

# WINDLESHAM HOUSE SCHOOL

## ONLINE SAFETY POLICY

**Approved:** 21 September 2023

**Last Technical Review:** September 2023

**Next Review date:** September 2024



**Policy Ref 01-02**

**Responsible Staff:** Head of Digital Learning & Strategy, Andy Calas

**Responsible Governor:** Adam Perry

**Summary Policy Statement:** This Online Safety Policy outlines the commitment of Windlesham House School to safeguard members of our school community online in accordance with statutory guidance and best practice.

This policy and procedures also apply to our Early Years Foundation Stage and after School care.

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## **1. Scope of the Online Safety Policy**

This Online Safety Policy applies to all members of the school community (including staff, pupils, governors, volunteers, parents and carers, visitors, community users) who have access to and are users of school digital systems, both in and out of the school. It also applies to the use of personal digital technology on the school site (where allowed).

Windlesham House 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 safety behaviour that take place out of school.

## **2. Policy development, monitoring and review**

This Online Safety Policy has been developed by the Head of Digital Learning in conjunction with the Designated Safeguarding Lead (DSL), Headteacher and Senior Leadership Team and the Governing Body.

The school will monitor the impact of the policy using:

- logs of reported incidents
- Filtering and monitoring logs
- internal monitoring data for network activity
- surveys/questionnaires of pupils, parents & carers, staff

The Governing Body will, as a minimum, receive an annual report on the implementation of the policy. Termly reports to the Governing Body on online safety will be provided to the Governing Body under the termly safeguarding report to Governors.

## **3. Responsibilities**

To ensure the online safeguarding of members of our school community it is important that all members of that community work together to develop safe and responsible online behaviours. This includes learning from each other and from good practice elsewhere and reporting inappropriate online behaviours, concerns, and misuse as soon as these become apparent. While this will be a team effort, the following sections outline the online safety roles and responsibilities of individuals and groups within the school.

### **3.1 Headteacher and senior leadership team**

- The headteacher has a duty of care for ensuring the safety (including online safety) of members of the school community and fostering a culture of safeguarding, though the day-to-day responsibility for online safety is held by the Designated Safeguarding Lead, as defined in Keeping Children Safe in Education.
- The headteacher, the DSL and the Bursar are aware of the procedures to be followed in the event of a serious online safety allegation being made against a member of staff.
- The headteacher and SLT are responsible for ensuring that the Designated Safeguarding Lead / Online Safety Lead, IT provider/technical staff, and other relevant staff carry out their responsibilities effectively and receive suitable training to enable them to carry out their roles and train other colleagues, as relevant.

- The headteacher and SLT 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.
- The headteacher and SLT will receive regular monitoring reports from the Designated Safeguarding Lead / Online Safety Lead.
- The headteacher and SLT will work with the responsible Governor, the designated safeguarding lead (DSL) and IT service providers in all aspects of filtering and monitoring.

### **3.2 Governors**

Governors are responsible for the approval of the Online Safety Policy and for reviewing the effectiveness of the policy. The Governing Body will receive termly reports on online safety.

A member of the governing body will take on the role of Online Safety Governor to include:

- Regular meetings with the Designated Safeguarding Lead / Online Safety Lead
- Regularly receiving (collated and anonymised) reports of online safety incidents
- Checking that provision outlined in the Online Safety Policy (e.g. online safety education provision and staff training is taking place as intended)
- Ensuring that the filtering and monitoring provision is reviewed and recorded, at least annually. (The review will be conducted by members of the SLT, the DSL, and the IT service provider and involve the responsible governor)
- Reporting to relevant governors group/meeting
- Receiving relevant training
- Membership of the school Online Safety Group

The governing body will also support the school in encouraging parents/carers and the wider community to become engaged in online safety activities.

