

# READING BLUE COAT

## E-Safety, Digital Communications, and Student Device Policy

### 1. Introduction

1.1 <u>Context:</u> The internet and digital communication are essential to and have transformed business and social interaction in the contemporary world. Reading Blue Coat (RBC) therefore has a duty to provide students with quality access as part of their learning experience, to raise educational standards, promote achievement and support the professional work of staff. We encourage our students to enjoy using the internet in a responsible way, not to forgetting that they are accountable for any media that they produce or share via online platforms and services. Internet safety is the responsibility of all those involved in the life of the School, including parents.

1.2 <u>School values</u>: The following policy is intended to support the five key values of RBC, for example:

- Aspiration aiming for excellence in the use of technology.
- Courage to identify and confront misuse or online abuse.
- Compassion to leverage technology to support and help others.
- Service enabling connections with the local community and wider world.
- Integrity acknowledging and rectifying the consequences of misuse.

1.3 <u>Scope</u>: This policy applies to all members of the RBC community (students, staff, volunteers, Governors, parents) with respect of their use of the School's ICT resources, accounts, and connections, and the use of personal devices and resources onsite. Policies are also applicable to the conduct of students and staff outside of School, which may include an element of online behaviours, and so this policy must be read in conjunction with the associated policies identified at the end of this policy document.

### 2. Roles and responsibilities

2.1 The Governors will:

- Review and approve the E-Safety, Digital Communications and Student Device Policy annually.
- Request and review information for the monitoring of e-safety at RBC.
- Ensure that there will be a designated Governor with responsibility for filtering and monitoring standards. This will be the Safeguarding Governor.
- Ensure that there are clear roles and responsibilities for filtering and monitoring among School staff and third parties (e.g., external service providers).

2.2 The Headmaster will:

- Promote a clear agenda for e-safety and appropriate digital conduct as part of the wider aims and ethos of the School.
- Understand and implement this policy and related policies in respect of allegations against staff, low level concerns, and any student behaviour or welfare concerns of sufficient seriousness to be referred to the Headmaster.

### 2.3 The Designated Safeguarding Lead will:

- Review, revise, and present this policy annually for Governor ratification.
- Provide information to Governors as per their requirement.
- Ensure good levels of training for the DSL, deputies, and other staff, and ensure that all staff understand their role, follow policy and procedure, and act on any concerns.
- Ensure the implementation of this policy and related policies that are relevant to online safety and welfare.
- Manage safeguarding cases that arise as a result of online behaviours.
- Act, in conjunction with the Second Master, as the designated member of SLT with responsibility for filtering and monitoring
- Liaise with the IT Manager and Second Master to manage e-safety and security (including filtering and monitoring) on the School's network.
- Chair a meeting (at least once per term) with the Second Master and IT Manager to: discuss procurement of filtering and monitoring systems, document decisions about what is blocked or allowed and why, review the effectiveness of the School's provision, and oversee reports relating to this domain.
- Ensure that minutes from these meetings are shared with Governors.

Ensure that the standards from Government Guidance (*Meeting Digital and Technology Standards in Schools and Colleges*, DfE, 2023) are used as a review checklist in regular meetings. 2.4 <u>The Second Master will:</u>

- Understand and implement this policy and related policies with respect of issues of student behaviour.
- Liaise and participate in regular meetings with the DSL and IT Manager, to manage e-safety and security on the School's network.
- Act, in conjunction with the DSL, as the designated member of SLT with responsibility for filtering and monitoring.

### 2.5 The IT Manager will:

- Proactively monitor the use of School networks, accounts, and resources to ensure appropriate e-safety and conduct.
- Hold technical responsibility for filtering and monitoring systems, providing reports, and completing actions following concerns or checks.
- Ensure that those systems meet the technical requirements set out in Government guidance and standards.
- Ensure that technical checks are carried out on a regular basis, which encompass a range of devices, locations, and user types, and are recorded in a log that includes: when checks took place, who did them, what was checked, and resulting actions.
- Report concerns regarding student behaviour to the appropriate pastoral staff.
- Report safeguarding and welfare concerns to the DSL.

