and that members of the school community are aware that incidents have been dealt with. It is intended that incidents of misuse will be dealt with through normal behaviour/disciplinary procedures as follows: [\(the school will need to agree upon its own responses and place the ticks in the relevant columns. They may also wish to add additional text to the column\(s\) on the left to clarify issues. Schools have found it useful to use the charts below at staff meetings/training sessions\)](#)



# Online safety policy template for schools

## Learner actions

Incidents	Refer to class teacher/tutor	Refer to Head of Department/Head of Year/other	Refer to Headteacher/Principal	Refer to Police	Refer to technical support staff for action re filtering/security etc.	Inform parents/carers	Removal of network/internet access rights	Warning	Further sanction, e.g. detention/exclusion
Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on unsuitable/inappropriate activities).		X	X	X					
Unauthorised use of non-educational sites during lessons.									
Unauthorised use of mobile phone/digital camera/other mobile device.									
Unauthorised use of social media/messaging apps/personal e-mail.									
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 learners' 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 Actions

Incidents	Refer to line manager	Refer to Headteacher/ Principal	Refer to local authority/HR	Refer to Police	Refer to Technical Support Staff for action re filtering, etc.	Warning	Suspension	Disciplinary action
<b>Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on unsuitable/inappropriate activities)</b>		X	X	X				
Inappropriate personal use of the internet/social media/personal e-mail								
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 e-mail, text or message that is regarded as offensive, harassment or of a bullying nature.								
Using personal email/social networking/messaging to carrying out digital communications with learners.								
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

Copies of the more detailed template policies and agreements, contained in the appendix, can be downloaded from:

<https://dysgu.hwb.gov.wales/playlists/view/dfdcd1d6-21b0-46ac-b6bb-fc83402ef3d7/en#page1>

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## Appendices – Section A - Acceptable Use Agreement

A1 Learner Acceptable Use agreement template (younger children)

- A2 Learner Acceptable Use agreement template (older children)
- A3 Staff and Volunteers Acceptable Use Agreement template
- A4 Parents /Carers Acceptable Use Agreement template
- A5 Community Users Acceptable Use Agreement template

## Appendices – Section B – Specific Policies

- B1 Technical security policy template
- B2 Personal data advice and guidance
- B3 Mobile technologies policy template
- B4 Social media policy template
- B5 Online safety group terms of reference

## Appendices – Section C – Supporting documents and links

- C1 Responding to incidents of misuse – flowchart
- C2 Record of reviewing sites (for internet misuse)
- C3 Reporting log template
- C4 Training needs audit template
- C5 Summary of legislation
- C6 Links to other organisations and documents
- C7 Glossary of terms

## A1 Learner Acceptable Use Agreement template – for younger learners (Foundation)

This is how we stay safe when we use computers:

I will ask a teacher or another adult from the school if I want to use the computers.

I will only use activities that a teacher or another adult from the school has told or allowed me to use.

I will take care of the computer and other equipment.

I will ask for help from a teacher or another adult from the school if I am not sure what to do or if I think I have done something wrong.

I will tell a teacher or another adult from the school if I see something that upsets me on the screen.

I know that if I break the rules I might not be allowed to use a computer/tablet.

**Signed (child):** .....

(The school will need to decide whether or not they wish the learners to sign the agreement – and at which age - for younger children the signature of a parent/carer should be sufficient, if the school requires signatures)

**Signed (parent):** .....

This AUA is based on one produced by St Mark's Church of England/Methodist Ecumenical VA Primary School, Weston super Mare.

Primary schools using this acceptable use agreement for younger children may also wish to use (or adapt for use) the Parent/Carer Acceptable use agreement (the template can be found later in these templates) as this provides additional permission forms (including the digital and video images permission form).

## A2 Learner Acceptable Use Agreement (AUA) template – for older learners

Sections that include advice or guidance are written in BLUE. It is anticipated that schools will remove these sections from their final AUA document. Schools should review and amend the contents of this AUA to ensure that it is consistent with their online safety policy and other relevant school policies. Due to the number of optional statements and the advice/guidance sections included in this template, it is anticipated that the final AUA will be more concise.

### School policy

Digital technologies have become integral to the lives of children and young people, both within and outside schools. These technologies are powerful tools, which open up new opportunities for everyone. They can stimulate discussion, promote creativity and stimulate awareness of context to promote effective learning. Young people should have an entitlement to safer internet access at all times.

### This Acceptable use agreement is intended to ensure:

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

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

### Acceptable use agreement

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

### For my own personal safety:

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

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

- I understand that the school systems and devices are primarily intended for educational use and that I will only use them for personal or recreational use if I have permission
- I will only make large downloads or uploads that might take up internet capacity and prevent other users from being able to carry out their work, if I have permission
- I will only use the school systems or devices for online gaming, online gambling, internet shopping, file sharing, or video broadcasting (eg YouTube), if I have permission of a member of staff to do so. (schools should amend this section to take account of their policy on each of these issues).

## Online safety policy template for schools

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

- I will respect others' work and property and will only access, copy, remove or alter any other user's files, with the owner's knowledge and permission
- I will be polite and responsible when I communicate with others, I will not use strong, aggressive or inappropriate language and I appreciate that others may have different opinions
- I will only take or distribute images of others with their permission.

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

- I will only use my own personal device(s) in school if I have permission (schools should amend this section in the light of their mobile devices policies). I understand that, if I do use my own device(s) in the school, I will follow the rules set out in this agreement, in the same way as if I was using school equipment
- I understand the risks and will not try to upload, download or access any materials which are illegal or inappropriate or may cause harm or distress to others, nor will I try to use any programmes or software that might allow me to bypass the filtering/security systems in place to prevent access to such materials
- I will immediately report any damage or faults involving equipment or software, however this may have happened
- I will only open hyperlinks in emails or attachments to emails, if I know and trust the person/organisation who sent the email, and have no concerns about the validity of the email (due to the risk of the attachment containing viruses or other harmful programmes)
- I will only install/ store programmes on a school device, if I have permission
- I will only use social media sites with permission and at the times that are allowed (schools should amend this section to take account of their policy on access to social media).

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

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

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

- I understand that the school also has the right to take action against me if I am involved in incidents of inappropriate behaviour, that are covered in this agreement, when I am out of school and where they involve my membership of the school community (examples would be online bullying, use of images or personal information)
- I understand that if I fail to comply with this acceptable use agreement, I will be subject to disciplinary action. This may include (schools should amend this section to provide relevant actions as per their behaviour policies) loss of access to the school network/internet, detentions, suspensions, contact with parents and in the event of illegal activities involvement of the police.

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

### Learner acceptable use agreement form

This form relates to the learner acceptable use agreement, to which it is attached.

Please complete the sections below to show that you have read, understood and agree to the rules included in the acceptable use agreement. If you do not sign and return this agreement, access will not be granted to school systems. (Schools will need to decide if they require learners to sign, or whether they wish to simply make them aware through education programmes/awareness raising).

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

## Online safety policy template for schools

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

Name of Learner:.....

Group/Class .....

Signed: .....

Date: .....

### Parent/Carer Countersignature (optional)

Note: It is for schools to decide whether or not they require parents/carers to sign the Parent/carers acceptable use agreement (see template later in this document). This includes a number of other permission forms (including digital and video images/biometric permission/cloud computing permission).

Some schools may, instead, wish to add a countersignature box for parents/carers to this learner acceptable use agreement.



## A3 Staff (and volunteer) acceptable use agreement template

Sections that include advice or guidance are written in **BLUE**. It is anticipated that schools will remove these sections from their final AUA document. Schools should review and amend the contents of this AUA to ensure that it is consistent with their online safety policy and other relevant school policies. Due to the number of optional statements and the advice/guidance sections included in this template, it is anticipated that the final AUA will be more concise.

### School policy

New technologies have become integral to the lives of children and young people in today's society, both within schools and in their lives outside school. The internet and other digital communications technologies are powerful tools, which open up new opportunities for everyone. These technologies can stimulate discussion, promote creativity and stimulate awareness of context to promote effective learning. They also bring opportunities for staff to be more creative and productive in their work. All users should have an entitlement to safer internet access at all times.

This acceptable use agreement is intended to ensure:

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

The school will try to ensure that staff and volunteers will have good access to digital technologies to enhance learning opportunities and will, in return, expect staff and volunteers to agree to be responsible users.

### Acceptable use agreement

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

For my professional and personal safety:

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

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

- I will only access, copy, remove or alter any other user's files, with their express permission

## Online safety policy template for schools

- I will communicate with others in a professional manner, I will not use aggressive or inappropriate language and I appreciate that others may have different opinions
- I will ensure that when I take and/or publish images of others I will do so with their permission and in accordance with the school's policy on the use of digital/video images. I will only use my personal equipment to record these images, if I have permission to do so. Where these images are published, (e.g. on the school website/learning platform) it will not be possible to identify by name, or other personal information, those who are featured
- I will only use chat and social networking sites in school in accordance with the school's policies. (schools should amend this section to take account of their policy on access to social networking and similar sites)
- I will only communicate with learners and parents/carers using official school systems. Any such communication will be professional in tone and manner. (schools should amend this section to take account of their policy on communications with learners and parents/carers. Staff should be made aware of the risks attached to using their personal email addresses/mobile phones/social networking sites for such communications)
- I will not engage in any online activity that may compromise my professional responsibilities.

The school and the local authority have the responsibility to provide safe and secure access to technologies and ensure the smooth running of the school :

- When I use my mobile devices (laptops/mobile phones/USB devices etc) in school, I will follow the rules set out in this agreement, in the same way as if I was using school equipment. I will also follow any additional rules set by the school about such use. I will ensure that any such devices are protected by up to date anti-virus software and are free from viruses. (schools should amend this section in the light of their policies which relate to the use of staff devices)
- I will not use personal email addresses on the school digital technology systems. (schools should amend this section in the light of their email policy – some schools will choose to allow the use of staff personal email addresses on the premises)
- I will not open any hyperlinks in emails or any attachments to emails, unless the source is known and trusted, or if I have any concerns about the validity of the email (due to the risk of the attachment containing viruses or other harmful programmes)
- I will ensure that my data is regularly backed up, in accordance with relevant school policies
- I will not try to upload, download or access any materials which are illegal (child sexual abuse images, criminally racist material, extremist material or adult pornography covered by the Obscene Publications Act) or inappropriate or may cause harm or distress to others. I will not try to use any programmes or software that might allow me to bypass the filtering/security systems in place to prevent access to such materials
- I will only make large downloads or uploads that might take up internet capacity and prevent other users from being able to carry out their work, with permission
- I will only install or attempt to install/store programmes on devices or if this is allowed in school policies (schools/academies should amend this section in the light of their policies on installing programmes/altering settings)
- I will not disable or cause any damage to school equipment, or the equipment belonging to others
- I will only transport, hold, disclose or share personal information about myself or others, as outlined in the school/LA Personal data policy (or other relevant policy). Where digital personal data is transferred outside the secure local network, it must be encrypted. Paper based protected and restricted data must be held in lockable storage
- I understand that data protection policy requires that any staff or learner data to which I have access, will be kept private and confidential, except when it is deemed necessary that I am required by law or by school policy to disclose such information to an appropriate authority
- I will immediately report any damage or faults involving equipment or software, however this may have happened

## Online safety policy template for schools

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

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

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

- I understand that this acceptable use agreement applies not only to my work and use of school digital technology equipment in school, but also applies to my use of school systems and equipment off the premises and my use of personal equipment on the premises or in situations related to my employment by the school
- I understand that if I fail to comply with this acceptable use agreement, I could be subject to disciplinary action. This could include ([schools should amend this section to provide relevant sanctions as per their behaviour policies](#)) a warning, a suspension, referral to Governors and/or the Local Authority and in the event of illegal activities the involvement of the police.

