St James Church of England Primary School

Name of Policy	eSafety Policy including Policy on use of digital & video images
Signed ratification by Governors	*Ratified* *27.11.18*
Review Date	October 2018
Next Review Date	October 2019

Overview

Aims

This policy aims to:

- Set out expectations for all St James' CE Primary School community members' online behaviour, attitudes and activities and use of digital technology (including when devices are offline)
- Help all stakeholders to recognise that online/digital behaviour standards (including social media activity) must be upheld beyond the confines of the school gates and school day, and regardless of device or platform
- Facilitate the safe, responsible and respectful use of technology to support teaching & learning, increase attainment and prepare children and young people for the risks and opportunities of today's and tomorrow's digital world, to survive and thrive online
- Help school staff working with children to understand their roles and responsibilities to work safely and responsibly with technology and the online world:
    - for the protection and benefit of the children and young people in their care, and
    - for their own protection, minimising misplaced or malicious allegations and to better understand their own standards and practice
    - for the benefit of the school, supporting the school ethos, aims and objectives, and protecting the reputation of the school and profession
- Establish clear structures by which online misdemeanours will be treated, and procedures to follow where there are doubts or concerns (with reference to other school policies such as Behaviour Policy or Anti-Bullying Policy)

Scope

This policy applies to all members of the St James' community (including staff, governors, volunteers, contractors, students/pupils, parents/carers, visitors and community users) who have access to our digital technology, networks and systems, whether on-site or remotely, and at any time.

Roles and responsibilities

This school is a community and all members have a duty to behave respectfully online and offline, to use technology for teaching and learning and to prepare for life after school, and to immediately report any concerns or inappropriate behaviour, to protect staff, pupils, families and the reputation of the school.

Headteacher – Karen Willis

Key responsibilities:

- Foster a culture of safeguarding where online safety is fully integrated into whole-school safeguarding
- Ensure that policies and procedures are followed by all staff
- Undertake training in offline and online safeguarding, in accordance with statutory guidance and relevant Local Safeguarding Children Board (LSCB) guidance
- Liaise with the designated safeguarding lead on all online-safety issues which might arise and receive regular updates on school issues and broader policy and practice information

- Take overall responsibility for data management and information security ensuring the school's provision follows best practice in information handling; work with the DSL team and governors to ensure a GDPR-compliant framework for storing data, but helping to ensure that child protection is always put first and data-protection processes support careful and legal sharing of information
- Ensure the school implements and makes effective use of appropriate ICT systems and services including school-safe filtering and monitoring, protected email systems and that all technology including cloud systems are implemented according to child-safety first principles
- Be responsible for ensuring that all staff receive suitable training to carry out their safeguarding and online safety roles
- Understand and make all staff aware of procedures to be followed in the event of a serious online safeguarding incident
- Ensure suitable risk assessments are undertaken so the curriculum meets needs of pupils, including risk of children being radicalised
- Ensure that there is a system in place to monitor and support staff (e.g. network manager) who carry out internal technical online-safety procedures
- Ensure governors are regularly updated on the nature and effectiveness of the school's arrangements for online safety
- Ensure the school website meets statutory DfE requirements

Designated Safeguarding Lead / Online Safety Lead – Karen Willis

Key responsibilities

- "The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety)."
- Ensure "An effective approach to online safety [that] empowers a school or college to protect and educate the whole school or college community in their use of technology and establishes mechanisms to identify, intervene in and escalate any incident where appropriate."
- Take day to day responsibility for online safety issues and be aware of the potential for serious child protection concerns
- Work with the governors to ensure a GDPR-compliant framework for storing data, but helping to ensure that child protection is always put first and data-protection processes support careful and legal sharing of information
- Review and update this policy, other online safety documents (e.g. Acceptable Use Policies) and the strategy on which they are based (in harmony with policies for behaviour, safeguarding, Prevent and others) and submit for review to the governors/trustees.
- Receive regular updates in online safety issues and legislation, be aware of local and school trends
- Ensure that online safety education is embedded across the curriculum
- Promote an awareness and commitment to online safety throughout the school community.
- Liaise with school technical, pastoral, and support staff as appropriate
- Communicate regularly with SLT and the designated online safety governor/committee to discuss current issues (anonymised), review incident logs and filtering.
- Ensure all staff are aware of the procedures that need to be followed in the event of an online safety incident, and that these are logged in the same way as any other safeguarding incident
- Appropriate filtering and monitoring' is provided by LGFL , with regular reports on web sites accessed and blocked listed by ip address throughout the school network.