- Liaise and participate in regular meetings with the Second Master and DSL to manage e-safety and security on the School's network. The IT Manager will be responsible for bringing technical expertise and proposals to these meetings.
- Ensure that other members of IT staff reporting to the IT Manager are aware of and effective in identifying and reporting concerns.
- Attend Governors' Safeguarding Committee annually, to enable strategic review of the School's approach to filtering and monitoring, and network security.

### 2.6 The Deputy Head (Academic) will:

- Identify and publish requirements for student devices in classrooms and other learning activities.
- Liaise with other members of SLT to ensure academic use of technology is consistent with the School's aims for the welfare and behaviour of students.

### 2.7 All Staff will:

- Understand and adhere to this policy and related policies, to ensure appropriate and safe online behaviours.
- Report any online related welfare, behaviour, or safeguarding concerns as per the School's other policies.
- Ensure that all digital communications are appropriate and professional.
- Promote the value of safe and appropriate online behaviour among students.
- Maintain a realistic and up-to-date awareness of how students use devices and the risks associated with that usage.
- Report any concerns about filtering and monitoring, and network security promptly, via email, to: the IT Manager, DSL, and Second Master. This will include any of the following cases:
  - they witness or suspect unsuitable material has been accessed
  - they can access unsuitable material
  - they are teaching topics which could create unusual activity on the filtering logs
  - there is failure in the software or abuse of the system
  - there are perceived unreasonable restrictions that affect teaching and learning or administrative tasks
  - they notice abbreviations or misspellings that allow access to restricted material

### 2.8 All Students:

- are responsible for using the School's IT systems in accordance with the Acceptable Use Policy
- have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations
- understand the importance of reporting abuse, misuse or access to inappropriate materials and know how to do so
- will be expected to know and understand policies on the use of mobile devices
- will be expected to know and understand policies on the taking/use of images and on onlinebullying
- should understand the importance of adopting good online safety practice when using digital technologies out of school and realise that the School's *E-safety, Digital*

*Communications and Student Device Policy* covers their actions out of school, if related to their membership of the School.

- 3.2 Parents/guardians:
  - Parents/guardians play a crucial role in ensuring that their children understand the need to use the internet/mobile devices in an appropriate way. The School will take every opportunity to help parents understand these issues through, for example:
    - Parents' seminars
    - Resource provision
    - Letters, social media and information about national/local online safety campaigns/literature (e.g. swgfl.org.uk, <u>www.saferinternet.org.uk</u>, <u>www.childnet.com/parents-and-carers</u>, 'ThinkUKnow' parents' <u>website</u> (which is run by the National Crime Agency) and the 'Safer Schools' app (available through Apple or Android) – our access code is 7675.).
  - Parents and guardians will be encouraged to support the School in promoting good online safety practice and to follow guidelines on the appropriate use of:
    - o digital and video images taken at School events
    - o access to the Parent Portal and online student records
    - o their children's personal devices in the School

### 3. E-Safety and education

3.1 <u>Educational aims for internet use</u>: Electronic information-handling skills are fundamental to the preparation of citizens and future employees in the Information Age. The School encourages online activities that:

- Investigate and research subjects, cross-curricular themes, or topics related to social and personal development.
- Support intellectual curiosity, individual research projects, academic extension.
- Investigate careers and Higher Education.
- Develop students' competence in ICT.
- Enable better communication and more efficient participation in enriching activities, such as the arts, sport, or adventure education.
- Promote good conduct, welfare, and a sense of community.

3.2 <u>Educating students about e-safety and appropriate communication</u>: Students are taught about the importance of safe and appropriate use of the internet and digital communication using the following means:

- A curriculum in PSHE lessons that is carefully mapped to be both comprehensive and age appropriate.
- Programmes of assemblies and tutor sessions that are set out by Directors of Section and Heads of Year.
- Pastoral talks by expert speakers that are arranged by the Deputy Head (Pastoral) (at least every three years).
- Communications with the Digital Council (see further point 7, below).
- Guidance documents published to students.

