

Setting	:	Tollgate Primary School
Policy title	:	Online Safety Policy
Date approved	:	September 2022
Review date*	:	September 2023

\*Please note that should any further national guidance be issued by external agencies that are relevant to this policy, it will be updated accordingly prior to the review date shown above and re-circulated.

### **Opening Statement**

We at Tollgate believe we have a duty to provide pupils with quality Internet access as part of their learning experience across all curricular areas. The use of the Internet is an invaluable tool in the development of lifelong learning skills.

We believe that used correctly Internet access will not only raise standards, but it will support teacher’s professional work and it will enhance the school’s management information and business administration systems

We acknowledge that the increased provision of the Internet in and out of school brings with it the need to ensure that learners are safe. We need to teach pupils how to evaluate Internet information and to take care of their own safety and security.

E-Safety, which encompasses Internet technologies and electronic communications, will educate pupils about the benefits and risks of using technology and provides safeguards and awareness to enable them to control their online experience.

We believe all pupils and other members of the school community have an entitlement to safe Internet access at all times.

We as a school community have a commitment to promote equality. Therefore, an equality impact assessment has been undertaken and we believe this policy is in line with the Equality Act 2010.

We believe it is essential that this policy clearly identifies and outlines the roles and responsibilities of all those involved in the procedures and arrangements that is connected with this policy.

This policy is to be read in conjunction with the following document:

- Inspecting E-Safety in School (OFSTED) – Guidance A
- 'Guidance for Safer Working Practice for Adults Who Work with Children and Young People' (Safer Recruitment Consortium) – Guidance B
- Keeping Children Safe in Education Guidance C

### **The purpose of this policy is to:**

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

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

### **Content**

- Exposure to inappropriate content, including online pornography, ignoring age ratings in games (exposure to violence associated with often racist language), substance abuse;
- Lifestyle websites, for example pro-anorexia/self-harm/suicide sites;
- Hate sites;
- Content validation: how to check authenticity and accuracy of online content.

### **Contact**

- Grooming;
- Cyber-bullying in all forms;
- Identity theft (including 'frape' (hacking Facebook profiles)) and sharing passwords.

### **Conduct**

- Privacy issues, including disclosure of personal information;
- Digital footprint and online reputation;
- Health and well-being (amount of time spent online (Internet or gaming));
- Sexting (sending and receiving of personally intimate images) also referred to as SGII (self-generated indecent images);

### **Cyber Crime**

- Malware, used to steal personal details and credentials.
- Copyright (little care or consideration for intellectual property and ownership – such as music and film) (Ref Ofsted 2013).
- Spyware used to hack computers

### **Scope**

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

The Education and Inspections Act 2006 empowers Headteacher's to such extent as is reasonable, to regulate the behaviour of students / pupils when they are off the school site and empowers members of staff to impose disciplinary penalties for inappropriate behaviour. This is pertinent to incidents of 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 as outlined in the Search and Confiscation guidance issued by the Department for Education. In the case of both acts, action can only be taken over issues covered by the published Behaviour Policy.

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

### **Roles and Responsibilities**

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## Headteacher

- To take overall responsibility for e-safety provision;
- To take overall responsibility for data and data security (SIRO);
- To ensure the school uses an approved, filtered Internet Service, which complies with current statutory requirements;
- To be responsible for ensuring that staff receive suitable training to carry out their e-safety roles and to train other colleagues, as relevant;  
To be aware of procedures to be followed in the event of a serious e-safety incident;
- To receive regular monitoring reports from the E-Safety Coordinator;
- To ensure that there is a system in place to monitor and support staff who carry out internal e-safety procedures;
- To ensure that all data held on pupils on the LEARNING PLATFORM is adequately protected;
- To ensure that all data held on pupils on the school office machines have appropriate access controls in place;
- To ensure all London Grid for Learning (Legal) services are managed on behalf of the school including maintaining the LGfL USO database of access accounts.

## E-Safety Coordinator

- Takes day to day responsibility for e-safety issues and has a leading role in establishing and reviewing the school e-safety policies / documents;
- Promotes an awareness and commitment to e-safeguarding throughout the school community;
- Ensures that e-safety education is embedded across the curriculum;
- Liaises with school ICT technical staff;
- To communicate regularly with the Senior Leadership Team (SLT) and the designated E-safety Link Governor to discuss current issues, review incident logs and filtering / change control logs;
- To ensure that all staff are aware of the procedures that need to be followed in the event of an E-safety incident;
  - To ensure that an e-safety incident log is kept up to date;
- Facilitates training and advice for all staff;
- Liaises with the Local Authority and relevant agencies;
- Is regularly updated in e-safety issues and legislation, and be aware of the potential for serious child protection 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 and use of social media.