- Facilitate training and advice for all staff:
    - all staff must read KCSIE Part 1 and all those working with children Annex A
    - cascade knowledge of risks and opportunities throughout the school

Governing Body, led by Online Safety / Safeguarding Link Governor – Jim Hutchinson

Key responsibilities (quotes are taken from Keeping Children Safe in Education 2018):

- Approve this policy and strategy and subsequently review its effectiveness.
- Support the school in encouraging parents and the wider community to become engaged in online safety activities
- Have regular strategic reviews with the online-safety co-ordinator / DSL and incorporate online safety into standing discussions of safeguarding at governor meetings
- Work with the DPO/DSL/headteacher to ensure a GDPR-compliant framework for storing data, but helping to ensure that child protection is always put first and data-protection processes support careful and legal sharing of information
- Check all school staff have read Part 1 of KCSIE; SLT and all working directly with children have read Annex A; check that Annex C on Online Safety reflects practice in your school
- "Ensure that all staff are issued with a KCSiE Part 1 document and logon to training designed to check that it has been read and understood. Esafety and AUA training will also be delivered in the same way and be monitored so that it is completed.
- "Ensure appropriate filters and appropriate monitoring systems are in place taking care that 'overblocking' does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding".
- "Ensure that children are taught about safeguarding, including online safety […] as part of providing a broad and balanced curriculum […] Consider a whole school approach to online safety [with] a clear policy on the use of mobile technology."

All staff

Key responsibilities:

- Understand that online safety is a core part of safeguarding; as such it is part of everyone's job – never think that someone else will pick it up
  Know that the Designated Safeguarding Lead (DSL)/Online Safety Lead (OSL) is Karen Willis.
- Read Part 1, Keeping Children Safe in Education and preferably also Annex A and Annex C.
- Read and follow this policy in conjunction with the school's main safeguarding policy
- Record online-safety incidents in the same way as any safeguarding incident and report in accordance with school procedures. Records will be kept
- Understand that safeguarding is often referred to as a jigsaw puzzle – you may have discovered the missing piece so do not keep anything to yourself
- Adhere to the Acceptable Use Agreement, either signed on paper or as part of the online training tool.

- Identify opportunities to thread online safety through all school activities, both outside the classroom and within the curriculum, supporting curriculum/stage/subject leads, and making the most of unexpected learning opportunities as they arise (which have a unique value for pupils)
- Whenever overseeing the use of technology (devices, the internet, new technology such as augmented reality, etc) in school or setting as homework tasks, encourage sensible use, monitor what pupils/students are doing and consider potential dangers and the age appropriateness of websites.
- Carefully supervise and guide pupils when engaged in learning activities involving online technology (including, extra-curricular and extended school activities if relevant), supporting them with search skills, critical thinking (e.g. fake news), age appropriate materials and signposting, and legal issues such as copyright and data law
- Encourage pupils/students to follow their acceptable use policy, remind them about it and enforce school sanctions
- Notify the DSL/OSL of new trends and issues before they become a problem
- Take a zero-tolerance approach to bullying and low-level sexual harassment.
- Be aware that you are often most likely to see or overhear online-safety issues (particularly relating to bullying and sexual harassment and violence) in the playground, corridors, toilets and other communal areas outside the classroom – let the DSL/OSL know
- Model safe, responsible and professional behaviours in their own use of technology. This includes outside the school hours and site, and on social media, in all aspects upholding the reputation of the school and of the professional reputation of all staff. More guidance on this point can be found in this Online Reputation guidance for schools.

PSHE / R(S)E /Health Education Lead/s – Michael Oliver/Charlie Burton

Key responsibilities from September 2019 for September 2020 (quotes taken from DfE press release on 19 July 2018 on New relationships and health education in schools):

- As listed in the 'all staff' section, plus:
- Embed consent, mental wellbeing, healthy relationships and staying safe online into the PSHE / RE / RSE curriculum, "complementing the existing computing curriculum – and how to use technology safely, responsibly and respectfully. Lessons will also cover how to keep personal information private, and help young people navigate the virtual world, challenge harmful content and balance online and offline worlds."
- Work closely with the DSL/OSL and all other staff to ensure an understanding of the issues, approaches and messaging within PSHE / RE / RSE

Computing Curriculum Lead – Michael Todd

Key responsibilities:

- As listed in the 'all staff' section, plus:
- Oversee the delivery of the online safety element of the Computing curriculum in accordance with the national curriculum
- Work closely with the DSL/OSL and all other staff to ensure an understanding of the issues, approaches and messaging within Computing

- Collaborate with technical staff and others responsible for ICT use in school to ensure a common and consistent approach, in line with acceptable-use agreements

Network manager/technician – Ruth Davies

Key responsibilities:

- As listed in the 'all staff' section, plus:
- Keep up to date with the school's online safety policy and technical information in order to effectively carry out their online safety role and to inform and update others as relevant
- Work closely with the DSL / online safety Governor / data protection officer to ensure that school systems and networks reflect school policy
- Ensure the above stakeholders understand the consequences of existing services and of any changes to these systems (especially in terms of access to personal and sensitive records / data and to systems such as YouTube mode, web filtering settings, sharing permissions for files on cloud platforms etc
- Support and advise on the implementation of 'appropriate filtering and monitoring' as decided by the DSL and senior leadership team
- Maintain up-to-date documentation of the school's online security and technical procedures
- To report online-safety related issues that come to their attention in line with school policy
- Manage the school's systems, networks and devices, according to a strict password policy, with systems in place for detection of misuse and malicious attack, with adequate remote backup for data, including critical incident plans.
- Monitor the use of school technology, online platforms and social media presence and that any misuse/attempted misuse is identified and reported in line with school policy
- Work with the Headteacher to ensure the school website meets statutory DfE requirements (see appendices for website audit document)

