ROTHERHITHE SCHOOL

INTERNET SAFETY POLICY

Date of issue	January 2020	**Date of next review**	January 2022
Person responsible for updating this plan		Lisa Christiansen	

Copies of this plan are held by:

NAME	**DESIGNATION**
Max Walters	PA to Executive Head Teacher
Shared area	Policies

Introduction

Key people / dates

	Designated Safeguarding Lead (DSL) team	[Galiema Amien-Cleote]
	Online-safety lead	[Lisa Christensen]
	PSHE/SMSC lead	[Suzy Malakhi]
	Network manager / other technical support	[Andy Cunningham] Concero
	Date this policy was reviewed and by whom	January 2020 [Anthony Williams]
	Date of next review and by whom	[September 2020]

Contents

Introduction 1

Key people / dates 2

Contents 2

Overview 4

Aims 4

Scope 4

Roles and responsibilities 4

Head of School – [Lisa Christensen] 5

Designated Safeguarding Lead – Galiema Amien-Cloete 5

Governing Body, led by Online Safety / Safeguarding Link Governor – Chris McCree 6

All staff 7

PSHE / RSHE Lead/s – Suzy Malakhi 8

Computing Lead – Anthony Williams 8

Subject / aspect leaders 9

Network Manager/technician – Andy Cunningham 9

Data Protection Officer (DPO) – Craig Stilwell 9

LGfL TRUSTnet Nominated contacts – Galiema Amien-Cloete, Anthony Williams and Sam Russell 10

Volunteers and contractors 10

Pupils 10
Parents/carers 11
External groups including parent associations 11
Education and curriculum 11
Handling online-safety concerns and incidents 12
Actions where there are concerns about a child 13
Sexting 14
Upskirting 14
Bullying 14
Sexual violence and harassment 15
Misuse of school technology (devices, systems, networks or platforms) 15
Social media incidents 15
Data protection and data security 16
Appropriate filtering and monitoring 16
Email 16
School website 17
Cloud platforms 17
Password Security 18
Policy Statements 18
Staff Passwords 18
Pupil Passwords 19
Digital images and video 19
Social media 20
Rotherhithe's SM presence 20
Staff, pupils' and parents' SM presence 20
Device usage 22
Personal devices including wearable technology and bring your own device (BYOD) 22
Network / internet access on school devices 22
Trips / events away from school 23
Searching and confiscation 23
Appendices 24

Overview

Aims

This policy aims to:

- Set out expectations for all Rotherhithe Primary School community members' online behaviour, attitudes and activities and use of digital technology (including when devices are offline)
- Help all stakeholders to recognise that online/digital behaviour standards (including social media activity) must be upheld beyond the confines of the school gates and school day, and regardless of device or platform
- Facilitate the safe, responsible and respectful use of technology to support teaching & learning, increase attainment and prepare children and young people for the risks and opportunities of today's and tomorrow's digital world, to survive and thrive online
- Help school staff working with children to understand their roles and responsibilities to work safely and responsibly with technology and the online world:
    - for the protection and benefit of the children and young people in their care, and
    - for their own protection, minimising misplaced or malicious allegations and to better understand their own standards and practice
    - for the benefit of the school, supporting the school ethos, aims and objectives, and protecting the reputation of the school and profession
- Establish clear structures by which online misdemeanours will be treated, and procedures to follow where there are doubts or concerns (with reference to other school policies such as Behaviour Policy or Anti-Bullying Policy)

Scope

This policy applies to all members of the Rotherhithe Primary School community (including staff, governors, volunteers, contractors, pupils, parents/carers, visitors and community users) who have access to our digital technology, networks and systems, whether on-site or remotely, and at any time, or who use technology in their school role.

Roles and responsibilities

This school is a community and all members have a duty to behave respectfully online and offline, to use technology for teaching and learning and to prepare for life after school, and to immediately report any concerns or inappropriate behaviour, to protect staff, pupils, families and the reputation of the school. We learn together, make honest mistakes together and support each other in a world that is online and offline at the same time.

Head of School – [Lisa Christensen

Key responsibilities:

- Foster a culture of safeguarding where online safety is fully integrated into whole-school safeguarding
- Oversee the activities of the designated safeguarding lead and ensure that the DSL responsibilities listed in the section below are being followed and fully supported
- Ensure that policies and procedures are followed by all staff
- Undertake training in offline and online safeguarding, in accordance with statutory guidance and relevant Local Safeguarding Partnerships
- Liaise with the designated safeguarding lead on all online-safety issues which might arise and receive regular updates on school issues and broader policy and practice information
- Take overall responsibility for data management and information security ensuring the school's provision follows best practice in information handling; work with the DPO, DSL and governors to ensure a GDPR-compliant framework for storing data, but helping to ensure that child protection is always put first and data-protection processes support careful and legal sharing of information
- Ensure the school implements and makes effective use of appropriate ICT systems and services including school-safe filtering and monitoring, protected email systems and that all technology including cloud systems are implemented according to child-safety first principles
- Be responsible for ensuring that all staff receive suitable training to carry out their safeguarding and online safety roles
- Understand and make all staff aware of procedures to be followed in the event of a serious online safeguarding incident
- Ensure suitable risk assessments are undertaken so the curriculum meets needs of pupils, including risk of children being radicalised
- Ensure that there is a system in place to monitor and support staff (e.g. network manager) who carry out internal technical online-safety procedures
- Ensure governors are regularly updated on the nature and effectiveness of the school's arrangements for online safety
- Ensure the school website meets statutory requirements

