

Online Safety Policy



September 2025

This policy covers many of the articles from the UN Convention on the Rights of the Child. Some key ones are listed below.

Article 12 - Children have the right to give their opinion and their views must be taken seriously.

Article 13 - Children have the right to find out information and share what they think by writing, drawing or talking about it unless it harms anyone else.

Article 16 - Every child has the right to privacy. The law should protect a child's private, family and home life.

Article 17 - Every child has the right to information from books, newspapers, computers and other sources, as long as it isn't harmful.





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Development / Monitoring / Review of this Policy

This online safety policy has been developed by the ICT Coordinator and Senior Leadership Team. Consultation with the whole school community has taken place through a range of formal and informal meetings.

Schedule for Development / Monitoring / Review

This online safety policy was approved by the Governing Body on:	
The implementation of this online safety policy will be monitored by the:	Senior Leadership Team, including the ICT Coordinator and Designated Safeguard Lead (DSL)
Monitoring will take place at regular intervals:	Once a year
The Online Safety Policy will be reviewed annually, or more regularly in the light of any significant new developments in the use of the technologies, new threats to e-safety or incidents that have taken place. The next anticipated review date will be:	November 2026
Should serious online safety incidents take place, the following external persons / agencies should be informed:	Barking and Dagenham Borough, Police, Child Protection Services

The school will monitor the impact of the policy using:

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



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Scope of the Policy

This policy applies to all members of the school community (including staff, pupils, volunteers, parents / carers, 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 Headteachers to such extent as is reasonable, to regulate the behaviour of 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. 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 behaviour and anti-bullying policies and will, where known, inform parents / carers of incidents of inappropriate online behaviour that take place out of school.

Roles and Responsibilities

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

Governors:

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

- regular monitoring of e-safety incident logs
- regular monitoring of filtering / change control logs
- reporting to relevant Governors

Headteacher and Senior Leaders:

- The Headteacher has a duty of care for ensuring the safety (including e-safety) of members of the school community, though the day to day responsibility for online safety will be delegated to the ICT/E-Safety Co-ordinator.
- The Headteacher and (at least) another member of the Senior Leadership 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. (see flow chart on dealing with e-safety incidents – included in a later section – “Responding to incidents of misuse” and relevant Local Authority disciplinary procedures).
- The Headteacher and Senior Leaders are responsible for ensuring that the E-Safety Coordinator / Officer 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 Headteacher and Senior Leaders will ensure that there is a system in place to allow for monitoring and support of those in school who carry out the internal e-safety monitoring role. This is to provide a safety net and also support those colleagues who take on important monitoring roles.



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ICT/E-Safety Coordinator:

- 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 e-safety incident taking place
- provides training and advice for staff
- liaises with the Local Authority / 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 with Online Safety Governor to discuss current issues, review incident logs and filtering / change control logs
- reports regularly to Senior Leadership Team

Network Manager / Technical staff:

The ICT Coordinator is responsible for ensuring:

- that the school's technical infrastructure is secure and is not open to misuse or malicious attack
- that the school meets required e-safety technical requirements and any Local Authority E-Safety Policy / Guidance that may apply
- that users may only access the networks and devices through a properly enforced password protection policy, in which passwords are 15 digits
- 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
- that they keep up to date with e-safety technical information in order to effectively carry out their e-safety role and to inform and update others as relevant
- that the use of the network / internet / email / Google Drive is regularly monitored in order that any misuse / attempted misuse can be reported to the Headteacher / Senior Leader / Online Safety Coordinator / for investigation / action / sanction
- that monitoring software / systems are implemented and updated as agreed in school policies

Teaching and Support Staff

are responsible for ensuring that:

- they have an up to date awareness of online safety matters and of the current school online safety policy and practices
- they have read, understood and signed the Staff Acceptable Use Policy
- they report any suspected misuse or problem to the Headteacher / Senior Leader / Online Safety Coordinator / for investigation / action / sanction
- all digital communications with pupils / parents / carers should be on a professional level and only carried out using official school systems
- online safety issues are embedded in all aspects of the curriculum and other activities
- pupils understand and follow the e-safety and acceptable use policies
- pupils 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 pupils 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



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Child Protection / Designated Safeguarding Lead (DSL)

