E-Safety Policy

SAMA American Private School

Scope of the Policy

This policy applies to all members of the school (including staff, students, volunteers, parents /caregivers, visitors, community users) who have access to and are users of school ICT systems, both in and out of the school.

The Education and Inspections Act 2006 empowers Directors to such extent as is reasonable, to regulate the behavior of students when they are off the school site and empowers members of staff to impose disciplinary penalties for inappropriate behavior. This is pertinent to incidents of cyber-bullying, or other e-safety incidents covered by this policy, which may take place outside of the school, but is linked to membership of the school. The 2011 Education Act increased these Powers with regard to the searching for and of electronic devices and the deletion of data.

The school will deal with such incidents within this policy and associated behavior and anti-bullying policies and will, where known, inform parents / caregivers of incidents of inappropriate e-safety behavior that take place out of school.

The school will monitor the impact of the policy using:

- Delete / add as relevant
- Logs of reported incidents
- Surveys of reported incidents related to:

➢ Students

➢ Parents / Caregivers

➢ Staff

Roles and Responsibilities:

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

Governors:

Governors are responsible for the approval of the E-Safety Policy and for reviewing the effectiveness of the policy. This will be carried out by the Governors receiving regular information about e-safety incidents and monitoring reports. A member of the Governing Body has taken on the role of E-Safety

Governor. The role of the E-Safety Governor will include:

- Regular meetings with the e-Safety Coordinator
- Regular monitoring of e-Safety incident logs

- Regular monitoring of filtering / change control logs
- Reporting to relevant Governors / Board / Committee / meeting

Director and Senior Leaders:

- The director has a duty of care for ensuring the safety (including e-Safety) of members of the school community
- The director 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 e-safety allegation being made against a member of staff
- The director and Senior Leaders are responsible for ensuring that the e-Safety Coordinator and other relevant staff receive suitable training to enable them to carry out their e-safety roles and to train other colleagues, as relevant
- The director will ensure that there is a system in place to allow for monitoring and support of those in school who carry out the internal e-Safety monitoring role. This is to provide a safety net and also support to those colleagues who take on important monitoring roles

E-Safety Coordinator:

- Leads the e-Safety committee
- Takes day to day responsibility for e-Safety issues and has a leading role in establishing and reviewing the school e-Safety policies / documents
- Ensures that all staff are aware of the procedures that need to be followed in the event of an e-Safety incident taking place
- Provides training and advice for staff
- Liaises with SPEA/ relevant body
- Liaises with school technical staff
- Receives reports of e-safety incidents and creates a log of incidents to inform future e-Safety developments
- Meets regularly with E-Safety Governor to discuss current issues, review incident logs and filtering / change control logs
- Attends relevant meeting / committee of Governors
- Reports regularly to Senior Leadership Team

Network Manager / Technical staff:

The Co-coordinator for ICT/ Computing is responsible for ensuring the following:

- The school's technical infrastructure is secure and is not open to misuse or malicious attack
- The school meets required e-Safety technical requirements and any SPEA/ other relevant body E-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

- The filtering policy (if it has one), is applied and updated on a regular basis and that its implementation is not the sole responsibility of any single person
- They keep up to date with e-Safety technical information in order to effectively carry out their esafety role and to inform and update others as relevant
- The use of the network / internet / Virtual Learning Environment / remote access / email is regularly monitored in order that any misuse / attempted misuse can be reported to the Director / Senior Leader; E-Safety Coordinator

Teaching and Support Staff

Are responsible for ensuring that:

- They have an up to date awareness of e-Safety matters and of the current school / academy e-safety policy and practices
- They have read, understood and signed the Staff Acceptable Use Policy / Agreement (AUP)
- They report any suspected misuse or problem to the section supervisors for investigation / action / sanction
- All digital communications with students / parents / caregivers should be on a professional level and only carried out using official school systems
- E-safety issues are embedded in all aspects of the curriculum and other activities
- Students understand and follow the e-Safety and acceptable use policies
- Students have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations
- They monitor the use of digital technologies, mobile devices, cameras etc. in lessons and other school activities (where allowed) and implement current policies with regard to these devices
- In lessons where internet use is pre-planned students 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

Child Protection / Safeguarding Designated Safeguarding Lead

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

- Sharing of personal data
- Access to illegal / inappropriate materials
- Inappropriate on-line contact with adults/strangers
- Potential or actual incidents of grooming
- Cyber-bullying

Students:

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

Parents / Caregivers:

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

- Digital and video images taken at school events
- Access to parents' sections of the website / blog
- Their children's personal devices in the school (where this is allowed)

Community Users

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

Policy Statements

Education – students

While regulation and technical solutions are very important, their use must be balanced by educating students to take a responsible approach. The education of students in e-Safety is therefore an essential part of the school's e-Safety provision. Children and young people need the help and support of the school to recognize and avoid e-Safety risks and build their resilience. E-safety should be a focus in all areas of the curriculum and staff should reinforce e-Safety messages across the curriculum. The e-Safety curriculum should be broad, relevant and provide progression, with opportunities for creative activities and will be provided in the following ways:

- A planned e-Safety curriculum should be provided as part of Computing / PHSE / other lessons and should be regularly revisited
- Key e-Safety messages should be reinforced as part of a planned program of assemblies and pastoral activities
- Students should be taught in all lessons to be critically aware of the materials / content they access on-line and be guided to validate the accuracy of information
- Students should be taught to acknowledge the source of information used and to respect copyright when using material accessed on the internet
- Students should be helped to understand the need for the students 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
- In lessons where internet use is pre-planned, it is best practice that students 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 students are allowed to freely search the internet, staff should be vigilant in monitoring the content of the websites the students visit
- It is accepted that from time to time, for good educational reasons, students may need to research topics (e.g. racism, drugs, and discrimination) that would normally result in internet searches being blocked. In such a situation, staff can request that the Technical Staff (or other relevant designated person) can temporarily remove those sites from the filtered list for the period of study. Any request to do so, should be auditable, with clear reasons for the need

Education – Parents / Caregivers

Many parents and caregivers have only a limited understanding of e-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 on-line behaviors. 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 caregivers through:

- Curriculum activities
- Letters, newsletters, website
- Parents / Caregivers evenings / sessions
- High profile events / campaigns e.g. Safer Internet Day
- Reference to the relevant web sites / publications

Education – The Wider Community

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

- Providing family learning courses in use of new digital technologies, digital literacy and e-Safety
- E-Safety messages targeted towards grandparents and other relatives as well as parents
- The school website will provide e-Safety information for the wider community
- Supporting community groups

Education & Training – Staff / Volunteers

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

- A program of formal e-Safety training will be made available to staff. This will be regularly updated and reinforced. An audit of the e-Safety training needs of all staff will be carried out regularly. It is expected that some staff will identify e-Safety as a training need within the performance management process
- All new staff should receive e-Safety training as part of their induction program, ensuring that they fully understand the school e-Safety policy and Acceptable Use Agreements
- This e-Safety policy and its updates will be presented to and discussed by staff in staff / team meetings
- The e-Safety Coordinator / Officer (or other nominated person) will provide advice / guidance / training to individuals as required.

Training – Governors

Governors should take part in e-Safety training / awareness sessions, with particular importance for those who are members of any subcommittee / group involved in technology / e-Safety / health and safety / child protection. This may be offered in a number of ways:

- Attendance at training provided by the SPEA / National Governors Association / or other relevant organization
- Participation in school training / information sessions for staff

Technical – infrastructure / equipment, filtering and monitoring

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 e-Safety responsibilities:

- School technical systems will be managed in ways that ensure that the school meets recommended technical requirements
- School technical systems will be managed in ways that ensure that the school / academy meets recommended technical requirements
- There will be regular reviews and audits of the safety and security of school technical systems
- Servers, wireless systems and cabling must be securely located and physical access restricted
- All users will have clearly defined access rights to school technical systems and devices
- Internet access is filtered for all users
- 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
- 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 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 for the provision of temporary access of "guests" (e.g. trainee teachers, supply teachers, visitors) into the school systems
- Personal data cannot be sent over the internet or taken off the school site unless safely encrypted or otherwise secured.

Bring Your Own Device (BYOD)

The educational opportunities offered by mobile technologies are being expanded as a wide range of devices, software and online services become available for teaching and learning, within and beyond the classroom. This has led to the exploration by schools of users bringing their own technologies in order to provide a greater freedom of choice and usability. However, there are a number of e-Safety considerations for BYOD that need to be reviewed prior to implementing such a policy. Use of BYOD should not introduce vulnerabilities into existing secure environments. Considerations will need to include; levels of secure access, filtering, data protection, storage and transfer of data, mobile device management systems, training, support, acceptable use, auditing and monitoring. This list is not exhaustive and a BYOD policy should be in place and reference made within all relevant policies:

- The school has a set of clear expectations and responsibilities for all users
- The school adheres to the Data Protection Act principles
- All users are provided with and accept the Acceptable Use Agreement
- All network systems are secure and access for users is differentiated

- Where possible, these devices will be covered by the school's normal filtering systems, while being used on the premises
- All users will use their username and password and keep this safe
- Mandatory training is undertaken for all staff
- Students receive training and guidance on the use of personal devices
- Regular audits and monitoring of usage will take place to ensure compliance
- Any device loss, theft, change of ownership of the device will be reported as in the BYOD policy
- Any user leaving the school will follow the process outlined within the BYOD policy

Use of Digital and Video Images

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

- When using digital images, staff should inform and educate students about the risks associated with the taking, use, sharing, publication and distribution of images. In particular they should recognize the risks attached to publishing their own images on the internet e.g. on social networking sites
- 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 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 students are appropriately dressed and are not participating in activities that might bring the individuals or the school into disrepute
- Students must not take, use, share, publish or distribute images of others without their permission
- Photographs published on the website, or elsewhere that include students will be selected carefully and will comply with good practice guidance on the use of such images
- Students' full names will not be used anywhere on a website or blog, particularly in association with photographs

- Written permission from parents or caregivers will be obtained before photographs of students are published on the school website
- Students' work can only be published with the permission of the pupil and parents or caregivers

Data Protection (followed as guidelines)

Personal data will be recorded, processed, transferred and made available according to the Data Protection Act 1998 which states that personal data must be:

- Fairly and lawfully processed
- Processed for limited purposes
- Adequate, relevant and not excessive
- Accurate
- Kept no longer than is necessary
- Processed in accordance with the data subject's rights
- Secure
- Only transferred to others with adequate protection

The school must ensure that:

- 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
- Every effort will be made to ensure that data held is accurate, up to date and that inaccuracies are corrected without unnecessary delay
- All personal data will be fairly obtained in accordance with the "Privacy Notice" and lawfully processed in accordance with the "Conditions for Processing"
- It has a Data Protection Policy
- It is registered as a Data Controller for the purposes of the Data Protection Act (DPA)
- Responsible persons are appointed / identified - Senior Information Risk Officer (SIRO) and Information Asset Owners (IAOs)
- Risk assessments are carried out
- It has clear and understood arrangements for the security, storage and transfer of personal data
- Data subjects have rights of access and there are clear procedures for this to be obtained
- There are clear and understood policies and routines for the deletion and disposal of data
- There is a policy for reporting, logging, managing and recovering from information risk incidents
- There are clear Data Protection clauses in all contracts where personal data may be passed to third parties

Staff must ensure that they:

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

Communications

A wide range of rapidly developing communications technologies has the potential to enhance learning. When using communication technologies, the school considers the following as good practice:

- The official school email service may be regarded as safe and secure and is monitored.
- Users should be aware that email communications are monitored.
- Staff and students 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 students or parents / caregivers' (email) must be professional in tone and content. These communications may only take place on official (monitored) school systems. Personal email addresses, text messaging or social media must not be used for these communications
- Students should be taught about e-Safety issues, such as the risks attached to the sharing of personal details. They should also be taught strategies to deal with inappropriate communications and be reminded of the need to communicate appropriately when using digital technologies
- Personal information should not be posted on the school website and only official email addresses should be used to identify members of staff

Social Media - Protecting Professional Identity

All schools and local authorities have a duty of care to provide a safe learning environment for students 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, cyberbully, discriminate on the grounds of sex, race or disability or who defame a third party may render the school or SPEA liable to the injured party. Reasonable steps to prevent predictable harm must be in place

The school provides the following measures to ensure reasonable steps are in place to minimize risk of harm to students, staff and the school through limiting access to personal information:

- **Training to including:**
    1. acceptable use
    2. social media risks
    3. checking of settings
    4. data protection; reporting issues
- **Clear reporting guidance including:**
    1. Responsibilities
    2. procedures and sanctions
- **Risk assessment including:**
    1. legal risk

School staff should ensure that:

- No reference should be made in social media to students, parents / caregivers 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 SPEA
- Security settings on personal social media profiles are regularly checked to minimize risk of loss of personal information
- The school's use of social media for professional purposes will be checked regularly by the senior risk officer and e-safety committee to ensure compliance with the Social Media, Data Protection, Communications, Digital Image and Video Policies.