Designated Safeguarding Lead – Galiema Amien-Cleote

Key responsibilities

- "The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety)."
- Where the online-safety coordinator is not the named DSL or deputy DSL, ensure there is regular review and open communication between these roles and that the DSL's clear overarching responsibility for online safety is not compromised

- Ensure “An effective approach to online safety [that] empowers a school or college to protect and educate the whole school or college community in their use of technology and establishes mechanisms to identify, intervene in and escalate any incident where appropriate.”
- “Liaise with the local authority https://www.southwark.gov.uk/ and work with other agencies in line with Working together to safeguard children”
- Take day to day responsibility for online safety issues and be aware of the potential for serious child protection concerns
- Work with the head of school, DPO and governors to ensure a GDPR-compliant framework for storing data, but helping to ensure that child protection is always put first and data-protection processes support careful and legal sharing of information
- Stay up to date with the latest trends in online safety
- Review and update this policy, other online safety documents and the strategy on which they are based and submit for review to the governors/trustees.
- Receive regular updates in online safety issues and legislation, be aware of local and school trends
- Ensure that online safety education is embedded across the curriculum and beyond, in wider school life
- Promote an awareness and commitment to online safety throughout the school community, with a strong focus on parents, who are often appreciative of school support in this area, but also including hard-to-reach parents
- Liaise with school technical, pastoral, and support staff as appropriate
- Communicate regularly with SLT and the designated safeguarding and online safety governor/committee to discuss current issues, review incident logs and filtering/change control logs and discuss how filtering and monitoring
- Ensure all staff are aware of the procedures that need to be followed in the event of an online safety incident, and that these are logged in the same way as any other safeguarding incident
- Oversee and discuss ‘appropriate filtering and monitoring’ with governors and ensure staff are aware.
- Ensure the 2018 DfE guidance on sexual violence and harassment is followed throughout the school and that staff adopt a zero-tolerance approach to this, as well as to bullying
- Facilitate training and advice for all staff

Governing Body, led by Online Safety / Safeguarding Link Governor – Chris McCree

Key responsibilities

- “Ensure an appropriate **senior member** of staff, from the school or college leadership team, is appointed to the role of DSL [with] **lead responsibility** for safeguarding and child protection (including online safety) [with] the appropriate status and authority [and] time, funding, training, resources and support…”
- Support the school in encouraging parents and the wider community to become engaged in online safety activities
- Have regular strategic reviews with the online-safety co-ordinator / DSL and incorporate online safety into standing discussions of safeguarding at governor meetings

- Where the online-safety coordinator is not the named DSL or deputy DSL, ensure that there is regular review and open communication between these roles and that the DSL's clear overarching responsibility for online safety is not compromised
- Work with the DPO, DSL and head of school to ensure a GDPR-compliant framework for storing data, but helping to ensure that child protection is always put first and data-protection processes support careful and legal sharing of information
- Check all school staff have read Part 1 of KCSIE; SLT and all working directly with children have read Annex A; check that Annex C on Online Safety reflects practice in your school
- "Ensure that all staff undergo safeguarding and child protection training at induction. The training should be regularly updated
- "Ensure appropriate filters and appropriate monitoring systems are in place
- "Ensure that children are taught about safeguarding, including online safety as part of providing a broad and balanced curriculum

All staff

Key responsibilities:

- Understand that online safety is a core part of safeguarding; as such it is part of everyone's job – never think that someone else will pick it up
- Know who the Designated Safeguarding Lead (DSL) and Online Safety Lead (OSL) is Galiema Amien-Cloete
- Read Part 1, Annex A and Annex C of Keeping Children Safe in Education
- Read and follow this policy in conjunction with the school's main safeguarding policy
- Record online-safety incidents in the same way as any safeguarding incident and report in accordance with school procedures.
- Understand that safeguarding is often referred to as a jigsaw puzzle – you may have discovered the missing piece so do not keep anything to yourself
- Sign and follow the staff acceptable use policy and code of conduct/handbook
- Notify the DSL/OSL if policy does not reflect practice in your school and follow escalation procedures if concerns are not promptly acted upon
- Identify opportunities to thread online safety through all school activities, both outside the classroom and within the curriculum, supporting curriculum/stage/subject leads, and making the most of unexpected learning opportunities as they arise
- Whenever overseeing the use of technology (devices, the internet, new technology such as augmented reality, etc) in school or setting as homework tasks, encourage sensible use, monitor what pupils are doing and consider potential dangers and the age appropriateness of websites
- To carefully supervise and guide pupils when engaged in learning activities involving online technology (including, extra-curricular and extended school activities if relevant), supporting them with search skills, critical thinking (e.g. fake news), age appropriate materials and signposting, and legal issues such as copyright and data law
- Prepare and check all online source and resources before using within the classroom

- Encourage pupils to follow their acceptable use policy, remind them about it and enforce school sanctions
- Notify the DSL/OSL of new trends and issues before they become a problem
- Take a zero-tolerance approach to bullying and low-level sexual harassment
- Be aware that you are often most likely to see or overhear online-safety issues in the playground, corridors, toilets and other communal areas outside the classroom – let the DSL/OSL know
- Receive regular updates from the DSL/OSL and have a healthy curiosity for online safety issues
- Model safe, responsible and professional behaviours in their own use of technology. This includes outside the school hours and site, and on social media, in all aspects upholding the reputation of the school and of the professional reputation of all staff.

