Baleares International College
Sant Agusti
an Orbital Education School

Orbitaled

E- Safety and acceptable use of ICT Policy

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APPROVED BY:	Principal:	Janice Short	December 2020
	Regional Head of Schools:	Karl Wilkinson	December 2020

This Policy is to be reviewed **every two years** and updated as and when changes occur.

Date of next review: **August 2021**

Scope of the Policy

This policy applies to all members of the school community (including staff, students, parents, visitors, community users) who have access to and are users of school digital technology systems, both in and out of the school. The school will deal with any e-safety incidents and will, where known, inform parents of incidents of inappropriate Online Safety 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:

Regional Head of Schools (RHoS) acting on behalf of the Board of Directors

- The Board is responsible for the approval of the E-Safety Policy and for reviewing the effectiveness of the policy. This will be carried out by the RHoS receiving regular information about online safety incidents and monitoring reports.

Principal

- has a duty of care for ensuring the safety (including online safety) of members of the school community, though the day to day responsibility for online safety will be delegated to the Deputy Designated Safeguarding Lead (DDSL)
- is responsible for ensuring that the DDSL and other relevant staff receive suitable training to enable them to carry out their online safety roles and to train other colleagues, as relevant.
- 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 support those colleagues who take on important monitoring roles.

Online Safety Lead (DDSL)

- 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
- where necessary liaises with the municipal authority
- liaises with school technical staff
- receives reports of online safety incidents and creates a log of incidents to inform future online safety developments,
- reports regularly to the Principal, and reports any incidents reported to the Principal immediately

ICT Manager / Technical staff are 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 online safety technical requirements and any national, municipal or other relevant body and Online Safety Guidance that may apply.
- that users may only access the networks and devices through a properly enforced password protection policy, in which passwords are regularly changed
- that they keep up to date with online safety technical information to effectively carry out their online safety role and to inform and update others as relevant
- that the use of the network, internet, Learning Platform, remote access and email is regularly monitored in order that any misuse or attempted misuse can be reported to the Principal or DDSL for investigation, action or sanction
- that monitoring software and 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 E-Safety Policy and practices
- they have read, understood and signed the Staff Acceptable Use Policy (AUP)
- they report any suspected misuse or problem to the Principal and DDSL
- all digital communications with students and parents 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
- students understand and follow the E Safety Policy and acceptable use policies
- students have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations
- they monitor the use of digital technologies, mobile devices, cameras etc. in lessons and other school activities (where allowed) and implement current policies regarding these devices
- in lessons where internet use is pre-planned students should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches

All staff 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 online safety incidents).

Designated Safeguarding Lead and Deputy 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

Students:

- *are responsible for using the school digital technology systems in accordance with the Student Acceptable Use Agreement*
- have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations
- need to understand the importance of reporting abuse, misuse or access to inappropriate materials and know how to do so
- will be expected to know and understand policies on the use of mobile devices and digital cameras. They should also know and understand policies on the taking / use of images and on 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.

Parents

Parents play a crucial role in ensuring that their children understand the need to use the internet / mobile devices in an appropriate way. Parents will be encouraged to support the school 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 parents' sections of the website / Learning Platform and on-line student records

Many parents 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 online behaviour. 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 through:

- Curriculum activities
- Letters, newsletters, web site, Learning Platform
- Parents evenings
- High profile events / campaigns e.g. Safer Internet Day
- Reference to the relevant web sites / publications e.g. www.saferinternet.org.uk/ http://www.childnet.com/parents-and-carers

Education

Whilst regulation and technical solutions are very important, their use must be balanced by educating students to take a responsible approach to their use of IT and online activity. The education of students in online safety is therefore an essential part of the school's 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 and will be provided in the following ways:

- **A planned online safety curriculum should be provided as part of Computing / PHSE / other lessons and should be regularly revisited**
- **Key online safety messages should be reinforced as part of a planned programme of assemblies and pastoral activities**
- **Students should be taught in all lessons to be critically aware of the materials / content they access on-line and be guided to validate the accuracy of information**
- **Students should be taught to acknowledge the source of information used and to respect copyright when using material accessed on the internet**
- **Students should be 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**
- Students should be helped to understand the need for the student Acceptable Use Agreement and encouraged to adopt safe and responsible use both within and outside school
- Staff should act as good role models in their use of digital technologies, the internet and mobile devices
- Where students can freely search the internet, staff should be vigilant in monitoring the content of the websites the young people visit
- It is accepted that from time to time, for good educational reasons, students may need to research topics (e.g. 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.