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 (sexually inappropriate, extreme and violent)
- inappropriate on-line contact with adults / strangers
- potential or actual incidents of grooming (including for sexual exploitation or radicalisation)
- cyber-bullying

Students / pupils:

- are responsible for using the school digital technology systems in accordance with the consent form for processing personal data
- 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. They should also know and understand policies on the taking / use of images and on cyber-bullying.
- should understand the importance of adopting good online practice when using digital technologies out of school and realise that the school's Online Safety Policy covers their actions out of school, if related to their membership of the school

Parents / Carers

Parents / Carers play a crucial role in ensuring that their children understand the need to use the internet / mobile devices in an appropriate way. The school will take every opportunity to help parents understand these issues through parents' evenings, newsletters, letters, website and information about national / local e-safety campaigns / literature. Parents and carers will be encouraged to support the school in promoting good online 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 and via school communication app
- their children's personal mobile devices in the school (Y5/6 only)

Policy Statements

Education – pupils

Whilst regulation and technical solutions are very important, their use must be balanced by educating pupils to take a responsible approach. The education of pupils in online safety is therefore an essential part of the school's e-safety provision and is fully embedded within our curriculum. The school provides a comprehensive age appropriate curriculum for online safety which enables pupils to become informed, safe and responsible. This includes teaching to prevent radicalisation, for which staff provide a narrative to counter extremism. The PSHE curriculum, Relationships and Health Curriculum and Computing curriculum are central in supporting the delivery of online safety education. Children and young people need the help and support of the school to recognise and avoid e-safety risks and build their resilience. It is necessary for pupils to develop skills of critical awareness, digital resilience and good online citizenship to enable them to use internet, mobile and digital technologies safely and responsibly.

Every child has the right to feel safe online and know that they have adults that care about their health and well-being. They understand the need to be taught how to be responsible online citizens and have the freedom to express their thoughts and opinions online within the confines of British law. In exercising the right to freedom of expression, children have the responsibility to also respect the rights, freedoms and reputations of others.



Online safety should be a focus in all areas of the curriculum and staff should reinforce e-safety messages across the curriculum. The online safety curriculum should be broad, relevant and provide progression, with opportunities for creative activities and will be provided in the following ways:

- A planned online safety curriculum should be provided as part of Computing / PHSE / Relationships and Health Curriculum/ Rights Respecting / other lessons and should be regularly revisited
- Key online safety messages should be reinforced as part of a planned programme of assemblies and tutorial / pastoral activities
- Pupils should be taught in all lessons to be critically aware of the materials / content they access online and be guided to validate the accuracy of information.
- Pupils should be taught to acknowledge the source of information used and to respect copyright when using material accessed on the internet
- Pupils should be helped to understand the need for the Google Class Charter 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 pupils 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.
- Children should use age appropriate search engines (eg Kiddle) to help filter content when searching the internet. Staff should be vigilant in monitoring the content of the websites visited.
- It is accepted that from time to time, for good educational reasons, students may need to research topics (eg racism, drugs, discrimination) that would normally result in internet searches being blocked. In such a situation, staff can request that the Technical Staff (or other 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 / carers

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

The school will therefore seek to provide information and awareness to parents and carers through:

- Curriculum activities
- Letters, newsletters, web site
- Parents / Carers evenings / sessions
- High profile events / campaigns eg Safer Internet Day
- Reference to the relevant web sites / publications

Education & Training – Staff / Volunteers

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

- 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 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 online safety training as part of their induction programme, ensuring that they fully understand the school online safety policy and Acceptable Use Agreements
- The Online Safety Coordinator will receive regular updates through attendance at external training events and by reviewing guidance documents released by relevant organisations.
- This online safety policy and its updates will be presented to and discussed by staff in staff / team meetings / INSET days.
- The online safety Coordinator will provide advice / guidance / training to individuals as required.