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

Staff/Volunteer Name: .....

Signed: .....

Date: .....

## A4 Parent/carers acceptable use agreement template

Digital technologies have become integral to the lives of children and young people, both within schools and outside school. These technologies provide powerful tools, which create new opportunities for everyone. They can stimulate discussion, promote creativity and stimulate awareness of context to promote effective learning. Young people should have an entitlement to safe internet access at all times.

This Acceptable Use Policy is intended to ensure that:

- young people will be responsible users and stay safe while using the internet and other digital technologies for educational, personal and recreational use
- school systems and users are protected from accidental or deliberate misuse that could put the security of the systems and users at risk
- parents and carers are aware of the importance of online safety and are involved in the education and guidance of young people with regard to their online behaviour.

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

Parents are requested to sign the permission form below to show their support of the school in this important aspect of the school's work. [\(Schools will need to decide whether or not they wish parents to sign the acceptable use agreement on behalf of their child\)](#)

### Permission Form

Parent/Carers Name: ..... Learner's Name .....

As the parent/carers of the above learner(s), I give permission for my son/daughter to have access to the internet and to digital technology systems at school.

#### Either: (KS2 and above)

*I know that my son/daughter has signed an acceptable use agreement and has received, or will receive, online safety education to help them understand the importance of safe use of technology and the internet – both in and out of school.*

#### Or: (Foundation)

*I understand that the school has discussed the acceptable use agreement with my son/daughter and that they have received, or will receive, online safety education to help them understand the importance of safe use of technology and the internet – both in and out of school.*

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

I understand that my son's/daughter's activity on the digital technology systems will be monitored and that the school will contact me if they have concerns about any possible breaches of the acceptable use agreement.

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

[As the school is collecting personal data by issuing this form, it should inform parents/carers as to:](#)

[Who will have access to this form.](#)

## Online safety policy template for schools

Where this form will be stored.

How long this form will be stored for.

How this form will be destroyed.

Signed ..... Date: .....

### Use of Digital/Video Images

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

Images may also be used to celebrate success through their publication in newsletters, on the school website and occasionally in the public media. Where an image is publically shared by any means, only your child's *\*delete as relevant\** first name/initials will be used.

The school will comply with data protection legislation and request parents/carers permission before taking images of members of the school. We will also ensure that when images are published that the young people cannot be identified by the use of their names.

In accordance with guidance from the Information Commissioner's Office, parents/carers are welcome to take videos and digital images of their children at school events for their own personal use (as such use is not covered by the Data Protection Act). To respect everyone's privacy and in some cases protection, these images should not be published / made publicly available on social networking sites, nor should parents/carers comment on any activities involving other learners in the digital / video images.

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

As the school is collecting personal data by issuing this form, it should inform parents/carers as to:

This form (electronic or printed)	The images
Who will have access to this form.	Where the images may be published. Such as; Twitter, Facebook, the school website, local press, etc. (see relevant section of form below)
Where this form will be stored.	Who will have access to the images.
How long this form will be stored for.	Where the images will be stored.
How this form will be destroyed.	How long the images will be stored for.
	How the images will be destroyed.
	How a request for deletion of the images can be made.

### Digital/Video Images Permission Form

Parent/Carers Name: .....

## Online safety policy template for schools

Learner Name(s): .....

As the parent /carer of the above learner, I agree to the school taking digital/video images of my child/children. Yes / No

I agree to these images being used:

• to support learning activities. Yes / No

• in publicity that reasonably celebrates success and promotes the work of the school. Yes / No

Insert statements here that explicitly detail where images are published by the school Yes / No

I agree that if I take digital or video images at, or of – school events which include images of children other than my own, I will abide by these guidelines in my use of these images. Yes / No

Signed: .....

## Use of Biometric Systems

If the school uses biometric systems (e.g. fingerprint / palm recognition technologies) to identify learners for access, attendance recording, charging, library lending etc it must (under the “Protection of Freedoms” and Data Protection legislation) seek permission from a parent or carer.

The school uses biometric systems for the recognition of individual learners in the following ways (the school should describe here how it uses the biometric system).

Biometric technologies have certain advantages over other automatic identification systems as learners do not need to remember to bring anything with them (to the canteen or library) so nothing can be lost, such as a swipe card.

The school has carried out a data privacy impact assessment and is confident that the use of such technologies is effective and justified in a school context.

No complete images of fingerprints / palms are stored and the original image cannot be reconstructed from the data. Meaning that it is not possible, for example, to recreate a learner’s fingerprint or even the image of a fingerprint from what is in effect a string of numbers.

As the school is collecting special category personal data and *\*delete as appropriate\** sharing this with a third party, it should inform parents/carers about:

This form (electronic or printed)	the data shared with the service provider
who will have access to this form	what data will be shared
where this form will be stored	who the data will be shared with
how long this form will be stored for	who will have access to the data
how this form will be destroyed	where the data will be stored
	how long the data will be stored for
	how the data will be destroyed

## Online safety policy template for schools

	how consent to process the biometric data can be withdrawn.
--	---

Parent/Carer Name: .....

Learner Name(s): .....

As the parent /carer of the above learner(s), I agree to the school using biometric recognition systems, as described above Yes / No

I understand that the images cannot be used to create a whole [fingerprint/palm print](#) of my child and that these images will not be shared with anyone outside the school Yes / No

Signed: .....

### Further guidance

- Each parent /carer of the child should be notified by the school that they are planning to process their child's biometrics and notified that they are able to object.
- In order for a school to process children's biometrics at least one parent /carer must consent and no parent / carer has withdrawn consent. This needs to be in writing.
- The child can object or refuse to participate in the processing of their biometric data regardless of parents' /carer's consent.
- Schools must provide reasonable alternative means of accessing services for those pupils who will not be using an automated biometric recognition system.
- Permission only needs to be collected once during the period that the learner attends the school, but new permission is required if there are changes to the biometric systems in use.

## Use of Cloud Systems Permission Form

Schools that use cloud hosting services may be required to seek parental permission to set up an account for learners.

Schools will need to review and amend the section below, depending on which cloud hosted services are used.

The school uses *\*insert cloud service provider name\** for learners and staff. This permission form describes the tools and learner responsibilities for using these services.

The following services are available to each learner as part of the school's online presence in *\*insert cloud service provider name\**

Using *\*insert cloud service provider name\** will enable your child to collaboratively create, edit and share files and websites for school related projects and communicate via email with other learner and members of staff. These services are entirely online and available 24/7 from any internet-connected computer.

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

As the school is collecting personal data and sharing this with a third party, it should inform parents/carers about:

This form (electronic or printed) who will have access to this form	The data shared with the service provider what data will be shared
--	---

## Online safety policy template for schools

where this form will be stored	who the data will be shared with
how long this form will be stored for	who will have access to the data.
how this form will be destroyed.	where the data will be stored.
	how long the data will be stored for.
	how the data will be destroyed.
	how a request for deletion of the data can be made.

Do you consent to your child to having access to this service?	Yes / No
--	----------

Learner Name(s): .....

Parent / Carers Name:.....

Signed: .....

Date: .....

### Learner acceptable use agreement

On the following pages we have copied, for the information of parents and carers, the learner acceptable use agreement. It is suggested that when the learner AUA is written that a copy should be attached to the parents/carers AUA to provide information for parents and carers about the rules and behaviours that learners have committed to by signing the form.

## A5 Acceptable Use Agreement for community users template

This acceptable use agreement is intended to ensure:

- that community users of school digital technologies will be responsible users and stay safe while using these systems and devices



## Online safety policy template for schools

- that school systems, devices and users are protected from accidental or deliberate misuse that could put the security of the systems and users at risk
- that users are protected from potential risk in their use of these systems and devices.

### Acceptable use agreement

I understand that I must use school systems and devices in a responsible way, to ensure that there is no risk to my safety or to the safety and security of the systems, devices and other users. This agreement will also apply to any personal devices that I bring into the school

- I understand that my use of school systems and devices and digital communications will be monitored.
- I will not use a personal device that I have brought into school for any activity that would be inappropriate in a school setting.
- I will not try to upload, download or access any materials which are illegal (child sexual abuse images, criminally racist material, extremist material, adult pornography covered by the Obscene Publications Act) or inappropriate or may cause harm or distress to others. I will not try to use any programmes or software that might allow me to bypass the filtering/security systems in place to prevent access to such materials.
- I will immediately report any illegal, inappropriate or harmful material or incident, I become aware of, to the appropriate person.
- I will not access, copy, remove or otherwise alter any other user's files, without permission.
- I will ensure that if I take and/or publish images of others I will only do so with their permission. I will not use my personal equipment to record these images, without permission. If images are published it will not be possible to identify by name, or other personal information, those who are featured.
- I will not publish or share any information I have obtained whilst in the school on any personal website, social networking site or through any other means, unless I have permission from the school.
- I will not, without permission, make large downloads or uploads that might take up internet capacity and prevent other users from being able to carry out their work.
- I will not install or attempt to install programmes of any type on a school device, nor will I try to alter computer settings, unless I have permission to do so.
- I will not disable or cause any damage to school equipment, or the equipment belonging to others.
- I will immediately report any damage or faults involving equipment or software, however this may have happened.
- I will ensure that I have permission to use the original work of others in my own work.
- Where work is protected by copyright, I will not download or distribute copies (including music and videos).
- I understand that if I fail to comply with this Acceptable Use Agreement, the school has the right to remove my access to school systems/devices.

As the school is collecting personal data by issuing this form, it should inform community users about:

who will have access to this form
where this form will be stored
how long this form will be stored for
how this form will be destroyed

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

## Online safety policy template for schools

Name ..... Signed ..... Date: .....

# B1 School technical security policy template (including filtering and passwords)

### Suggestions for use

Within this template sections which include information or guidance are shown in **BLUE**. It is anticipated that schools would remove these sections from their completed policy document, though this will be a decision for the group that produces the policy.

Where sections in the template are written in **ITALICS** it is anticipated that schools would wish to consider whether or not to include that section or statement in their completed policy.

**Where sections are highlighted in BOLD text, it is the view of the Welsh Government that these would be an essential part of a school online safety policy.**

The template uses various terms such as school. Users will need to choose which term to use for their circumstances and delete the other accordingly.

### Introduction

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

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

If the school has an externally managed ICT service, it is the responsibility of the school to ensure that the managed service provider carries out all the online safety measures that might otherwise be carried out by the school itself (as suggested below). It is also important that the managed service provider is fully aware of the school online safety policy/ acceptable use agreements. The school should also check their local authority/other relevant body policies/guidance on these technical issues if the managed service is not provided by the authority.