## Link Governor

- To ensure that the school follows all current e-safety advice to keep the children and staff safe;
- Together with the Full Governing Body approve the E-Safety Policy and review the effectiveness of the policy. This will be carried out by the Link Governor receiving regular information about e-safety incidents and monitoring reports;
- To support the school in encouraging parents and the wider community to become engaged in e-safety activities;

The role of the Link Governor will include:

- Regular review with the E-Safety Coordinator (including e-safety incident logs, filtering / change control logs).

## Computing Curriculum Leader

- To oversee the delivery of the e-safety element of the Computing curriculum; -  
To liaise with the Link Governor
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## Technical Support Provider

- To report any e-safety related issues that arises, to the e-safety coordinator;
- To ensure that users may only access the school's networks through an authorised and properly enforced password protection policy, in which passwords are regularly changed every 30 days;
- To ensure that provision exists for misuse detection and malicious attack e.g. keeping virus protection up to date;
- To ensure the security of the school ICT system;
- To ensure that access controls / encryption exist to protect personal and sensitive information held on schoolowned devices;
- The school's policy on web filtering is applied and updated on a regular basis;
- LGfL is informed of issues relating to the filtering applied by the Grid;  
That he / she keeps up to date with the school's e-safety policy and technical information in order to effectively carry out their e-safety role and to inform and update others as relevant;

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- That the use of the network / Virtual Learning Environment (LEARNING PLATFORM) / remote access / email is regularly monitored in order that any misuse / attempted misuse can be reported to the E-Safety Coordinator for investigation / action / sanction;
- To ensure appropriate backup procedures exist so that critical information and systems can be recovered in the event of a disaster;
- To keep up-to-date documentation of the school's e-security and technical procedures.

## Teachers

- To embed e-safety issues in all aspects of the curriculum and other school activities;
- To supervise and guide pupils carefully when engaged in learning activities involving online technology (including, extra-curricular and extended school activities if relevant);
- To ensure that pupils are fully aware of research skills and are fully aware of legal issues relating to electronic content such as copyright laws.

## All Staff

- To read, understand and help promote the school's e-safety policies and guidance;
- To read, understand, sign and adhere to the school staff Acceptable Use Agreement / Policy (**Appendix A**);
- To be aware of e-safety issues related to the use of mobile phones, cameras and hand held devices and that they monitor their use and implement current school policies with regard to these devices;
- To report any suspected misuse or problem to the e-safety coordinator;
- To maintain an awareness of current e-safety issues and guidance e.g. through CPD;
- To model safe, responsible and professional behaviours in their own use of technology;
- To ensure that any digital communications with pupils should be on a professional level and only through school based systems, never through personal mechanisms, e.g. email, text, mobile phones etc.

## Pupils

- Read, understand, sign and adhere to the Student / Pupil Acceptable Use Policy (NB: at KS1 it would be expected that parents / carers would sign on behalf of the pupils);
- Have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations;
  - To understand the importance of reporting abuse, misuse or access to inappropriate materials;
- To know what action to take if they or someone they know feels worried or vulnerable when using online technology;
- To know and understand school policy on the use of mobile phones, digital cameras and hand held devices;
- To know and understand school policy on the taking / use of images and on cyber-bullying;
- To understand the importance of adopting good e-safety practice when using digital technologies out of school and realise that the school's E-Safety Policy covers their actions out of school, if related to their membership of the school;
- To take responsibility for learning about the benefits and risks of using the Internet and other technologies safely both in school and at home;
- To help the school in the creation / review of e-safety policies.

## Community Hub

- Educating Parents and raising awareness.

## Parents / Carers

- To support the school in promoting e-safety and endorse the Parents' Acceptable Use Agreement which includes the pupils' use of the Internet and the school's use of photographic and video images;
- To read, understand and promote the school Pupil Acceptable Use Agreement with their children;
- To access the school website / LEARNING PLATFORM / on-line student / pupil records in accordance with the relevant school Acceptable Use Agreement;
- To consult with the school if they have any concerns about their children's use of technology.

## External Groups

- Any external individual / organisation will sign an Acceptable Use Policy (**Appendix A**) prior to using any equipment or the Internet within school.

## Communication

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

- Policy to be posted on the school website/ LEARNING PLATFORM / staffroom/ classrooms;
- Policy to be part of school induction pack for new staff;
- Acceptable use agreements discussed with pupils at the start of each year;
- Acceptable use agreements to be issued to whole school community, usually on entry to the school and to be resigned when there are major changes;
- Acceptable use agreements to be held in pupil and personnel files.

## Handling complaints:

- Tollgate Primary School will take all reasonable precautions to ensure e-safety. However, owing to the international scale and linked nature of Internet content, the availability of mobile technologies and speed of change, it is not possible to guarantee that unsuitable material will never appear on a school computer or mobile device. Neither the school nor the Local Authority can accept liability for material accessed, or any consequences of Internet access;
- Staff and pupils are given information about infringements in use and possible sanctions. Sanctions available include:
  - Interview / counselling by teacher or / E-Safety Coordinator / Headteacher;
  - Informing parents or carers;
  - Removal of Internet or computer access for a period, [which could ultimately prevent access to files held on the system, including examination coursework]; - Referral to LA / Police.
- Our E-Safety Coordinator acts as first point of contact for any complaint. Any complaint about staff misuse is referred to the Headteacher;
- Complaints of cyber-bullying are dealt with in accordance with our Anti-Bullying Policy. Complaints related to child protection are dealt with in accordance with school / LA child protection procedures.