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Training – Governors

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

- Attendance at training provided by the Local Authority / National Governors Association / or other relevant organisation
- Participation in school training / information sessions for staff or parents

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
- 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
- All users will be provided with a username and secure password by the ICT Coordinator who will keep an up to date record of users and their usernames. Users are responsible for the security of their username and password.
- The administrator passwords for the school ICT system, used by the Network Manager (or other person) must also be available to the Headteacher or other nominated senior leader and kept in a secure place (through our outside support agency Computer Talk)
- The ICT Coordinator is responsible for ensuring that software licence logs are accurate and up to date and that regular checks are made to reconcile the number of licences purchased against the number of software installations
- Internet access is filtered for all users. Illegal content (child sexual abuse images) is filtered by the broadband or filtering provider by actively employing the Internet Watch Foundation CAIC list. Content lists are regularly updated and internet use is logged and regularly monitored. There is a clear process in place to deal with requests for filtering changes.
- The school has provided enhanced / differentiated user-level
- The ICT Coordinator and 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 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) onto the school systems.
- An agreed policy is in place regarding the extent of personal use that users (staff / students / pupils / community users) and their family members are allowed on school devices that may be used out of school.
- An agreed policy is in place that allows staff to / forbids staff from downloading executable files and installing programmes on school devices.
- An agreed policy is in place regarding the use of removable media (e.g. memory sticks) by users on school devices. Personal data cannot be sent over the internet or taken off the school site unless safely encrypted or otherwise secured.



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Use of digital and video images

The development of digital imaging technologies has created significant benefits to learning, allowing staff and pupils instant use of images that they have recorded themselves or downloaded from the internet. However, staff, parents / carers and pupils 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 pupils 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 eg on social networking sites.
- In accordance with guidance from the Information Commissioner's Office, parents / carers are welcome to take videos and digital images of their children at school events for their own personal use (as such use is not covered by the Data Protection Act). To respect everyone's privacy and in some cases protection, these images should not be published / made publicly available on social networking sites, nor should parents / carers comment on any activities involving other pupils in the digital / video images.
- Staff and volunteers are allowed to take digital / video images to support educational aims, but must follow school policies concerning the sharing, distribution and publication of those images. Those 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 pupils are appropriately dressed and are not participating in activities that might bring the individuals or the school into disrepute.
- Pupils must not take, use, share, publish or distribute images of others without their permission
- Photographs published on the website, or elsewhere that include pupils will be selected carefully and will comply with good practice guidance on the use of such images.
- Pupils' full names will not be used anywhere on a website or blog, particularly in association with photographs.
- Written permission from parents or carers will be obtained before photographs of pupils are published on the school website
- Pupil's work can only be published with the permission of the pupil and parents or carers.

Data Protection

Personal data will be recorded, processed, transferred and made available according to the Data Protection Act 2018 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 - Data Protection Lead and Senior ICT Technician

Author: Alice Carroll, Assistant Head
Convention on the Rights of the Child Articles that this policy links to:
12, 13, 16, 17



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- 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
- There are clear policies about the use of cloud storage / cloud computing which ensure that such data storage meets the requirements laid down by the Information Commissioner's Office.

Staff must ensure that they:

- 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:

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



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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 (Gmail/Outlook) may be regarded as safe and secure and is monitored. Users should be aware that email communications are monitored. Staff and pupils should therefore use only the school email service to communicate with others when in school, or on school systems (eg 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 pupils or parents / carers (email, parent messaging) 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.
- Pupils should be taught about online safety issues, such as the risks attached to the sharing of personal details. They should also be taught strategies to deal with inappropriate communications and be reminded of the need to communicate appropriately when using digital technologies.
- Personal information should not be posted on the school website and only official email addresses should be used to identify members of staff.

Social Media - Protecting Professional Identity

All schools, academies and local authorities have a duty of care to provide a safe learning environment for pupils 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 local authority 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 minimise risk of harm to pupils, staff and the school through limiting access to personal information:

- Training to include: 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 pupils, 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 or local authority
- Security settings on personal social media profiles are regularly checked to minimise risk of loss of personal information.