### Responsibilities

The management of technical security will be the responsibility of (insert title) (schools will probably choose the Network Manager/Technical Staff/Head of Computing or other relevant responsible person)

### Technical Security

#### Policy statements

The school will be responsible for ensuring that their 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 receive guidance and training and will be effective in carrying out their responsibilities:

## Online safety policy template for schools

- **school technical systems will be managed in ways that ensure that the school meets recommended technical requirements** (if not managed by the Local Authority, these may be outlined in Local Authority/other relevant body technical/online safety policy and guidance)
- there will be regular reviews and audits of the safety and security of school technical systems
- servers, wireless systems and cabling must be securely located and physical access restricted
- appropriate security measures are in place to protect the servers, firewalls, switches, routers, wireless systems, work stations, mobile devices etc from accidental or malicious attempts which might threaten the security of the school systems and data
- responsibilities for the management of technical security are clearly assigned to appropriate and well trained staff ([this may be at school, local authority or managed provider level](#))
- all users will have clearly defined access rights to school technical systems. *Details of the access rights available to groups of users will be recorded by the network manager/technical staff/other person and will be reviewed, at least annually, by the online safety group.*
- users will be made responsible 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 ([see password section below](#))
- ([insert name or role](#)) is responsible for ensuring that software licence logs are accurate and up to date and that regular checks are made to reconcile the number of licences purchased against the number of software installations ([Inadequate licencing could cause the school to breach the Copyright Act which could result in fines or unexpected licensing costs](#))
- *mobile device security and management procedures are in place ([where mobile devices are allowed access to school systems](#)). (schools may wish to add details of the mobile device security procedures that are in use).*
- *school/local authority/managed service provider/technical staff regularly monitor and record the activity of users on the school technical systems and users are made aware of this in the acceptable use agreement. (schools may wish to add details of the monitoring programmes that are used)*
- *remote management tools are used by staff to control workstations and view users activity*
- *an appropriate system is in place ([to be described](#)) for users to report any actual/potential technical incident to the online safety co-ordinator/network manager/technician (or other relevant person, as agreed)*
- an agreed policy is in place ([to be described](#)) for the provision of temporary access of “guests”, (e.g. trainee teachers, supply teachers, visitors) onto the school system
- *an agreed policy is in place ([to be described](#)) regarding the downloading of executable files and the installation of programmes on school devices by users*
- *an agreed policy is in place ([to be described](#)) regarding the extent of personal use that users (staff/learners/community users) and their family members are allowed on school devices that may be used out of school*
- an agreed policy is in place ([to be described](#)) regarding the use of removable media (eg memory sticks/CDs/DVDs) by users on school devices ([see school personal data policy template in the appendix for further detail](#))
- the school infrastructure and individual workstations are protected by up to date software to protect against malicious threats from viruses, worms, trojans etc.
- personal data cannot be sent over the internet or taken off the school site unless safely encrypted or otherwise secured. ([see school personal data policy template in the appendix for further detail](#))

### Password Security

A safe and secure username/password system is essential if the above is to be established and will apply to all school technical systems, including networks, devices, email and learning platform). You can find out more about passwords, why they are important and how to manage them in our blog article. You may wish to share this with staff members to help explain the significance of passwords as this is helpful in explaining why they are necessary and important. [Where sensitive data is in use – particularly when accessed on mobile devices – schools may wish to use more secure forms of authentication e.g. two factor authentication such as the use of hardware tokens and if so should add a relevant section in this policy. Where this is adopted, the policy should state clearly that such items as hardware tokens must be stored separately from the device when in transit – to avoid both being lost/stolen together.](#)

### Policy Statements:

- These statements apply to all users.
- All school networks and systems will be protected by secure passwords.
- All users have clearly defined access rights to school technical systems and devices. Details of the access rights available to groups of users will be recorded by the Network Manager (or other person) and will be reviewed, at least annually, by the online safety group (or other group).
- All users (adults and learners) 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.
- Passwords must not be shared with anyone.
- All users will be provided with a username and password by xxxxx (insert name or title) (see section on password generation in technical notes) who will keep an up to date record of users and their usernames.

### Password requirements:

- Passwords should be long. Good practice highlights that passwords over 12 characters in length are considerably more difficult to compromise than shorter passwords. Passwords generated by using a combination of unconnected words that are over 16 characters long are extremely difficult to crack. Password length trumps any other special requirements such as uppercase/lowercase letters, number and special characters. Passwords should be easy to remember, but difficult to guess or crack.
- Passwords should be different for different accounts, to ensure that other systems are not put at risk if one is compromised and should be different for systems used inside and outside of school
- Passwords must not include names or any other personal information about the user that might be known by others
- Passwords must be changed on first login to the system
- *The school may wish to recommend to staff and learners (depending on age) that they make use of a 'password vault' these can store passwords in an encrypted manner and can generate very difficult to crack passwords. There may be a charge for these services.*
- *Passwords should not be set to expire as long as they comply with the above, but should be unique to each service the user logs into.*

### Learner passwords:

Primary schools will need to decide at which point they will allocate individual usernames and passwords to pupils. They may choose to use class log-ons for Foundation Phase (though increasingly children are using their own passwords to access programmes). Schools need to be aware of the risks associated with not being able to identify any individual who may have infringed the rules set out in the policy and the Acceptable Use Agreement (AUA). Use by learners in this way should always be supervised and members of staff should never use a class log on for their own network/internet access. Schools should also consider the implications of using whole class log-ons when providing access to learning environments and applications, which may be used outside school.

- **Records of learner usernames and passwords for foundation phase learners can be kept in an electronic or paper-based form, but they must be securely kept when not required by the user.** *Password complexity in foundation phase should be reduced (for example 6 character maximum) and should not include special characters. Where external systems have different password requirements the use of random words or sentences should be encouraged.*
- Password requirements for learners at Key Stage 2 and above should increase as learners progress through school.
- Users will be required to change their password if it is compromised. *Some schools may choose to reset passwords at the start of each academic year to avoid large numbers of forgotten password reset requests where there is no user-controlled reset process. (Note: passwords should not be regularly changed but should be secure and unique to each account.)*

## Online safety policy template for schools

- Learners will be taught the importance of password security, this should include how passwords are compromised, and why these password rules are important.

Schools may wish to add to this list for all or some learners any of the relevant policy statements from the staff section above.

### Notes for technical staff/teams

- **Each administrator should have an individual administrator account, as well as their own user account with access levels set at an appropriate level. Consideration should also be given to using two factor authentication for such accounts.**
- **An administrator account password for the school systems should also be kept in a secure place e.g. school safe. This account and password should only be used to recover or revoke access. Other administrator accounts should not have the ability to delete this account.** (*A school should never allow one user to have sole administrator access*)
- **Any digitally stored administrator passwords should be hashed using a suitable algorithm for storing passwords (e.g. Bcrypt or Scrypt). Message Digest algorithms such as MD5, SHA1, SHA256 etc. should not be used.**
- *It is good practice that where passwords are used there is a user-controlled password reset process to enable independent, but secure re-entry to the system. This ensures that only the owner has knowledge of the password.*
- *Where user-controlled reset is not possible, passwords for new users, and replacement passwords for existing users will be allocated by xxxxx (insert title) (schools may wish to have someone other than the school's technical staff carrying out this role e.g. an administrator who is easily accessible to users). Good practice is that the password generated by this change process should be system generated and only known to the user. This password should be temporary and the user should be forced to change their password on first login. The generated passwords should also be long and random.*
- *Where automatically generated passwords are not possible, then a good password generator should be used by xxxxx (insert title) to provide the user with their initial password. There should be a process for the secure transmission of this password to limit knowledge to the password creator and the user. The password should be temporary and the user should be forced to change their password on the first login.*
- *Requests for password changes should be authenticated by (the responsible person) to ensure that the new password can only be passed to the genuine user (the school will need to decide how this can be managed – possibly by requests being authorised by a line manager for a request by a member of staff or by a member of staff for a request by a learner)*
- **Suitable arrangements should be in place to provide visitors with appropriate access to systems which expires after use.** (*For example, your technical team may provide pre-created user/password combinations that can be allocated to visitors, recorded in a log, and deleted from the system after use.*)
- **In good practice, the account is “locked out” following six successive incorrect log-on attempts.**
- **Passwords shall not be displayed on screen, and shall be securely hashed when stored (use of one-way encryption).**

### Training/Awareness:

*It is essential that users should be made aware of the need for keeping passwords secure, and the risks attached to unauthorised access/data loss. This should apply to even the youngest of users. It is also essential that users be taught how passwords are compromised, so they understand why things should be done a certain way. Please see our blog for more details on this.*

Members of staff will be made aware of the school's password policy:

- at induction
- through the school's online safety policy and password security policy
- through the acceptable use agreement

Learners will be made aware of the school's password policy:



## Online safety policy template for schools

- in lessons (the school should describe how this will take place)
- through the Acceptable Use Agreement

### Audit/Monitoring/Reporting/Review:

The responsible person (insert title) will ensure that full records are kept of:

- User Ids and requests for password changes
- *User log-ons*
- *Security incidents related to this policy*

## Filtering

### Introduction

The filtering of internet content provides an important means of preventing users from accessing material that is illegal or is inappropriate in an educational context. The filtering system cannot, however, provide a 100% guarantee that it will do so, because the content on the web changes dynamically and new technologies are constantly being developed. It is important, therefore, to understand that filtering is only one element in a larger strategy for online safety and acceptable use. It is important that the school has a filtering policy to manage the associated risks and to provide preventative measures which are relevant to the situation in this school. When considering the filtering policy, schools must consult with their provider to ensure that all aspects of the policy will be supported.

Many users are not aware of the flexibility provided by many filtering services at a local level for schools. Where available, schools should use this flexibility to meet their learning needs and reduce some of the frustrations occasionally felt by users who wish to maximise the use of the new technologies.

Schools need to consider carefully the issues raised and decide:

- whether to introduce differentiated filtering for different groups/ages of users, if technically possible
- whether to remove filtering controls for some internet use (eg social networking sites) at certain times of the day or for certain users
- who has responsibility for such decisions and the checks and balances put in place
- what (if any) other system and user monitoring systems will be used to supplement the filtering system and how these will be used.

### Responsibilities:

The responsibility for the management of the school's filtering policy will be held by (insert title). They will manage the school filtering, in line with this policy and will keep records/logs of changes and of breaches of the filtering systems.

To ensure that there is a system of checks and balances and to protect those responsible, changes to the school filtering service must (schools should choose their relevant responses):

- be logged in change control logs
- be reported to a second responsible person (insert title)
- *either... be reported to and authorised by a second responsible person prior to changes being made (recommended)*
- *or... be reported to a second responsible person (insert title) every X weeks/months in the form of an audit of the change control logs*
- *be reported to the online safety group every X weeks/months in the form of an audit of the change control logs*

All users have a responsibility to report immediately to (insert title) any infringements of the school's filtering policy of which they become aware or any sites that are accessed, which they believe should have been filtered.

## Online safety policy template for schools

Users must not attempt to use any programmes or software that might allow them to bypass the filtering/security systems in place to prevent access to such materials.

### Policy Statements:

Internet access is filtered for all users. Differentiated internet access is available for staff and customised filtering changes are managed by the school. Illegal content is filtered by broadband or filtering provider by actively employing the Internet Watch Foundation CAIC list and other illegal content lists. Filter content lists are regularly updated and internet use is logged and frequently monitored. Ideally, the monitoring process alerts the school to breaches of the filtering policy, which are then acted upon. There is a clear route for reporting and managing changes to the filtering system. Where personal mobile devices are allowed internet access through the school network, filtering will be applied that is consistent with school practice.

- *Either - The school maintains and supports the managed filtering service provided by the internet service provider (ISP) (or other filtering service provider)*
- *and/or – the school manages its own filtering service (NB. If a school decides to remove the external filtering and replace it with another internal filtering system, this should be clearly explained in the policy and evidence provided that the headteacher would be able to show, in the event of any legal issue that the school was able to meet its statutory requirements to ensure the safety of staff/learners)*
- *the school has provided enhanced/differentiated user-level filtering through the use of the (insert name) filtering programme (allowing different filtering levels for different ages/stages and different groups of users – staff/pupils/students, etc.)*
- *in the event of the technical staff needing to switch off the filtering for any reason, or for any user, this must be logged and carried out by a process that is agreed by the Headteacher/Principal (or other nominated senior leader)*
- *mobile devices that access the school internet connection (whether school or personal devices) will be subject to the same filtering standards as other devices on the school systems*
- *any filtering issues should be reported immediately to the filtering provider*
- *requests from staff for sites to be removed from the filtered list will be considered by the technical staff or Service Provider (insert name or title) (n.b. an additional person should be nominated – to ensure protection for the network manager or any other member of staff, should any issues arise re unfiltered access). If the request is agreed, this action will be recorded and logs of such actions shall be reviewed regularly by the online safety group.*

### Education/Training/Awareness:

Learners will be made aware of the importance of filtering systems through the online safety education programme (schools may wish to add details). They will also be warned of the consequences of attempting to subvert the filtering system.