Data Protection Officer (DPO) – Karen Willis

Key responsibilities:

- Be aware that of references to the relationship between data protection and safeguarding in key Department for Education documents 'Keeping Children Safe in Education' and 'Data protection: a toolkit for schools' (April 2018), especially this quote from the latter document:
    - GDPR does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Legal and secure information sharing between schools, Children's Social Care, and other local agencies, is essential for keeping children safe and ensuring they get the support they need. Information can be shared without consent if to gain consent would place a child at risk. Fears about sharing information must not be allowed to stand in the way of promoting the welfare and protecting the safety of children. As with all data sharing, appropriate organisational and technical safeguards should still be in place […] Remember, the law does not prevent information about children being shared with specific authorities if it is for the purposes of safeguarding
- Work with the governors to ensure frameworks are in place for the protection of data and of safeguarding information sharing as outlined above.
- Ensure that all access to safeguarding data is limited as appropriate, and also monitored and audited.
- Oversee data retention procedure and adherence.

- Report data breaches within 72 hours as required by the ICO.
- Deal with Data Access Requests in line with GDPR guidelines.

Volunteers and contractors

Key responsibilities:

- Read, understand, sign and adhere to an acceptable use policy (AUP)
- Report any concerns, no matter how small, to the designated safety lead / online safety coordinator as named in the AUP
- Maintain an awareness of current online safety issues and guidance
- Model safe, responsible and professional behaviours in their own use of technology

Pupils

Key responsibilities:

- Read, understand, sign and adhere to the student/pupil acceptable use policy and review this annually
- Understand the importance of reporting abuse, misuse or access to inappropriate materials
- Know what action to take if they or someone they know feels worried or vulnerable when using online technology
- To understand the importance of adopting safe and responsible behaviours and good online safety practice when using digital technologies outside of school and realise that the school's acceptable use policies cover actions out of school, including on social media
- Understand the benefits/opportunities and risks/dangers of the online world and know who to talk to at school or outside school if there are problems

Parents/carers

Key responsibilities:

- Read the pupil AUA they have signed and discussed in school.
- Consult with the school if they have any concerns about their children's use of technology
- Promote positive online safety and model safe, responsible and positive behaviours in their own use of technology, including on social media: not sharing other's images or details without permission and refraining from posting negative, threatening or violent comments about others, including the school staff, volunteers, governors, contractors, pupils or other parents/carers.

External groups such as Fit4Sport who have PC access at St James'

Key responsibilities:

- Any external individual/organisation will sign an acceptable use policy prior to using technology or the internet within school
- Support the school in promoting online safety and data protection

- Model safe, responsible, respectful and positive behaviours in their own use of technology, including on social media: not sharing other's images or details without permission and refraining from posting negative, threatening or violent comments about others, including the school staff, volunteers, governors, contractors, pupils or other parents/carers

Education and curriculum

It is the role of all staff to identify opportunities to thread online safety through all school activities, both outside the classroom and within the curriculum, supporting curriculum/stage/subject leads, and making the most of unexpected learning opportunities as they arise (which have a unique value for pupils)

Whenever overseeing the use of technology (devices, the internet, new technology such as augmented reality, etc) in school or setting as homework tasks, all staff should encourage sensible use, monitor what pupils/students are doing and consider potential dangers and the age appropriateness of websites (ask your DSL what appropriate filtering and monitoring policies are in place).

Equally, all staff should carefully supervise and guide pupils when engaged in learning activities involving online technology (including, extra-curricular and extended school activities if relevant), supporting them with search skills, critical thinking (e.g. fake news), age appropriate materials and signposting, and legal issues such as copyright and data law.

At St James' CE Primary School we recognise that online safety and broader digital resilience must be thread throughout the curriculum.

Handling online-safety concerns and incidents

It is vital that all staff recognise that online-safety is a part of safeguarding (as well as being a curriculum strand of Computing, PSHE, Citizenship and (from September 2019 for September 2020) the new statutory Health Education and Relationships Education.

General concerns must be handled in the same way as any other safeguarding concern; safeguarding is often referred to as a jigsaw puzzle, so all stakeholders should err on the side of talking to the online-safety lead / designated safeguarding lead to contribute to the overall picture or highlight what might not yet be a problem.

Non-teaching staff will often have a unique insight and opportunity to find out about issues first in the playground, corridors, toilets and other communal areas outside the classroom (particularly relating to bullying and sexual harassment and violence).

School procedures for dealing with online-safety will be mostly detailed in the following policies (primarily in the first key document):

- Safeguarding and Child Protection Policy
- Anti-Bullying Policy
- Behaviour Policy (including school sanctions)
- Acceptable Use Policies
- Prevent Policy
- Data Protection Policy, agreements and other documentation (e.g. privacy statement and consent forms for data sharing, image use etc)

This school commits to take all reasonable precautions to ensure online safety, but recognises that incidents will occur both inside school and outside school (and that those from outside school will continue to impact on pupils when they come into school. All members of the school are encouraged to report issues swiftly to allow us to deal with them quickly and sensitively through the school's escalation processes.

