



## **St George's (Hanover Square) Primary School** **Complaints Policy and Procedures**

### **St George's Mission Statement**

St George's is a Christian school which works in partnership with parents, governors, the church and the local community.

Through friendliness and care we develop independent, successful and confident learners

In reverence we embrace the awe and wonder of God's creation

In service we celebrate the diversity and uniqueness of each other

### **St George's School Motto**

Working together for the achievement of all

### **St George's School Values**

Respect, Kindness, Creativity, Forgiveness, Friendship and Honesty

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### 1. Introduction and Overview

#### Rationale

##### The purpose of this policy is to:

- set out the key principles expected of all members of the school community at St George's Hanover Square with respect to the use of ICT-based technologies.
- safeguard and protect the children and staff of St George's Hanover Square School
- assist school staff working with children to work safely and responsibly with the Internet and other communication technologies and to monitor their own standards and practice.
- set clear expectations of behaviour and/or codes of practice relevant to responsible use of the Internet for educational, personal or recreational use.
- have clear structures to deal with online abuse such as cyberbullying which are cross referenced with other school policies.
- ensure that all members of the school community are aware that unlawful or unsafe behaviour is unacceptable and that, where appropriate, disciplinary or legal action will be taken.
- minimise the risk of misplaced or malicious allegations made against adults who work with students.

##### The main areas of risk for our school community can be summarised as follows:

#### Content

- exposure to inappropriate content, including online pornography, ignoring age ratings in games (exposure to violence associated with often racist language)
- content validation: how to check authenticity and accuracy of online content

## Contact

- grooming
- cyber-bullying in all forms
- identity theft (including hacking social media accounts) and sharing passwords

## Conduct

- privacy issues, including disclosure of personal information
- digital footprint and online reputation
- health and well-being (amount of time spent online (Internet or gaming))
- sexting (sending and receiving of personally intimate images) also referred to as SGII (self-generated indecent images)
- copyright (little care or consideration for intellectual property and ownership – such as music and film)

## Scope

This policy applies to all members of St George's Hanover Square school community (including staff, pupils, volunteers, parents, carers, visitors, community users) who have access to and are users of school ICT systems, both in and out of St George's Hanover Square School.

The Education and Inspections Act 2006 empowers Head teachers to such extent as is reasonable, to regulate the behaviour of pupils when they are off the *school* site and empowers members of staff to impose disciplinary penalties for inappropriate behaviour. This is pertinent to incidents of cyber-bullying, or other e-safety incidents covered by this policy, which may take place outside of the school, but is linked to membership of the school. The 2011 Education Act increased these powers with regard to the searching for and of electronic devices and the deletion of data. In the case of both acts, action can only be taken over issues covered by the published Behaviour Policy.

The *school* will deal with such incidents within this policy and associated behaviour and anti-bullying policies and will, where known, inform parents and carers of incidents of inappropriate e-safety behaviour that take place out of school.

Role	Key Responsibilities
Headteacher	<ul style="list-style-type: none"> <li>• To take overall responsibility for e-safety provision</li> <li>• To take overall responsibility for data and data security (SIRO)</li> <li>• To ensure the school uses an approved, filtered Internet Service, which complies with current statutory requirements e.g. LGfL</li> <li>• To be responsible for ensuring that staff receive suitable training to carry out their e-safety roles and to train other colleagues, as relevant</li> <li>• To ensure that procedures for safe and secure storage of staff and pupil data are in place</li> <li>• To be aware of procedures to be followed in the event of a serious e-safety incident.</li> <li>• To receive regular monitoring reports from the E-Safety Co-ordinator</li> <li>• To ensure that there is a system in place to monitor and support staff who carry out internal e-safety procedures( e.g. network manager)</li> </ul>
E-Safety Co-ordinator / Designated Child Protection Lead	<ul style="list-style-type: none"> <li>• Takes day to day responsibility for e-safety issues and has a leading role in establishing and reviewing the school e-safety policies / documents</li> <li>• Promotes an awareness and commitment to e-safeguarding throughout the school community</li> <li>• Ensures that e-safety education is embedded across the curriculum</li> <li>• Liaises with school ICT technical staff</li> <li>• To communicate regularly with SLT and the designated e-safety Governor (Marie Rowland-Kidman) to discuss current issues and review incident logs</li> <li>• To ensure that all staff are aware of the procedures that need to be followed in the event of an e-safety incident</li> <li>• To ensure that an e-safety incident log is kept up to date</li> <li>• To facilitate training and advice for all staff</li> <li>• Is regularly updated in e-safety issues and legislation, and be aware of the potential for serious child protection issues to arise from: <ul style="list-style-type: none"> <li>▪ sharing of personal data</li> <li>▪ access to illegal / inappropriate materials</li> <li>▪ inappropriate on-line contact with adults / strangers</li> <li>▪ potential or actual incidents of grooming</li> <li>▪ cyber-bullying and use of social media</li> </ul> </li> </ul>
Governors / E-safety governor	<ul style="list-style-type: none"> <li>• The designated e-safety governor is Marie Rowland-Kidman.</li> <li>• To ensure that the school follows all current e-safety advice to keep the children and staff safe</li> </ul>