Staff users will be made aware of the filtering systems through: (amend as relevant)

- the Acceptable Use Agreement
- induction training
- staff meetings, briefings, training sessions

Parents will be informed of the school's filtering policy through the Acceptable Use Agreement and through online safety awareness sessions/newsletter etc. (amend as relevant)

### Changes to the Filtering System:

In this section the school should provide a detailed explanation of:

- how, and to whom, users may request changes to the filtering (whether this is carried out in school or by an external filtering provider)
- the grounds on which they may be allowed or denied (schools may choose to allow access to some sites, e.g. social networking sites for some users, at some times, or for a limited period of time. There should be strong educational reasons for changes that are agreed).

## Online safety policy template for schools

- how a second responsible person will be involved to provide checks and balances (preferably this will be at the time of request, but could be retrospectively through inspection of records/audit of logs)
- any audit/reporting system.

Users who gain access to, or have knowledge of others being able to access, sites which they feel should be filtered (or unfiltered) should report this in the first instance to (insert title) who will decide whether to make school level changes (as above).

### Monitoring:

Some schools supplement their filtering systems with additional monitoring systems. If this is the case, schools should include information in this section, including – if they wish – details of internal or commercial systems that are in use. They should also ensure that users are informed that monitoring systems are in place.

No filtering system can guarantee 100% protection against access to unsuitable sites. The school will therefore monitor the activities of users on the school network and on school equipment as indicated in the school online safety policy and the acceptable use agreements. *Monitoring will take place as follows: (details should be inserted if the school so wishes).*

### Audit/Reporting:

Logs of filtering change controls and of filtering incidents will be made available to: (schools should amend as relevant)

- the second responsible person (insert title)
- online safety group
- online safety governor/governors committee
- external filtering provider/local authority/police on request

The filtering policy will be reviewed in the response to the evidence provided by the audit logs of the suitability of the current provision. (The evidence might show a large number of requests to remove the filtering from sites – in which case schools might question whether their current level of filtering is too restrictive for educational purposes. Alternatively, a large number of incidents where users try to subvert the filtering system might suggest that improved monitoring/disciplinary action might be necessary).

### Further Guidance:

Schools may wish to seek further guidance. The following is recommended:

- NEN Technical guidance: <http://www.nen.gov.uk/e-security-managing-and-maintaining-e-securitycyber-security-in-schools/>
- [NEN –School e-Security Checklist](#)
- [Somerset Technical Guidance for schools](#) – this checklist is particularly useful where a school uses external providers for its technical support/security:
- Prevent duty - schools in England (and Wales) are required “to ensure children are safe from terrorist and extremist material when accessing the internet in school, including by establishing appropriate levels of filtering” ([Revised Prevent Duty Guidance: for England and Wales, 2015](#)).
- [Welsh Government - Respect and Resilience - Community Cohesion](#) - Guidance and associated tool to support the development of community cohesion and prevent extremism in schools and other educational settings in Wales.
- In response to the above, the UK Safer Internet Centre produced guidance for schools on “[Appropriate filtering and appropriate monitoring](#)”.



## B2 School personal data advice and guidance

### Suggestions for use

This document is for advice and guidance purposes only. It is anticipated that schools will use this advice alongside their own data protection policy. This document is not intended to provide legal advice and the school is encouraged to seek their own legal counsel when considering their management of personal data.

The template uses the terms learners to refer to the children or young people at the institution.

### School personal data handling

Recent publicity about data breaches suffered by organisations and individuals continues to make the area of personal data protection a current and high profile issue for schools, and other organisations. It is important that the school has a clear and well understood personal data handling policy in order to minimise the risk of personal data breaches. A breach may arise from a theft, a deliberate attack on your systems, the unauthorised or malicious use of personal data by a member of staff, accidental loss, or equipment failure. In addition:

- no school or individual would want to be the cause of a data breach, particularly as the impact of data loss on individuals can be severe, put individuals at risk and affect personal, professional or organisational reputation
- schools are “data rich” and the introduction of electronic storage and transmission of data has created additional potential for the loss of data
- the school will want to avoid the criticism and negative publicity that could be generated by any personal data breach
- the school is subject to a wide range of legislation related to data protection and data use, with significant penalties for failure to observe the relevant legislation
- it is a legal requirement for all schools to have a Data Protection Policy and be able to demonstrate compliance with data protection law.

Schools have always held personal data on the pupils in their care, and increasingly this data is held digitally and accessible not just in school but also from remote locations. It is important to stress that the data protection laws apply to all forms of personal data, regardless of whether it is held on paper or in electronic format. However, as it is part of an overall online safety policy template, this document will place particular emphasis on data which is held or transferred digitally.

Schools will need to carefully review their policy, in the light of pertinent Local Authority regulations and guidance and changes in legislation.

### Introduction

Schools and their employees must do everything within their power to ensure the safety and security of any material of a personal or sensitive nature, including personal data.

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

- have permission to access that data
- need to have access to that data.

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

## Online safety policy template for schools

Anyone who has access to personal data must know, understand and adhere to the relevant school policy which brings together the statutory requirements contained in relevant data protection legislation and relevant regulations and guidance (where relevant from the Local Authority / Parent Organisation).

### Legislative Context

With effect from 25<sup>th</sup> May 2018, the data protection arrangements for the UK changed following the implementation of the European Union General Data Protection Regulation (GDPR). This represents a significant shift in legislation and in conjunction with the Data Protection Act 2018 replaces the Data Protection Act 1998. These two documents are intended to be read side-by-side.

The GDPR provides the principles and rights which apply across the European Union. The Data Protection Act 2018 covers the areas outside of the EU GDPR and provides the UK-specific details such as; how to handle education and safeguarding information.

### Are schools in Wales required to comply?

In short, yes. Any natural or legal person, public authority, agency or other body which processes personal data is considered a 'data controller'. Given the nature of schools and the personal data required in a variety of forms to operate a school this means that all educational establishments in the UK are required to comply.

Guidance for schools is available on the [Information Commissioner's Office](#) website including information about the new regulations.

### Personal Data

The school and its employees will have access to a wide range of personal information and data. The data may be held in a digital format or on paper records. Personal data is information that relates to an identified or identifiable living individual This will include:

- personal information about members of the school community – including learners, members of staff and parents/carers e.g. names, addresses, contact details, legal guardianship contact details, health records, disciplinary records
- curricular / academic data e.g. class lists, learner progress records, reports, references
- professional records e.g. employment history, taxation and national insurance records, appraisal records and references
- any other information that might be disclosed by parents/carers or by other agencies working with families or staff members.

### Special categories of personal data

The following is a list of personal data listed in the [GDPR](#) as a 'special category'.

"revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation"

In order to lawfully process special category data, you must identify both a [lawful basis](#) and a [separate condition for processing special category data](#). You should decide and document this before you start processing the data.

### Consent

## Online safety policy template for schools

Consent (which is one of the lawful bases to use data) under the regulation has changed. Consent is defined as:

“in relation to the processing of personal data relating to an individual, means a freely given, specific, informed and unambiguous indication of the individual’s wishes by which the individual, by a statement or by a clear affirmative action, signifies agreement to the processing of the personal data”

This means that where a school is relying on consent as the basis for processing personal data that consent has to be clear, meaning that pre-ticked boxes, opt-out or implied consent are no longer suitable. The GDPR does not specify an age of consent for general processing but schools should consider the capacity of pupils to freely give their informed consent.

The Information Commissioner’s Office (ICO) gives clear advice on when it’s appropriate to [use consent](#) as a lawful base. It states:

“Consent is appropriate if you can offer people real choice and control over how you use their data and want to build their trust and engagement. But if you cannot offer a genuine choice, consent is not appropriate. If you would still process the personal data without consent, asking for consent is misleading and inherently unfair.”

You should only use consent if none of the other lawful bases is appropriate. If you do so, you must be able to cope with people saying no (and/or changing their minds), so it’s important that you only use consent for optional extras, rather than for core information the school requires in order to function. Examples;

- consent would be appropriate for considering whether a child's photo could be published in any way.
- if your school or requires learner details to be stored in an MIS, it would not be appropriate to rely on consent if the learner cannot opt out of this. In this case, you could apply the public task lawful base.

Consent is just one of the [six lawful bases](#) for processing data:

1. Consent
2. Contract: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract
3. Legal obligation: the processing is necessary for you to comply with the law
4. Vital interests: the processing is necessary to protect someone’s life
5. Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law
6. Legitimate interests: processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child. (This cannot apply if you are a public authority processing data to perform your official tasks).

Previously maintained schools were able to rely on the ‘legitimate interests’ justification. But under the new laws, this has been removed for Public Bodies (which includes schools). However, public bodies should consider using the Public Task lawful base whenever they are undertaking a task that is part of their statutory function.

## Data Protection Impact Assessments (DPIA)

## Online safety policy template for schools

Data Protection Impact Assessments (DPIA) identify and address privacy risks early on in any project so that you can mitigate them before the project goes live.

DPIAs should be carried out by Data Managers (where relevant) under the support and guidance of the DPO. Ideally you should conduct a DPIA before processing activity starts. However, some may need to be retrospective in the early stages of compliance activity.

The risk assessment will involve:

- recognising the risks that are present
- judging the level of the risks (both the likelihood and consequences)
- prioritising the risks.

According to the ICO a DPIA should contain:

- a description of the processing operations and the purpose
- an assessment of the necessity and proportionality of the processing in relation to the purpose
- an assessment of the risks to individuals
- the measures in place to address risk, including security and to demonstrate that you comply.

Or more simply and fully:

- who did you talk to about this?
- what is going to happen with the data and how – collection, storage, usage, disposal
- how much personal data will be handled (number of subjects)
- why you need use personal data in this way
- what personal data (including if it's in a 'special category') are you using
- at what points could the data become vulnerable to a breach (loss, stolen, malicious)
- what are the risks to the rights of the individuals if the data was breached
- what are you going to do in order to reduce the risks of data loss and prove you are compliant with the law.

DPIA is an ongoing process and should be re-visited at least annually to verify that nothing has changed since the processing activity started.

## Secure storage of and access to data

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

[Good practice](#) suggests that all users will use strong passwords made up from a combination of simpler words. User passwords must never be shared.

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

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

## Online safety policy template for schools

Personal data should only be stored on school equipment. Private equipment (i.e. owned by the users) must not be used for the storage of school personal data.

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

- The data must be encrypted and password protected
- The device must be password protected
- The device must offer approved virus and malware checking software
- The data must be securely deleted from the device, in line with school policy once it has been transferred or its use is complete.

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

The school should have a clear policy and procedures for the automatic backing up, accessing and restoring of all data held on school systems, including off-site backups.

The school should have clear policy and procedures for the use of “Cloud Based Storage Systems” (for example Dropbox, Microsoft 365, Google Drive) and is aware that data held in remote and cloud storage is still required to be protected in line with the Data Protection Act. The school will ensure that it is satisfied with controls put in place by remote / cloud based data services providers to protect the data.

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

All paper based personal data must be held in lockable storage, whether on or off site.