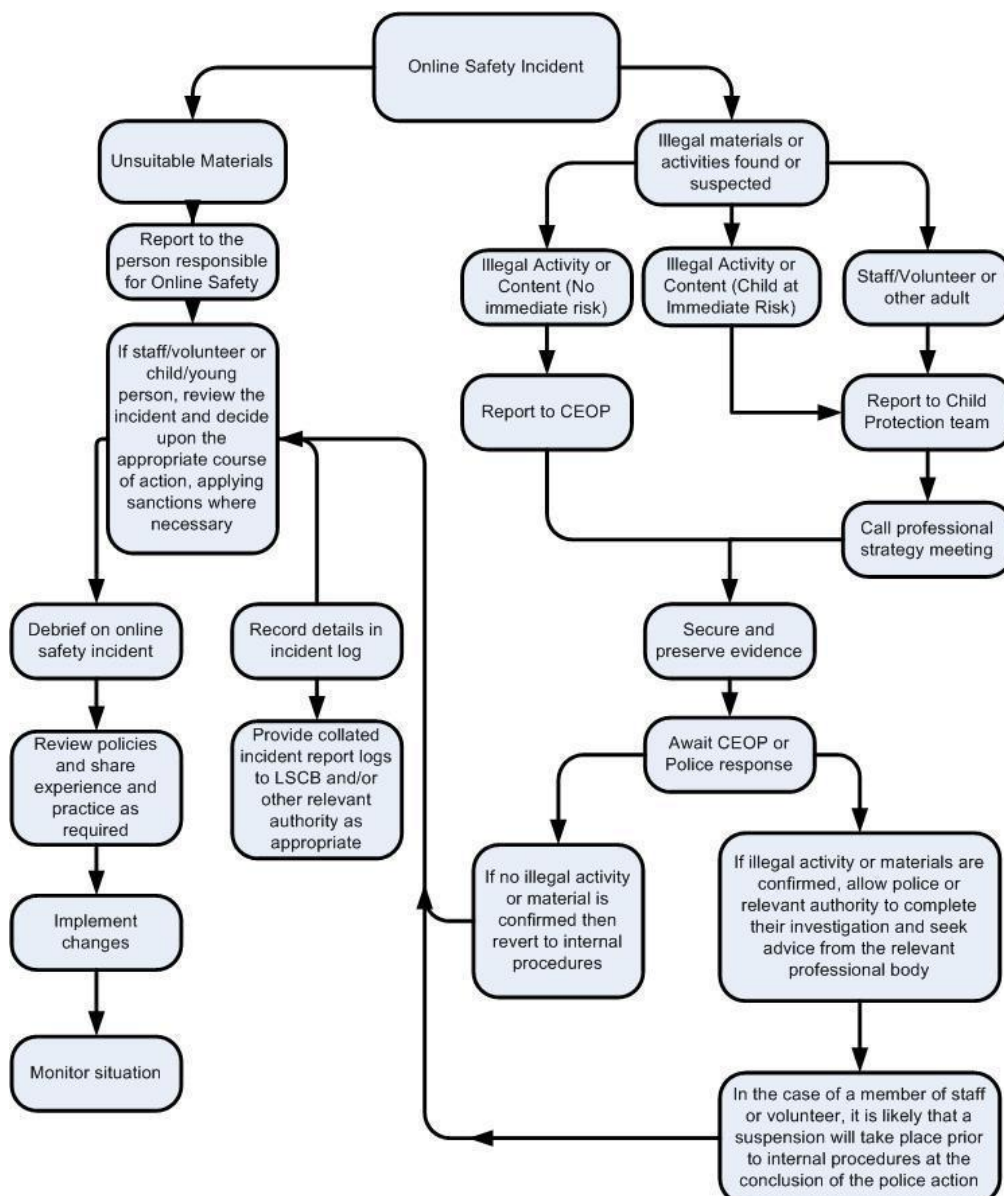
The school's use of social media for professional purposes will be checked regularly to ensure compliance with the Social Media, Data Protection, Communications, Digital Image and Video Policies.

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 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 and appendix) for responding to online safety incidents and report immediately to the police.





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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 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
 - 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. It is intended that incidents of misuse will be dealt with through normal behaviour / disciplinary procedures (see behaviour policy)

School Technical Security Policy (including filtering and passwords)

Introduction

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

- users can only access data to which they have right of access



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

Responsibilities

The management of technical security will be the responsibility of the ICT Coordinator.