Role	Key Responsibilities
	<ul style="list-style-type: none"> <li>• To approve the E-Safety Policy and review the effectiveness of the policy. This will be carried out by the Governors receiving regular information about e-safety incidents and monitoring reports. A member of the Governing Body has taken on the role of E-Safety Governor.</li> <li>• To support the school in encouraging parents and the wider community to become engaged in e-safety activities</li> <li>• The role of the E-Safety Governor will include: <ul style="list-style-type: none"> <li>▪ regular review with the E-Safety Co-ordinator including e-safety incident logs</li> </ul> </li> </ul>
Computing Curriculum Leader	<ul style="list-style-type: none"> <li>• To oversee the delivery of the e-safety element of the Computing curriculum</li> <li>• To liaise with Designated Person for Safeguarding</li> </ul>
Network Manager/ computing technician	<ul style="list-style-type: none"> <li>• To report any e-safety related issues that arise, to the e-safety coordinator.</li> <li>• To ensure that users may only access the school's networks through an authorised and properly enforced password protection policy, in which passwords are regularly changed</li> <li>• To ensure that provision exists for misuse detection and malicious attack e.g. keeping virus protection up to date</li> <li>• To ensure the security of the school ICT system</li> <li>• To ensure that access controls/encryption exist to protect personal and sensitive information held on school-owned devices</li> <li>• To ensure that LGfL is informed of issues relating to the filtering applied by the Grid <ul style="list-style-type: none"> <li>▪ They keep up to date with the school's e-safety policy and technical information in order to effectively carry out their e-safety role and to inform and update others as relevant</li> <li>▪ They ensure that the use of the <i>network /remote access/ email</i> is regularly monitored in order that any misuse/ attempted misuse can be reported to the <i>Headteacher for investigation/action/sanction</i></li> </ul> </li> <li>• To ensure appropriate backup procedures exist so that critical information and systems can be recovered in the event of a disaster.</li> <li>• To keep up-to-date documentation of the school's e-security and technical procedures</li> </ul>
LGfL Nominated contact(s)	<ul style="list-style-type: none"> <li>• To ensure all LGfL services are managed on behalf of the school including maintaining the LGfL USO database of access accounts</li> </ul>
Teachers	<ul style="list-style-type: none"> <li>• To embed e-safety issues in all aspects of the curriculum and other school activities</li> <li>• To supervise and guide pupils carefully when engaged in learning activities involving online technology (including; extra-curricular and extended school activities if relevant)</li> </ul>

Role	Key Responsibilities
	<ul style="list-style-type: none"> <li>• To ensure that pupils are fully aware of research skills and are fully aware of legal issues relating to electronic content such as copyright laws</li> </ul>
All staff	<ul style="list-style-type: none"> <li>• To read, understand and help promote the school's e-safety policies and guidance</li> <li>• To read, understand, sign and adhere to the school staff Acceptable Use Agreement / Policy</li> <li>• To be aware of e-safety issues related to the use of mobile phones, cameras and hand held devices and that they monitor their use and implement current school policies with regard to these devices</li> <li>• To report any suspected misuse or problem to the e-safety coordinator</li> <li>• To maintain an awareness of current e-safety issues and guidance e.g. through CPD</li> <li>• To model safe, responsible and professional behaviours in their own use of technology</li> <li>• To ensure that any digital communications with pupils should be on a professional level and only through school based systems, never through personal mechanisms, e.g. email, text, mobile phones etc.</li> </ul>
Pupils	<ul style="list-style-type: none"> <li>• Read, understand, sign and adhere to the Student / Pupil Acceptable Use Policy (NB: at KS1 it would be expected that parents / carers would sign on behalf of the pupils)</li> <li>• Have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations</li> <li>• To understand the importance of reporting abuse, misuse or access to inappropriate materials</li> <li>• To know what action to take if they or someone they know feels worried or vulnerable when using online technology.</li> <li>• To know and understand school policy on the use of mobile phones, digital cameras and hand held devices.</li> <li>• To know and understand school policy on the taking/use of images and on cyber-bullying.</li> <li>• To understand the importance of adopting good e-safety practice when using digital technologies out of school and realise that the school's E-Safety Policy covers their actions out of school, if related to their membership of the school</li> <li>• To take responsibility for learning about the benefits and risks of using the Internet and other technologies safely both in school and at home</li> <li>• To help the school in the review of e-safety policies through meetings with the E-safety co-ordinator to discuss trends in</li> </ul>