## Secure transfer of data and access out of school

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

- Users may not remove or copy sensitive or restricted or protected personal data from the school or authorised premises without permission and unless the media is encrypted and password protected and is transported securely for storage in a secure location
- Users must take particular care that computers or removable devices which contain personal data must not be accessed by other users (e.g. family members) when out of school
- When restricted or protected personal data is required by an authorised user from outside the organisation’s premises (for example, by a member of staff to work from their home), they should preferably have secure remote access to the management information system or learning platform
- If secure remote access is not possible, users must only remove or copy personal or sensitive data from the organisation or authorised premises if the storage media, portable or mobile device is encrypted and is transported securely for storage in a secure location
- Users must protect all portable and mobile devices, including media, used to store and transmit personal information using approved encryption software
- Particular care should be taken if data is taken or transferred to another country, particularly outside Europe, and advice should be taken from the local authority (if relevant) in this event.

## Online safety policy template for schools

### Disposal of data

The school should implement a document retention schedule that defines the length of time data is held before secure destruction. The Information and Records Management Society [Toolkit for schools](#) provides support for this process. The school must ensure the safe destruction of personal data when it is no longer required.

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

A Destruction Log should be kept of all data that is disposed of. The log should include the document ID, classification, date of destruction, method and authorisation.

### Audit Logging / Reporting / Incident Handling

In the GDPR, organisations are required to keep records of processing activity. This must include:

- the name and contact details of the data controller
- where applicable, the name and contact details of the joint controller and data protection officer
- the purpose of the processing
- to whom the data has been/will be disclosed
- description of data subject and personal data
- where relevant the countries it has been transferred to
- under which condition for processing the data has been collected
- under what lawful basis processing is being carried out
- where necessary, how it is retained and destroyed
- a general description of the technical and organisational security measures.

Clearly, in order to maintain these records good auditing processes must be followed, both at the start of the exercise and on-going throughout the lifetime of the requirement. Therefore, audit logs will need to be kept to:

- provide evidence of the processing activity and the DPIA
- record where, how and to whom data has been shared
- log the disposal and destruction of the data
- enable the school to target training at the most at-risk data
- record any breaches that impact on the data

### Data Breaches

From 25 May 2018, if you experience a personal data breach you need to consider whether this poses a risk to people. You need to consider the likelihood and severity of any risk to people's rights and freedoms, following the breach. When you've made this assessment, if it's likely there will be a risk then you must notify the ICO; if it's unlikely then you don't have to report it. You do not need to report every breach to the ICO.

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This includes breaches that are the result of both accidental and deliberate causes. It also means that a breach is more than just about losing personal data.

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

- "responsible person" for each incident

## Online safety policy template for schools

- communications plan, including escalation procedure
- plan of action for rapid resolution
- plan of action of non-recurrence and further awareness raising

All significant [data protection incidents must be reported](#) through the DPO to the Information Commissioner's Office based upon the local incident handling policy and communication plan. The new laws require that this notification should take place within 72 hours of the breach being detected, where feasible.

## Data Mapping

The process of data mapping is designed to help schools identify with whom their data is being shared in order that the appropriate contractual arrangements can be implemented. If a third party is processing personal data on your behalf about your learners then this processor has obligations on behalf of the school to ensure that processing takes place in compliance with data protection laws.

## Data subject's right of access

Data subjects have a number of rights in connection with their personal data. They have the right:

- to be informed – Privacy Notices
- of access – Subject Access Requests
- to rectification – correcting errors
- to erasure – deletion of data when there is no compelling reason to keep it
- to restrict processing – blocking or suppression of processing
- to portability – Unlikely to be used in a school context
- to object – objection based on grounds pertaining to their situation
- related to automated decision making, including profiling

Several of these could impact schools, such as the right of access. You need to put procedures in place to deal with [Subject Access Requests](#). These are written or verbal requests to see all or a part of the personal data held by the Controller in connection with the individual. Controllers normally have 1 calendar month to provide the information, unless the case is unusually complex in which case an extension can be obtained.

Individuals have the right to know:

- if the Controller holds personal data about them
- a description of that data
- the purpose for which the data is processed
- the sources of that data
- to whom the data may be disclosed
- a copy of all the personal data that is held about them.

A school must not disclose

- if doing so would cause serious harm to the individual
- child abuse data
- adoption records
- statements of special educational needs

## Online safety policy template for schools

Your school or must provide the information free of charge. However, if the request is clearly unfounded or excessive – and especially if this is a repeat request – you may charge a reasonable fee.

### Fee

The school should pay the relevant fee to the Information Commissioner's Office (ICO).

### Responsibilities

Every maintained school is required to appoint a Data Protection Officer as a core function of 'the business'

The Data Protection Officer (DPO) can be internally or externally appointed.

They must have:

- expert knowledge
- timely and proper involvement in all issues relating to data protection
- the necessary resources to fulfil the role
- access to the necessary personal data processing operations
- a direct reporting route to the highest management level

The data controller must:

- not give the DPO instructions regarding the performance of tasks
- ensure that the DPO does not perform a duty or role that would lead to a conflict of interests
- not dismiss or penalise the DPO for performing the tasks required of them

As a minimum a Data Protection Officer must:

- inform, as necessary, the controller, a processor or an employee of their obligations under the data protection laws
- provide advice on a data protection impact assessment
- co-operate with the Information Commissioner
- act as the contact point for the Information Commissioner
- monitor compliance with policies of the controller in relation to the protection of personal data
- monitor compliance by the controller with data protection laws

The school may also wish to appoint a Data Manager. Schools are encouraged to separate this role from that of Data Protection Officer, where possible. This person will keep up to date with current legislation and guidance and will:

- determine and take responsibility for the school's information risk policy and risk assessment
- oversee the System Controllers

The school may also wish to appoint System Controllers for the various types of data being held (e.g. learner information / staff information / assessment data etc.). These Controllers will manage and address risks to the information and will understand:

- what information is held, for how long and for what purpose
- how information has been amended or added to over time, and
- who has access to the data and why.



## Online safety policy template for schools

Everyone in the school has the responsibility of handling protected or sensitive data in a safe and secure manner.

Governors are required to comply fully with this policy in the event that they have access to personal data, when engaged in their role as a Governor (either in the school or elsewhere if on school business).

### Training & awareness

All staff must receive data handling awareness / data protection training and will be made aware of their responsibilities. This should be undertaken regularly. You can do this through:

- Induction training for new staff
- Staff meetings / briefings / INSET
- Day to day support and guidance from System Controllers

### Freedom of Information Act

All schools must have a Freedom of Information Policy which sets out how it will deal with FOI requests. FOI aims to increase transparency and accountability in public sector organisations as part of a healthy democratic process. Whilst FOI requests are submitted by an individual, the issue is for the school to consider whether the requested information should be released into the public domain. FOI links to data protection law whenever a request includes personal data. Good advice would encourage the school to:

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

### Model Publication Scheme

The Information Commissioner's Office provides schools and organisations with a [model publication scheme](#) which they should complete. The school's publication scheme should be reviewed annually.

The ICO produce [guidance on the model publication scheme](#) for schools. This is designed to support schools complete the [Guide to Information for Schools](#).

### Information to Parents/carers – the Privacy Notice

In order to comply with the fair processing requirements in data protection law, the school will inform parents/carers of all learners of the data they collect, process and hold on the learners, the purposes for which the data is held and the third parties (e.g. LA etc.) to whom it may be passed. This privacy notice will be passed to parents/carers for example in the prospectus, newsletters, reports or a specific letter / communication or you could publish it on your website and keep it updated there. Parents/carers of young people who are new to the school will be provided with the privacy notice through an appropriate mechanism.

## Online safety policy template for schools

### Parental permission for use of cloud hosted services

Schools that use cloud hosting services are advised to seek appropriate consent to set up an account for learners.

### Use of Biometric Information

Biometric information is special category data. The Protection of Freedoms Act 2012, included measures that affect schools that use biometric recognition systems, such as fingerprint identification and facial scanning:

- For all pupils in schools under 18, they must obtain the written consent of a parent before they take and process their child's biometric data
- They must treat the data with appropriate care and must comply with data protection principles as set out in the Data Protection Act
- They must provide alternative means for accessing services where a parent or pupil has refused consent

[New advice](#) to schools makes it clear that they are not able to use pupils' biometric data without parental consent. Schools may wish to incorporate the parental permission procedures into revised consent processes. (see [Appendix A4 Parent / Carer Acceptable Use Agreement](#))

### Privacy and Electronic Communications

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

## B3 School Mobile Technologies Policy Template (inc. BYOD/BYOT)

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

The key to considering the use of mobile technologies is that the learners, staff and wider school community understand that the primary purpose of having their personal device at school is educational and that this is irrespective of whether the device is school owned/provided or personally owned. The mobile technologies policy should sit alongside a range of policies including but not limited to the safeguarding policy, anti-bullying

## Online safety policy template for schools

policy, acceptable use agreement, policies around theft or malicious damage and the behaviour policy. Teaching about the safe and appropriate use of mobile technologies should be included in the online safety education programme.

A policy that completely prohibits pupil/student, staff or visitors from bringing mobile technologies to the school/academy could be considered to be unreasonable and unrealistic for school/academy to achieve. For example, many parents/carers would also be concerned for health and safety reasons if their child were not allowed to carry a mobile phone and many staff and visitors use mobile phones to stay in touch with family. Contractors require mobile technologies for legitimate business reasons.

### Potential benefits of mobile technologies

Research has highlighted the widespread uptake of mobile technologies amongst adults and children of all ages. Web-based tools and resources have changed the landscape of learning. Learners now have at their fingertips unlimited access to digital content, resources, experts, databases and communities of interest. By effectively maximizing the use of such resources, schools not only have the opportunity to deepen learning, but they can also develop digital literacy, fluency and citizenship in learners that will prepare them for the high-tech world in which they will live, learn and work.

For further reading, please refer to the “NEN Technical Strategy Guidance Note 5 – Bring your own device” - <http://www.nen.gov.uk/bring-your-own-device-byod/>

### Considerations

There are a number of issues and risks to consider when implementing mobile technologies, these include; security risks in allowing connections to your school network, filtering of personal devices, breakages and insurance, access to devices for all learners, avoiding potential classroom distraction, network connection speeds, types of devices, charging facilities, total cost of ownership

Schools may consider implementing the use of mobile technologies as a means of reducing expenditure on school provided devices. However, it is important to remember that the increased network management costs and overheads involved in implementing this properly are likely to counterbalance or outweigh any savings.

The use of mobile technologies brings both real benefits and challenges for the whole school community – including teachers - and the only effective way for a school to implement these successfully is to involve the whole school community from the outset. Before the school embarks on this path, the risks and benefits must be clearly identified and shared with all stakeholders.