PSHE / SMSC Lead/s – Suzy Malakhi

Key responsibilities:

- As listed in the 'all staff' section, plus:
- Embed consent, mental wellbeing, healthy relationships and staying safe online into the PSHE / Relationships education, relationships and sex education (RSE) and health education curriculum. "This will include being taught what positive, healthy and respectful online relationships look like, the effects of their online actions on others and knowing how to recognise and display respectful behaviour online. Throughout these subjects, teachers will address online safety and appropriate behaviour in an age appropriate way that is relevant to their pupils' lives."
- This will complement the computing curriculum, which covers the principles of online safety at all key stages, with progression in the content to reflect the different and escalating risks that pupils face. This includes how to use technology safely, responsibly, respectfully and securely, and where to go for help and support when they have concerns about content or contact on the internet or other online technologies.
- Work closely with the DSL/OSL and all other staff to ensure an understanding of the issues, approaches and messaging within PSHE / RSHE.

Computing Lead – Anthony Williams

Key responsibilities:

- As listed in the 'all staff' section, plus:
- Oversee the delivery of the online safety element of the Computing curriculum in accordance with the national curriculum
- Work closely with the DSL/OSL and all other staff to ensure an understanding of the issues, approaches and messaging within Computing
- Collaborate with technical staff and others responsible for ICT use in school to ensure a common and consistent approach, in line with acceptable-use agreements

Subject / aspect leaders

Key responsibilities:

- As listed in the 'all staff' section, plus:
- Look for opportunities to embed online safety in your subject or aspect, and model positive attitudes and approaches to staff and pupils alike
- Consider how the UKCIS framework Education for a Connected World and Teaching Online Safety in Schools can be applied in your context
- Work closely with the DSL/OSL and all other staff to ensure an understanding of the issues, approaches and messaging within Computing
- Ensure subject specific action plans also have an online-safety element

Network Manager/technician – Andy Cunningham

Key responsibilities:

- As listed in the 'all staff' section, plus:
- Keep up to date with the school's online safety policy and technical information in order to effectively carry out their online safety role and to inform and update others as relevant
- Work closely with the designated safeguarding lead / online safety lead / data protection officer / LGfL nominated contact to ensure that school systems and networks reflect school policy
- Ensure the above stakeholders understand the consequences of existing services and of any changes to these systems
- Support and advise on the implementation of 'appropriate filtering and monitoring' as decided by the DSL and senior leadership team
- Maintain up-to-date documentation of the school's online security and technical procedures
- To report online-safety related issues that come to their attention in line with school policy
- Manage the school's systems, networks and devices, according to a strict password policy, with systems in place for detection of misuse and malicious attack, with adequate protection, encryption and backup for data, including disaster recovery plans, and auditable access controls

Data Protection Officer (DPO) – Craig Stilwell

Key responsibilities:

- Be aware of references to the relationship between data protection and safeguarding in key Department for Education documents 'Keeping Children Safe in Education' and 'Data protection: a toolkit for schools' (August 2018), especially this quote from the latter document:
- "GDPR does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Lawful and secure information sharing between schools, Children's Social Care, and other local agencies, is essential for keeping children safe and ensuring they get the support they need. **The Data Protection Act 2018 introduced 'safeguarding' as a reason to be able to process sensitive, personal information, even without consent** (DPA, Part 2, 18; Schedule 8, 4) When

Designated Safeguarding Leads in schools are considering whether, or not, to share safeguarding information (especially with other agencies) it is considered best practice for them to record who they are sharing that information with and for what reason. If they have taken a decision not to seek consent from the data subject and/or parent/carer that should also be recorded within the safeguarding file. All relevant information can be shared without consent if to gain consent would place a child at risk. Fears about sharing information **must not be allowed** to stand in the way of promoting the welfare and protecting the safety of children."