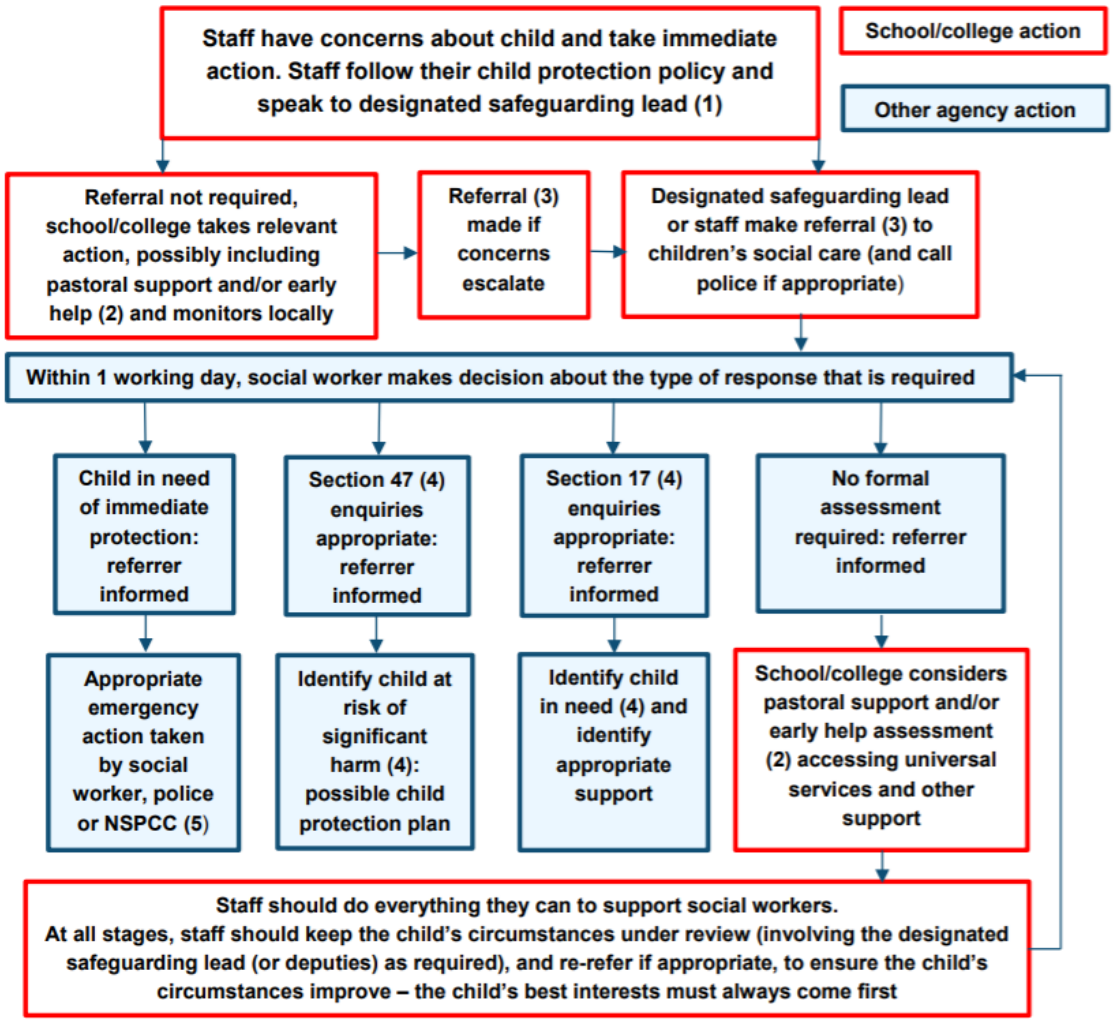
Any suspected online risk or infringement should be reported to the online safety lead / designated safeguarding lead on the same day – where clearly urgent, it will be made by the end of the lesson.

Any concern/allegation about staff misuse is always referred directly to the Headteacher, unless the concern is about the Headteacher in which case the compliant is referred to the Chair of Governors and the LADO (Local Authority's Designated Officer).

The school will actively seek support from other agencies as needed (i.e. the local authority, LGfL, UK Safer Internet Centre's Professionals' Online Safety Helpline, NCA CEOP, Prevent Officer, Police, IWF). We will inform parents/carers of online-safety incidents involving their children, and the Police where staff or pupils engage in or are subject to behaviour which we consider is particularly disturbing or breaks the law (particular procedures are in place for sexting; see section below).

Actions where there are concerns about a child

The following flow chart (it cannot be edited) is taken from page 13 of Keeping Children Safe in Education 2018 as the key education safeguarding document. As outlined previously, online safety concerns are no different to any other safeguarding concern.