*A range of mobile technology implementations is possible. Schools should consider the following statements and remove those that do not apply to their planned implementation approach.*

- **The school has addressed broadband performance and capacity to ensure that core educational and administrative activities are not negatively affected by the increase in the number of connected devices**
- **The school has provided technical solutions for the safe use of mobile technology for school devices and for personal devices**
- **For all mobile technologies, filtering will be applied to the school internet connection and attempts to bypass this are not permitted**
- **Where mobile broadband (e.g. 3G and 4G) use is allowed in the school, users are required to follow the same acceptable use requirements as they would if using school owned devices.**
- **Mobile technologies must only be used in accordance with the law**
- **Mobile technologies are not permitted to be used in certain areas within the school site such as changing rooms, toilets and swimming pools.**
- **Learners will be educated in the safe and appropriate use of mobile technologies as part of the online safety curriculum**
- The school Acceptable Use Agreements for staff, learners, parents and carers will give consideration to the use of mobile technologies

## Online safety policy template for schools

- The school allows: (the school should complete the table below to indicate which devices are allowed and define their access to school systems)

	School Devices			Personal Devices		
	School owned and allocated to a single user	School owned for use by multiple users	Authorised device <sup>9</sup>	Pupil/Student owned	Staff owned	Visitor owned
Allowed in school	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>	Yes / No <sup>10</sup>	Yes / No <sup>10</sup>	Yes / No <sup>10</sup>
Full network access	Yes	Yes	Yes			
Internet only						
No network access						

### School devices

- All school devices are controlled through the use of mobile device management (MDM) software
- Appropriate access control is applied to all mobile devices according to the requirements of the user (e.g internet only access, network access allowed, shared folder network access)
- All school devices must be suitably protected via a passcode/password/pin (and encryption where relevant). Those devices allocated to members of staff must only be accessed and used by members of staff
- Appropriate exit processes are implemented for devices no longer used at a school location or by an authorised user. These may include; revoking the link between MDM software and the device, removing proxy settings, ensuring no sensitive data is removed from the network, uninstalling school-licensed software etc.
- The software/apps originally installed by the school must remain on the school owned device in usable condition and be easily accessible at all times. From time to time the school may add software applications for use in a particular lesson. Periodic checks of devices will be made to ensure that users have not removed required apps
- The school will ensure that school devices contain the necessary apps for school work. Apps added by the school will remain their property and will not be accessible to learners on authorised devices once they leave the school roll. Any apps bought by the user on their own account will remain theirs
- The school is responsible for keeping devices up to date through software, security and app updates. The device is virus protected and should not be capable of passing on infections to the network. Where user intervention or support for this process is required, this will be made clear to the user
- School devices are provided to support learning. It is expected that learners will bring devices to school as required
- The changing of settings (exceptions include personal settings such as font size, brightness, etc.) that would stop the device working as it was originally set up and intended is not permitted

<sup>9</sup> Authorised device – purchased by the pupil/family through a school-organised scheme. This device may be given full access to the network as if it were owned by the school

<sup>10</sup> The school should add below any specific requirements about the use of personal devices in school, e.g. storing in a secure location, use during the school day, liability, taking images etc

## Online safety policy template for schools

- *All school devices are subject to routine monitoring*
- *Pro-active monitoring has been implemented to monitor activity* ([details should be added here](#))

### Personal devices

It is for the school to decide whether/or/not personal devices are permitted on school/academy premises and should clearly communicate this in their policies and acceptable use agreements.

Where the school is located in a position with a good 3G/4G signal, the school should provide guidance on the usage of this internet connectivity given that devices using these connections will not be covered by the normal school filtering. Schools should be aware that it is illegal to block (without an appropriate Ofcom licence) telephone/wireless signals.

*When personal devices are permitted:*

- *all personal devices are restricted through the implementation of technical solutions that provide appropriate levels of filtered network access*
- *personal devices are brought into the school entirely at the risk of the owner and the decision to bring the device in to the school lies with the user (and their parents/carers) as does the liability for any loss or damage resulting from the use of the device in the school*
- *staff personal devices should not be used to contact learners or their families, nor should they be used to take images of learners*
- *the school accepts no responsibility or liability in respect of lost, stolen or damaged devices while at the school or on activities organised or undertaken by the school (the school recommends insurance is purchased to cover that device whilst out of the home)*
- *the school accepts no responsibility for any malfunction of a device due to changes made to the device while on the school network or whilst resolving any connectivity issues*
- *the school recommends that the devices are made easily identifiable and have a protective case to help secure them as the devices are moved around the school. Pass-codes or PINs should be set on personal devices to aid security*
- *the school is not responsible for the day to day maintenance or upkeep of the user's personal device such as the charging of any device, the installation of software updates or the resolution of hardware issues*
- *personal devices should be charged before being brought to the school as the charging of personal devices is not permitted during the school day*

### User behaviour

**Users are expected to act responsibly, safely and respectfully in line with current acceptable use agreements, in addition;**

- **the sending of abusive or inappropriate messages or content via mobile phones or personal devices is forbidden by any member of the community and any breaches will be dealt with as part of the discipline/behaviour policy**
- **guidance is made available by the school to users concerning where and when mobile devices may be used** ([the school will need to decide this](#))
- **devices may not be used in tests or exams**
- **users are responsible for keeping their device up to date through software, security and app updates. The device is virus protected and should not be capable of passing on infections to the network**
- **users are responsible for charging their own devices and for protecting and looking after their devices while in the school**

## Online safety policy template for schools

- **devices must be in silent mode on the school site and on school buses**
- **users should be mindful of the age limits for app purchases and use and should ensure they read the terms and conditions before use.**
- **learners must only photograph people with their permission and must only take pictures or videos that are required for a task or activity. All unnecessary images or videos will be deleted immediately**
- *devices may be used in lessons in accordance with teacher direction*
- *staff owned devices should not be used for personal purposes during teaching sessions, except in emergency situations*
- *printing from personal devices will not be possible*

### Visitors

Visitors should be provided with information about how, where and when they are permitted to use mobile technology on the site, in line with local safeguarding arrangements. They should also be informed about the school policy on taking images.

### Residential settings

Where a school has residential provision it should consider how they might balance the needs of keeping young people safe when using digital technologies and protecting the school with the importance of young people being able to communicate with friends and family and engage in appropriate online activities in a similar way to their peers in non-residential settings. The school should provide suitable statements within this policy and/or in acceptable use agreements

Similar consideration should be given to how and when learners may access digital technologies if engaged in residential activities away from the site.

### Insurance

Schools that have implemented an authorised device approach (1:1 deployment) may wish to consider how they will insure these devices and should include details of the claims process in this policy.

## B4 Social Media Template Policy

Social media (e.g. Facebook, Twitter, LinkedIn) is a broad term for any kind of online platform which enables people to directly interact with each other. However some games, for example Minecraft or World of Warcraft and video sharing platforms such as You Tube have social media elements to them.

The school recognises the numerous benefits and opportunities which a social media presence offers. Staff, parents and carers and learners are actively encouraged to find creative ways to use social media. However, there are some risks associated with social media use, especially around the issues of safeguarding, bullying and personal reputation. This policy aims to encourage the safe use of social media by the school its staff, parents and carers and learners.

### Scope

This policy is subject to the school's codes of conduct and acceptable use agreements.

This policy:

- applies to all staff and to all online communications which directly or indirectly, represent the school
- applies to such online communications posted at any time and from anywhere
- encourages the safe and responsible use of social media through training and education
- *defines the monitoring of public social media activity pertaining to the school*

The school respects privacy and understands that staff and learners may use social media forums in their private lives. However, personal communications likely to have a negative impact on professional standards and/or the school's reputation are within the scope of this policy.

Professional communications are those made through official channels, posted on a school account or using the school name. All professional communications are within the scope of this policy.

Personal communications are those made via a personal social media accounts. In all cases, where a personal account is used which associates itself with, or impacts on the school, it must be made clear that the member of staff is not communicating on behalf of the school with an appropriate disclaimer. Such personal communications are within the scope of this policy.

Personal communications which do not refer to or impact upon the school are outside the scope of this policy.

Digital communications with learners are also considered. Staff may use social media to communicate with learners via a school social media account for teaching and learning purposes but must consider whether this is appropriate and consider the potential implications.

### Organisational control

#### Roles & Responsibilities

- Senior Leadership Team (SLT)
  - facilitating training and guidance on Social Media use
  - developing and implementing the Social Media policy
  - taking a lead role in investigating any reported incidents
  - making an initial assessment when an incident is reported and involving appropriate staff and external agencies as required
  - receive completed applications for Social Media accounts
  - approve account creation
- Administrator / Moderator
  - create the account following SLT approval
  - store account details, including passwords securely
  - be involved in monitoring and contributing to the account

## Online safety policy template for schools

- control the process for managing an account after the lead staff member has left the school (closing or transferring)
- Staff
  - know the contents of and ensure that any use of social media is carried out in line with this and other relevant policies
  - attending appropriate training
  - regularly monitoring, updating and managing content he/she has posted via school accounts
  - adding an appropriate disclaimer to personal accounts when naming the school

### Managing accounts

- Process for creating new accounts

The school community is encouraged to consider if a social media account will help them in their work, eg a history department Twitter account, or a “Friends of the school” Facebook page. Anyone wishing to create such an account must present a business case to the school Senior Leadership Team which covers the following points:-

  - the aim of the account
  - the intended audience
  - how the account will be promoted
  - who will run the account (at least two staff members should be named)
  - will the account be open or private/closed

Following consideration by the SLT an application will be approved or rejected. In all cases, the SLT must be satisfied that anyone running a social media account on behalf of the school has read and understood this policy and received appropriate training. This also applies to anyone who is not directly employed by the school, including volunteers or parents.

### Monitoring

- **School accounts must be monitored regularly and frequently** (preferably 7 days a week, including during holidays). Any comments, queries or complaints made through those accounts must be responded to within 24 hours (or on the next working day if received at a weekend) even if the response is only to acknowledge receipt. Regular monitoring and intervention is essential in case a situation arises where bullying or any other inappropriate behaviour arises on a school social media account.

### Behaviour

- **The school requires that all users using social media adhere to the standard of behaviour as set out in this policy and other relevant policies.**
- **Digital communications by staff must be professional and respectful at all times and in accordance with this policy.** Staff will not use social media to infringe on the rights and privacy of others or make ill-considered comments or judgments about staff. School social media accounts must not be used for personal gain. Staff must ensure that confidentiality is maintained on social media even after they leave the employment of the school.
- Users must declare who they are in social media posts or accounts. Anonymous posts are discouraged in relation to school activity.
- If a journalist makes contact about posts made using social media staff must follow the school media policy before responding.
- Unacceptable conduct, (e.g. defamatory, discriminatory, offensive, harassing content or a breach of data protection, confidentiality, copyright) will be considered extremely seriously by the school and will be reported as soon as possible to a relevant senior member of staff, and escalated where appropriate.
- The use of social media by staff while at work may be monitored, in line with school policies. *The school permits reasonable and appropriate access to private social media sites. However, where excessive use is suspected, and considered to be interfering with relevant duties, disciplinary action may be taken*



## Online safety policy template for schools

- The school will take appropriate action in the event of breaches of the social media policy. Where conduct is found to be unacceptable, the school will deal with the matter internally. Where conduct is considered illegal, the school will report the matter to the police and other relevant external agencies and may take action according to the disciplinary policy.

### Legal considerations

- Users of social media should consider the copyright of the content they are sharing and, where necessary, should seek permission from the copyright holder before sharing.
- Users must ensure that their use of social media does not infringe upon relevant data protection laws, or breach confidentiality.

### Handling abuse

- When acting on behalf of the school, handle offensive comments swiftly and with sensitivity.
- If a conversation turns and becomes offensive or unacceptable, school users should block, report or delete other users or their comments/posts and should inform the audience exactly why the action was taken
- If you feel that you or someone else is subject to abuse by colleagues through use of a social networking site, then this action must be reported using the agreed school protocols.

### Tone

- The tone of content published on social media should be appropriate to the audience, whilst retaining appropriate levels of professional standards. Key words to consider when composing messages are:
  - engaging
  - conversational
  - informative
- friendly (on certain platforms, eg. Facebook)

### Use of images

- School use of images can be assumed to be acceptable, providing the following guidelines are strictly adhered to.
- **permission to use any photos or video recordings should be sought in line with the school's digital and video images policy.** If anyone, for any reason, asks not to be filmed or photographed then their wishes should be respected
- **under no circumstances should staff share or upload learner pictures online other than via school owned social media accounts**
- staff should exercise their professional judgement about whether an image is appropriate to share on school social media accounts. Students should be appropriately dressed, not be subject to ridicule and must not be on any school list of children whose images must not be published
- if a member of staff inadvertently takes a compromising picture which could be misconstrued or misused, they must delete it immediately.