- Work with the DSL, head of school and governors to ensure frameworks are in place for the protection of data and of safeguarding information sharing as outlined above.
- Ensure that all access to safeguarding data is limited as appropriate, and also monitored and audited

LGfL TRUSTnet Nominated contacts – Galiema Amien-Cloete, Anthony Williams and Sam Russell

Key responsibilities:

- To ensure all LGfL services are managed on behalf of the school in line with school policies, following data handling procedures as relevant
- Work closely with the DSL and DPO to ensure they understand who the nominated contacts are and what they can do / what data access they have, as well as the implications of all existing services and changes to settings that you might request
- Ensure the DPO is aware of the GDPR information on the relationship between the school and LGfL

Volunteers and contractors

Key responsibilities:

- Read, understand, sign and adhere to an acceptable use policy (AUP)
- Report any concerns, no matter how small, to the designated safety lead / online safety coordinator as named in the AUP
- Maintain an awareness of current online safety issues and guidance
- Model safe, responsible and professional behaviours in their own use of technology

Pupils

Key responsibilities:

- Read, understand, sign and adhere to the pupil acceptable use policy and review this annually
- Understand the importance of reporting abuse, misuse or access to inappropriate materials

- Know what action to take if they or someone they know feels worried or vulnerable when using online technology
- To understand the importance of adopting safe and responsible behaviours and good online safety practice when using digital technologies outside of school and realise that the school's acceptable use policies cover actions out of school, including on social media
- Understand the benefits/opportunities and risks/dangers of the online world and know who to talk to at school or outside school if there are problems

Parents/carers

Key responsibilities:

- Read, sign and promote the school's parental acceptable use policy (AUP) and read the pupil AUP and encourage their children to follow it
- Consult with the school if they have any concerns about their children's and others' use of technology
- Promote positive online safety and model safe, responsible and positive behaviours in their own use of technology, including on social media: not sharing other's images or details without permission and refraining from posting negative, threatening or violent comments about others, including the school staff, volunteers, governors, contractors, pupils or other parents/carers.

External groups including parent associations

Key responsibilities:

- Any external individual/organisation will sign an acceptable use policy prior to using technology or the internet within school
- Support the school in promoting online safety and data protection
- Model safe, responsible, respectful and positive behaviours in their own use of technology, including on social media: not sharing other's images or details without permission and refraining from posting negative, threatening or violent comments about others, including the school staff, volunteers, governors, contractors, pupils or other parents/carers

Education and curriculum

At Rotherhithe Primary School, we recognise that online safety and broader digital resilience must be thread throughout the curriculum and that is why we are working to adopt the cross-curricular framework 'Education for a Connected World' from UKCIS (the UK Council for Internet Safety.)

Annual reviews of curriculum plans / schemes of work (including for SEND pupils) are used as an opportunity to follow this framework more closely in its key areas of Self-image and Identity, Online relationships, Online reputation, Online bullying, Managing online information, Health, Wellbeing and lifestyle, Privacy and security, and Copyright and ownership.

Handling online-safety concerns and incidents

This school commits to take all reasonable precautions to ensure online safety, but recognises that incidents will occur both inside school and outside school. All members of the school are encouraged to report issues swiftly to allow us to deal with them quickly and sensitively through the school's escalation processes.

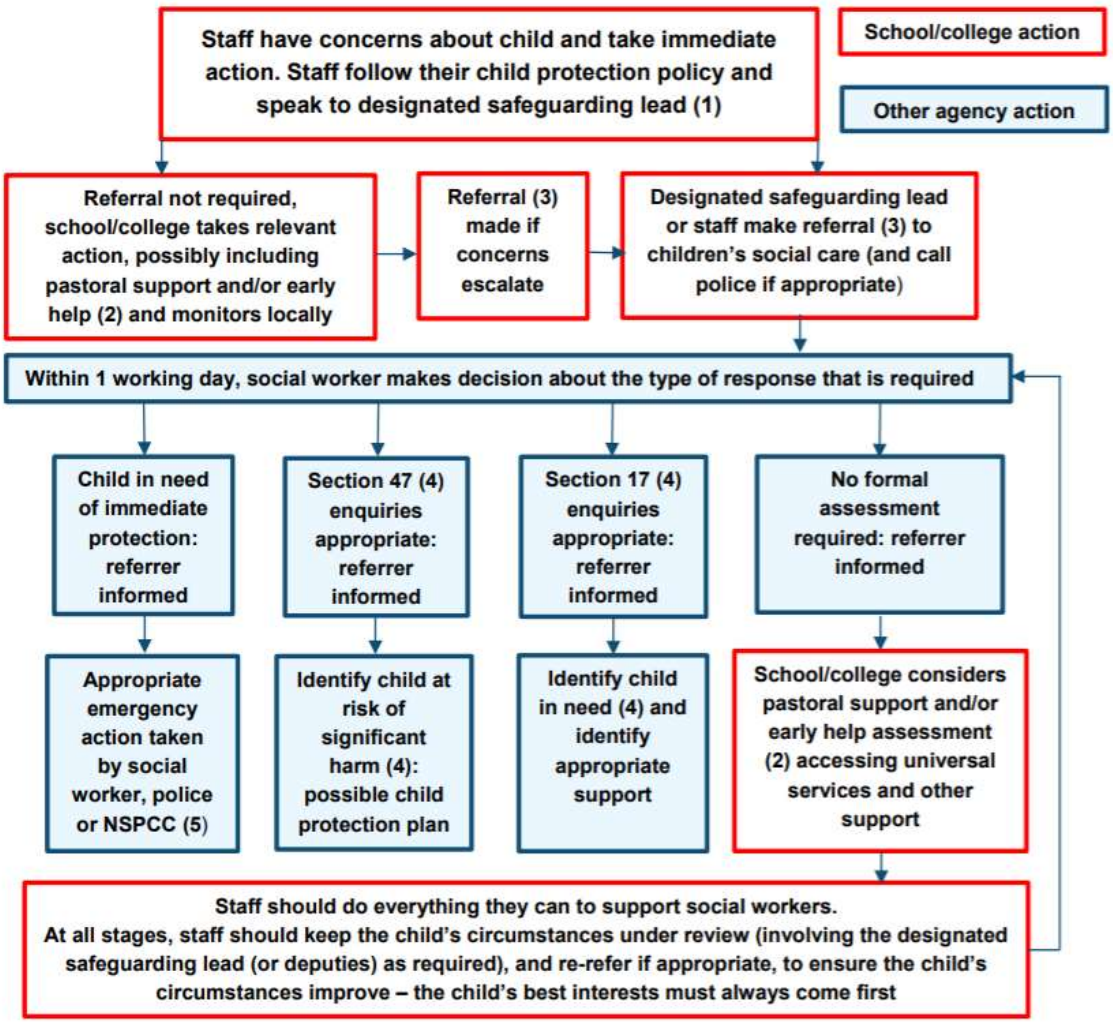
Any suspected online risk or infringement should be reported to the online safety lead / designated safeguarding lead on the same day – where clearly urgent, it will be made by the end of the lesson.