Role	Key Responsibilities
	social media sites
Parents/carers	<ul style="list-style-type: none"> <li>• To support the school in promoting e-safety and endorse the Parents' Acceptable Use Agreement which includes the pupils' use of the Internet and the school's use of photographic and video images</li> <li>• To read, understand and promote the school Pupil Acceptable Use Agreement with their children</li> <li>• To access the school website in accordance with the relevant school Acceptable Use Agreement.</li> <li>• To consult with the school if they have any concerns about their children's use of technology</li> </ul>
External groups	<ul style="list-style-type: none"> <li>• Any external individual/organisation will sign an Acceptable Use Policy prior to using any equipment or the Internet within school</li> </ul>

**Communication:**

The policy will be communicated to staff/pupils/community in the following ways:

- Policy to be posted on the school website and network, along with hard copies kept in the school office.
- Policy to be part of school induction pack for new staff
- Acceptable use agreements discussed with pupils at the start of each year.
- Acceptable use agreements to be issued to whole school community, usually on entry to the school
- Acceptable use agreements to be held in pupil and personnel files

**Handling complaints:**

- The school will take all reasonable precautions to ensure e-safety. However, owing to the international scale and linked nature of Internet content, the availability of mobile technologies and speed of change, it is not possible to guarantee that unsuitable material will never appear on a school computer or mobile device. Neither the school nor the Local Authority can accept liability for material accessed, or any consequences of Internet access.
- Staff and pupils are given information about infringements in use and possible sanctions. Sanctions available include:
  - interview/counselling by Headteacher or E-safety co-ordinator;
  - informing parents or carers;
  - removal of Internet or computer access for a period,
  - referral to Local authority or police.
- Our E-Safety Coordinator acts as first point of contact for any complaint. Any complaint about staff misuse is referred to the Headteacher.
- Complaints of cyberbullying are dealt with in accordance with our Anti-Bullying Policy. Complaints related to child protection are dealt with in accordance with school child protection procedures.

**Review and Monitoring**

The e-safety policy is referenced from within other school policies: ICT and Computing policy, Child Protection policy, Anti-Bullying policy and in the School Development Plan, Behaviour policy, Personal, Social and Health Education and Citizenship policies.

- The school has an e-safety coordinator who will be responsible for document ownership, review and updates.
- The e-safety policy will be reviewed annually or when any significant changes occur with regard to the technologies in use within the school
- The e-safety policy has been written by the school e-safety Coordinator and is current and appropriate for its intended audience and purpose.

- There is widespread ownership of the policy and it has been agreed by the SLT and approved by Governors. All amendments to the school e-safeguarding policy will be discussed in detail with all members of teaching staff.

## 2. Education and Curriculum

### Pupil e-safety curriculum

This school

- Has a clear, progressive e-safety education programme as part of the Computing curriculum. It is built on EYFS to Year 6 'Switched On Computing' scheme of work that follows national guidance. This covers a range of skills and behaviours appropriate to their age and experience, including:
  - To STOP and THINK before they CLICK
  - To develop a range of strategies to evaluate and verify information before accepting its accuracy;
  - To be aware that the author of a web site/page may have a particular bias or purpose and to develop skills to recognise what that may be;
  - To know how to narrow down or refine a search;
  - To understand how search engines work and to understand that this affects the results they see at the top of the listings;
  - To understand acceptable behaviour when using an online environment/ email, i.e. be polite, no bad or abusive language or other inappropriate behaviour; keeping personal information private;
  - To understand how photographs can be manipulated and how web content can attract the wrong sort of attention;
  - To understand why on-line 'friends' may not be who they say they are and to understand why they should be careful in online environments;
  - To understand why they should not post or share detailed accounts of their personal lives, contact information, daily routines, location, photographs and videos and to know how to ensure they have turned-on privacy settings;
  - To understand why they must not post pictures or videos of others without their permission;
  - To know not to download any files – such as music files - without permission;
  - To have strategies for dealing with receipt of inappropriate materials;
  - To understand why and how some people will 'groom' young people for sexual reasons;
  - To understand the impact of cyberbullying, sexting and trolling and know how to seek help if they are affected by any form of online bullying.
  - To know how to report any abuse including cyberbullying; and how to seek help if they experience problems when using the Internet and related technologies, i.e. parent or carer, teacher or trusted staff

member, or an organisation such as ChildLine or the CLICK CEOP button.