(1) In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.

(2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of Working Together to Safeguard Children provides detailed guidance on the early help process.

(3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of Working Together to Safeguard Children.

(4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of Working Together to Safeguard Children.

(5) This could include applying for an Emergency Protection Order (EPO).

Sexting

All schools (regardless of phase) should refer to the UK Council for Child Internet Safety (UKCCIS) guidance on sexting (also referred to as 'youth produced sexual imagery') in schools. NB - where one of the parties is over 18, this is no longer sexting but child sexual abuse.

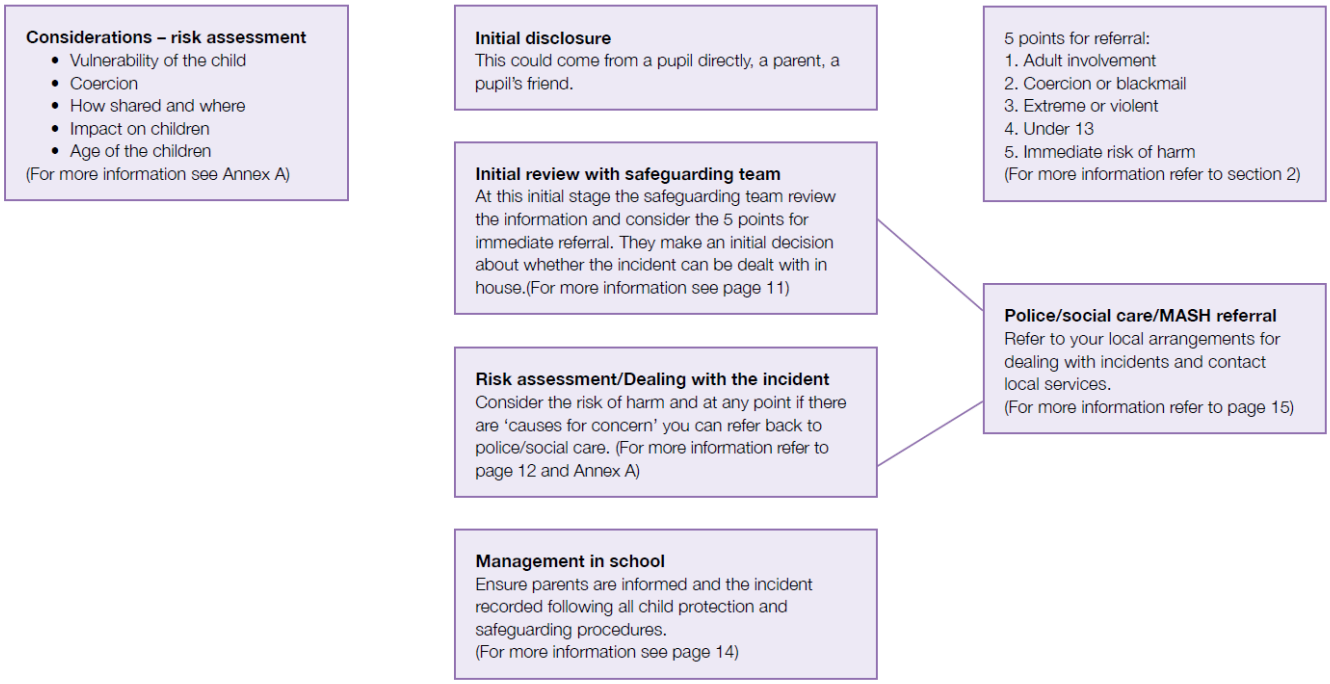
There is a one-page overview for all staff (not just classroom-based staff) to read, in recognition of the fact that it is mostly someone other than the designated safeguarding lead (DSL) or online safety lead to first become aware of an incident, and it is vital that the correct steps are taken. This one page guide is circulated to all staff and issued to all new members of staff as part of our Safeguarding information. Staff other than the DSL must not attempt to view, share or delete the image or ask anyone else to do so, but to go straight to the DSL.

The school DSL will in turn use the full 50-page guidance document including case studies, typologies and a flow chart as shown below (for information only, must be viewed in the context of the full document) to decide next steps and whether other agencies need to be involved.

It is important that everyone understands that whilst sexting is illegal, pupils/students can come and talk to members of staff if they have made a mistake or had a problem in this area.

Annex G

Flowchart for responding to incidents



Anti-Bullying and Cyberbullying

Online bullying should be treated like any other form of bullying and the St James' Anti-Bullying Policy should be followed for online bullying, which may also be referred to as cyberbullying.

Sexual violence and harassment

In 2018 new Department for Education guidance was issued on sexual violence and harassment, as a new section within Keeping Children Safe in Education and also a document in its own right. It would be useful for all staff to be aware of the DfE guidance: paragraphs 45-49 cover the immediate response to a report and confidentiality which is highly relevant for all staff; the case studies section provides a helpful overview of some of the issues which may arise.