Any concern/allegation about staff misuse is always referred directly to the Head of school, unless the concern is about the Head of school in which case the compliant is referred to the Chair of Governors and the LADO (Local Authority's Designated Officer). Staff may also use the NSPCC Whistleblowing Helpline.

The school will actively seek support from other agencies as needed. We will inform parents/carers of online-safety incidents involving their children, and the Police where staff or pupils engage in or are subject to behaviour which we consider is particularly disturbing or breaks the law (particular procedures are in place for sexting and upskirting; see section below).

Actions where there are concerns about a child

The following flow chart is taken from page 13 of Keeping Children Safe in Education 2019 as the key education safeguarding document. As outlined previously, online safety concerns are no different to any other safeguarding concern.



(1) In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.

(2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of Working Together to Safeguard Children provides detailed guidance on the early help process.

(3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of Working Together to Safeguard Children.

(4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of Working Together to Safeguard Children.

(5) This could include applying for an Emergency Protection Order (EPO).

Sexting

Staff other than the DSL must not attempt to view, share or delete the image or ask anyone else to do so, but to go straight to the DSL.

The school DSL will in turn use the full guidance document, Sexting in Schools and Colleges to decide next steps and whether other agencies need to be involved.

It is important that everyone understands that whilst sexting is illegal, pupils can come and talk to members of staff if they have made a mistake or had a problem in this area.

Upskirting

It is important that everyone understands that upskirting (taking a photo of someone under their clothing) is now a criminal offence, as highlighted in Keeping Children Safe in Education and that pupils can come and talk to members of staff if they have made a mistake or had a problem in this area.

Bullying

Online bullying should be treated like any other form of bullying and the school bullying policy should be followed for online bullying, which may also be referred to as cyberbullying.

Annex G

Flowchart for responding to incidents

Sexual violence and harassment

Any incident of sexual harassment or violence (online or offline) should be reported to the DSL who will follow the full guidance. Staff should work to foster a zero-tolerance culture.

Misuse of school technology (devices, systems, networks or platforms)

Where pupils contravene these rules, the school behaviour policy will be applied; where staff contravene these rules, action will be taken as outlined in the staff code of conduct/handbook.

Further to these steps, the school reserves the right to withdraw – temporarily or permanently – any or all access to such technology, or the right to bring devices onto school property.

Social media incidents

See the social media section later in this document for rules and expectations of behaviour for children and adults in the Rotherhithe Primary School community. These are also governed by school Acceptable Use Policies.

Breaches will be dealt with in line with the school behaviour policy (for pupils) or code of conduct/handbook (for staff).

Further to this, where an incident relates to an inappropriate, upsetting, violent or abusive social media post by a member of the school community, Rotherhithe Primary School will request that the post be deleted and will expect this to be actioned promptly.

Where an offending post has been made by a third party, the school may report it to the platform it is hosted on, and may contact the Professionals' Online Safety Helpline for support or help to accelerate this process.

Data protection and data security

All pupils, staff, governors, volunteers, contractors and parents are bound by the school's data protection policy and agreements. Further, this school makes use of the following discounted GDPR solution from LGfL:

- GDPRiS from Groupcall
- GDPR.co.uk from Wonde

Rigorous controls on the LGfL network, USO sign-on for technical services, firewalls and filtering all support data protection. The following data security products are also used to protect the integrity of data, which in turn supports data protection: USO sign on for LGfL services

The head of school, data protection officer and governor's work together to ensure a GDPR-compliant framework for storing data, but which ensures that child protection is always put first and data-protection processes support careful and legal sharing of information.

Staff are reminded that all safeguarding data is highly sensitive and should be treated with the strictest confidentiality at all times, and only shared via approved channels to colleagues or agencies with appropriate permissions. The use of USO-FX to encrypt all non-internal emails is compulsory for sharing pupil data. If this is not possible, the DPO and DSL should be informed in advance.