- Plans Internet use carefully to ensure that it is age-appropriate and supports the learning objectives for specific curriculum areas.
- Will remind students about their responsibilities through an end-user Acceptable Use Policy which every student will sign.
- Ensures staff will model safe and responsible behaviour in their own use of technology during lessons.
- Ensures that when copying materials from the web, staff and pupils understand issues around plagiarism; how to check copyright and also know that they must respect and acknowledge copyright/intellectual property rights;
- Ensures that staff and pupils understand the issues around aspects of the commercial use of the Internet, as age appropriate. This may include, risks in pop-ups; buying on-line; on-line gaming/gambling;

### **Staff and governor training**

This school

- Ensures staff know how to send or receive sensitive and personal data and understand the requirement to encrypt data where the sensitivity requires data protection;
- Makes regular training available to staff on e-safety issues and the school's e-safety education program; CPD, invite CEOP ambassadors to run regular accredited training.
- Provides, as part of the induction process, all new staff with information and guidance on the e-safeguarding policy and the school's Acceptable Use Policies.

### **Parent awareness and training**

This school

- Runs a rolling programme of advice, guidance and training for parents, including:
  - Introduction of the Acceptable Use Agreements to new parents, to ensure that principles of e-safe behaviour are made clear
  - Information leaflets; in school newsletters; on the school web site;
  - Demonstrations, practical sessions held at school;
  - Suggestions for safe Internet use at home;
  - Provision of information about national support sites for parents.

## **3. Expected Conduct and Incident management**

## **Expected conduct**

In this school, all users:

- Are responsible for using the school ICT systems in accordance with the relevant Acceptable Use Policy which they will be expected to sign before being given access to school systems.
- Need to understand the importance of misuse or access to inappropriate materials and are aware of the consequences
- Need to understand the importance of reporting abuse, misuse or access to inappropriate materials and know how to do so
- Should understand the importance of adopting good e-safety practice when using digital technologies out of school and realise that the school's E-Safety Policy covers their actions out of school, if related to their membership of the school
- Will be expected to know and understand school policies on the use of mobile phones, digital cameras and hand held devices. They should also know and understand school policies on the taking / use of images and on cyber-bullying

Staff

- Are responsible for reading the school's e-safety policy and using the school ICT systems accordingly, including the use of mobile phones, and hand held devices.

Students/Pupils

- Should have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations

Parents/Carers

- Should provide consent for pupils to use the Internet, as well as other technologies, as part of the e-safety acceptable use agreement form at time of their child's entry to the school
- Should know and understand what the 'rules of appropriate use' are and what sanctions result from misuse

## **Incident Management**

In this school:

- There is strict monitoring and application of the e-safety policy and a differentiated and appropriate range of sanctions, though the attitudes and behaviour of users are generally positive and there is rarely need to apply sanctions
- All members and its wider community are encouraged to be vigilant in reporting issues, in the confidence that issues will be dealt with quickly and sensitively, through the school's escalation processes.

- Support is actively sought from other agencies as needed (e.g. the local authority and regional broadband grid, UK Safer Internet Centre helpline) in dealing with e-safety issues
- Monitoring and reporting of e safety incidents takes place and contribute to developments in policy and practice in e-safety within the school. The records are reviewed and reported to the school's senior leaders, Governors and local authority
- Parents/carers are specifically informed of e-safety incidents involving young people for whom they are responsible.
- We will contact the Police if one of our staff or pupils receives online communication that we consider is particularly disturbing or breaks the law

#### **4. Managing the ICT infrastructure**

- **Internet access, security (virus protection) and filtering**

This school:

- Has the educational filtered secure broadband connectivity through the LGfL and so connects to the 'private' National Education Network;
- Uses the LGfL Net Sweeper filtering system which blocks sites that fall into categories such as pornography, race hatred, gaming, sites of an illegal nature, etc. All changes to the filtering policy is logged and only available to staff with the approved 'web filtering management' status;
- Uses USO user-level filtering where relevant, thereby closing down or opening up options appropriate to the age/stage of the students;
- Ensures network healthy through use of Sophos anti-virus software and network set-up so staff and pupils cannot download executable files;
- Uses DfE, LA or LGfL approved systems such as TLS encrypted secure email to send personal data over the Internet and uses encrypted devices, encrypted services such as MyUSO or RAV3 secure remote access were staff need to access personal level data while off-site;
- Blocks all Chat rooms and social networking sites except those that are part of an educational network or approved Learning Platform;
- Only unblocks other external social networking sites for specific purposes/ Internet Literacy lessons;
- Has blocked pupil access to music download or shopping sites – except those approved for educational purposes at a regional or national level, such as Audio Network;