## Review and Monitoring

The e-safety policy is referenced from within other school policies: Computing policy, Child Protection policy, AntiBullying policy and in the School Development Plan, Behaviour policy, Personal, Social and Health Education and for Citizenship policies.

- The school has an e-safety coordinator who will be responsible for document ownership, review and updates;
- The e-safety policy will be reviewed annually or when any significant changes occur with regard to the technologies in use within the school;
- The e-safety policy has been written by the school e-safety Coordinator and is current and appropriate for its intended audience and purpose;
- There is widespread ownership of the policy and it has been agreed by the SLT and approved by the Full Governing Body. All amendments to the school e-safeguarding policy will be discussed in detail with all members of teaching staff.

## Education and Curriculum

### Pupil e-safety curriculum

This school:

- Has a clear, progressive e-safety education programme as part of the Computing curriculum / PSHE curriculum. It is built on LA / LGfL e-safeguarding and e-literacy framework for EYFS to Y6 / national

guidance. This covers a range of skills and behaviours appropriate to their age and experience, including:

- Click clever, click safe.
  - To develop a range of strategies to evaluate and verify information before accepting its accuracy;
  - To be aware that the author of a web site / page may have a particular bias or purpose and to develop skills to recognise what that may be;
  - To know how to narrow down or refine a search;
  - For older pupils to understand how search engines work and to understand that this affects the results they see at the top of the listings;
  - To understand acceptable behaviour when using an online environment / email, i.e. be polite, no bad or abusive language or other inappropriate behaviour; keeping personal information private;
  - To understand how photographs can be manipulated and how web content can attract the wrong sort of attention;
  - To understand why on-line 'friends' may not be who they say they are and to understand why they should be careful in online environments;
  - To understand why they should not post or share detailed accounts of their personal lives, contact information, daily routines, location, photographs and videos and to know how to ensure they have turned-on privacy settings;
  - To understand why they must not post pictures or videos of others without their permission;
  - To know not to download any files – such as music files - without permission;
  - To have strategies for dealing with receipt of inappropriate materials;
  - For older pupils to understand why and how some people will 'groom' young people for sexual reasons;
  - To understand the impact of cyber-bullying, sexting and trolling and know how to seek help if they are affected by any form of online bullying;
  - To know how to report any abuse including cyber-bullying; and how to seek help if they experience problems when using the Internet and related technologies, i.e. parent or carer, teacher or trusted staff member, or an organisation such as ChildLine or the CLICK CEOP button.
- Plans Internet use carefully to ensure that it is age-appropriate and supports the learning objectives for specific curriculum areas;
  - Will remind students about their responsibilities through an end-user Acceptable Use Policy which every student

will sign;

- Ensures staff will model safe and responsible behaviour in their own use of technology during lessons;
- Ensures that when copying materials from the web, staff and pupils understand issues around plagiarism; how to check copyright and also know that they must respect and acknowledge copyright / intellectual property rights;
- Ensures that staff and pupils understand the issues around aspects of the commercial use of the Internet, as age appropriate. This may include risks in pop-ups; buying on-line; on-line gaming / gambling.

### **Staff and Governor training**

This school

- Ensures staff know how to send or receive sensitive and personal data and understand the requirement to encrypt data where the sensitivity requires data protection;
- Makes regular training available to staff on e-safety issues and the school's e-safety education program annually;
- Provides, as part of the induction process, all new staff [including those on university/college placement and work experience] with information and guidance on the e-safeguarding policy and the school's Acceptable Use Policies.

### **Parent awareness and training**

This school runs a rolling programme of advice, guidance and training for parents, including:

- Introduction of the Acceptable Use Agreements to new parents, to ensure that principles of e-safe behaviour are made clear;
- Information leaflets; in school newsletters; on the school web site;
- demonstrations, practical sessions held at school;
- suggestions for safe Internet use at home;
- Provision of information about national support sites for parents.
- Community Hib will target vulnerable families and train these parents with the aid of 'National Online Safety' videos and information posters.
- Information sessions and coffee mornings will be held half termly to address the needs of the school community

### **Expected Conduct and Incident management**

#### **Expected conduct**

At Tollgate Primary School, all users:



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- Are responsible for using the school ICT systems in accordance with the relevant Acceptable Use Policy which they will be expected to sign before being given access to school systems. At KS1 it is expected that parents / carers would sign on behalf of the pupils;  
Need to understand the importance of misuse or access to inappropriate materials and are aware of the consequences;
- Need to understand the importance of reporting abuse, misuse or access to inappropriate materials and know how to do so;
- Should understand the importance of adopting good e-safety practice when using digital technologies out of school and realise that the school's E-Safety Policy covers their actions out of school, if related to their membership of the school
- Will be expected to know and understand school policies on the use of mobile phones, digital cameras and hand held devices. They should also know and understand school policies on the taking / use of images and on cyber-bullying.