Any incident of sexual harassment or violence (online or offline) should be reported to the DSL who will follow the full guidance. Staff should work to foster a zero-tolerance culture. The guidance stresses that schools must take all forms of sexual violence and harassment seriously, explaining how it exists on a continuum and that behaviours incorrectly viewed as 'low level' are treated seriously and not allowed to perpetuate. The document makes specific reference to behaviours such as bra-strap flicking and the careless use of language.

The following is an excerpt from section 46 on page 21 of that document:

"As with all safeguarding concerns, it is important that in such instances staff take appropriate action in accordance with their child protection policy. They should not assume that someone else is responding to any incident or concern. If in any doubt, they should speak to the designated safeguarding lead (or a deputy). In such cases, the basic safeguarding principles remain the same, but it is important for the school or college to understand why the victim has chosen not to make a report themselves. This discussion should be handled sensitively and with the support of children's social care if required. There may be reports where the alleged sexual violence or sexual harassment involves pupils or students from the same school or college, but is alleged to have taken place away from the school or college premises, or online. There may also be reports where the children concerned attend two or more different schools or colleges. The safeguarding principles, and individual schools' and colleges' duties to safeguard and promote the welfare of their pupils and students, remain the same. The same principles and processes as set out from paragraph 48 will apply. In such circumstances, appropriate information sharing and effective multi-agency working will be especially important."

Misuse of school technology (devices, systems, networks or platforms)

Clear and well communicated rules and procedures are essential to govern pupil and adult use of school networks, connections, internet connectivity and devices, cloud platforms and social media (both when on school site and outside of school).

These are defined in the relevant Acceptable Use Policy as well as in this document, for example in the sections relating to the professional and personal use of school platforms/networks/clouds, devices and other technology.

Where pupils contravene these rules, St James' Behaviour Policy will be applied; where staff contravene these rules, action will be taken as outlined in the staff handbook.

Further to these steps, the school reserves the right to withdraw – temporarily or permanently – any or all access to such technology, or the right to bring devices onto school property.

Social media incidents

See the social media section later in this document for rules and expectations of behaviour for children and adults in the St James' CE Primary School community. These are also governed by school Acceptable Use Policy.

Breaches will be dealt with in line with the school Behaviour Policy (for pupils) or Staff Handbook (for staff).

Further to this, where an incident relates to an inappropriate, upsetting, violent or abusive social media post by a member of the school community, St James' will request that the post be deleted and will expect this to be actioned promptly.

Where an offending post has been made by a third party, the school may report it to the platform it is hosted on, and may contact the Professionals' Online Safety Helpline (run by the UK Safer Internet Centre) for support or help to accelerate this process.

Data protection and data security

"GDPR does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Legal and secure information sharing between schools, Children's Social Care, and other local agencies, is essential for keeping children safe and ensuring they get the support they need. Information can be shared without consent if to gain consent would place a child at risk. Fears about sharing information must not be allowed to stand in the way of promoting the welfare and protecting the safety of children. As with all data sharing, **appropriate organisational and technical safeguards should still be in place […]** Remember, **the law does not prevent information about children being shared with specific authorities if it is for the purposes of safeguarding** ."

All pupils, staff, governors, volunteers, contractors and parents are bound by the school's data protection policy and agreements. We also utilise the services of the online 360° data from South West Grid for Learning to monitor our adherence to the requirements of GDPR.

Rigorous controls on the LGfL TRUSTnet network, USO sign-on for technical services, firewalls and filtering all support data protection. The following data security products are also used to protect the integrity of data, which in turn supports data protection: USO sign on for LGfL TRUSTnet services, Sophos Anti-Virus, Sophos Anti-Phish*, Sophos InterceptX, Sophos Server Advance, Egress*, * from Sept 2018

The headteacher/DPO and governors work together to ensure a GDPR-compliant framework for storing data, but which ensures that child protection is always put first and data-protection processes support careful and legal sharing of information.

Staff are reminded that all safeguarding data is highly sensitive and should be treated with the strictest confidentiality at all times, and only shared via approved channels to colleagues or agencies with appropriate permissions. Egress is used to encrypt any emails and attachments containing pupil information. CP data is controlled via logon access in Arbor. Full CPOMS access is also limited to the safeguarding team.

Appropriate filtering and monitoring

Keeping Children Safe in Education obliges schools to "ensure appropriate filters and appropriate monitoring systems are in place [and] not be able to access harmful or inappropriate material [but at the same time] be

careful that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding."

At this school, the internet connection is provided by LGfL TRUSTnet. This means we have a dedicated and secure, schoolsafe connection that is protected with firewalls and multiple layers of security, including a web filtering system called WebScreen, which is made specifically to protect children in schools. You can read more about why this system is appropriate on the UK Safer Internet Centre's appropriate filtering submission pages here.

There are three types of appropriate monitoring identified by the Safer Internet Centre. These are:

1. Physical monitoring (adult supervision in the classroom, at all times)
2. Internet and web access
3. Active/Pro-active technology monitoring services

At St James' we have decided that all three options play a part in appropriately monitoring our network and the traffic coming in and out of it. We have stated our intention to monitor individuals and their internet usage on our GDPR Privacy Notices to students, families and staff.