### **3.3 Designated Safety Lead (DSL)/Online Safety Lead**

The DSL will:

- Hold the lead responsibility for online safety, within their safeguarding role.
- Receive relevant and regularly updated training in online safety to enable them to understand the risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online.
- Meet regularly with the online safety governor to discuss current issues, review incidents and filtering and monitoring logs and ensuring that annual filtering and monitoring checks are carried out.
- Attend relevant governing body meetings/groups.
- Report regularly to the headteacher and SLT
- Be responsible for receiving reports of online safety incidents and handling them and deciding whether to make a referral by liaising with relevant agencies, ensuring that all incidents are recorded.
- Liaise with staff and IT providers on matters of safety and safeguarding and welfare (including online and digital safety)
- Lead the Online Safety Group
- Receiving reports of online safety issues, being aware of the potential for serious child protection concerns and ensure that these are logged to inform future online safety developments.

- Have a leading role in establishing and reviewing the school online safety policies/documents.
- Promote an awareness of and commitment to online safety education / awareness raising across the school and beyond by coordinating an online safety education programme across the school years, including themed events.
- Liaise with curriculum leaders to ensure that the online safety curriculum is planned, mapped, embedded and evaluated.
- Ensure that all staff are aware of the procedures that need to be followed in the event of an online safety incident taking place and the need to immediately report those incidents.
- Provide (or identify sources of) training and advice for staff/governors/parents/carers/**pupils**
- Liaise with technical staff, pastoral staff and support staff
- Receive regularly updated training to allow them to understand how digital technologies are used and are developing (particularly by pupils) with regard to the areas defined In Keeping Children Safe in Education: content, contact, conduct, commerce

### **3.4 Teaching and support staff**

School staff are responsible for ensuring that:

- They have an awareness of current online safety matters/trends and of the current school Online Safety Policy and practices.
- They understand that online safety is a core part of safeguarding.
- They have read, understood, and signed the staff acceptable use agreement (SUA)
- They immediately report any suspected misuse or problem to the schools DSL, online safety lead and IT Service team for investigation/action, in line with the school safeguarding procedures.
- All digital communications with pupils and parents/carers are 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.
- Ensure pupils understand and follow the Online Safety Policy and acceptable/safe use agreements, have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations
- They supervise and 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 pupils are guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches
- Where lessons take place using live-streaming or video-conferencing, there is regard to national safeguarding guidance and local safeguarding policies.
- There is a zero-tolerance approach to incidents of online-bullying, sexual harassment, discrimination, hatred etc
- They model safe, responsible, and professional online behaviours in their own use of technology, including out of school and in their use of social media.

### **3.5 IT Service Provider (CTS)**

It is the responsibility of the Windelsham House School to ensure that the IT service provider (CTS) carries out all the online safety measures that the school's obligations and responsibilities require. It is also important that the provider (CTS) follows and implements school Online Safety Policy and procedures.

The IT Service Provider is responsible for ensuring that:

- They are aware of and follow the school Online Safety Policy and Technical Security Policy to carry out their work effectively in line with school policy.
- The school technical infrastructure is secure and is not open to misuse or malicious attack.
- The school meets (as a minimum) the required online safety technical requirements.
- There is clear, safe, and managed control of user access to networks and devices.
- They keep up to date with online safety technical information in order to effectively carry out their online safety role and to inform and update others as relevant.
- The use of technology is regularly and effectively monitored in order that any misuse/attempted misuse can be reported to DSL for investigation and action
- The filtering policy is applied and updated on a regular basis and its implementation is not the sole responsibility of any single person.
- Monitoring systems are implemented and regularly updated as agreed in school policies.

### **3.6 Pupils**

- Are responsible for using the school digital technology systems in accordance with the Pupil Acceptable user agreement and Online Safety Policy.
- Should understand the importance of reporting abuse, misuse or access to inappropriate materials and know how to do so.
- Should know what to do if they or someone they know feels vulnerable when using online technology.
- 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.