### Personal use

#### Staff

- personal communications are those made via a personal social media accounts. In all cases, where a personal account is used which associates itself with, or impacts on, the school, it must be made clear that the member of staff is not communicating on behalf of the school with an appropriate disclaimer. Such personal communications are within the scope of this policy
- personal communications which do not refer to or impact upon the school are outside the scope of this policy
- where excessive personal use of social media in the 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.*

## Online safety policy template for schools

### Pupil/Students

- staff are not permitted to follow or engage with current or prior learners of the school on any personal social media network account
- the school's education programme should enable the learners to be safe and responsible users of social media
- learners are encouraged to comment or post appropriately about the school. Any offensive or inappropriate comments will be resolved by the use of the school's behaviour policy

### Parents/Carers

- if parents/carers have access to a school learning platform where posting or commenting is enabled, parents/carers will be informed about acceptable use
- the school has an active parent and carer education programme which supports the safe and positive use of social media. This includes information on the website
- parents and carers are encouraged to comment or post appropriately about the school. In the event of any offensive or inappropriate comments being made, the school will ask the parent/carer to remove the post and invite them to discuss the issues in person. If necessary, refer parents to the school's complaints procedures.

### Monitoring posts about the school

- as part of active social media engagement, it is considered good practice to pro-actively monitor the Internet for public postings about the school
- the school should effectively respond to social media comments made by others according to a defined policy or process.

## Appendix

### Managing your personal use of Social Media:

- "nothing" on social media is truly private
- social media can blur the lines between your professional and private life. Don't use the school logo and/or branding on personal accounts
- check your settings regularly and test your privacy
- keep an eye on your digital footprint
- keep your personal information private
- regularly review your connections – keep them to those you want to be connected to
- when posting online consider; Scale, Audience and Permanency of what you post
- if you want to criticise, do it politely
- take control of your images – do you want to be tagged in an image? What would children or parents say about you if they could see your images?
- know how to report a problem

### Managing school social media accounts

#### The Do's

- Check with a senior leader before publishing content that may have controversial implications for the school
- use a disclaimer when expressing personal views
- make it clear who is posting content
- use an appropriate and professional tone
- be respectful to all parties
- ensure you have permission to 'share' other peoples' materials and acknowledge the author
- express opinions but do so in a balanced and measured manner
- think before responding to comments and, when in doubt, get a second opinion
- seek advice and report any mistakes using the school's reporting process

## Online safety policy template for schools

- consider turning off tagging people in images where possible

### The Don'ts

- Don't make comments, post content or link to materials that will bring the school into disrepute
- don't publish confidential or commercially sensitive material
- don't breach copyright, data protection or other relevant legislation
- consider the appropriateness of content for any audience of school accounts, and don't link to, embed or add potentially inappropriate content
- don't post derogatory, defamatory, offensive, harassing or discriminatory content
- don't use social media to air internal grievances

## B5 School policy template - Online safety group terms of reference

### 1. PURPOSE

To provide a consultative group that has wide representation from the school community, with responsibility for issues regarding online safety and the monitoring the online safety policy including the impact of initiatives. [Depending on the size or structure of the school this group may be part of the safeguarding group. The group will also be responsible for regular reporting to the full governing body.](#)

### 2. MEMBERSHIP

2.1 The online safety group will seek to include representation from all stakeholders.

The composition of the group should include (n.b. in small schools one member of staff may hold more than one of these posts): [add/delete where appropriate]

- Senior Leadership Team (SLT) member/s
- safeguarding officer
- teaching staff member
- support staff member
- online safety co-ordinator (not ICT coordinator by default)
- governor
- parent/carers
- technical support staff (where possible)
- community users (where appropriate)
- *learner representation* – for advice and feedback. *Learner voice is essential in the make up of the online safety group, but learners would only be expected to take part in meetings where deemed relevant.*

2.2 Other people may be invited to attend the meetings at the request of the Chairperson on behalf of the group to provide advice and assistance where necessary

2.3 Group members must declare a conflict of interest if any incidents being discussed directly involve themselves or members of their families.

2.4 Group members must be aware that many issues discussed by this group could be of a sensitive or confidential nature

2.5 When individual members feel uncomfortable about what is being discussed they should be allowed to leave

## Online safety policy template for schools

the meeting with steps being made by the other members to allow for these sensitivities

### 3. CHAIRPERSON

The group should select a suitable chairperson from within the group. Their responsibilities include:

- scheduling meetings and notifying group members
- inviting other people to attend meetings when required by the group
- guiding the meeting according to the agenda and time available
- ensuring all discussion items end with a decision, action or definite outcome
- making sure that notes are taken at the meetings and that these with any action points are distributed as necessary

### 4. DURATION OF MEETINGS

Meetings shall be held [insert frequency] for a period of [insert number] hour(s). A special or extraordinary meeting may be called when and if deemed necessary.

### 5. FUNCTIONS

These are to assist the online safety co-ordinator (or other relevant person) with the following: [add/delete where relevant]

- to keep up to date with new developments in the area of online safety
- to (at least) annually review and develop the online safety policy in line with new technologies and incidents
- to monitor the delivery and impact of the online safety policy
- to monitor the log of reported online safety incidents (anonymous) to inform future areas of teaching/learning/training.
- to co-ordinate consultation with the whole school community to ensure stakeholders are up to date with information, training and/or developments in the area of online safety. This could be carried out through [add/delete as relevant]:
  - staff meetings
  - learner forums (for advice and feedback)
  - governors meetings
  - surveys/questionnaires for learners, parents/carers and staff
  - parents evenings
  - website/learning platform/newsletters
  - online safety events
  - Internet Safety Day (annually held on the second Tuesday in February)
  - other methods
- to ensure that monitoring is carried out of Internet sites used across the school (if possible)
- to monitor filtering/change control logs (e.g. requests for blocking/unblocking sites).
- to monitor the safe use of data across the [school]
- to monitor incidents involving online bullying for staff and pupils

### 6. AMENDMENTS

The terms of reference shall be reviewed annually from the date of approval. They may be altered to meet the current needs of all group members, by agreement of the majority

The above Terms of Reference for [insert name of organisation] have been agreed

Signed by (SLT): .....

Date: .....

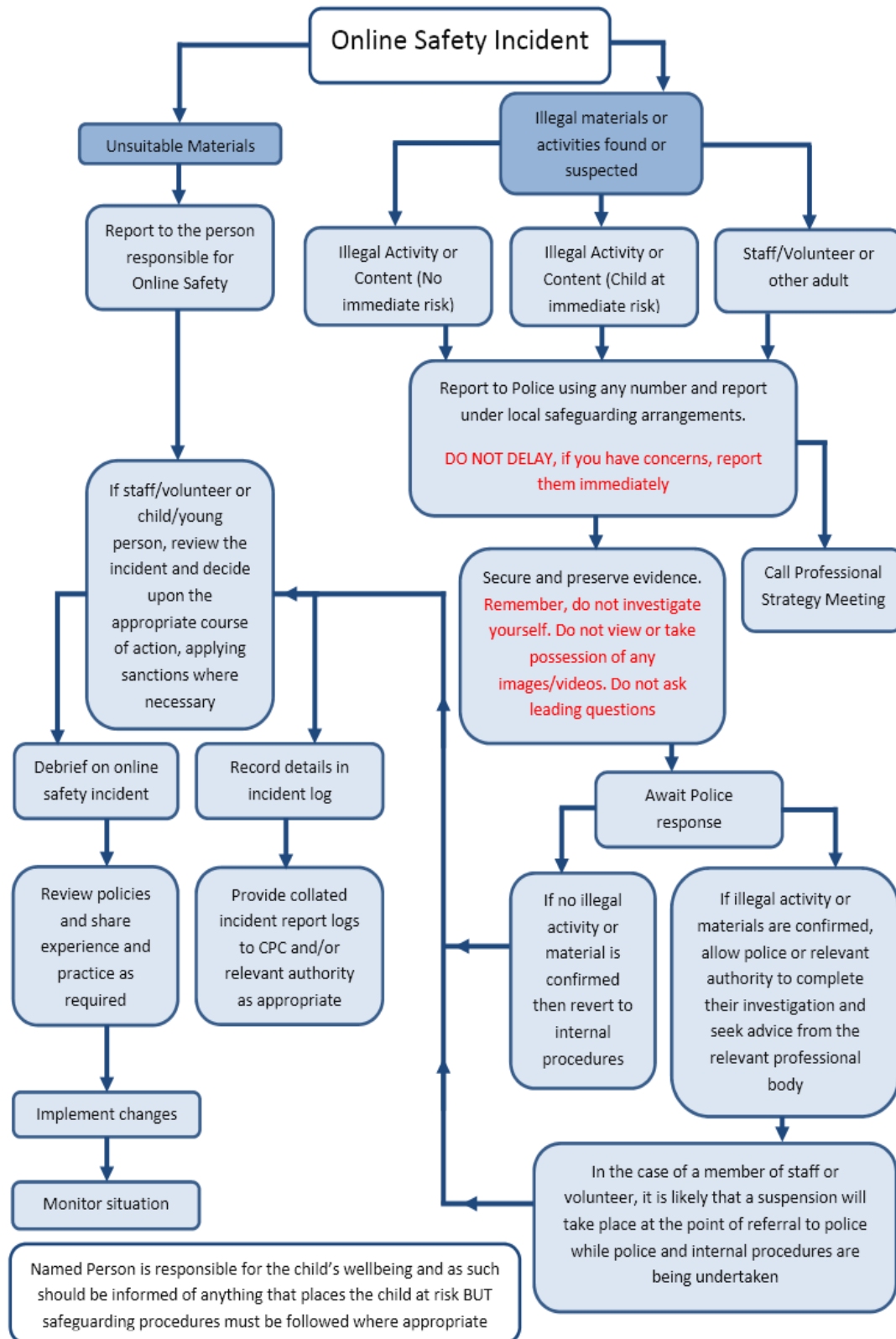
Date for review: .....

## Online safety policy template for schools

### Acknowledgement

This [template terms of reference document](#) is based on one provided to schools by Somerset County Council

## C1 Responding to incidents of misuse – flow chart



## C2 Record of reviewing devices/internet sites

(responding to incidents of misuse)

Group	
Date	
Reason for investigation	

### Details of first reviewing person

Name	
Position	
Signature	

### Details of second reviewing person

Name	
Position	
Signature	

### Name and location of computer used for review (for web sites)

--

### Web site(s) address/device

### Reason for concern


### Conclusion and action proposed or taken


## C3 Reporting Log Template

Group: .....

Date	Time	Incident	Action Taken		Incident Reported By	Signature
			What?	By Whom?		



C4 Training Needs Audit Log Template						
Group: .....						
Relevant training the last 12 months	Identified Training Need	To be met by	Cost	Review Date		

## C5 Summary of Legislation

Schools should be aware of the legislative framework under which this online safety policy template and guidance has been produced. It is important to note that in general terms an action that is illegal if committed offline is also illegal if committed online.

It is recommended that legal advice is sought in the advent of an online safety issue or situation.

### Computer Misuse Act 1990

This Act makes it an offence to:

- erase or amend data or programs without authority;
- obtain unauthorised access to a computer;
- “eavesdrop” on a computer;
- make unauthorised use of computer time or facilities;
- maliciously corrupt or erase data or programs;
- deny access to authorised users.

### Data Protection Act 2018

Controls how personal information is used by organisations, businesses or the government. The Data Protection Act 2018 is the UK’s implementation of the General Data Protection Regulation (GDPR).