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 (see appendix I) for responding to online safety incidents and report immediately to the police

Other Incidents

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

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

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

❖ Internal response or discipline procedures
❖ Involvement by SPEA or national / local organization (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:

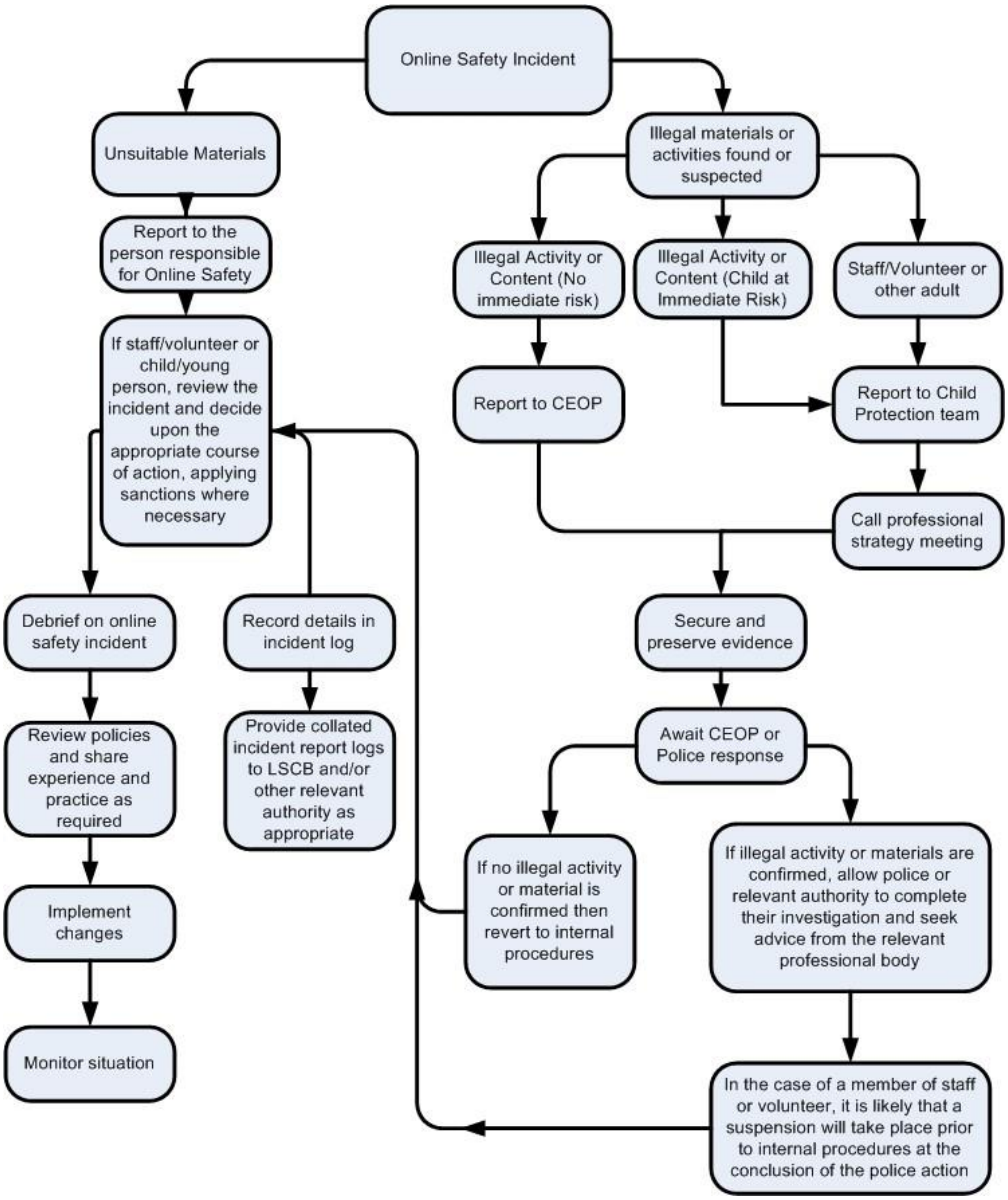
❖ Incidents of 'grooming' behavior
❖ The sending of obscene materials to a child
❖ Adult material which potentially breaches the Obscene Publications Act
❖ Criminally racist material
❖ Other criminal conduct, activity or materials

• 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 child protection purposes. The completed form should be retained by the group for evidence and reference purposes.

School Actions & Sanctions

It is more likely that the school will need to deal with incidents that involve inappropriate rather than illegal misuse. It is important that any incidents are dealt with as soon as possible in a proportionate manner, and that members of the school community are aware that incidents have been dealt with.


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