### **Staff**

- Are responsible for reading the school's e-safety policy and using the school ICT systems accordingly, including the use of mobile phones, and hand held devices.

### **Students/Pupils**

- Should have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations.

### **Parents/Carers**

- Should provide consent for pupils to use the Internet, as well as other technologies, as part of the e-safety acceptable use agreement form at time of their child's entry to the school; should know and understand what the 'rules of appropriate use' are and what sanctions result from misuse.

### **Incident Management**

At Tollgate Primary school:

- There is strict monitoring and application of the e-safety policy and a differentiated and appropriate range of sanctions, though the attitudes and behaviour of users are generally positive and there is rarely need to apply sanctions;
- All members and its wider community are encouraged to be vigilant in reporting issues, in the confidence that issues will be dealt with quickly and sensitively, through the school's escalation processes;
- Support is actively sought from other agencies as needed (e.g. the local authority and regional broadband grid, UK Safer Internet Centre helpline) in dealing with e-safety issues;
- Monitoring and reporting of e-safety incidents takes place and contribute to developments in policy and practice in e-safety within the school. The records are reviewed/audited and reported to the school's senior leaders, Link Governor /the Local Authority (LA) / Local Safeguarding Children's Board (LCSB);
- Parents / carers are specifically informed of e-safety incidents involving young people for whom they are responsible;
- We will contact the Police if one of our staff or pupils receives online communication that we consider is particularly disturbing or breaks the law.

### **Managing the ICT infrastructure**

#### **Internet access, security (virus protection) and filtering**

This school and through its Service Level Agreement with its Technical Support Provider:

- Has the educational filtered secure broadband connectivity through the LGfL and so connects to the 'private' National Education Network;
- Uses the LGfL Net Sweeper filtering system which blocks sites that fall into categories such as pornography, race hatred, gaming, sites of an illegal nature, etc. All changes to the filtering policy is logged and only available to staff with the approved 'web filtering management' status;
- Uses USO user-level filtering where relevant, thereby closing down or opening up options appropriate to the age / stage of the students;
- Ensures network healthy through use of Sophos anti-virus software (from LGfL) etc. and network set-up so staff and pupils cannot download executable files;
- Uses DfE, LA or LGfL approved systems such as S2S, USO FX, secured email to send personal data over the Internet and uses encrypted devices or secure remote access were staff need to access personal level data off-site;
- Blocks all Chat rooms and social networking sites except those that are part of an educational network or approved Learning Platform;
- Only unblocks other external social networking sites for specific purposes / Internet Literacy lessons;
- Has blocked pupil access to music download or shopping sites – except those approved for educational purposes at a regional or national level, such as Audio Network;
- Uses security time-outs on Internet access where practicable / useful;
- Works in partnership with the LGfL to ensure any concerns about the system are communicated so that systems remain robust and protect students;
- Is vigilant in its supervision of pupils' use at all times, as far as is reasonable, and uses common-sense strategies in learning resource areas where older pupils have more flexible access;
- Ensures all staff and students have signed an acceptable use agreement form and understands that they must report any concerns;
- Ensures pupils only publish within an appropriately secure environment: the school's learning environment/ the London LEARNING PLATFORM/ LGfL secure platforms such as J2Bloggy, etc.
- Requires staff to preview websites before use [where not previously viewed or cached] and encourages use of the school's Learning Platform as a key way to direct students to age / subject appropriate web sites; Plans the curriculum context for Internet use to match pupils' ability, using child-friendly search engines where more open Internet searching is required; e.g. Yahoo for Kids, Ask for Kids and Google Safe Search etc.; - Never allows / Is vigilant when conducting 'raw' image search with pupils e.g. Google image search;
- Informs all users that Internet use is monitored;
- Informs staff and students that that they must report any failure of the filtering systems directly to the E-Safety Coordinator. Our E-Safety Coordinator logs or escalates as appropriate to the Technical Service Provider or LGfL Helpdesk as necessary;
- Makes clear all users know and understand what the 'rules of appropriate use' are and what sanctions result from misuse – through staff meetings and teaching programme;
- Provides advice and information on reporting offensive materials, abuse/ bullying etc. available for pupils, staff and parents
- Immediately refers any material we suspect is illegal to the appropriate authorities – Police – and the LA.

### **Network management (user access, backup)**

This school

- Uses individual, audited log-ins for all users - the London USO system;
- Uses guest accounts occasionally for external or short term visitors for temporary access to appropriate services;
- Ensures the Technical Support Provider to be up-to-date with LGfL services and policies;
- Storage of all data within the school will conform to the UK data protection requirements
- Pupils and Staff using mobile technology, where storage of data is online, will conform to the EU data protection directive where storage is hosted within the EU.

