The Potteries School

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POLICY: Online safety policy			
COMPILED	IMPLEMENTED	COORDINATED	REVIEWED
08/02/2019	**08/02/2019**	**Andy Joynson**	**23/02/2026**

1. Description and ethos of the Potteries School

The Potteries School is an Independent School operating within the Greenfields Company, a subsidiary of CareTech Community Services Ltd., who are the proprietors. The Potteries School is one of the key elements in an integrated, tripartite model of care, education and therapy for learners experiencing social, emotional and mental health difficulties (S.E.M.H.) in mid-Wales. All our learners are Looked After Children and present complex needs with regard to interpersonal, emotional and social issues.
The Potteries School provides a positive, supportive and child-centred educational environment for all its learners. Through a process of creating a safe learning space, building effective teacher-learner relationships and precision identification of individual learning need, the School supports learners to achieve and attain and prepare for the next steps on the educational ladder.
The School supports the following mission statement:

We would like our learners to restart their educational experience with confidence and resume a pattern of learning in order to progress, attain and achieve.

And the following associated set of Aims:

- Empower learners to participate in their own education planning
- Support learners to reengage and to rediscover enjoyment in education
- Provide a safe, secure learning environment to encourage engagement
- Help learners to achieve, attain and progress academically
- Assist learners to develop the skills for positive social interaction
- Prepare learners for the next step on their educational pathway
- Provide opportunities that compensate for earlier missed experiences
- Inspire learners to invest in their own future development

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Many of the learners have a history of school exclusion or had limited access to learning prior to admission. Most have been unable to manage in a formal educational setting and often the risks their behaviours present has impacted on their ability to be educated alongside large peer groups.
The education offered at the Potteries School seeks to reengage learners in a creative and meaningful curriculum, assisting them to catch up on missed learning and an assessment programme that identifies their learning needs accurately. All learning is offered in an inclusive environment and delivered by education professionals with an understanding of the needs of the learners, working to build self-esteem and learning confidence, develop peer relationships and progress independent learning skills.

2. Online Safety Policy

Scope of the policy

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. An effective approach to online safety 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. The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- **Content:** being exposed to illegal, inappropriate or harmful material; for example pornography, fake news, racist or radical and extremist views;
- **Contact:** being subjected to harmful online interaction with other users; for example commercial advertising as well as adults posing as children or young adults; and
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images, or online bullying.

This policy applies to all members of the Potteries School community (including staff, learners, parents, carers, support staff and visitors) who have access to and are users of schools' digital technology systems.
The Education and Inspections Act 2006 empowers head teachers, to such extent as is reasonable, to regulate the behaviour of learners when they are off the school site and empowers members of staff to impose sanctions for inappropriate behaviour. This is pertinent to incidents of online-bullying or other Online Safety incidents covered by this policy. The 2011 Education Act increased these powers with regard to the searching for and of electronic devices and the deletion of data.

Relevant legislation

- Keeping Learners Safe, WAG, 2014
- Keeping Children Safe in Education, DfE, 2018
- Recommended Web Filtering Standards for Schools in Wales, WAG 169/2015, 2015
- Recommended Web Filtering Standards for Schools in Wales, WAG 228/2018, 2018
- General Data Protection Regulations, 2018
- Counter Terrorism and Securities Act 2015
- Education and Inspection Act 2006
- Education Act 2011

Introduction

The purpose of having Internet access in School:

The purpose of the Internet access in school is to increase the opportunities for learners to access a wider range of resources in support of the curriculum. It supports the professional work of staff and enhances the school's management information and business administration practice. Access to the school network and the Internet is necessary for staff and learners. It is an entitlement for all learners as it helps them to develop a responsible and mature approach to accessing information. Access to Internet, ICT and digital media, in order to provide opportunities for technology enhanced learning, forms part of all school inspections under the Common Inspection Frameworks in England and Wales.