- Works in partnership with the LGfL to ensure any concerns about the system are communicated so that systems remain robust and protect students;
  - Is vigilant in its supervision of pupils' use at all times, as far as is reasonable, and uses common-sense strategies in learning resource areas where older pupils have more flexible access;
  - Ensures all staff and students have signed an acceptable use agreement form and understands that they must report any concerns;
  - Ensures pupils only publish within an appropriately secure environment; the school's learning environment
  - Requires staff to preview websites before use (where not previously used); Plans the curriculum context for Internet use to match pupils' ability, using child-friendly search engines where more open Internet searching is required; e.g. [yahoo for kids](#) or [ask for kids](#) , Google Safe Search etc.
  - Is vigilant when conducting 'raw' image search with pupils e.g. Google image search
  - Informs all users that Internet use is monitored
  - Informs staff and students that that they must report any failure of the filtering systems directly to the *system administrator*. Our system administrator logs or escalates as appropriate to the Technical service provider or LGfL Helpdesk as necessary;
  - Makes clear all users know and understand what the 'rules of appropriate use' are and what sanctions result from misuse – through staff meetings and teaching programme
  - Provides advice and information on reporting offensive materials, abuse and bullying. Which is available for pupils, staff and parents
  - Immediately refers any material we suspect is illegal to the appropriate authorities – Police – and the Local Authority.
- **Network management (user access, backup)**

This school

    - Uses individual, audited log-ins for non-student users - the London USO system;
    - Uses Generic, year based, Secured audited log-ins for student users;
    - Uses a guest account for external or short term visitors for temporary access to appropriate services
    - Has additional local network monitoring software installed
    - Ensures the Systems Administrator is up-to-date with LGfL services and policies

- Storage of all data within the school will conform to the UK data protection requirements
- Pupils and Staff using mobile technology, where storage of data is online, will conform to the [EU data protection directive](#) where storage is hosted within the EU.

*To ensure the network is used safely, this school:*

- Ensures staff read and sign that they have understood the school's e-safety Policy. Following this, they are set-up with Internet, email access and network access. Online access to a service is through a unique, audited username and password. We also provide a separate username and password for logging in to the school network
- Staff access to the schools' management information system is controlled through a separate password for data security purposes
- Children log in as their Form group which restricts access to sensitive areas of the network
- We use the London Grid for Learning's Unified Sign-On (USO) system for username and passwords
- Makes clear that no one should log on as another user and makes clear that pupils should never be allowed to log-on or use teacher and staff logins as these have far less security restrictions and inappropriate use could damage files or the network;
- Has set-up the network with a shared work area for pupils and one for staff. Staff and pupils are shown how to save work and access work from these areas;
- Requires all users to always log off when they have finished working or are leaving the computer unattended
- Where a user finds a logged-on machine, we require them to always log-off and then log-on again as themselves. Users accessing sensitive data will automatically be logged out after a period of inactivity.
- Requests that teachers and pupils do not switch the computers off during the day unless they are unlikely to be used again that day or have completely crashed. Computers in the computing suite should be left on standby overnight, which is an ultra low energy mode and facilitates quick use each day
- Has set-up the network so that users cannot download executable files / programmes
- Has blocked access to music/media download or shopping sites – except those approved for educational purposes
- Scans all mobile equipment with anti-virus / spyware before it is connected to the network

- Makes clear that staff are responsible for ensuring that any computer or laptop loaned to them by the school, is used solely to support their professional responsibilities and that they notify the school of any “significant personal use” as defined by HM Revenue & Customs.
- Maintains equipment to ensure Health and Safety is followed; e.g. projector filters cleaned by technician; equipment installed and checked by approved suppliers
- Has integrated curriculum and administration networks, but access to the Management Information System is set-up so as to ensure staff users can only access modules related to their role
- Ensures that access to the school’s network resources from remote locations by staff is restricted and access is only through school and local authority systems
- Does not allow any outside agencies to access our network remotely except where there is a clear professional need and then access is restricted and is only through approved systems;
- Makes clear responsibilities for the daily back up of finance systems and other important files
- Has a clear disaster recovery system in place for critical data that includes a secure, remote back up of critical data, that complies with external audit’s requirements
- Uses the DfE secure s2s website for all CTF files sent to other schools
- Ensures that all pupil level data or personal data sent over the Internet is encrypted or only sent within the approved secure system in our LA or through USO secure file exchange
- Follows ISP advice on Local Area and Wide Area security matters and firewalls and routers have been configured to prevent unauthorised use of our network
- Our wireless network has been secured to appropriate standards suitable for educational use
- All computer equipment is installed professionally and meets health and safety standards
- Projectors are maintained so that the quality of presentation remains high
- Reviews the school ICT systems regularly with regard to health and safety and security.