Technical Security

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

- School technical systems will be managed in ways that ensure that the school 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
- Appropriate security measures are in place to protect the servers, firewalls, switches, routers, wireless systems, work stations, mobile devices etc from accidental or malicious attempts which might threaten the security of the school systems and data
- Responsibilities for the management of technical security are clearly assigned to appropriate and well trained staff
- Users will be made responsible for the security of their username and password, must not allow other users to access the systems using their log on details and must immediately report any suspicion or evidence that there has been a breach of security
- The ICT Coordinator is responsible for ensuring that software licence logs are accurate and up to date and that regular checks are made to reconcile the number of licences purchased against the number of software installations
- Mobile device security and management procedures are in place
- 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
- Remote management tools are used by staff to control workstations and view users activity
- An appropriate system is in place for users to report any actual / potential technical incident to the ICT Coordinator / Technician
- An agreed policy is in place regarding the downloading of executable files and the installation of programmes on school devices by users
- An agreed policy is in place regarding the extent of personal use that users (staff / pupils / community users) and their family members are allowed on school devices that may be used out of school.
- An agreed policy is in place regarding the use of removable media (eg memory sticks / CDs / DVDs) by users on school devices.
- The school infrastructure and individual workstations are protected by up to date software to protect against malicious threats from viruses, worms, trojans etc.
- Personal data cannot be sent over the internet or taken off the school site unless safely encrypted or otherwise secured.



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Password Security

A safe and secure username / password system is essential if the above is to be established and will apply to all school technical systems, including networks, devices and email.

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- All school networks and systems will be protected by secure passwords that are regularly changed
- The "administrator" passwords for the school systems, used by the technical staff must also be available to the Headteacher or other nominated senior leader and kept in a secure place eg school safe. Consideration should also be given to using two factor authentication for such accounts.
- Passwords for new users, and replacement passwords for existing users will be allocated by the ICT Coordinator or IT Technician Any changes carried out must be notified to the manager of the password security policy.
- All users (adults and young people) will have responsibility for the security of their username and password, must not allow other users to access the systems using their log on details and must immediately report any suspicion or evidence that there has been a breach of security.
- Users will change their passwords at regular intervals – as described in the staff and student / pupil sections below
- Requests for password changes should be authenticated by (the responsible person) to ensure that the new password can only be passed to the genuine user.

Staff passwords:

- All staff users will be provided with a username and password by the ICT Coordinator who will keep an up to date record of users and their usernames.
- the password should be a minimum of 15 characters long and must include two of – uppercase character, number, special characters -
- the account should be "locked out" following six successive incorrect log-on attempts
- temporary passwords e.g. used with new user accounts or when users have forgotten their passwords, shall be enforced to change immediately upon the next account log-on
- passwords shall not be displayed on screen, and shall be securely hashed (use of one-way encryption)
- should be different for systems used inside and outside of school

Student / pupil passwords

- All users will be provided with a username and password by the ICT Coordinator who will keep an up to date record of users and their usernames.
- Users will be required to change their password every year
- Pupils will be taught the importance of password security
- The complexity (i.e. minimum standards) will be set with regards to the cognitive ability of the children.

Training / Awareness

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

- at induction
- through the Acceptable Use Agreement

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

- in lessons

Audit / Monitoring / Reporting / Review

The ICT Coordinator will ensure that full records are kept of:

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

Filtering

Introduction

The filtering of internet content provides an important means of preventing users from accessing material that is illegal or is inappropriate in an educational context. The filtering system cannot, however, provide a 100% guarantee that it will do so, because the content on the web changes dynamically and new technologies are constantly being developed. It is important, therefore, to understand that filtering is only one element in a larger strategy for e-safety and acceptable use.

Responsibilities

The responsibility for the management of the school's filtering will be held by EXA. They manage the school's filtering, in line with government guidelines and the school will keep records / logs of breaches of the filtering systems.

Policy Statements

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

- Either - The school maintains and supports the managed filtering service provided by the Internet Service Provider
- In the event of the technical staff needing to switch off the filtering for any reason, or for any user, this must be logged and carried out by a process that is agreed by the Headteacher (or other nominated senior leader).
- Mobile devices that access the school internet connection (whether school or personal devices) will be subject to the same filtering standards as other devices on the school systems
- Any filtering issues should be reported immediately to the filtering provider.
- Requests from staff for sites to be removed from the filtered list will be considered by the technical staff. If the request is agreed, this action will be recorded and logs of such actions shall be reviewed regularly by the ICT -Coordinator..

Education / Training / Awareness

Pupils will be made aware of the importance of filtering systems through the e-safety education programme. They will also be warned of the consequences of attempting to subvert the filtering system.

Staff users will be made aware of the filtering systems through:

- the Acceptable Use Agreement
- induction training
- staff meetings, briefings, Inset.