Email

- Pupils at this school use the LondonMail system from LGfL TRUSTnet for all school emails
- Staff at this school use the StaffMail for all school emails

Both these systems are linked to the USO authentication system and are fully auditable, trackable and managed by LGfL TRUSTnet on behalf of the school. This is for the mutual protection and privacy of all staff, pupils and parents, as well as to support data protection.

General principles for email use are as follows:

- Email is the only means of electronic communication to be used between staff and pupils / staff and parents (in both directions). Use of a different platform must be approved in advance by the data-protection officer / headteacher in advance. Any unauthorised attempt to use a different system may be a safeguarding concern or disciplinary matter and should be notified to the DSL (if by a child) or to the headteacher (if by a staff member).
- Email may only be sent using the email systems above. There should be no circumstances where a private email is used; if this happens by mistake, the DSL/Headteacher/DPO (the particular circumstances of the incident will determine whose remit this is) should be informed immediately.
- Staff or pupil personal data should never be sent/shared/stored on email.
    - If data needs to be shared with external agencies, Egress systems for a small number of users within school for the encrypting of emails containing pupil data.
    - Internally, staff should use the school network, including when working from home when remote access is available via the RAV3 system.
- Appropriate behaviour is expected at all times, and the system should not be used to send inappropriate materials or language which is or could be construed as bullying, aggressive, rude, insulting, illegal or otherwise inappropriate, or which (for staff) might bring the school into disrepute or compromise the professionalism of staff
- Pupils and staff are NOT allowed to use the email system for personal use and should be aware that all use is monitored, their emails may be read and the same rules of appropriate behaviour apply at all

times. Emails using inappropriate language, images, malware or to adult sites may be blocked and not arrive at their intended destination.

School website

The school website is a key public-facing information portal for the school community (both existing and prospective stakeholders) with a key reputational value. The Headteacher and Governors have delegated the day-to-day responsibility of updating the content of the website to staff.. The site is managed by / hosted by E4Education. Staff who submit information for the website are asked to remember that the school has the same duty as any person or organisation to respect and uphold copyright law .

Cloud platforms

Many schools are recognising the benefits of cloud computing platforms, not just for cost savings but to enhance teaching and learning.

For online safety, basic rules of good password hygiene ("Treat your password like your toothbrush –never share it with anyone!"), expert administration and training can help to keep staff and pupils safe, and to avoid incidents. The data protection officer and network manager analyse and document systems and procedures before they are implemented, and regularly review them.

The following principles apply:

- Privacy statements inform parents and children (13+) when and what sort of data is stored in the cloud
- The DPO approves new cloud systems, what may or may not be stored in them and by whom. This is noted in a DPIA (data-protection impact statement) and parental permission is sought
- Regular training ensures all staff understand sharing functionality and this is audited to ensure that pupil data is not shared by mistake. Open access or widely shared folders are clearly marked as such
- Pupils and staff are only given access and/or sharing rights when they can demonstrate an understanding of what data may be stored and how it can be seen
- Pupil images/videos are only made public with parental permission
- Only school-approved platforms are used by students or staff to store pupil work

Policy on digital images and video

When a pupil/student joins the school, parents/carers are asked if they give consent for their child's image to be captured in photographs or videos and for what purpose (beyond internal assessment, which does not require express consent). Parents answer as follows:

- I give my consent to my son/daughter's work being electronically published

- I give my consent that appropriate images and video that include my son/daughter may be published electronically, for example, on the school website, on twitter, on pupil asset, etc.

- I give my consent that images of my son/daughter may be included in St James' marketing materials such as the school prospectus, and may be submitted to the local and national press as part of news items.

Whenever a photo or video is taken/made, the member of staff taking it will check the latest database before using it for any purpose.

Any pupils shown in public facing materials are never identified with more than first name (and photo file names/tags do not include full names to avoid accidentally sharing them).

All staff are governed by their contract of employment and the school's Acceptable Use Policy, which covers the use of mobile phones/personal equipment for taking pictures of pupils, and where these are stored. At St James' CE Primary School members of staff may occasionally use personal phones to capture photos or videos of pupils, but these will be appropriate, linked to school activities, taken without secrecy and not in a one-to-one situation, and always moved to school storage as soon as possible, after which they are deleted from personal devices or cloud services (NB – many phones automatically back up photos).

Photos are stored on a separate drive kept in a locked cupboard and accessed via the network but not backed up remotely, in line with the retention schedule of the school Data Protection Policy.

The school blocks/filter access to social networking sites or newsgroups unless there is a specific approved educational purpose;

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

Staff and parents are reminded annually about the importance of not sharing without permission, due to reasons of child protection (e.g. looked-after children often have restrictions for their own protection), data protection, religious or cultural reasons, or simply for reasons of personal privacy.

We encourage young people to think about their online reputation and digital footprint, so we should be good adult role models by not oversharing (or providing embarrassment in later life – and it is not for us to judge what is embarrassing or not).