### **Password policy**

- This school makes it clear that staff and pupils must always keep their password private, must not share it with others and must not leave it where others can find it

- All members of staff have their own unique username and private passwords to access school systems. Members of staff are responsible for keeping their password private.
- We require staff to use strong passwords to access any sensitive data

## **E-mail**

### **This school**

- Provides staff with a *London Staffmail* email account for their professional use, and makes clear personal email should be through a separate account;
- Provides *highly restricted simulated environments for e-mail with Key Stage 1 pupils*; Uses Londonmail with students as this has email content control
- Does not publish personal e-mail addresses of pupils or staff on the school website.
- Will contact the Police if one of our staff or pupils receives an e-mail that we consider is particularly disturbing or breaks the law.
- Will ensure that email accounts are maintained and up to date
- Reports messages relating to or in support of illegal activities to the relevant authority and if necessary to the Police.
- Knows that spam, phishing and virus attachments can make e-mails dangerous. We use a number of LGfL-provided technologies to help protect users and systems in the school, including desktop anti-virus product Sophos, plus direct email filtering for viruses, Trojans, pornography, phishing and inappropriate language. Finally, and in support of these, LGfL WebScreen2 filtering, monitors and protects our Internet access to the World Wide Web.

### **Pupils:**

- We use LGfL LondonMail with pupils and lock this down where appropriate using LGfL SafeMail rules.
- Pupils' LGfL LondonMail e-mail accounts are intentionally 'anonymised' for their protection.
- Pupils are introduced to, and use e-mail as part of the Computing scheme of work.
- Year R/1 pupils are introduced to principles of e-mail through the Visual Mail facility in closed 'simulation' software.
- Pupils can only receive external mail from, and send external mail to, addresses if the SafeMail rules have been set to allow this.
- Pupils are taught about the safety and 'netiquette' of using e-mail both in school and at home i.e. they are taught:

- Not to give out their e-mail address unless it is part of a school managed project or to someone they know and trust and is approved by their teacher or parent/carer
  - That an e-mail is a form of publishing where the message should be clear, short and concise
  - That any e-mail sent to an external organisation should be written carefully and authorised before sending, in the same way as a letter written on school headed paper
  - They must not reveal private details of themselves or others in e-mail, such as address, telephone number, etc.
  - To 'Stop and Think Before They Click' and not open attachments unless sure the source is safe
  - That they should think carefully before sending any attachments
  - That they must immediately tell a teacher or responsible adult if they receive an e-mail which makes them feel uncomfortable, is offensive or bullying in nature
  - Not to respond to malicious or threatening messages
  - Not to delete malicious or threatening e-mails, but to keep them as evidence of bullying
  - Not to arrange to meet anyone they meet through e-mail without having discussed with an adult and taking a responsible adult with them
  - That forwarding 'chain' e-mail letters is not permitted.
- Pupils sign the school Agreement Form to say they have read and understood the e-safety rules, including e-mail and we explain how any inappropriate use will be dealt with.

**Staff:**

- Staff only use LA or LGfL e-mail systems for professional purposes
- Access in school to external personal e-mail accounts may be blocked
- Staff use a 'closed' LA email system which is used for LA communications and some 'LA approved' transfers of information
- Never use email to transfer staff or pupil personal data. We use secure, LA / DfE approved systems. These include: S2S (for school to school transfer)
- Staff know that e-mail sent to an external organisation must be written carefully, (and may require authorisation), in the same way as a letter written on school headed paper. That it should follow the school format:
  - The sending of multiple or large attachments should be limited, and may also be restricted by the provider of the service being used;
  - The sending of chain letters is not permitted;
  - Embedding adverts is not allowed;

- All staff sign our school agreement Form to say that they have read and understood the e-safety rules, including e-mail, and we explain how any inappropriate use will be dealt with.

### **School website**

- The Headteacher takes overall responsibility to ensure that the website content is accurate and the quality of presentation is maintained
- Uploading of information is restricted to our website authorisers: the headteacher, the computing leader, the school bursar
- The school web site complies with the [statutory DfE guidelines for publications](#);
- Most material is the school's own work; where other's work is published or linked to, we credit the sources used and state clearly the author's identity or status
- The point of contact on the web site is the school address, telephone number and we use a general email contact address, [office@sghsprimary.co.uk](mailto:office@sghsprimary.co.uk). Home information or individual e-mail identities will not be published
- Photographs published on the web do not have full names attached
- We do not use pupils' names when saving images in the file names or in the tags when publishing to the school website
- We do not use embedded geodata in respect of stored images
- We expect teachers using' school approved blogs or wikis to password protect them and run from the school website.