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Parents will be informed of the school's filtering policy through the Acceptable Use Agreement and through e-safety awareness sessions / newsletter / etc.

Monitoring

No filtering system can guarantee 100% protection against access to unsuitable sites. The school will therefore monitor the activities of users on the school network and on school equipment as indicated in the School E-Safety Policy and the Acceptable Use Agreement. Monitoring will take place as follows:

- Through the use of Impero, all internet usage will be monitored with any potentially harmful websites flagged up to the ICT Coordinator for consideration and reports / logs kept.
- Annual reports will be produced to show any violations of the filtering system or where potentially harmful websites have been accessed by staff / pupils / parents / carers.

Audit / Reporting

Logs of filtering change controls and of filtering incidents will be made available to:

- E-Safety Coordinator/DSL
- E-Safety Governor / Governors committee
- External Filtering provider / Local Authority / Police on request

The filtering policy will be reviewed in the response to the evidence provided by the audit logs of the suitability of the current provision.



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School Personal Data Handling Policy

Introduction

Schools and their employees should do everything within their power to ensure the safety and security of any material of a personal or sensitive nature

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

- have permission to access that data, and/or
- need to have access to that data.

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

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

The DPA lays down a set of rules for processing of personal data (both structured manual records and digital records). It provides individuals (data subjects) with rights of access and correction. The DPA requires organisations to comply with eight data protection principles, which, among others require data controllers to be open about how the personal data they collect is used.

The DPA defines "Personal Data" as data which relate to a living individual who can be identified:

- from those data, or
- from those data and other information which is in the possession of, or is likely to come into the possession of, the data controller,
- and includes any expression of opinion about the individual and any indication of the intentions of the data controller or any other person in respect of the individual.

It further defines special category data as personal data consisting of information as to:

- the racial or ethnic origin of the data subject,
- his political opinions,
- his religious beliefs or other beliefs of a similar nature,
- whether he is a member of a trade union (within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992),
- his physical or mental health or condition,
- his sexual life,
- the commission or alleged commission by him of any offence, or
- any proceedings for any offence committed or alleged to have been committed by him, the disposal of such proceedings or the sentence of any court in such proceedings.

Guidance for organisations processing personal data is available on the Information Commissioner's Office website: <https://ico.org.uk/>

Policy Statements

The school 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".

Author: Alice Carroll, Assistant Head
Convention on the Rights of the Child Articles that this policy links to:
12, 13, 16, 17



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Personal Data

The school and individuals will have access to a wide range of personal information and data. The data may be held in a digital format or on paper records. Personal data is defined as any combination of data items that identifies an individual and provides specific information about them, their families or circumstances. This will include:

- Personal information about members of the school community – including pupils, members of staff and parents / carers eg names, addresses, contact details, legal guardianship contact details, health records, disciplinary records
- Curricular data eg class lists, pupil progress records, reports, references
- Professional records eg employment history, taxation and national insurance records, appraisal records and references
- Any other information that might be disclosed by parents / carers or by other agencies working with families or staff members

Responsibilities

The school's Data Protection Lead (DPL) is the Office Manager. This person will keep up to date with current legislation and guidance and will:

- determine and take responsibility for the school's information risk policy and risk assessment
- appoint the Senior ICT Technician

The school will identify Data Controllers for the various types of data being held (eg pupil information / staff information / assessment data etc). The Senior ICT Technicians will manage and address risks to the information and will understand:

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

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

Governors are required to comply fully with this policy in the event that they have access to personal data, when engaged in their role as a Governor.

Registration

The school is registered as a Data Controller on the Data Protection Register held by the Information Commissioner.

Information to Parents / Carers – the “Privacy Notice”

In order to comply with the fair processing requirements of the DPA, the school will inform parents / carers of all pupils of the data they collect, process and hold on the pupils, the purposes for which the data is held and the third parties (e.g. LA, DfE, etc) to whom it may be passed. This privacy notice will be passed to parents / carers via the school website. Parents / carers of young people who are new to the school will be provided with the privacy notice through the admission pack.