### **3.7 Parents and carers**

The school will take every opportunity to help parents and carers understand these issues through:

- Publishing the school Online Safety Policy on the school website.
- Providing them with a copy of the pupils' acceptable use agreement.
- Publishing information about appropriate use of social media relating to posts concerning the school.
- Seeking their permissions concerning digital images.
- Workshops, newsletters, website, social media and information about national/local online safety campaigns and literature.

Parents and carers will be encouraged to support the school in:

- Reinforcing the online safety messages provided to pupils in school.
- The safe and responsible use of their children's personal devices in the school

### **3.8 Community users**

Community users who access school systems/website/learning platform as part of the wider school provision will be expected to sign a community user AUA before being provided with access to school systems.

### **3.9 Online Safety Group**

The Online Safety Group has the following members

- Designated Safeguarding Lead/Online Safety Lead
- Senior leaders
- Online safety governor
- Technical staff
- Teacher and support staff members

- Pupils

Members of the Online Safety Group will assist the DSL/Head of Digital learning with:

- The production/review/monitoring of the school Online Safety Policy/documents
- The production/review/monitoring of the school filtering policy and requests for filtering changes
- Mapping and reviewing the online safety education provision – ensuring relevance, breadth and progression and coverage
- Reviewing network/filtering/monitoring/incident logs, where possible
- Encouraging the contribution of pupils to staff awareness, emerging trends and the school online safety provision
- Consulting stakeholders – including staff/parents/carers about the online safety provision
- Monitoring improvement actions identified through use of the 360-degree safe self-review tool.

An Online Safety Group terms of reference template can be found in the appendices

#### **4. Purpose of the Online Safety Policy**

The school Online Safety Policy:

- Sets expectations for the safe and responsible use of digital technologies for learning, administration, and communication.
- Allocates responsibilities for the delivery of the policy.
- Is regularly reviewed in a collaborative manner, taking account of online safety incidents and changes/trends in technology and related behaviours.
- Establishes guidance for staff in how they should use digital technologies responsibly, protecting themselves and the school and how they should use this understanding to help safeguard pupils in the digital world.
- Describes how the school will help prepare pupils to be safe and responsible users of online technologies.
- Establishes clear procedures to identify, report, respond to and record the misuse of digital technologies and online safety incidents, including external support mechanisms.
- Is supplemented by a series of related acceptable use agreements.
- Is made available to staff at induction and through normal communication channels
- Is published on the school website.

#### **5. Acceptable use agreements**

The Online Safety Policy and acceptable use agreements define acceptable use at the school.

The acceptable use agreements will be communicated/re-enforced through:

- Staff induction and handbook
- Digital signage
- Communication with parents/carers
- Built into education
- School website
- Peer support.

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

- When communicating in a professional capacity, staff should ensure that the technologies they use are officially sanctioned by the school.

- Any digital communication between staff and pupils or parents/carers must be professional in tone and content.
- Staff should be expected to follow good practice when using personal social media regarding their own professional reputation and that of the school and its community.
- Users should immediately report to a 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.

## **6. Reporting and responding**

The school will take all reasonable precautions to ensure online safety for all school users but recognises that incidents may occur inside and outside of the school which will need intervention.

The school will ensure:

- There are clear reporting routes which are understood and followed by all members of the school community which are consistent with the school safeguarding procedures, and with the whistleblowing, complaints and managing allegations policies.
- All members of the school community will be made aware of the need to report online safety issues/incidents.
- Reports will be dealt with as soon as is practically possible once they are received.
- The Designated Safeguarding Lead/Online Safety Lead and other responsible staff have appropriate skills and training to deal with online safety risks.
- If there is any suspicion that the incident involves any illegal activity or the potential for serious harm the incident must be escalated through the agreed school safeguarding procedures.
- Any concern about staff misuse will be reported to the Headteacher, unless the concern involves the Headteacher, in which case the complaint is referred to the DSL.
- Where there is no suspected illegal activity, devices may be checked using the following procedures:
  - one or more senior members of staff should be involved in this process. This is vital to protect individuals if accusations are subsequently reported.
  - conduct the procedure using a designated device that will not be used by pupils and, if necessary, can be taken off site by the police should the need arise (should illegal activity be subsequently suspected). Use the same device for the duration of the procedure.
  - ensure that the relevant staff 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
  - 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.
    - police involvement and/or action.
- It is important that those reporting an online safety incident have confidence that the report will be treated seriously and dealt with effectively.