### **Social networking**

- Teachers are instructed not to run social network spaces for student use on a personal basis or to open up their own spaces to their students, but to use the schools' preferred system for such communications.
- The school's preferred system for social networking will be maintained in adherence with the communications policy.

School staff will ensure that in private use:

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

## **Video Conferencing**

### **This school**

- Only uses approved or checked webcam sites that are password protected and secure

## **CCTV**

- We have CCTV in the school as part of our site surveillance for staff and student safety. We will not reveal any recordings without permission except where disclosed to the Police as part of a criminal investigation.
- We may use specialist lesson recording equipment on occasions as a tool to share best teaching practice. We do not reveal any such recordings outside of the staff and will not use for any other purposes.

## **5. Data security: Management Information System access and Data transfer**

### **Strategic and operational practices**

At this school:

- The Head Teacher is the Senior Information Risk Officer (SIRO).
- Staff are clear who are the key contacts for key school information are. We have listed the information and information asset owners in the school office
- We ensure staff members know who to report any incidents where data protection may have been compromised.
- All staff are DBS checked and records are held in one central record

We ensure ALL the following school stakeholders sign an Acceptable Use Agreement form. We have a system so we know who has signed.

- staff
- governors
- pupils
- parents

This makes clear staffs' responsibilities with regard to data security, passwords and access.

- We follow LA guidelines for the transfer of any data or reports of children, to professionals working in the Local Authority or their partners in Children's Services/ Family Services, Health, Welfare and Social Services.

- We require that any Protect and Restricted material must be encrypted if the material is to be removed from the school and limit such data removal. We have an approved remote access solution so that key staff can access sensitive and other data from home, without need to take data home.
- School staff with access to setting-up usernames, and passwords for email and network access, are working within the approved system and follow the security processes required by those systems.
- We ask staff to undertake at least annual house-keeping to review, remove and destroy any digital materials and documents which need no longer be stored.

### **Technical Solutions**

- Staff have secure areas on the network to store sensitive data and photographs
- We require staff to log-out of systems when leaving their computer
- We use encrypted flash drives if any member of staff has to take any sensitive information off site.
- We use the DfE S2S site to securely transfer CTF pupil data files to other schools.
- We use the Pan-London Admissions system (based on USO FX) to transfer admissions data.
- We use RAV3 / VPN solution with its 2-factor authentication for remote access into our systems.
- We use LGfL's USO FX to transfer other data to schools in London, such as references, reports of children.
- We use the LGfL secure data transfer system, USOAUTOUPDATE, for creation of online user accounts for access to broadband services and the London content
- We store any Protect and Restricted written material in a lockable storage area
- All servers are in physically lockable locations and managed by DBS-checked staff.
- Back-ups are encrypted and stored offsite. No local back-ups are to leave the site on mobile devices.
- We use LGfL's GridStore remote secure back-up for disaster recovery on our network server(s).
- We comply with the WEEE directive on equipment disposal by using an approved or recommended disposal company for disposal of equipment where any protected or restricted data has been held and get a certificate of secure deletion for any server that once contained personal data.
- Portable equipment loaned by the school (for use by staff at home), where used for any protected data, is disposed of through the same procedure.
- Paper based sensitive information is shredded, using cross cut shredder and/or collected by secure data disposal service.

- We are using secure file deletion software when disposing of devices.

## **6. Equipment and Digital Content**

### **Ipads**

- Each class has a designated Ipad which has access to the network which is the responsibility of the class teacher
- Ipads are only able to access the internet through the school network and are subject to the same filtering as other computers across the network
- At the end of each day Ipads should be locked in a centralised secure location within the computing suite.

### **Personal mobile phones and mobile devices**

- Mobile phones brought into school are entirely at the staff member, student's & parents' or visitors own risk. The School accepts no responsibility for the loss, theft or damage of any phone or hand held device brought into school.
- Student mobile phones which are brought into school, must be turned off (not placed on silent) and stored at the school office on arrival at school. They must remain turned off and out of sight until the end of the day. Staff members may use their phones during school break times within the staffroom or off premises.  
All visitors are requested to keep their phones on silent and out of sight of children.
- The recording, taking and sharing of images, video and audio on any mobile phone is prohibited; except where it has been explicitly agreed otherwise by the headteacher. Such authorised use is to be monitored and recorded. All mobile phone use is to be open to scrutiny and the headteacher is to be able to withdraw or restrict authorisation for use at any time if it is to be deemed necessary.
- The School reserves the right to search the content of any mobile or handheld devices on the school premises where there is a reasonable suspicion that it may contain undesirable material, including those which promote pornography, violence or bullying.
- Where parents or students need to contact each other during the school day, they should do so only by calling the school office. Staff may use their phones during break times. If a staff member is expecting a personal call they may leave their phone with the school office to answer on their behalf, or seek specific permissions to use their phone at a time other than their break times.
- Mobile phones and personally-owned devices will not be used in any way during lessons or formal school time. They should be switched off or silent at all times.
- Mobile phones and personally-owned mobile devices brought in to school are the responsibility of the device owner. The school accepts no responsibility for

the loss, theft or damage of personally-owned mobile phones or mobile devices.