Training & awareness

All staff will receive data handling awareness / data protection training and will be made aware of their responsibilities, as described in this policy through:

- Induction training for new staff
- Staff meetings / briefings / Inset
- Day to day support and guidance from Senior ICT Technicians
- Annual online GDPR training for all staff and governors



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Risk Assessments

School Online Safety Audit & Risk Assessments will be carried out to establish the security measures already in place and whether they are the most appropriate and cost effective. The risk assessment will involve:

- Recognising the risks that are present;
- Judging the level of the risks (both the likelihood and consequences); and
- Prioritising the risks.

Secure Storage of and access to data

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

All users will use strong passwords which must be changed regularly as per the school's password security policy. User passwords must never be shared.

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

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

Personal data can only be stored on school equipment (this includes computers and portable storage media. Private equipment (i.e. owned by the users) must not be used for the storage of personal data.

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

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

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

The school has clear policy and procedures for the use of "Cloud Based Storage Systems" (for example dropbox, google apps and google docs) and is aware that data held in remote and cloud storage is still required to be protected in line with the Data Protection Act. The school will ensure that it is satisfied with controls put in place by remote / cloud based data services providers to protect the data.

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

All paper based Protected and Restricted (or higher) material must be held in lockable storage, whether on or off site.

The school recognises that under Section 7 of the DPA data subjects have a number of rights in connection with their personal data, the main one being the right of access. Procedures are in place to deal with Subject Access Requests i.e. a written request to see all or a part of the personal data held by the data controller in connection with the data subject. Data subjects have the right to know: if the data controller holds personal data about them; a description of that data; the purpose for which the data is processed; the sources of that data; to whom the data may be disclosed; and a copy of all the personal data that is held about them. Under certain circumstances the data subject can also exercise rights in connection with the rectification; blocking; erasure and destruction of data.



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Secure transfer of data and access out of school

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

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

Disposal of data

The school will comply with the requirements for the safe destruction of personal data when it is no longer required.

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

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

Audit Logging / Reporting / Incident Handling

It is good practice, as recommended in the "Data Handling Procedures in Government" document that the activities of data users, in respect of electronically held personal data, will be logged and these logs will be monitored by responsible individuals.

The audit logs will be kept to provide evidence of accidental or deliberate data security breaches – including loss of protected data or breaches of an acceptable use policy, for example.

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

- a "responsible person" for each incident;
- a communications plan, including escalation procedures
- results in a plan of action for rapid resolution
- a plan of action of non-recurrence and further awareness raising.

All significant data protection incidents must be reported through the Data Protection Lead to the Information Commissioner's Office based upon the local incident handling policy and communication plan.

Use of technologies and Protective Marking

The following provides a useful guide:

	The information	The technology	Notes on Protect Markings (Impact Level)
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School life and events	School terms, holidays, training days, the curriculum, extra-curricular activities, events, displays of pupils work, lunchtime menus, extended services, parent consultation events	Common practice is to use publically accessible technology such as school websites or portal, emailed newsletters, subscription text services	Most of this information will fall into the NOT PROTECTIVELY MARKED (Impact Level 0) category.
Learning and achievement	Individual pupil / student academic, social and behavioural achievements, progress with learning, learning behaviour, how parents can support their child's learning, assessments, attainment, attendance, individual and personalised curriculum and educational needs.	Typically schools will make information available by parents logging on to a system that provides them with appropriately secure access, such as a Learning Platform or portal, or by communication to a personal device or email account belonging to the parent.	Most of this information will fall into the PROTECT (Impact Level 2) category. There may be students/ pupils whose personal data requires a RESTRICTED marking (Impact Level 3) or higher. For example, the home address of a child at risk. In this case, the school may decide not to make this pupil / student record available in this way.
Messages and alerts	Attendance, behavioural, achievement, sickness, school closure, transport arrangements, and other information that it may be important to inform or contact a parent about as soon as possible. This may be particularly important when it is necessary to contact a parent concerning information that may be considered too sensitive to make available using other online means.	Email and text messaging are commonly used by schools to contact and keep parents informed. Where parents are frequently accessing information online then systems e.g. Learning Platforms or portals, might be used to alert parents to issues via "dashboards" of information, or be used to provide further detail and context.	Most of this information will fall into the PROTECT (Impact Level 1) category. However, since it is not practical to encrypt email or text messages to parents, schools should not send detailed personally identifiable information. General, anonymous alerts about schools closures or transport arrangements would fall into the NOT PROTECTIVELY MARKED (Impact Level 0) category.