- Incidents should be logged.
- Relevant staff are aware of external sources of support and guidance in dealing with online safety issues,
- Those involved in the incident will be provided with feedback about the outcome of the investigation and follow up actions.
- Learning from the incident (or pattern of incidents) will be provided to the school community to support online safety development.

The school will treat online safety incidents the same as safeguarding and therefore implement the decision-making process for dealing incidents. However, on this occasion it will include the Head of Digital Learning.

incidents that involve inappropriate or illegal misuse are dealt with as soon as possible in a proportionate manner. Members of the school community will be made aware that the incident has been dealt with. It is intended that incidents of misuse will be dealt with through normal behaviour/disciplinary procedures.

## **7. Online Safety Education Programme**

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 for all year groups matched against a nationally agreed framework (Common sense media)
- Lessons are matched to need; are age-related and build on prior learning.
- Lessons are context-relevant with agreed objectives leading to clear and evidenced outcomes.
- Digital competency is planned and effectively threaded through the appropriate digital pillars in other curriculum areas e.g. PHSE
- The programme will be accessible to pupils at different ages and abilities.
- Vulnerability is actively addressed as part of a personalised online safety curriculum.
- Pupils should be helped to understand the need for the pupil 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.
- 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.
- Where pupils are allowed to freely search the internet, staff should be vigilant in supervising the pupils and 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 should be able to request the temporary removal of 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.
- The online safety education programme should be relevant and up to date to ensure the quality of learning and outcomes.



## **8. Contribution of pupils**

The school acknowledges, learns from, and uses the skills and knowledge of pupils 'Pupil Voice' in the use of digital technologies. We recognise the potential for this to shape the online safety strategy for the school community and how this contributes positively to the personal development of young people.

## **9. Staff**

All staff will receive online safety training and understand their responsibilities, as outlined in this policy. Training will be offered as follows:

- A planned programme, issued by DSL, of formal online safety and data protection training will be made available to all staff. This will be regularly updated and reinforced.
- The training will be an integral part of the school's annual safeguarding and data protection training for all staff.
- All new staff will receive online safety training as part of their induction programme, ensuring that they fully understand the school online safety policy and acceptable use agreements. It includes explicit reference to classroom management, professional conduct, online reputation and the need to model positive online behaviours.
- This Online Safety Policy and its updates will be presented to staff.

## **10. Governors**

Governors should take part in online safety training/awareness sessions. This may be offered through participation in school training / information sessions for staff.

A higher level of training will be made available to (at least) the Governors. This will include training to allow the governor to understand the school's filtering and monitoring provision, in order that they can participate in the required checks and review.

## **11. Families**

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

- regular communication, awareness-raising and engagement on online safety issues, curriculum activities and reporting routes
- regular opportunities for engagement with parents/carers on online safety issues through awareness workshops / parent/carer evenings etc
- the pupils – who are encouraged to pass on to parents the online safety messages they have pupils in lessons and by pupils leading sessions at parent/carer evenings.
- letters, newsletters, website, learning platform,
- reference to the relevant websites/publications, and training.

## **12. Technology**

The school is 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. The school should ensure that all staff are made aware of policies and procedures in place on a regular basis and explain that everyone is responsible for online safety and data protection.

### **13. Filtering & Monitoring – Provided by SmoothWall**

The school filtering and monitoring provision is agreed by senior leaders, governors and the IT Service Provider (CTS) and is regularly reviewed and updated in response to changes in technology and patterns of online safety incidents.

The DSL will have lead responsibility for safeguarding and online safety and the IT service provider will have technical responsibility

Checks on the filtering and monitoring system are carried out by the IT Service Provider with the involvement of a senior leader, the Designated Safeguarding Lead and a governor, in particular when a safeguarding risk is identified.