What are the benefits to the School? :

Following a number of studies it has been determined that there are defined benefits to be gained through the appropriate use of the ICT systems, including the Internet, in education. These benefits include:

- Access to worldwide educational resources including museums and art galleries;
- Information and cultural exchanges between learners world-wide;
- News, current events and archive material;
- Cultural, social and leisure use in libraries, clubs and at home;
- Discussion with experts in many fields for learners and staff;
- Staff professional development with access to educational materials and curricula;
- Communication with the advisory and support services, local authorities and agencies.

Therefore, learners at the Potteries School are educated and supported to access the Internet and digital learning resources safely and appropriately, and in order to enrich the learning opportunities available to them.

Roles and responsibilities

Head Teacher:

- The Head teacher has a duty of care for ensuring the safety (including online safety) of members of the school community and is the Online Safety Lead;
- The Headteacher should be aware of the procedures to be followed in the event of a serious online safety allegation being made against a member of staff;
- The Headteacher is responsible for ensuring that the Online Safety Lead and other relevant staff receive suitable training to enable them to carry out their online safety roles and to train other colleagues as relevant;
- The Headteacher will ensure that there is a system in place to allow for monitoring and support of those in school who carry out the internal online safety-monitoring role. This is to provide a safety net, and also support to those colleagues who take on monitoring roles.

Online Safety Lead:

- takes day to day responsibility for online safety issues and has a leading role in establishing and reviewing the school online safety policies / documents;
- ensures that all staff are aware of the procedures that need to be followed in the event of an online safety incident taking place. ;
- provides training and advice for staff ;
- receives reports of online safety incidents and creates a log of incidents to inform future online safety developments ;
- maintains oversight of the schools filtering and monitoring system; and,
- meet regularly with Head teacher to discuss current issues, review incident logs and filtering / change control logs.

Teaching & Education Support Staff:

Are responsible for ensuring that:

- **under no circumstances should young people have unsupervised access to Internet sites or social media platforms whilst in school;**
- on occasion, there may be a specific prohibition order concerning Internet access applied to a young person by a court order. In this case staff must, where necessary for the purposes of education, access the Internet on behalf of the young person and relay any necessary information to them;
- they have an up to date awareness of online safety matters and of the current school Online Safety Policy and practices;
- they immediately report any suspected misuse or problem to the Headteacher or Online Safety Lead for investigation, action or sanction;
- all digital communications with learners, parents, carers, and other professionals should be on a professional level and only carried out using official school systems;
- online safety issues are embedded in all aspects of the curriculum and other activities;
- learners understand and follow the Online Safety Policy and acceptable use agreement;
- learners have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations;
- they monitor the use of digital technologies, mobile devices, cameras etc in lessons and other school activities (where allowed) and implement current policies with regard to these devices;
- in lessons where Internet use is pre-planned learners should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in Internet searches.

Designated Safeguarding Lead:

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

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

- online-bullying

Learners:

- are responsible for using the schools digital technology systems appropriately;
- 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 the agreed school rules on the use of mobile devices and digital cameras. They should also know and understand school rules on the taking / use of images and on online-bullying;
- should understand the importance of adopting good online safety practice when using digital technologies out of school and realise that the school's Online Safety Policy covers their actions out of school if related to their membership of the school.

Education support staff

Support staff 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 support staff to understand these issues through meetings and newsletters, and provide information about national / local online safety campaigns and literature. Support staff are encouraged to support the schools in promoting good online safety practice and to follow guidelines on the appropriate use of:

- digital and video images taken at school events
- access to the Internet and social media platforms
- digital media and mobile communication devices

Education overview

Learners:

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

Online safety should be a focus in all areas of the curriculum and staff should reinforce online safety messages across the curriculum. The online safety curriculum should be broad, relevant and provide progression, with opportunities for creative activities. The cross-curricular Digital Competency Framework will include a cross-curricular, and whole-school, approach to online safety in the following ways:

- A planned online safety curriculum should be provided as part of Computing and PSE lessons and should be regularly revisited;
- Key online safety messages should be reinforced as part of a planned programme of pastoral activities;
- Learners 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;
- Learners should be taught to acknowledge the source of information used and to respect copyright when using material accessed on the Internet;
- Learners should be supported in building resilience to radicalisation by providing a safe environment for debating controversial issues and helping them to understand how they can influence and participate in decision-making. Note that additional duties exist for schools, under the Counter Terrorism and Securities Act 2015, which requires schools to ensure that children are safe from terrorist and extremist material on the Internet;
- Education support 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 learners should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in Internet searches;

- Where learners are allowed to freely search the Internet, staff should be vigilant in monitoring the content of the websites the young people visit. **Staff must supervise all learner use of Internet at all times.**

Staff:

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

- A planned programme of formal online safety training will be made available to staff. This will be regularly updated and reinforced. An audit of the online safety training needs of all staff is carried out regularly. Training is available through the following sources:
  - Think U Know Training – CEOPS
  - Keeping Children Safe Online – NSPCC
  - Professional Conduct on the Internet and Social Media – HWB+
- All new staff should receive online safety training as part of their induction programme, ensuring that they fully understand the school Online Safety;
- It is expected that some staff will identify online safety as a training need within the performance management process;
- The Online Safety Lead will receive regular updates through attendance at external training events (e.g. from CEOPS, NSPCC, SWGfL or the Local Authority) and by reviewing guidance documents released by relevant organisations;
- The Online Safety Lead (or other nominated person) will provide advice, guidance and training to individuals as required.

Filtering and monitoring

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

Additionally, schools will need to liaise and communicate effectively with CareTech IT Support Services in order to ensure that all corporate infrastructure/network relevant to the school is as safe and secure as reasonably possible, and in order to ensure that schools can maintain their duty of safeguarding to all learners.

Mobile technologies

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

All users should understand that the primary purpose of the use of mobile / personal devices in a school context is educational. This policy is consistent with and inter-related to other relevant school polices including but not limited to the Safeguarding Policy, Behaviour Policy, Bullying Policy and policies around theft or malicious damage. Teaching about the safe and appropriate use of mobile technologies is an integral part of the school's Online Safety education programme.

School Owned Devices:

The schools have mobile technology devices available for use as learning tools in the school day. These include laptops, tablets, kindles and e-reader pens. School owned devices are managed in the following way:

- Devices are allocated to learners and staff for education and training purposes;
- Devices are allocated by the head teacher, ICT teacher or classroom teacher for use in the school, at a specific time, and for a designated purpose;
- Unsupervised personal use in NOT permitted;
- Network access is controlled by the parameters created by the user level assigned to a username;
- All Internet access is security protected with a password, and supervised by staff;

- The Head teacher and ICT teacher are responsible for the management of devices, settings, installation of software and apps, and monitoring use;
- Technical support is provided by CareTech IT Support Services
- Learners and staff may be held liable for intentional damage to school devices.

Personal devices:

- Learners are NOT allowed personal mobile devices in school;
- Teachers and support staff are not allowed to use personal mobile devices during school time, other than at prescribed break times, or in the event of an emergency;
- The Head teacher and Deputy Head teacher are allowed access to their personal or work mobile devices during school time, in order to fulfil their work commitments;
- Whether staff will be allowed to use personal devices for school business;
- All Internet access is security protected with a Wi-Fi password, and supervised by staff;
- Personal devices must not be used to store any personal data relating to the workplace;
- Personal devices must not be used to record video or digital images of learners or staff in the workplace;
- Liability for loss/damage or malfunction of personal devices rests with the owner of the personal device;
- Staff personal devices must not be shared with learners or used to allow them access to the Internet;
- Visitors will be informed of their responsibilities in regards to bringing personal devices onto school site.