To ensure the network is used safely, Tollgate Primary School:

- Ensures staff read and sign that they have understood the school's e-safety Policy. Following this, they are setup with Internet, email access and network access. Online access to service is through a unique, audited username and password. We also use the same username and password for access to our school's network;

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- Staff access to the schools' management information system is controlled through a separate password for data security purposes;
- All pupils have a generic classroom username and password which gives them access to the Internet and the Learning Platform;
- We use the London Grid for Learning's Unified Sign-On (USO) system for username and passwords;
- Makes clear that no one should log on as another user and makes clear that pupils should never be allowed to log-on or use teacher and staff logins as these have far less security restrictions and inappropriate use could damage files or the network;
- Has set-up the network with a shared work area for pupils and one for staff. Staff and pupils are shown how to save work and access work from these areas;
- Requires all users to always log off when they have finished working or are leaving the computer unattended; Where a user finds a logged-on machine, we require them to always log-off and then log-on again as themselves. [Users needing access to secure data are timed out after 10 minutes and have to re-enter their username and password to re-enter the network;
- Requests that teachers and pupils do not switch the computers off during the day unless they are unlikely to be used again that day or have completely crashed. We request that they do switch the computers off at the end of the day, however we ensure all machines are automatically shut down at 6pm every day through our Technical Support Provider;
- Has blocked access to music/media download or shopping sites – except those approved for educational purposes;
- Scans all mobile equipment with anti-virus / spyware before it is connected to the network;
- Makes clear that staff are responsible for ensuring that all equipment that goes home has the anti-virus and spyware software maintained up-to-date and the school provides them with a solution to do so;
- Makes clear that staff are responsible for ensuring that any computer or laptop loaned to them by the school, is used solely to support their professional responsibilities and that they notify the school of any "significant personal use" as defined by HM Revenue & Customs;
- Makes clear that staff accessing LA systems do so in accordance with any Corporate policies; e.g. Borough email or Intranet; finance system, Personnel system etc.;
- Has integrated curriculum and administration networks, but access to the Management Information System is set-up so as to ensure staff users can only access modules related to their role, e.g. teachers access report writing module; SEN coordinator - SEN data;
- Provides pupils and staff with access to content and resources through the approved Learning Platform which staff and pupils access using their username and password (their USO username and password);
- Makes clear responsibilities for the daily back up of MIS and finance systems and other important files;
- Has a clear disaster recovery system in place for critical data that includes a secure, remote back up of critical data, that complies with external Audit's requirements;
- Uses our broadband network for our CCTV system and have had set-up by approved partners; (just need to double check CCTV Policy but I think its run on an independent network)
- Uses the DfE secure s2s website for all CTF files sent to other schools;
- Ensures that all pupil level data or personal data sent over the Internet is encrypted or only sent within the approved secure system in our LA or through USO secure file exchange (USO FX);
- Follows ISP advice on Local Area and Wide Area security matters and firewalls and routers have been configured to prevent unauthorised use of our network;
- Our wireless network has been secured to industry standard Enterprise security level / appropriate standards suitable for educational use;
- All computer equipment is installed professionally and meets health and safety standards;
- Projectors are maintained so that the quality of presentation remains high;
- Reviews the school ICT systems regularly with regard to health and safety and security.

### **Password policy**

- This school makes it clear that staff and pupils must always keep their password private, must not share it with others and must not leave it where others can find it;
- All staff have their own unique username and private passwords to access school systems. Staff are responsible for keeping their password private.
- We require staff to use strong passwords for accessing our network;

- We require staff to change their passwords into the MIS, LGFL USO admin site and other secure systems every 30 days.

## **E-mail**

Tollgate Primary School:

- Provides staff and governors with an email account for their professional use, London Staffmail / LA email and makes clear personal email should be through a separate account;
- Does not publish personal e-mail addresses of pupils or staff on the school website. We use anonymous email addresses, for example admin@tollgate.boleyntrust.org for communication with the wider public;
- Will contact the Police if one of our staff or pupils receives an e-mail that we consider is particularly disturbing or breaks the law;
- Will ensure that email accounts are maintained and up to date;
- Reports messages relating to or in support of illegal activities to the relevant Authority and if necessary to the Police;
- Knows that spam, phishing and virus attachments can make e-mails dangerous. We use a number of LGfL provided technologies to help protect users and systems in the school, including desktop anti-virus product

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Sophos, plus direct email filtering for viruses, Trojans, pornography, phishing and inappropriate language. Finally, and in support of these, LGfL WebScreen2 filtering monitors and protects our Internet access to the World Wide Web.