#### **Filtering**

- The school manages access to content across its systems for all users and on all devices using the schools internet provision. The filtering provided meets the standards defined in the DfE Filtering standards for schools and colleges and the guidance provided in the UK Safer Internet Centre Appropriate filtering.
- Illegal content is filtered by the filtering provider SmoothWall.
- There are established and effective routes for users to report inappropriate content, recognising that no system can be 100% effective.
- There is a clear process in place to deal with, and log, requests/approvals for filtering changes.
- Filtering logs are regularly reviewed and alert the Designated Safeguarding Lead to breaches of the filtering policy, which are then acted upon.
- The school has provided differentiated user-level filtering.
- Younger pupils will use safe search engines.
- Access to content through non-browser services (e.g. apps and other mobile technologies) is managed in ways that are consistent with school policy and practice.

#### **Monitoring**

The school has monitoring systems in place to protect the school, systems and users:

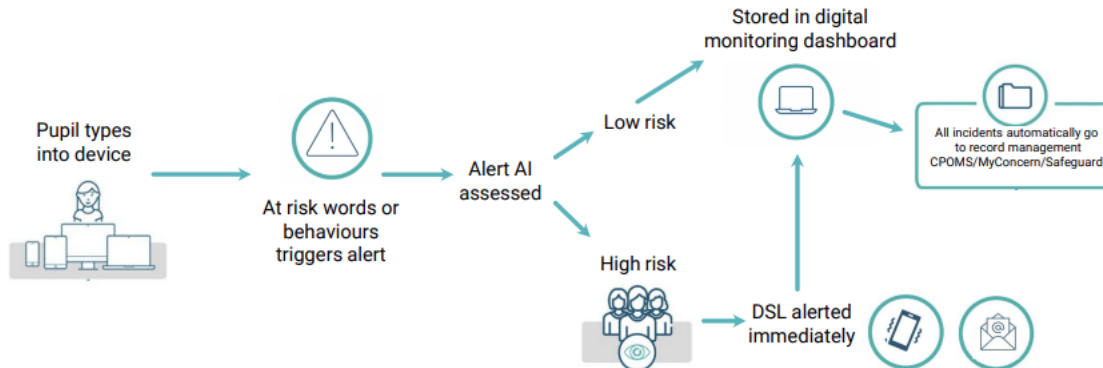
- The school monitors all network use across all its devices and services.
- Monitoring reports are urgently picked up, acted on and outcomes are recorded by the Designated Safeguarding Lead, all users are aware that the network (and devices) are monitored.
- There are effective protocols in place to report abuse/misuse. There is a clear process for prioritising response to alerts that require rapid safeguarding intervention.
- Management of serious safeguarding alerts is consistent with safeguarding policy and practice.

The school follows Appropriate Monitoring guidance and protects users and school systems through the use of the appropriate blend of strategies. These may include:

- Physical monitoring.
- Internet use is logged, regularly monitored and reviewed
- Filtering logs are regularly analysed and breaches are reported to DSL.

- Pro-active alerts inform the school of breaches to the filtering policy, allowing effective intervention.

## Digital monitoring - how it works - Smoothwall only



### 14. Technical Security

The school technical systems will be managed in ways that ensure that the school meets recommended technical requirements.

- Responsibility for technical security resides with SLT who may delegate activities to identified roles.
- All users 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 IT service provider and will be reviewed, at least annually, by the SLT/Online Safety Group
- Password policy and procedures are implemented.
- The security of their username and password and must not allow other users to access the systems using their log on details.
- All users have responsibility for the security of their username and password and must not allow other users to access the systems using their log on details.
- All school networks and systems will be protected by secure passwords. Passwords must not be shared with anyone.
- The administrator passwords for school systems are kept in a secure place.
- There will be regular reviews and audits of the safety and security of school technical systems.
- Appropriate security measures are in place to protect the servers, firewalls, routers, wireless systems and devices from accidental or malicious attempts which might threaten the security of the school systems and data. The school infrastructure and individual workstations are protected by up-to-date endpoint software.
- There are rigorous and verified back-up routines, including the keeping of network-separated (air-gapped) copies off-site or in the cloud,
- The Head of Digital Learning is responsible for ensuring that all software purchased by and used by the school is adequately licensed and that the latest software updates are applied.
- Personal use of any device on the school network is regulated by acceptable use statements that a user consents to when using the network.
- Staff members are not permitted to install software on school-owned devices without the consent of the IT service provider.