Recommended Education – The Wider Community (Partnerships)

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

- Providing family learning courses in use of new digital technologies, digital literacy and online safety
- Online safety messages targeted towards grandparents and other relatives as well as parents.
- The school website will provide online safety information for the wider community
- Supporting community groups e.g. Early Years Settings, Childminders, youth, sports, voluntary groups to enhance their Online Safety provision

Staff Training

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.
- All new staff should receive online safety training (EduCare - Online Safety for International Schools) as part of their induction programme, ensuring that they fully understand the school Online Safety Policy and Acceptable Use Agreements.
- This Online Safety Policy and its updates will be presented to and discussed by staff.
- The DDSL will provide advice, guidance and training to individuals as required.

Technical – infrastructure / equipment, filtering and monitoring

The school will be responsible for ensuring that the school infrastructure and network is as safe and secure as is reasonably possible and that policies and procedures approved within this policy are implemented.

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 team and teachers 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 "master or administrator" passwords for the school ICT systems, used by the Network Manager (or another person) must also be available to the Principal and kept in a secure place.
- The ICT manager 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. Content lists are regularly updated, and internet use is logged and regularly monitored.
- Internet monitoring should ensure that children are safe from radicalisation material when accessing the internet.
- The school has provided enhanced and differentiated user-level filtering.
- 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 or potential technical 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 use of removable media (e.g. memory sticks / CDs / DVDs) 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**.

Mobile Technologies

Mobile devices can be useful in many educational contexts, such as recording a student's own work through images or audio files or in the use of electronic calendars to plan work. In terms of teaching and learning they may be useful for e-mailing work home, researching on the internet, listening to revision podcasts, or as electronic dictionaries. Regulation for the safe and appropriate use of mobile technologies is:

- Staff can have mobile phones and other devices in school but they must be kept in silent mode during the school day;
- Students are not allowed to have mobile devices in school, including mobile phones and smartwatches.
- if parents need to urgently contact their child, or if students need to make a phone call to their parents, they should do so through Reception.
- staff may not use mobile phones during lessons or when on duty. They should take care to be discrete at other times so as not to disturb other members of the school or for others to hear personal information, and should not use mobile phones in the vicinity of students;
- the use of digital equipment to take photos of students, staff or of the school is not allowed except with the express permission of a member of staff. Even when such permission has been given the permission of the individual – or the parent of the individual - concerned must also be gained;
- images of students, staff or of the school may not be posted on public or private web sites, or transferred or given to another person, without the permission of the Principal.

Use of digital and video images

The development of digital imaging technologies has created significant benefits to learning, allowing staff and students instant use of images that they have recorded themselves or downloaded from the internet. However, staff, parents and students need to be aware of the risks associated with publishing digital images on the internet. Such images may provide avenues

for cyberbullying to take place. Digital images may remain available on the internet forever and may cause harm or embarrassment to individuals in the short or longer term. It is common for employers to carry out internet searches for information about potential and existing employees.

- Written permission from parents will be obtained before photographs of students are published on the school website, social media or local press.
- Parents are welcome to take videos and digital images of their children at school events for their own personal use. To respect everyone's privacy and in some cases protection, these images should not be published on social networking sites, nor should parents comment on any activities involving other students in the images.
- Staff and volunteers can take digital / video images to support educational aims but must follow school policies concerning the sharing, distribution and publication of those images. Those images should only be taken on school equipment, **the personal equipment of staff should not be used for such purposes.**
- Care should be taken when taking digital / video images that students are appropriately dressed and are not participating in activities that might bring the individuals or the school into disrepute.
- Students must not take, use, share, publish or distribute images of others without their permission
- Photographs published on the website, or elsewhere that include students will be selected carefully and will comply with good practice guidance on the use of such images.
- Students' full names will not be used anywhere on a website or blog, particularly in association with photographs.

Data Protection

Personal data will be recorded, processed, transferred and made available according to the current data protection legislation.

In line with the Data Protection Policy, Baleares International College, Sant Agusti will 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.
- 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.
- 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.
- 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 staff receive data handling awareness / data protection training and are made aware of their responsibilities.

Staff must ensure that they:

- 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.