Communication devices:

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

A wide range of rapidly developing communications technologies has the potential to enhance learning. The following table shows how the school currently considers the benefit of using these technologies for education outweighs their risks / disadvantages (see above). When using communication technologies the school considers the following as good practice:

- The official company email service is regarded as safe and secure and is monitored. Users should be aware that email communications are monitored. Staff should therefore, use only the school email service to communicate with others when in school, or on school systems (e.g. by remote access).

- Users must immediately report, to the nominated person – in accordance with the school policy, the receipt of any communication that makes them feel uncomfortable, is offensive, discriminatory, threatening or bullying in nature and must not respond to any such communication.
- Any digital communication between staff and learners or parents / carers (email, social media, chat, blogs, VLE etc) must be professional in tone and content. These communications may only take place on official (monitored) school / academy systems. Personal email addresses, text messaging or social media **must not be used** for these communications.
- Learners should be taught about online safety issues, such as the risks attached to the sharing of personal details. They should also be taught strategies to deal with inappropriate communications and be reminded of the need to communicate appropriately when using digital technologies.
- Personal information **must not** be posted on the school website and only official email addresses should be used to identify members of staff.

Use of digital and video images:

The development of digital imaging technologies has created significant benefits to learning, allowing staff and learners instant use of images that they have recorded themselves or downloaded from the Internet. However, staff, carers and learners 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 to reduce the likelihood of the potential for harm:

- When using digital images, staff should inform and educate learners about the risks associated with the taking, use, sharing, publication and distribution of images. In particular they should recognise the risks attached to publishing their own images on the Internet e.g. on social networking sites.
- Written consent from the learner or the corporate parent will be obtained before photographs of learners are published on the school website / social media / local press.
- In accordance with guidance from the Information Commissioner's Office, parents / carers are welcome to take videos and digital images of their children at school events for their own personal use (as such use in not covered by the Data Protection Act). To respect everyone's privacy and in some cases protection, these images should not be published / made publicly available on social networking sites, nor should parents / carers comment on any activities involving other learners in the digital / video images.
- Staff and volunteers are allowed to take digital / video images to support educational aims, but must follow this policy concerning the sharing, distribution and publication of those images. Those images should only be taken on school equipment. The personal equipment of staff **must not** be used for such purposes.
- Care should be taken when taking digital / video images that learners are appropriately dressed and are not participating in activities that might bring the individuals or the school into disrepute.
- Learners must not take, use, share, publish or distribute images of others without their permission
- Photographs published on the website, or elsewhere that include learners will be selected carefully and will comply with good practice guidance on the use of such images.
- Learners' full names will not be used anywhere on a website or blog, particularly in association with photographs.
- Learner's work can only be published with the permission of the learner and parents or carers.

Data Protection

With effect from 25th May 2018, the data protection arrangements for the UK changed, following the European Union General Data Protection Regulation (GDPR) announced in 2016. As a result, schools are subject to greater scrutiny in their care and use of personal data. More detailed guidance is available in the schools' Data Protection Policy. Personal data will be recorded, processed, transferred and made available according to GDPR data protection legislation.

The school must ensure that:

- It has a Data Protection Policy.
- CareTech are registered as a data controller with the ICO. All schools operate within CareTech registration.
- There is a corporate Data Protection Officer, but the Head teacher in each school has the role of **Nominated Individual for Data Control**, reporting to the DPO.
- It will hold the minimum personal data necessary to enable it to perform its function and it will not hold it for longer than necessary for the purposes it was collected for.
- Data held must be accurate and up to date. Inaccuracies are corrected without unnecessary delay.
- The lawful basis for processing personal data (including, where relevant, consent) has been identified and documented and details provided in a Privacy Notice. (see Privacy Notice section in the appendix)
- Where special category data is processed, a lawful basis and a separate condition for processing have been identified.
- Data Protection Impact Assessments (DPIA) are carried out.
- It has clear and understood arrangements for access to and the security, storage and transfer of personal data, including, where necessary, adequate contractual clauses or safeguards where personal data is passed to third parties e.g. cloud service providers.
- Procedures must be in place to deal with the individual rights of the data subject i.e. a Subject Access Requests to see all or a part of their personal data held by the data controller.
- There are clear and understood data retention policies and routines for the deletion and disposal of data.
- There is a policy for reporting, logging, managing and recovering from an information risk incident, which recognises the requirement to report relevant data breaches to the ICO within 72 hours of the breach, where feasible.
- Consideration has been given to the protection of personal data when accessed using any remote access solutions.
- All schools must have a Freedom of Information Policy, which sets out how it will deal with FOI requests.
- All staff receive data handling awareness / data protection training and are made aware of their responsibilities.
- At all times take care to ensure the safe keeping of personal data, minimising the risk of its loss or misuse.
- Use personal data only on secure password protected computers and other devices, ensuring that they are properly "logged-off" at the end of any session in which they are using personal data.
- Transfer data using encryption and secure password-protected devices.
- When personal data is stored on any portable computer system, memory stick or any other removable media:
  - The data must be encrypted and password protected.
  - The device must be password protected. (many memory sticks / cards and other mobile devices cannot be password protected)
  - The device must offer approved virus and malware checking software.
  - The data must be securely deleted from the device, in line with school policy once it has been transferred or its use is complete.

Social Media – Protecting professional reputation and identity

All schools have a duty of care to provide a safe learning environment for learners and staff. Schools could be held responsible, indirectly, for acts of their employees in the course of their employment. Staff members who harass, engage in online bullying, discriminate on the grounds of sex, race or disability or who defame a third party may render the school liable to the injured party. Reasonable steps to prevent predictable harm must be in place. The Potteries School provides the following measures to ensure reasonable steps are in place to minimise risk of harm to learners, staff and the school through:

- Ensuring that personal information is not published;

- Training is provided including: acceptable use; social media risks; checking of settings; data protection; reporting issues;
- Clear reporting guidance, including responsibilities, procedures and sanctions;
- Risk assessment, including legal risk;

School staff should ensure that:

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

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

- A process for approval by senior leaders
- Clear processes for the administration and monitoring of these accounts – involving at least two members of staff
- A code of behaviour for users of the accounts, including
- Systems for reporting and dealing with abuse and misuse
- Understanding of how incidents may be dealt with under school / academy disciplinary procedures

Personal Use:

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

Monitoring of Public Social Media

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

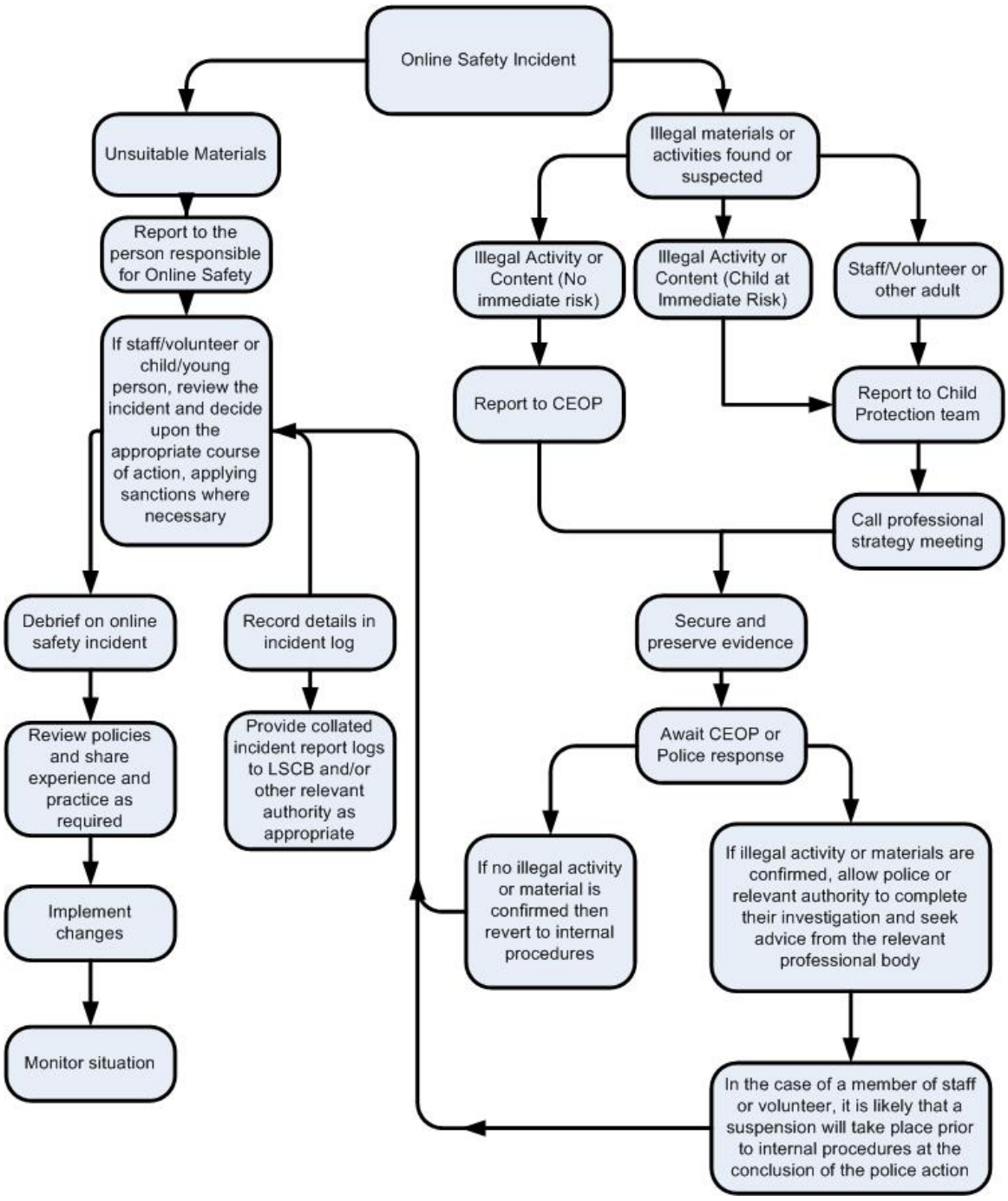
The Headteacher to ensure compliance with the school policies, will check the school's use of social media for professional purposes regularly.

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

Illegal Incidents:

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



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 investigation 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 learners and if necessary can be taken off site by the police should the need arise. Use the same computer for the duration of the procedure.
- It is important to ensure that the relevant staff should have appropriate Internet access to conduct the procedure, but also that the sites and content visited are closely monitored and recorded (to provide further protection).

- Record the URL of any site containing the alleged misuse and describe the nature of the content causing concern. It may also be necessary to record and store screenshots of the content on the machine being used for investigation. These may be printed, signed and attached to the investigation form (except in the case of images of child sexual abuse – see below)
- Once this has been completed and fully investigated, the group will need to judge whether this concern has substance or not. If it does then appropriate action will be required and could include the following:
  - Internal response or discipline procedures
  - Involvement by Local Authority or national / local organisation (as relevant).
  - Police involvement and/or action
- If content being reviewed includes images of child abuse then the monitoring should be halted and referred to the Police immediately. Other instances to report to the police would include:
  - incidents of 'grooming' behaviour
  - the sending of obscene materials to a child
  - adult material which potentially breaches the Obscene Publications Act
  - criminally racist material
  - promotion of terrorism or extremism
  - other criminal conduct, activity or materials
- Isolate the computer in question as best you can. Any change to its state may hinder a later police investigation.

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

Monitoring and evaluation of this policy

This policy will be monitored through scrutiny of risk assessments and records of incidents.
Evaluation will be through discussion with staff and feedback from young people.
The policy will be reviewed at least once a year, or whenever a particular incident points to a failure of procedures and practice.
The next annual review will be on 23/02/2027.