#### **Pupils:**

- Pupils sign the school Agreement Form to say they have read and understood the e-safety rules, including email and we explain how any inappropriate use will be dealt with;
- We use LGfL LondonMail with pupils and lock this down where appropriate using LGfL SafeMail rules.
- Pupils' LGfL LondonMail e-mail accounts are intentionally 'anonymised' for their protection;
- Pupils are introduced to, and use e-mail as part of the ICT/Computing scheme of work;
- Years 1,2,3 pupils are introduced to principles of e-mail through the Visual Mail facility in the London LEARNING PLATFORM OR closed 'simulation' software;
- Pupils can only receive external mail from, and send external mail to, addresses if the SafeMail rules have been set to allow this.
- Pupils are taught about the safety and 'netiquette' of using e-mail both in school and at home i.e. they are taught:
  - Not to give out their e-mail address unless it is part of a school managed project or to someone they know and trust and is approved by their teacher or parent/carer;
  - That an e-mail is a form of publishing where the message should be clear, short and concise;
  - That any e-mail sent to an external organisation should be written carefully and authorised before sending, in the same way as a letter written on school headed paper;
  - They must not reveal private details of themselves or others in e-mail, such as address, telephone number, etc.;
  - To follow the school mantra of S.M.A.R.T – Safe, Meet, Accept, Reliable and Tell.
  - That they should think carefully before sending any attachments;
  - Embedding adverts is not allowed;
  - That they must immediately tell a teacher / responsible adult if they receive an e-mail which makes them feel uncomfortable, is offensive or bullying in nature;
  - Not to respond to malicious or threatening messages;
  - Not to delete malicious or threatening e-mails, but to keep them as evidence of bullying;
  - Not to arrange to meet anyone they meet through e-mail without having discussed with an adult and taking a responsible adult with them;
  - That forwarding 'chain' e-mail letters are not permitted.

#### **Staff:**

- All staff sign our school Agreement to say they have read and understood the e-safety rules, including e-mail and we explain how any inappropriate use will be dealt with;
- Staff can only use the LA or LGfL e-mail systems on the school system;
- Staff only use LA or LGfL e-mail systems for professional purposes;
- Access in school to external personal e-mail accounts is blocked;
- Staff use a 'closed' LA email system which is used for LA communications and some 'LA approved' transfers of information;
- Never use email to transfer staff or pupil personal data. We use secure, LA / DfE approved systems. These include: S2S (for school to school transfer); Collect; USO-FX, named LA system;
- Staff know that e-mail sent to an external organisation must be written carefully, (and may require authorisation), in the same way as a letter written on school headed paper. That it should follow the school 'house-style':
  - the sending of multiple or large attachments should be limited, and may also be restricted by the provider of the service being used;
  - the sending of chain letters is not permitted;
  - embedding adverts is not allowed;

## School website

- The Headteacher takes overall responsibility to ensure that the website content is accurate and the quality of presentation is maintained;
- Uploading of information is restricted to our website authorisers;
- The school web site complies with the statutory DfE guidelines for publications;
- Most material is the school's own work; where other's work is published or linked to, we credit the sources used and state clearly the author's identity or status;  
The point of contact on the web site is the school address, telephone number and we use a general email contact address, [admin@Tollgate.boleyntrust.org](mailto:admin@Tollgate.boleyntrust.org) . Home information or individual e-mail identities will not be published;  
Photographs published on the web do not have full names attached;
- We do not use pupils' names when saving images in the file names or in the tags when publishing to the school website;
- We do use embedded geodata in respect of stored images;
- We expect teachers using' school approved blogs or wikis to password protect them and run from the school website.

## Learning platform

- Uploading of information on the schools' Learning Platform / virtual learning space is shared between different staff members according to their responsibilities e.g. all class teachers upload information in their class areas;
- Photographs and videos uploaded to the schools LEARNING PLATFORM will only be accessible by members of the school community;
- In school, pupils are only able to upload and publish within school approved and closed systems, such as the Learning Platform.
- Learning platforms include j2e and Google Classroom.

## Social Media

### The use of social networking sites by pupils within school

Tollgate's acceptable use agreements outline the rules for using IT in school and these rules therefore apply to use of social networking sites. Such sites should not be used/accessed in school unless under the direction of a teacher and for a purpose clearly apparent from the learning objective of the relevant learning experience. If social media sites are used, then staff should carry out a risk assessment to determine which tools are appropriate. Social Media sites to be used in school include blogging sites and Twitter. Parents will give permission for children to access these sites in school as well as permission for digital consent/ child's work to be included on the site.

In terms of private use of social networking sites by a child it is generally understood that children under the age of 13 are not permitted to be registered, including Facebook, Tik-Tok and Instagram to name two. Where it comes to the attention of staff that children under 13 have such accounts we will contact parents to inform them.

### Use of social networking by staff in a personal capacity

It is possible that a high proportion of staff will have their own social networking site accounts. It is important for them to protect their professional reputation by ensuring that they use their personal accounts in an appropriate manner.