- Systems are in place to control and protect personal data and data is encrypted at rest and in transit.
- Mobile device security and management procedures are in place
- Guest users are provided with appropriate access to school systems based on an identified risk profile.

## **15. Mobile technologies**

The school acceptable use agreements for staff, pupils, parents, and carers outline the expectations around the use of mobile technologies.

### **School owned/provided devices:**

- All school devices are managed through the use of Mobile Device Management software.
- There is an asset log that clearly states whom a device has been allocated to.
- Personal use is clearly defined, and expectations are well-communicated.
- The use of devices on trips/events away from school is clearly defined and expectation are well-communicated.
- Liability for damage aligns with current school policy for the replacement of equipment.
- Education is in place to support responsible use.

### **Personal devices:**

- Pupils are not permitted personal mobile phone devices during the school day.
- There is a clear policy on the use of personal mobile devices by boarding pupils.
- Staff are not permitted to use personal mobile phone devices when children are present. The only exception to this is on off site activities where there may be a need for the staff member to contact the school using their device..
- Where personal devices are brought to school, but their use is not permitted, appropriate, safe and secure storage is available via the school office.
- Use of personal devices for school business is defined in the acceptable use policy and staff handbook.
- The expectations for taking/storing/using images/video aligns with the school's acceptable use policy and use of images/video policy. The non-consensual taking/using of images of others is not permitted.
- Education about the safe and responsible use of mobile devices is included in the school online safety education programmes.

## **16. Social media**

The school provides the following measures to ensure reasonable steps are in place to minimise risk of harm to pupils through:

- Ensuring that personal information is not published.
- Education/training being provided including acceptable use, age restrictions, social media risks, digital and video images policy, checking of settings, data protection and reporting issues.
- Clear reporting guidance, including responsibilities, procedures, and sanctions.
- Guidance for pupils, parents/carers

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.
- Security settings on personal social media profiles are regularly checked to minimise risk of loss of personal information.
- They act as positive role models in their use of social media

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

- A process for approval by senior leaders
- Clear processes for the administration, moderation, 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 personal social media accounts. In all cases, where a personal account is used which associates itself with, 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, the school may pro-actively monitor the Internet for public postings about the school.
- The school will effectively respond to social media comments made by others via the Head of Marketing.
- When parents/carers express concerns about the school on social media we will urge them to make direct contact with the school, in private, to resolve the matter. Where this cannot be resolved, parents/carers should be informed of the school complaints procedure.

### **17. Digital and video images**

The school will inform and educate users about these risks and will implement policies to reduce the likelihood of the potential for harm.

- The school may use live-streaming or video-conferencing services in line with national and local safeguarding guidance / policies.
- When using digital images, staff will inform and educate pupils about the risks associated with the taking, use, sharing, publication and distribution of images.
- Staff/volunteers must be aware of those pupils whose images must not be taken/published. Those images should only be taken on school devices. The personal devices of staff should not be used for such purposes.
- Parents/carers are welcome to take videos and digital images of their children only at school events for their own personal use. 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, storage, distribution and publication of those images.
- Care should be taken when sharing digital/video images that pupils are appropriately dressed.
- 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 Online Safety Policy
- 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 taken for use in school or published on the school website/social media.
- Parents/carers will be informed of the purposes for the use of images, how they will be stored and for how long – in line with the school data protection policy.
- Images will be securely stored in line with the school retention policy.