- Mobile phones and personally-owned devices are not permitted to be used in certain areas within the school site, eg classrooms
- Mobile phones will not be used during lessons or formal school time unless as part of an approved and directed curriculum-based activity with consent from a member of staff.
- The Bluetooth or similar function of a mobile phone should be switched off at all times and not be used to send images or files to other mobile phones.
- No images or videos should be taken on mobile phones or personally-owned mobile devices
- All mobile phones and devices owned by pupils will be handed in at reception should they be brought into school.

#### ***Students' use of personal devices***

- The school only permits children in year 6 to bring personal mobile phones into school and in rare exceptions children from other year groups
- The School accepts that there may be particular circumstances in which a parent wishes their child to have a mobile phone for their own safety.
- If a student breaches the school policy then the phone or device will be confiscated and will be held in a secure place in the school office. Mobile phones and devices will be released to parents or carers in accordance with the school policy.
- If a student needs to contact his or her parents or carers, they will be allowed to use a school phone. Parents are advised not to contact their child via their mobile phone during the school day, but to contact the school office.
- Students should protect their phone numbers by only giving them to trusted friends and family members. Students will be instructed in safe and appropriate use of mobile phones and personally-owned devices and will be made aware of boundaries and consequences.

#### ***Staff use of personal devices***

- Any permitted images or files taken in school must be downloaded from the device and deleted in school before the end of the day.
- Staff are not permitted to use their own mobile phones or devices for contacting children, young people or their families within or outside of the setting in a professional capacity.
- Staff will be issued with a school phone where contact with students, parents or carers is required.

- Mobile Phones and personally-owned devices will be switched off or switched to 'silent' mode. Bluetooth communication should be 'hidden' or switched off and mobile phones or personally-owned devices will not be used during teaching periods unless permission has been granted by a member of the senior leadership team in emergency circumstances.
- If members of staff have an educational reason to allow children to use mobile phones or a personally-owned device as part of an educational activity then it will only take place when approved by the senior leadership team.
- Staff should not use personally-owned devices, such as mobile phones or cameras, to take photos or videos of students and will only use work-provided equipment for this purpose.
- If a member of staff breaches the school policy then disciplinary action may be taken.
- Where staff members are required to use a mobile phone for school duties, for instance in case of emergency during off-site activities, or for contacting students or parents, then a school mobile phone will be provided and used. In an emergency where a staff member doesn't have access to a school-owned device, they should use their own device and hide (by inputting 141) their own mobile number for confidentiality purposes.

### **Digital images and video**

#### **In this school:**

- We gain parental/carer permission for use of digital photographs or video involving their child as part of the school agreement form when their child joins the school;
- We do not identify pupils in online photographic materials or include the full names of pupils in the credits of any published school produced DVDs;
- Staff sign the school's Acceptable Use Policy and this includes a clause on the use of mobile phones and personal equipment for taking pictures of pupils;
- If specific pupil photos (not group photos) are used on the school web site, in the prospectus or in other high profile publications the school will obtain individual parental or pupil permission for its long term use
- The school blocks access to social networking sites or newsgroups unless there is a specific approved educational purpose
- Pupils are taught about how images can be manipulated in their e-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 as part of their computing scheme of work;
- Pupils are advised to be very careful about placing any personal photos on any 'social' online network space. 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, such as house number, street name or school. We teach them about the need to keep their data secure and what to do if they are subject to bullying or abuse.

### **Asset disposal**

Details of all school-owned hardware will be recorded in a hardware inventory. Details of all school-owned software will be recorded in a software inventory. All redundant equipment will be disposed of through an authorised agency. This will include a written receipt for the item including an acceptance of responsibility for the destruction of any personal data.

All redundant equipment that may have held personal data will have the storage media forensically wiped. Alternatively, if the storage media has failed, it will be physically destroyed. The school will only use authorised companies who will supply a written guarantee that this will happen

Disposal of any equipment will conform to [The Waste Electrical and Electronic Equipment Regulations 2006](#) and/or [The Waste Electrical and Electronic Equipment \(Amendment\) Regulations 2007](#). [Further information](#) can be found on the Environment Agency website.

September 2018

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