Guidelines are issued to staff:

- Staff must **never** add pupils as 'friends' into their personal accounts (including past pupils under the age of 16);
- Staff are **strongly advised** not to add parents as 'friends' into their personal accounts;
- Staff **must not** post comments about the school, pupils, parents or colleagues including members of the governing body;
- Staff must not use social networking sites within lesson times (for personal use);
- Staff should only use social networking in a way that does not conflict with the current national teacher's standards;
- Staff should review and adjust their privacy settings to give them the appropriate level of privacy and confidentiality;

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- Staff should read and comply with 'Guidance for Safer Working Practice for Adults who Work with Children and Young People' (Safer Recruitment Consortium);
- Inappropriate use by staff should be referred to the Headteacher in the first instance and may lead to disciplinary action.

### **Dealing with incidents of online bullying/inappropriate use of social networking sites**

The school's anti-bullying policy sets out the processes and sanctions regarding any type of bullying by a child on the school roll.

In the case of inappropriate use of social networking by parents, the governing body will contact the parent asking them to remove such comments and seek redress through the appropriate channels such as the complaints policy and will send a letter.

The governing body understands that, 'there are circumstances in which police involvement is appropriate. These include where postings have a racist element or where violence is threatened or encouraged.' Furthermore, 'Laws of defamation and privacy still apply to the web and it is unlawful for statements to be written...which:

- expose (*an individual*) to hatred, ridicule or contempt;
- cause (*an individual*) to be shunned or avoided;
- lower (*an individual's*) standing in the estimation of right-thinking members of society or;
- disparage (*an individual in their*) business, trade, office or profession.' (National Association of Headteachers).

### **CCTV**

- We have CCTV in the school as part of our site surveillance for staff and student safety. We will not reveal any recordings (retained by the Support Provider for 28 days), without permission except where disclosed to the Police as part of a criminal investigation.
- We use specialist lesson recording equipment on occasions as a tool to share best teaching practice. We do not reveal any such recordings outside of the staff and will not use for any other purposes; - The school has an independent CCTV policy on file.

### **Data security: Management Information System access and Data transfer**

#### **Strategic and operational practices**

At Tollgate:

- The Head Teacher is the Senior Information Risk Officer (SIRO);
- We ensure staff know who to report any incidents where data protection may have been compromised; - All staff and governors are DBS checked and records are held in one central record located in the Headteacher's office;
- We ensure ALL the following school stakeholders sign an Acceptable Use Agreement form. We have a system so we know who has signed. This makes clear staffs' responsibilities with regard to data security, passwords and access.
- Staff,
- Governors

- Volunteers
- Pupils
- Parents / Carers
  
- We follow LA guidelines for the transfer of any data, such as MIS data or reports of children, to professionals working in the Local Authority or their partners in Children's Services / Family Services, Health, Welfare and Social Services;
- We require that any Protect and Restricted material must be encrypted if the material is to be removed from the school and limit such data removal;
- We ask staff to undertake at least annual house-keeping to review, remove and destroy any digital materials and documents which need no longer be stored.

### **Technical Solutions**

- Staff have secure area(s) on the network to store sensitive documents or photographs;
- We require staff to log-out of systems when leaving their computer, but also enforce lock-out after 10 minutes' idle time;
- We use the DfE S2S site to securely transfer CTF pupil data files to other schools;
- We use the Pan-London Admissions system (based on USO FX) to transfer admissions data;
- Staff with access to the Admissions system also use a LGfL OTP tag as an extra precaution;
- We use RAV3 / VPN solutions with its 2-factor authentication for remote access into our systems;



- We use LGfL's USO FX to transfer other data to schools in London, such as references, reports of children;
- We use the LGfL secure data transfer system, USOAUTOUPDATE, for creation of online user accounts for access to broadband services and the London content;
- All servers are in lockable locations and managed by DBS checked staff;
- We lock any back-up tapes in a secure, fire-proof cabinet. Back-ups are encrypted and one back-up remains offsite with the Headteacher at all times;
- We comply with the WEEE directive on equipment disposal by using an approved or recommended disposal company for disposal of equipment where any protected or restricted data has been held and get a certificate of secure deletion for any server that one contained personal data;
- Portable equipment loaned by the school (for use by staff at home), where used for any protected data, is disposed of through the same procedure;
- Paper based sensitive information is shredded using a cross cut shredder;