## **18. Online Publishing**

The school communicates with parents/carers and the wider community and promotes the school through:

- Public-facing website
- Social media
- Online newsletters

The school website is managed by the Head of Marketing. The school ensures that the online safety policy has been followed in the use of online publishing e.g., use of digital and video images, copyright, identification of young people, publication of school calendars and personal information – ensuring that there is least risk to members of the school community, through such publications. Where pupil work, images or videos are published, their identities are protected, and full names are not published.

## **19. Data Protection**

Personal data will be recorded, processed, transferred, and made available according to the current data protection legislation. The school has a Data Protection Policy and Privacy Notices, available on the school's website, that outline how it handles data.

When personal data is stored on any mobile device or removable media the:

- Data will be password protected.
- Device will be password protected.
- Device will be protected by up-to-date endpoint (anti-virus) software.
- Data will be securely deleted from the device, in line with school policy once it has been transferred or its use is complete.

Staff must ensure that they:

- At all times take care to ensure the safekeeping of personal data.

- Can recognise a possible breach, understand the need for urgency and know who to report it to within the school.
- Will not transfer any school personal data to personal devices.
- 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.

## **Online Safety Group Terms of Reference**

### **1. Purpose**

To provide a consultative group that has wide representation from the schools community, with responsibility for issues regarding online safety and the monitoring the online safety policy including the impact of initiatives.

### **2. Membership**

- 2.1. The online safety group will seek to include representation from all stakeholders. The composition of the group should include (N.B. in small schools one member of staff may hold more than one of these posts):  
[add/delete where appropriate]
- Designated Safeguarding Lead/Head of Online Safety
  - Head of Digital Learning
  - Compliance Officer
  - Teaching staff Member
  - ICT technical staff
  - Governor
  - Digital Learner pupil representatives x 2
- 2.2. Other people may be invited to attend the meetings at the request of the Chairperson on behalf of the committee to provide advice and assistance where necessary.
- 2.3. Committee members must declare a conflict of interest if any incidents being discussed directly involve themselves or members of their families.
- 2.4. Committee members must be aware that many issues discussed by this group could be of a sensitive or confidential nature
- 2.5. When individual members feel uncomfortable about what is being discussed they should be allowed to leave the meeting with steps being made by the other members to allow for these sensitivities

### **3. Chair**

The Designated Safeguarding Lead/Head of Online Safety will Chair the group. Their responsibilities include:

- Scheduling meetings and invitations to meetings
- Guiding the meeting according to the agenda and time available;
- Ensuring all discussion items end with a decision, action or definite outcome;
- Making sure that meeting notes are taken, with action points and distributed as necessary

### **4. Duration of Meetings**

Meetings shall be held as a minimum termly. A special or extraordinary meeting may be called when and if deemed necessary.



**5. Functions**

- To keep up to date with new developments in the area of online safety
- To (at least) annually review and develop the online safety policy in line with new technologies and incidents
- To monitor the delivery and impact of the online safety policy
- To monitor the log of reported online safety incidents (anonymous) to inform future areas of teaching/learning/training.
- To co-ordinate consultation with the whole school community to ensure stakeholders are up to date with information, training and/or developments in the area of online safety.
- Staff training/meetings/briefings
- Learner forums (for advice and feedback)
- Governor meetings
- Surveys/questionnaires for learners, parents/carers and staff
- Parent/carer sessions
- Website/Newsletters
- Online safety events
- Internet Safety Day (annually held on the second Tuesday in February)
- With the IT Service Provider and Governor, to carry out checks on filtering and monitoring systems
- To monitor filtering/change control logs (e.g. requests for blocking/unblocking sites).
- To monitor incidents involving online bullying

**6. Amendments**

The terms of reference shall be reviewed annually from the date of approval. They may be altered to meet the current needs of all committee members, by agreement of the majority. The above Terms of Reference for Windlesham House School have been agreed

Signed by (SLT): .....

Date: .....

Date for review: .....