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

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

Uploading of information is restricted to our website editors. The school website complies with the school's guidelines for publications. The point of contact on the website is the school address, telephone number and we use a general email contact address, office@st-james.southwark.sch.uk. Home information or individual email identities will not be published;

Staff, pupils' and parents' Social Media presence

Social media (including here all apps, sites and games that allow sharing and interaction between users). We accept that many parents, staff and pupils will use it. However, as stated in the acceptable use policies which all members of the school community sign, we expect everybody to behave in a positive manner, engaging respectfully with the school and each other on social media, in the same way as they would face to face.

This positive behaviour can be summarised as not making any posts which are or could be construed as bullying, aggressive, rude, insulting, illegal or otherwise inappropriate, or which might bring the school or (particularly for staff) teaching profession into disrepute. This applies both to public pages and to private posts, e.g. parent chats, pages or groups.

If parents have a concern about the school, we would urge them to contact us directly and in private to resolve the matter. If an issue cannot be resolved in this way, the school complaints procedure will be adhered to and the headteacher should be contacted directly.

Many social media platforms have a minimum age of 13, but the school does have to deal with issues arising on social media with pupils/students under the age of 13. We ask parents to respect age ratings on social media platforms wherever possible and not encourage or condone underage use.

However, the school has to strike a difficult balance of not encouraging underage use at the same time as needing to acknowledge reality in order to best help our pupils/students to avoid or cope with issues if they arise. Online safety lessons will look at social media and other online behaviour, how to be a good friend online and how to report bullying, misuse, intimidation or abuse. However, children will often learn most from the models of behaviour they see and experience, which will often be from adults.

The school has official Twitter accounts for each year group to celebrate work and achievements and these feed directly onto the school website. However, this is not the forum for communicating with parents directly and we do not respond to communications on this platform.

Email is the official electronic communication channel between parents and the school, and between staff and pupils.

Pupils/students are not allowed* to be 'friends' with or make a friend request** to any staff, governors, volunteers and contractors or otherwise communicate via social media.

Pupils/students are discouraged from 'following' staff, governor, volunteer or contractor public accounts (e.g. following a staff member with a public Instagram account). However, we accept that this can be hard to control (but this highlights the need for staff to remain professional in their private lives). In the reverse situation, however, staff must not follow such public student accounts.

* Exceptions may be made, e.g. for pre-existing family links, but these must be approved by the headteacher/Principal, and should be declared upon entry of the pupil or staff member to the school).

** Any attempt to do so may be a safeguarding concern or disciplinary matter and should be notified to the DSL (if by a child) or to the headteacher (if by a staff member).

Staff are reminded that they are obliged not to bring the school or profession into disrepute and the easiest way to avoid this is to have the strictest privacy settings and avoid inappropriate sharing and oversharing online. They should never discuss the school or its stakeholders on social media and be careful that their personal opinions might not be attributed to the school, trust or local authority, bringing the school into disrepute.

All members of the school community are reminded that particularly in the context of social media, it is important to comply with the school policy on Digital Images and Video (see page 16) and permission is sought before uploading photographs, videos or any other information about other people.

Use of personal devices

- **Pupils/students**are allowed to bring mobile phones in for emergency use only and phones must be left with the class teacher who secures them in a locked cupboard for the duration of the school day.. Important messages and phone calls to or from parents can be made at the school office, which will also pass on messages from parents to pupils in emergencies.
- **All staff who work directly with children** should leave their mobile phones on silent and only use them in private staff areas during school hours. See also the Policy on digital images and video section on page 16 and
- Data protection and data security section on page 14. Child/staff data should never be downloaded onto a private phone.
- **Volunteers, contractors, governors** should leave their phones in their pockets and turned off. Under no circumstances should they be used in the presence of children or to take photographs or videos. If this is required (e.g. for contractors to take photos of equipment or buildings), permission of the headteacher should be sought (the headteacher may choose to delegate this) and this should be done in the presence of a member staff.
- **Parents** should ask permission before taking any photos within the school ground and must avoid capturing images of other children.

Network / internet access on school devices

- **Pupils/students** are not allowed networked file access via personal devices.
- **All staff who work directly with children** should leave their mobile phones on silent and only use them in private staff areas during school hours. See also the Policy on digital images and video section on page 16 and
- Data protection and data security section on page 14. Child/staff data should never be downloaded onto a private phone.
- **Volunteers, contractors, governors** can access the guest wireless network but have no access to networked files/drives, subject to the acceptable use policy. All internet traffic is monitored.
- **Parents** have no access to the school network or wireless internet on personal devices

Trips / events away from school

For school trips/events away from school, teachers are permitted to use their personal phone in an emergency and will ensure that the number is hidden to avoid a parent or student accessing a teacher's private phone number.

Searching and confiscation

In line with the DfE guidance 'Searching, screening and confiscation: advice for schools', the Headteacher/Principal and staff authorised by them have a statutory power to search pupils/property on school premises. This includes the content of mobile phones and other devices, for example as a result of a reasonable suspicion that a device contains illegal or undesirable material