When using communication technologies, the school considers the following as good practice:

- The official school email service may be regarded as safe and secure and is monitored. Users should be aware that email communications are monitored. Staff and students should therefore use only the school email service to communicate with others when in school, or on school / systems (e.g. by remote access).
- Users must immediately report to the Principal, the receipt of any communication that makes them feel uncomfortable, is offensive, discriminatory, threatening or bullying in nature and must not respond to any such communication.
- Any digital communication between staff and students or parents (email, social media, chat, blogs, VLE etc) 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.
- Whole class / group email addresses may be used at KS1, while students at KS2 and above will be provided with individual school email addresses for educational use.
- Students 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

Schools are increasingly using social media as a powerful learning tool and means of communication. It is important that this is carried out in a safe and responsible way.

All schools have a duty of care to provide a safe learning environment for students and staff. Schools could be held responsible, indirectly for acts of their employees during 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 school provides the following measures to ensure reasonable steps are in place to minimise risk of harm to students, 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 students, parents 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 Orbital Education
- 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 the Principal before anything is published
- 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
- Systems for reporting and dealing with abuse and misuse
- Understanding of how incidents may be dealt with under school 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

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

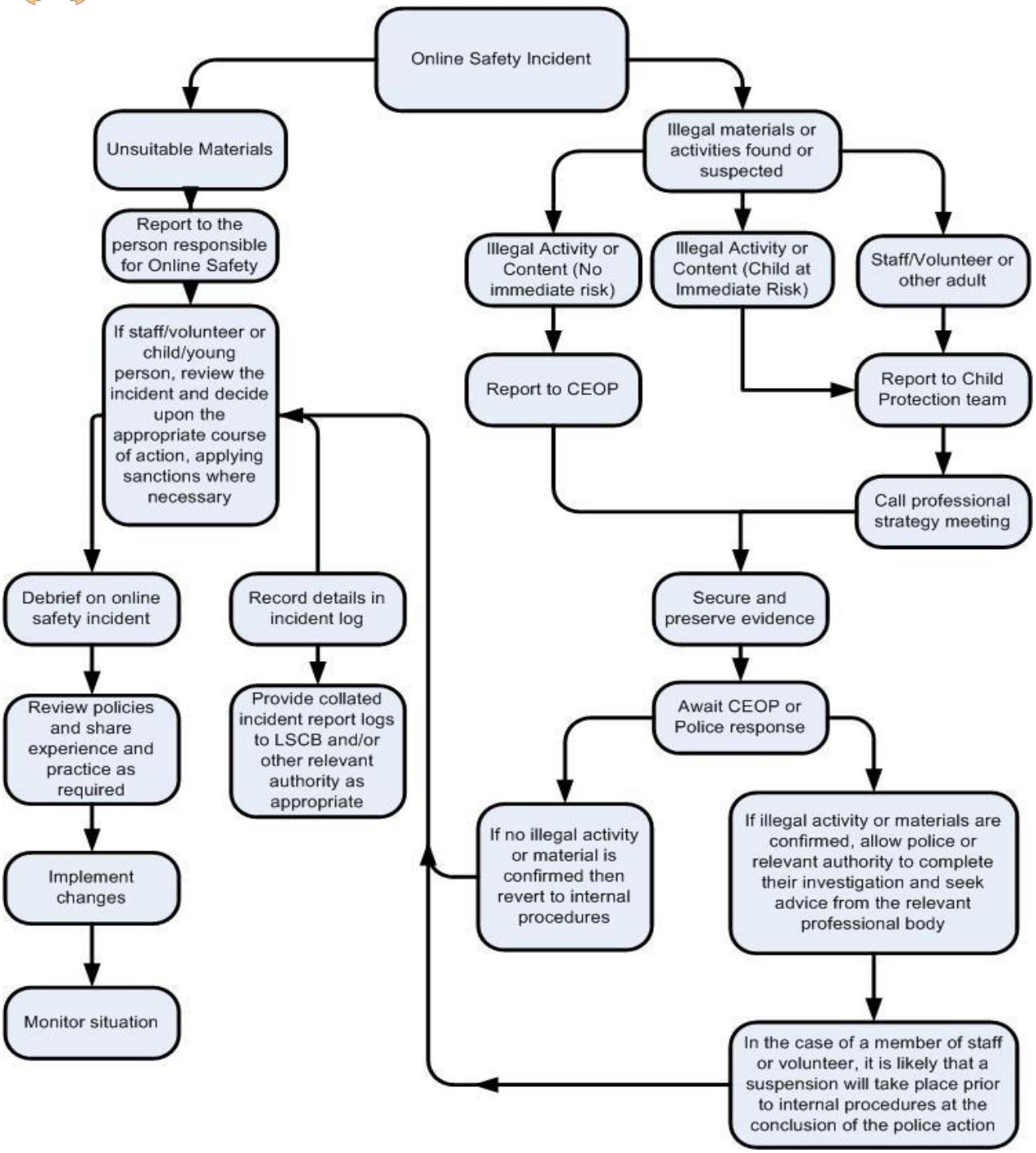
The school's use of social media for professional purposes will be checked regularly by the Online Safety Leader and Head of Admissions to ensure compliance with the school policies.