Appropriate filtering and monitoring

At this school, the internet connection is provided by LGfL. This means we have a dedicated and secure, schoolsafe connection that is protected with firewalls and multiple layers of security, including a web filtering system called WebScreen 3, which is made specifically to protect children in schools.

All Riverhill Federation owned Windows devices are now monitored for use via **Senso** for safeguarding purposes, regardless of whether the device is on or off Riverhill Federation premises. This uses automated processes to monitor and log keystrokes, phrases, screen content and traffic for inappropriate or offensive material. Manual targeted monitoring can and will be deployed if deemed necessary but will not be undertaken just because it is technically feasible. This is for your own safety and that of others. The Head of School monitors Senso reporting for staff and the Safeguarding and Interventions officer monitors it for children.

Email

- Pupils at this school use the LondonMail system from LGfL for all school emails
- Staff at this school use the StaffMail system for all school emails

Both these systems are linked to the USO authentication system and are fully auditable, trackable and managed by LGfL on behalf of the school. This is for the mutual protection and privacy of all staff, pupils and parents, as well as to support data protection.

General principles for email use are as follows:

- Email is the only means of electronic communication to be used between staff and pupils / staff and parents (in both directions). Use of a different platform must be approved in advance by the data-protection officer / head of school in advance. Any unauthorised attempt to use a different system may be a safeguarding concern or disciplinary matter and should be notified to the DSL (if by a child) or to the Head of school (if by a staff member).
- Email may only be sent using the email systems above. There should be no circumstances where a private email is used; if this happens by mistake, the DSL/Head of school/DPO should be informed immediately.
- Staff or pupil personal data should never be sent/shared/stored on email.
    - If data needs to be shared with external agencies, USO-FX and Egress systems are available from LGfL.
    - Internally, staff should use the school network, including when working from home when remote access is available via the RAV3 system.
- Appropriate behaviour is expected at all times, and the system should not be used to send inappropriate materials or language which is or could be construed as bullying, aggressive, rude, insulting, illegal or otherwise inappropriate, or which (for staff) might bring the school into disrepute or compromise the professionalism of staff
- Pupils and staff are NOT allowed to use the email system for personal use and should be aware that all use is monitored, their emails may be read and the same rules of appropriate behaviour apply at all times. Emails using inappropriate language, images, malware or to adult sites may be blocked and not arrive at their intended destination.

School website

The school website is a key public-facing information portal for the school community (both existing and prospective stakeholders) with a key reputational value. The Head of school and Governors have delegated has been the day-to-day responsibility of updating the content of the website to Tony Cavallo. The site is managed by Tony Cavallo.

Where other staff submit information for the website, they are asked to remember:

- School have the same duty as any person or organisation to respect and uphold copyright law – schools have been fined thousands of pounds for copyright breaches. Sources must always be credited and material only used with permission. If in doubt, check with Tony Cavallo. There are many open-access libraries of high-quality public-domain images that can be used.
- Where pupil work, images or videos are published on the website, their identities are protected and full names are not published.

Cloud platforms

This school adheres to the principles of the DfE document '[Cloud computing services: guidance for school leaders, school staff and governing bodies]'.

The data protection officer and network manager analyse and document systems and procedures before they are implemented, and regularly review them.

The following principles apply:

- Privacy statements inform parents and children (13+) when and what sort of data is stored in the cloud
- The DPO approves new cloud systems, what may or may not be stored in them and by whom. This is noted in a DPIA (data-protection impact statement) and parental permission is sought
- Regular training ensures all staff understand sharing functionality and this is audited to ensure that pupil data is not shared by mistake. Open access or widely shared folders are clearly marked as such
- Pupils and staff are only given access and/or sharing rights when they can demonstrate an understanding of what data may be stored and how it can be seen
- Two-factor authentication is used for access to staff or pupil data
- Pupil images/videos are only made public with parental permission
- Only school-approved platforms are used by pupils or staff to store pupil work
- All stakeholders understand the difference between consumer and education products (e.g. a private Gmail account or Google Drive and those belonging to a managed educational domain)

Password Security

Policy Statements

- All users will have clearly defined access rights to school technical systems and devices. Details of the access rights available to groups of users will be recorded by the Network Manager and will be reviewed, at least annually, by the Online Safety Group.
- 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.
- *Passwords for new users, and replacement passwords for existing users will be allocated by the schools Admin Assistant. Any changes carried out must be notified to the manager of the password security policy*
- *Passwords for new users and replacement passwords for existing users will be issued through an automated process*.
- *Users will change their passwords at regular intervals*
- *Where passwords are set / changed manually requests for password changes should be authenticated by Admin Assistant) 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 automated process which will keep an up to date record of users and their usernames.
- the password should be a minimum of 8 characters long and must include three of – uppercase character, lowercase character, number, special characters
- *must not include proper names or any other personal information about the user that might be known by others*
- *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*
- *passwords should be different for different accounts, to ensure that other systems are not put at risk if one is compromised and should be different for systems used inside and outside of school*
- should be changed at least every 60 to 90 days
- should not re-used for 6 months and be significantly different from previous passwords created by the same user*. The last four passwords cannot be re-used*.