Everyone responsible for using personal data has to follow strict rules called ‘data protection principles’. They must make sure the information is:

- used fairly, lawfully and transparently
- used for specified, explicit purposes
- used in a way that is adequate, relevant and limited to only what is necessary
- accurate and, where necessary, kept up to date
- kept for no longer than is necessary
- handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage

There is stronger legal protection for more sensitive information, such as:

- race
- ethnic background
- political opinions
- religious beliefs
- trade union membership
- genetics
- biometrics (where used for identification)
- health
- sex life or orientation

### Your rights

Under the Data Protection Act 2018, you have the right to find out what information the government and other organisations store about you. These include the right to:

- be informed about how your data is being used
- access personal data
- have incorrect data updated
- have data erased
- stop or restrict the processing of your data
- data portability (allowing you to get and reuse your data for different services)
- object to how your data is processed in certain circumstances

You also have rights when an organisation is using your personal data for:

- automated decision-making processes (without human involvement)
- profiling, for example to predict your behaviour or interests

## Freedom of Information Act 2000

The Freedom of Information Act gives individuals the right to request information held by public authorities. All public authorities and companies wholly owned by public authorities have obligations under the Freedom of Information Act. When responding to requests, they have to follow a number of set procedures.

## Communications Act 2003

Sending by means of the Internet a message or other matter that is grossly offensive or of an indecent, obscene or menacing character; or sending a false message by means of or persistently making use of the Internet for the purpose of causing annoyance, inconvenience or needless anxiety is guilty of an offence liable, on conviction, to imprisonment. This wording is important because an offence is complete as soon as the message has been sent: there is no need to prove any intent or purpose.

## Malicious Communications Act 1988

It is an offence to send an indecent, grossly offensive, or threatening letter, electronic communication or other article to another person. It is also an offence to send information which is false and known or believed to be false by the sender.

## Regulation of Investigatory Powers Act 2000

It is an offence for any person to intentionally and without lawful authority intercept any communication. Where the system controller has given express consent monitoring or keeping a record of any form of electronic communications is permitted, in order to:

- establish the facts
- ascertain compliance with regulatory or self-regulatory practices or procedures
- demonstrate standards, which are or ought to be achieved by persons using the system
- investigate or detect unauthorised use of the communications system
- prevent or detect crime or in the interests of national security
- ensure the effective operation of the system
- monitoring but not recording is also permissible in order to
- ascertain whether the communication is business or personal
- protect or support help line staff

## Trade Marks Act 1994

This provides protection for Registered Trade Marks, which can be any symbol (words, shapes or images) that are associated with a particular set of goods or services. Registered Trade Marks must not be used without permission. This can also arise from using a Mark that is confusingly similar to an existing Mark.

## Copyright, Designs and Patents Act 1988

It is an offence to copy all, or a substantial part of a copyright work. There are, however, certain limited user permissions, such as fair dealing, which means under certain circumstances permission is not needed to copy small amounts for non-commercial research or private study. The Act also provides for Moral Rights, whereby authors can sue if their name is not included in a work they wrote, or if the work has been amended in such a way as to impugn their reputation. Copyright covers materials in print and electronic form, and includes words, images, and sounds, moving images, TV broadcasts and other media (e.g. YouTube).

## **Criminal Justice & Public Order Act 1994/Public Order Act 1986**

This defines a criminal offence of intentional harassment, which covers all forms of harassment, including sexual. A person is guilty of an offence if, with intent to cause a person harassment, alarm or distress, they:

- use threatening, abusive or insulting words or behaviour, or disorderly behaviour; or
- display any writing, sign or other visible representation, which is threatening, abusive or insulting, thereby causing that or another person harassment, alarm or distress.

## **Racial and Religious Hatred Act 2006/Public Order Act 1986**

This Act makes it a criminal offence to threaten people because of their faith, or to stir up religious hatred by displaying, publishing or distributing written material which is threatening. Other laws already protect people from threats based on their race, nationality or ethnic background.

## **Protection from Harassment Act 1997**

A person must not pursue a course of conduct, which amounts to harassment of another, and which he knows or ought to know amounts to harassment of the other. A person whose course of conduct causes another to fear, on at least two occasions, that violence will be used against him is guilty of an offence if he knows or ought to know that his course of conduct will cause the other so to fear on each of those occasions.

## **Protection of Children Act 1978**

It is an offence to take, permit to be taken, make, possess, show, distribute or advertise indecent images of children in the United Kingdom. A child for these purposes is anyone under the age of 18. An image of a child also covers pseudo-photographs (digitally collated or otherwise). A person convicted of such an offence is liable to imprisonment for a term of not more than 10 years, or to a fine or to both.

## **Sexual Offences Act 2003**

A grooming offence is committed if you are over 18 and have communicated with a child under 16 at least twice (including by phone or using the Internet) it is an offence to meet them or travel to meet them anywhere in the world with the intention of committing a sexual offence. Causing a child under 16 to watch a sexual act is illegal, including looking at images such as videos, photos or webcams, for your own gratification. It is also an offence for a person in a position of trust to engage in sexual activity with any person under 18, with whom they are in a position of trust. (Typically, teachers, social workers, health professionals, connexions staff fall in this category of trust). Any sexual intercourse with a child under the age of 13 commits the offence of rape.

## **Public Order Act 1986**

This Act makes it a criminal offence to stir up racial hatred by displaying, publishing or distributing written material which is threatening. Like the Racial and Religious Hatred Act 2006 it also makes the possession of inflammatory material with a view of releasing it a criminal offence.

## **Obscene Publications Act 1959 and 1964**

Publishing an "obscene" article is a criminal offence. Publishing includes electronic transmission.

## **Human Rights Act 1998**

This does not deal with any particular issue specifically or any discrete subject area within the law. It is a type of "higher law", affecting all other laws. In the school context, human rights to be aware of include:

- the right to a fair trial
- the right to respect for private and family life, home and correspondence
- freedom of thought, conscience and religion
- freedom of expression
- freedom of assembly

- prohibition of discrimination
- the right to education
- the right not to be subjected to inhuman or degrading treatment or punishment

The school is obliged to respect these rights and freedoms, but should balance them against those rights, duties and obligations, which arise from other relevant legislation.

### The Protection of Freedoms Act 2012

Requires schools to seek permission from a parent/carers to use Biometric systems

### The Counter-Terrorism and Security Act 2015

Places a responsibility on schools to participate in work to prevent people from being drawn into terrorism, and challenge extremist ideas that support or are shared by terrorist groups.

## C6 Links to other organisations or documents

These may help those who are developing or reviewing an online safety policy.

### Welsh Government

- National Online Safety Plan for children and young people in Wales – July 2018
- [Welsh Government - Respect and Resilience - Community Cohesion](#) - Guidance and associated tool to support the development of community cohesion and prevent extremism in schools and other educational settings in Wales.

### UK Safer Internet Centre

- [Safer Internet Centre](#)
- [South West Grid for Learning](#)
- [Childnet](#)
- [Professionals Online Safety Helpline](#)
- [Internet Watch Foundation](#)

### CEOP

- <http://ceop.police.uk/>
- [ThinkUKnow](#)

### Others

- INSAFE - <http://www.saferinternet.org/ww/en/pub/insafe/index.htm>
- UK Council for Child Internet Safety (UKCCIS) - [www.education.gov.uk/ukccis](http://www.education.gov.uk/ukccis)
- Netsmartz - <http://www.netsmartz.org/>

### Cyberbullying

- Welsh Government – [Anti Bullying Guidance](#)
- Scottish Anti-Bullying Service, Respectme - <http://www.respectme.org.uk/>
- Scottish Government - [Better relationships, better learning, better behaviour](#)
- Anti-Bullying Network - <http://www.antibullying.net/cyberbullying1.htm>
- Cyberbullying.org - <http://www.cyberbullying.org/>

- Enable – EU funded anti-bullying project - <http://enable.eun.org/>

## Sexting

- [UKCCIS - Sexting in schools](#) (available in English and Welsh)
- [UKSIC – Responding to and managing sexting incidents](#)

## Social Networking

- Digizen – [Social Networking](#)
- [Connectsafely Parents Guide to Facebook](#)
- [UKSIC – Social Media Guides](#)

## Curriculum

- [Welsh Government – Digital Competence Framework](#)
- [DCF Professional Learning Needs Tool](#)
- [SWGfL Online Safety Resource \(accessed through Hwb\)](#)
- UKCCIS – [Education for a Connected World- Framework](#)
- Teach Today – [www.teachtoday.eu/](http://www.teachtoday.eu/)
- Insafe - [Education Resources](#)

## Mobile Devices/BYOD

Cloudlearn Report [Effective practice for schools moving to end locking and blocking](#)

NEN - [Guidance Note - BYOD](#)

## Data Protection

[Welsh Government - Information, guidance and templates to support schools in the implementation of our information management strategy \(IMS\) and to ensure biometric data is properly collected and processed.](#)

- Information Commissioners Office:
  - [ICO Guide for Organisations \(general information about Data Protection\)](#)
  - [ICO Guides for Education \(wide range of sector specific guides\)](#)
  - [DfE advice on Cloud software services and the Data Protection Act](#)
  - [ICO Guidance on Bring Your Own Device](#)
  - [ICO Guidance on Cloud Computing](#)
  - [ICO - Guidance we gave to schools - September 2012](#)
  - [IRMS - Records Management Toolkit for Schools](#)
  - [NHS - Caldicott Principles \(information that must be released\)](#)
  - [ICO Guidance on taking photos in schools](#)
  - [Dotkumo - Best practice guide to using photos](#)

## Professional Standards/Staff Training

- [General Teaching Council for Wales - The Code of Professional Conduct and Practice](#)
- Kent - Safer Practice with Technology

- [Childnet/TDA - Social Networking - a guide for trainee teachers & NQTs](#)
- [Childnet/TDA - Teachers and Technology - a checklist for trainee teachers & NQTs](#)
- [UK Safer Internet Centre Professionals Online Safety Helpline](#)

### Infrastructure/Technical Support

- [Somerset - Questions for Technical Support](#)
- [NEN - Guidance Notes](#)

### Working with parents and carers

- [Vodafone Digital Parents Magazine](#)
- [Childnet Webpages for Parents & Carers](#)
- [Get Safe Online - resources for parents](#)
- [Teach Today - resources for parents workshops/education](#)
- [The Digital Universe of Your Children - animated videos for parents \(Insafe\)](#)
- [Cerebra - Learning Disabilities, Autism and Internet Safety - a Parents' Guide](#)
- [Insafe - A guide for parents - education and the new media](#)
- [Internetmatters.org](#)

## C7 Glossary of terms

AUA	Acceptable use agreement – see templates earlier in this document
CEOP	Child Exploitation and Online Protection Centre (part of UK Police, dedicated to protecting children from sexual abuse, providers of the Think U Know programmes.
CPD	Continuous Professional Development
FOSI	Family Online safety Institute
EA	Education Authority
ICO	Information Commissioners Office
ICT	Information and Communications Technology
ICTMark	Quality standard for schools provided by NAACE
INSET	In Service Education and Training
IP address	The label that identifies each computer to other computers using the IP (internet protocol)
ISP	Internet Service Provider
ISPA	Internet Service Providers' Association
IWF	Internet Watch Foundation
LA	Local Authority
LAN	Local Area Network
MIS	Management Information System
NEN	National Education Network – works with the Regional Broadband Consortia (e.g. SWGfL) to provide the safe broadband provision to schools across Britain.
Ofcom	Office of Communications (Independent communications sector regulator)
SWGfL	South West Grid for Learning Trust – the Regional Broadband Consortium of SW Local Authorities – is the provider of broadband and other services for schools and other organisations in the SW
TUK	Think U Know – educational Online safety programmes for schools, young people and parents.
VLE	Virtual Learning Environment (a software system designed to support teaching and learning in an educational setting.
WAP	Wireless Application Protocol



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