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.

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 for responding to online safety incidents and report immediately to the Principal and DSL.


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

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 the Regional Head of Schools/ Group 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 Principal, Regional Head of Schools and 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 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 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 as follows:

Student Incidents	Refer to class teacher / tutor	Refer to Principal	Refer to Police	Refer to technical support staff for action re filtering / security etc.	Inform parents / carers	Removal of network / internet access rights	Warning	Further sanction e.g. detention / exclusion
Deliberately accessing or trying to access material that could be considered illegal		X	X		x		x	x
Unauthorised use of non-educational sites during lessons	x	x					x	x
Unauthorised / inappropriate use of mobile phone / digital camera / another mobile device	x	x					x	x
Unauthorised / inappropriate use of social media / messaging apps / personal email	x	x					x	x
Unauthorised downloading or uploading of files	x	x						
Allowing others to access school network by sharing username and passwords	x	x		x	x		x	x
Attempting to access or accessing the school network, using another student's account	x	x		x	x		x	x
Attempting to access or accessing the school network, using the account of a member of staff	x	x		x	x		x	x
Corrupting or destroying the data of other users	x	x		x	x		x	x

	Refer to class teacher / tutor	Refer to Principal	Refer to Police	Refer to technical support staff for action re filtering / security etc.	Inform parents / carers	Removal of network / internet access rights	Warning	Further sanction e.g. detention / exclusion
Continued infringements of the above, following previous warnings or sanctions	x	x			x		x	x
Actions which could bring the school into disrepute or breach the integrity of the ethos of the school	x	x			x		x	x
Using proxy sites or other means to subvert the school's filtering system	x	x		x	x		x	x
Accidentally accessing offensive or pornographic material and failing to report the incident	x	x		x	x		x	
Deliberately accessing or trying to access offensive or pornographic material	x	x		x	x	x	x	x
Receipt or transmission of material that infringes the copyright of another person or infringes the Data Protection Act	x	x		x	x	x	x	x

Staff Incidents

	Refer to RHoS / HR	Refer to Police	Refer to Technical Support Staff for action re filtering etc.	Warning	Suspension	Disciplinary action
Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on unsuitable / inappropriate activities).	x	x	x	x	x	x
Inappropriate personal use of the internet / social media / personal email				x		
Unauthorised downloading or uploading of files				x		

	Refer to RHoS / HR	Refer to Police	Refer to Technical Support Staff for action re filtering etc.	Warning	Suspension	Disciplinary action
Allowing others to access school network by sharing username and passwords or attempting to access or accessing the school network, using another person's account	x		x	x		x
Careless use of personal data e.g. holding or transferring data in an insecure manner				x		
Deliberate actions to breach data protection or network security rules	x	x	x	x		x
Corrupting or destroying the data of other users or causing deliberate damage to hardware or software	x	x	x			x
Sending an email, text or message that is regarded as offensive, harassment or of a bullying nature	x			x		
Using personal email / social networking / instant messaging / text messaging to carrying out digital communications with students	x		x	x		x
Actions which could compromise the staff member's professional standing	x			x		
Actions which could bring the school into disrepute or breach the integrity of the ethos of the school	x		x	x	x	x
Using proxy sites or other means to subvert the school's filtering system	x		x	x		
Accidentally accessing offensive or pornographic material and failing to report the incident	x		x	x		
Deliberately accessing or trying to access offensive or pornographic material	x	x	x	x	x	x
Breaching copyright or licensing regulations	x			x		x
Continued infringements of the above, following previous warnings or sanctions	x	x	x	x		x