Pupil Passwords

- **All users will be provided with a username and password** by automated routine which will keep an up to date record of users and their usernames.
- *Users will be required to change their password every 60 to 90 days*
- Pupils will be taught the importance of password security
- *School* password routines should model good password practice for users

Digital images and video

When a pupil joins the school, parents/carers are asked if they give consent for their child's image to be captured in photographs or videos, for what purpose and for how long. Parents answer as follows:

- For displays around the school
- For the newsletter
- For use in paper-based school marketing
- For online prospectus or websites
- For a specific high profile image for display or publication
- For social media

Whenever a photo or video is taken/made, the member of staff taking it will check the latest database before using it for any purpose.

Any pupils shown in public facing materials are never identified with more than first name.

All staff are governed by their contract of employment and the school's Acceptable Use Policy, which covers the use of mobile phones/personal equipment for taking pictures of pupils, and where these are stored. At Rotherhithe Primary School, no member of staff will ever use their personal phone to capture photos or videos of pupils. Photos are stored on the school network in line with the retention schedule of the school Data Protection Policy.

Staff and parents are reminded annually to check about the importance of not sharing without permission, due to reasons of child protection, data protection, religious or cultural reasons, or simply for reasons of personal privacy.

We encourage young people to think about their online reputation and digital footprint, so we should be good adult role models by not oversharing (or providing embarrassment in later life – and it is not for us to judge what is embarrassing or not).

Pupils are taught about how images can be manipulated in their online safety education programme and also taught to consider how to publish for a wide range of audiences which might include governors, parents or younger children

Pupils are advised to be very careful about placing any personal photos on social media. They are taught to understand the need to maintain privacy settings so as not to make public, personal information.

Pupils are taught that they should not post images or videos of others without their permission. We teach them about the risks associated with providing information with images (including the name of the file), that reveals the identity of others and their location. We teach them about the need to keep their data secure and what to do if they / or a friend are subject to bullying or abuse.

Social media

Rotherhithe's SM presence

Rotherhithe Primary School works on the principle that if we don't manage our social media reputation, someone else will.

Accordingly, we manage and monitor our social media footprint carefully to know what is being said about the school and to respond to criticism and praise in a fair, responsible manner.

Tony Cavallo is responsible for managing our Twitter accounts and checking our Wikipedia and Google reviews. He follows the guidance in the LGfL / Safer Internet Centre online-reputation management.

Staff, pupils' and parents' SM presence

Social media is a fact of modern life, and as a school, we accept that many parents, staff and pupils will use it. However, as stated in the acceptable use policies which all members of the school community sign, we expect everybody to behave in a positive manner, engaging respectfully with the school and each other on social media, in the same way as they would face to face.

This positive behaviour can be summarised as not making any posts which are or could be construed as bullying, aggressive, rude, insulting, illegal or otherwise inappropriate, or which might bring the school or (particularly for staff) teaching profession into disrepute. This applies both to public pages and to private posts, e.g. parent chats, pages or groups.

If parents have a concern about the school, we would urge them to contact us directly and in private to resolve the matter. If an issue cannot be resolved in this way, the school complaints procedure should be followed. Sharing complaints on social media is unlikely to help resolve the matter, but can cause upset to staff, pupils and parents, also undermining staff morale and the reputation of the school (which is important for the pupils we serve).

Many social media platforms have a minimum age of 13, but the school regularly deals with issues arising on social media with pupils under the age of 13. We ask parents to respect age ratings on social media platforms wherever possible and not encourage or condone underage use.

However, the school has to strike a difficult balance of not encouraging underage use at the same time as needing to acknowledge reality in order to best help our pupils to avoid or cope with issues if they arise. Online safety lessons will look at social media and other online behaviour, how to be a good friend online and how to report bullying, misuse, intimidation or abuse. However, children will often learn most from the models of behaviour they see and experience, which will often be from adults.

Parents can best support this by talking to their children about the apps, sites and games they use (you don't need to know them – ask your child to explain it to you), with whom, for how long, and when (late at night / in bedrooms is not helpful for a good night's sleep and productive teaching and learning at school the next day).

The school has an official Twitter (managed by Tony Cavallo) and will respond to general enquiries about the school, but asks parents/carers not to use these channels to communicate about their children.

Email is the official electronic communication channel between parents and the school, and between staff and pupils.

Pupils are not allowed* to be 'friends' with or make a friend request** to any staff, governors, volunteers and contractors or otherwise communicate via social media.

Pupils are discouraged from 'following' staff, governor, volunteer or contractor public accounts (e.g. following a staff member with a public Instagram account). However, we accept that this can be hard to control (but this highlights the need for staff to remain professional in their private lives). In the reverse situation, however, staff must not follow such public pupil accounts.

* Exceptions may be made, e.g. for pre-existing family links, but these must be approved by the Head of school, and should be declared upon entry of the pupil or staff member to the school.

** Any attempt to do so may be a safeguarding concern or disciplinary matter and should be notified to the DSL (if by a child) or to the Head of school (if by a staff member).