## **Equipment and Digital Content**

### **Personal mobile phones and mobile devices**

- Mobile phones brought into school are entirely at the staff member, parents' or visitors own risk. The School accepts no responsibility for the loss, theft or damage of any phone or hand held device brought into school;
- Student are not allowed to bring mobile phones into school;
- Staff members may use their phones during school break times;
- All visitors are requested to keep their phones on silent and not use them;
- The recording, taking and sharing of images, video and audio on any mobile phone is to be avoided; except where it has been explicitly agreed otherwise by the Headteacher. Such authorised use is to be monitored and recorded. All mobile phone use is to be open to scrutiny and the Headteacher is to be able to withdraw or restrict authorisation for use at any time if it is to be deemed necessary;
- The School reserves the right to search the content of any mobile or handheld devices on the school premises where there is a reasonable suspicion that it may contain undesirable material, including those which promote pornography, violence or bullying. Staff mobiles or hand held devices may be searched at any time as part of routine monitoring by the Headteacher and one other member of the Senior Leadership Team;
- Where parents or students need to contact each other during the school day, they should do so only through the School's Office.
- If a staff member is expecting a personal call they may leave their phone with the school office to answer on their behalf, or seek specific permissions to use their phone at other than their break times.
- Mobile phones and personally-owned devices will not be used in any way during lessons or formal school time. They should be switched off or silent at all times;
- Mobile phones and personally-owned devices are not permitted to be used in certain areas within the school site, e.g. changing rooms and toilets.
- Mobile phones will not be used during lessons or formal school time unless as part of an approved and directed curriculum-based activity with consent from the Headteacher;
- The Bluetooth or similar function of a mobile phone should be switched off at all times and not be used to send images or files to other mobile phones.

### **Students' use of personal devices**

- Tollgate Primary School do not permit students to bring mobile phones or personally owned devices into school;
- If a student breaches the school policy, then the phone or device will be confiscated and will be held in a secure place in the school office. Mobile phones and devices will be released to parents or carers in accordance with the school policy;
- Phones and devices must not be taken into examinations. Students found in possession of a mobile phone during an exam will be reported to the appropriate examining body. This may result in the student's withdrawal from either that examination or all examinations;

- If a student needs to contact his or her parents or carers, they will be allowed to use a school phone. Parents are advised to contact their child via the school office;
- Students should protect their phone numbers by only giving them to trusted friends and family members. Students will be instructed in safe and appropriate use of mobile phones and personally-owned devices and will be made aware of boundaries and consequences.
- Children who are travelling long distances can leave phone in school office at the beginning of the school day and collect at the end of the school day from the school office.

### **Staff use of personal devices**

- Staff are not permitted to use their own mobile phones or devices for contacting children, young people or their families within or outside of the setting in a professional capacity;
- Staff will have access to a school phone where contact with students, parents or carers is required;
- Mobile Phones and personally-owned devices will be switched off or switched to 'silent' mode. Bluetooth communication should be 'hidden' or switched off and mobile phones or personally-owned devices will not be used during teaching periods unless permission has been granted by the Headteacher in emergency circumstances;
- Staff should not use personally-owned devices, such as mobile phones or cameras, to take photos or videos of students and will only use work-provided equipment for this purpose;
- If a member of staff breaches the school policy, then disciplinary action may be taken;
- In an emergency where a staff member doesn't have access to a school-owned device, they should use their own device and hide (by inputting 141) their own mobile number for confidentiality purposes.

### **Digital images and video**

At Tollgate Primary School:

- We gain parental / carer permission for use of digital photographs or video involving their child as part of the school agreement form when their daughter / son joins the school;
- We do not identify pupils in online photographic materials or include the full names of pupils in the credits of any published school produced video materials / DVDs;
- Staff sign the school's Acceptable Use Policy and this includes a clause on the use of mobile phones / personal equipment for taking pictures of pupils;
- If specific pupil photos (not group photos) are used on the school web site, in the prospectus or in other high profile publications the school will obtain individual parental or pupil permission for its long term use
- The school blocks/filter access to social networking sites or newsgroups unless there is a specific approved educational purpose;
- Pupils are taught about how images can be manipulated in their e-safety education programme and also taught to consider how to publish for a wide range of audiences which might include governors, parents or younger children as part of their ICT scheme of work;
- Pupils are advised to be very careful about placing any personal photos on any 'social' online network space. They are taught to understand the need to maintain privacy settings so as not to make public, personal information;
- Pupils are taught that they should not post images or videos of others without their permission. We teach them about the risks associated with providing information with images (including the name of the file), that reveals the identity of others and their location, such as house number, street name or school. We teach them about the need to keep their data secure and what to do if they are subject to bullying or abuse.

### **Asset disposal**

- Details of all school-owned hardware will be recorded in a hardware inventory;
- Details of all school-owned software will be recorded in a software inventory;
- All redundant equipment will be disposed of through an authorised agency. This will include a written receipt for the item including an acceptance of responsibility for the destruction of any personal data;
- All redundant equipment that may have held personal data will have the storage media forensically wiped. Alternatively, if the storage media has failed, it will be physically destroyed.

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### **Equality Impact Assessment**

Under the Equality Act 2010 we have a duty not to discriminate against people on the basis of their age, disability, gender, gender identity, pregnancy or maternity, race, religion or belief and sexual orientation. As such, we believe that it is in line with the Equality Act 2010 as it is fair, it does not prioritise or disadvantage any pupil and it helps to promote equality at this school.

### **Monitoring the Effectiveness of the Policy**

The practical application of this policy will be reviewed annually or when the need arises by the coordinator and the Headteacher