Staff are reminded that they are obliged not to bring the school or profession into disrepute and the easiest way to avoid this is to have the strictest privacy settings and avoid inappropriate sharing and oversharing online. They should never discuss the school or its stakeholders on social media and be careful that their personal opinions might not be attributed to the school, trust or local authority, bringing the school into disrepute.

The serious consequences of inappropriate behaviour on social media are underlined by the fact that there have been 200 Prohibition Orders issued to teachers over the past four years related to the misuse of technology/social media.

All members of the school community are reminded that particularly in the context of social media, it is important to comply with the school policy on Digital Images and Video and permission is sought before uploading photographs, videos or any other information about other people.

Device usage

Personal devices including wearable technology and bring your own device (BYOD)

- **Pupils in year 5 & 6** who walk home alone are allowed to bring mobile phones in for emergency use only. Children must hand their phones in to the class teacher in the morning. Phones will be locked away until the end of the day. Any attempt to use a phone in lessons without permission or to take illicit photographs or videos will lead to pupils being sent to their Assistant head and the withdrawal of mobile privileges. Important messages and phone calls to or from parents can be made at the school office, which will also pass on messages from parents to pupils in emergencies.
- **All staff who work directly with children** should leave their mobile phones on silent and only use them in private staff areas during school hours. See also the Digital images and video section on page 19 and Data protection and data security section on page 16. Child/staff data should never be downloaded onto a private phone. If a staff member is expecting an important personal call when teaching or otherwise on duty, they may leave their phone with the school office to answer on their behalf or ask for the message to be left with the school office.
- **Volunteers, contractors, governors** should leave their phones in their pockets and turned off. Under no circumstances should they be used in the presence of children or to take photographs or videos. If this is required (e.g. for contractors to take photos of equipment or buildings), permission of the head of school should be sought and this should be done in the presence of a member staff.
- **Parents** are asked to leave their phones in their pockets and turned off when they are on site. They should ask permission before taking any photos, e.g. of displays in corridors or classrooms, and avoid capturing other children. When at school events, please refer to the Digital images and video section of this document on page 19. Parents are asked not to call pupils on their mobile phones during the school day; urgent messages can be passed via the school office.

All the above information with regard to mobile phones also refers to any portable digital devices e.g. Smart and Apple Watches

Network / internet access on school devices

- **Pupils** are not allowed networked file access via personal devices.
- **All staff who work directly with children** should leave their mobile phones on silent and only use them in private staff areas during school hours. See also the Digital images and video section on page 19 and Data protection and data security section on page 16. Child/staff data should never be downloaded onto a private phone.
- **Volunteers, contractors, governors** can access the guest wireless network but have no access to networked files/drives, subject to the acceptable use policy. All internet traffic is monitored.

- **Parents** have no access to the school network or wireless internet on personal devices. All internet traffic is monitored.

Trips / events away from school

For school trips/events away from school, teachers will be issued a school duty phone and this number used for any authorised or emergency communications with pupils and parents. Any deviation from this policy (e.g. by mistake or because the school phone will not work) will be notified immediately to the head of school. Teachers are permitted to use their personal mobile phone on trips or in school in an emergency only and will ensure that the number is hidden to avoid a parent or pupil accessing a teacher's private phone number.

Searching and confiscation

In line with the DfE guidance 'Searching, screening and confiscation: advice for schools', the Head of school and staff authorised by them have a statutory power to search pupils/property on school premises. This includes the content of mobile phones and other devices, for example as a result of a reasonable suspicion that a device contains illegal or undesirable material, including but not exclusive to sexual images, pornography, violence or bullying.

Appendices

Where marked with * the latest version or a template you may use is available at safepolicies.lgfl.net

1. Safeguarding Incident log https://www.myconcern.education/Account/Login
2. Safeguarding and Child Protection Policy http://rotherhitheprimary.co.uk/school-policies/
3. Behaviour Policy / Anti-Bullying Policy
4. Staff Code of Conduct / Handbook
5. *Acceptable Use Policies (AUPs) for:
    - *Pupils
    - *Staff, Volunteers Governors & Contractors
    - *Parents
6. *Letter to parents about filming/photographing/streaming school events
7. *Prevent Risk Assessment Template
8. *E-Security Policy
9. *Online-Safety Questions from the Governing Board (UKCIS)
10. *Education for a Connected World cross-curricular digital resilience framework (UKCIS)
11. *Safer working practice for those working with children & young people in education (Safer Recruitment Consortium)
12. *Working together to safeguard children (DfE)
13. *Searching, screening and confiscation advice (DfE)
14. *Sexual violence and sexual harassment between children in schools and colleges (DfE advice)
15. *Sexting guidance from UKCIS
    - *Overview for all staff
    - *Full guidance for school DSLs
16. *Prevent Duty Guidance for Schools (DfE and Home Office documents)
17. *Data protection and data security advice, procedures etc
18. *Preventing and tackling bullying (DfE)
19. Cyber bullying: advice for head of schools and school staff (DfE) – find this at bullying.lgfl.net
20. *RAG (red-amber-green) audits for statutory requirements of school websites