3.3 <u>Key elements covered in the education of students</u>: A wide range of topics and messages are communicated to students via the means identified above. This policy does not provide an exhaustive list, but key elements that the School's provision will cover include:

- Critical awareness of materials that can be found online their accuracy, validity, safety, and appropriateness.
- Understanding of the benefits and risks of social media and other forms of online communication with peers and others.
- The role that online communication plays in wider safeguarding concerns, such as grooming or sharing of images.
- The role of digital media and data in wider society and economy and how management of a digital footprint can affect later life.

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

- E-safety training will be embedded in the annual staff training programme. Established issues and new or evolving online harms will be covered in the annual safeguarding training, delivered to all staff at the beginning of each academic year.
- All new staff should receive online safety training as part of their induction programme, ensuring that they fully understand the *E-Safety*, *Digital Communications and Student Device Policy* and *Acceptable Use Policy*.
- All staff are expected to undertake dedicated training focused on online safety (typically, in the form of an e-learning course) and will be required to refresh such training regularly by the DSL.
- It is expected that some staff will identify online safety as a training need within the PDR process.
- The DSL (or other nominated person) will receive regular updates through attendance at external training events (e.g. from SWGfL/LA/other relevant organisations) and by reviewing guidance documents released by relevant organisations
- This *E-Safety, Digital Communications and Student Device Policy* and its updates will be presented to staff as part of ongoing training and feedback will be sought.
- The DSL (or other nominated person) will provide advice/guidance/training to individuals as required.

### 4. Systems, devices, mobile phones

4.1 <u>Use of School hardware and network:</u> Access to the internet may be provided via School computers and networks, and wireless connections. School devices are located in designated computer rooms. Guidelines for appropriate use of the internet are posted near all computers and in every form room. Students and staff are required to read and accept the School's *Acceptable Use Policy (AUP)* before making use of the School's devices and networks. Access to School networks and accounts is given via a personal login for each student or member of staff, which is password protected. Passwords should be secure and routinely updated. The IT Manager ensures that anti-virus software is utilised and updated, to protect systems and users.

4.2 <u>Monitoring, filters, and blocking:</u> The following measures are taken to ensure safety and appropriateness of the School's systems, networks, accounts:

- The IT Manager continually reviews the safety and security of systems, the means by which they are monitored, and liaises with SLT to develop and improve the technical side of e-safety.
- Monitoring includes both the physical monitoring of student screens by any staff supervising and the remote monitoring of internet access by IT staff and through any software / third party solutions employed by the school.
- The IT Manager monitors students' use of the School's network, including communications via email and Teams. Any messages sent via School systems could come to the attention of IT staff and potentially be shared with members of SLT.
- The School will filter and block access to some online resources via its network judgements are made in consultation by the IT Manager, Second Master, and the DSL. These judgements will consider the balance of online safety without unreasonably impacting teaching and learning, or restricting students from learning how to assess and manage risk themselves. Students may from time-to-time require access to a site that is blocked for some legitimate academic purpose. Access to such sites via the School's networks will only be given by written permission from the DSL and Second Master and the rationale will be recorded.

4.3 <u>Student laptops</u>: All students are required to bring a laptop each day (including compatible headphones and charger) for academic purposes. Further technical requirements will be agreed and advertised from time-to-time by SLT, and reasonable notification given to parents. Laptops must be able to access School accounts and internet resources (for example, Microsoft Teams). To ensure good levels of e-safety and appropriate use, supervising staff will:

- Advise students during lessons and activities as to what is (and is not) correct use of the laptop for the designated task.
- Proactively monitor what students are doing on their devices; intervene when necessary.
- Report inappropriate use to pastoral staff (Head of Year, in the first instance).
- Where appropriate, review what a student is accessing or doing more closely e.g., asking to see tabs open on a browser, reading a Teams chat thread.
- Laptops should not be connected to the internet via VPNs or hotspots, as these circumvent the School's filtering and monitoring systems. If discovered, the member of staff should ask the student to stop immediately and report promptly to the student's Head of Year.

4.4 <u>Mobile phones and other devices</u>: Students are permitted to bring mobile phones to School each day and they have a legitimate purpose (e.g., communicating with parents about transport arrangements). However, their use at RBC is strictly regulated:

- Mobile phones should be switched off and stored securely during the school day. Years 10 and 11, and Sixth Form students are permitted to use these devices in Common Rooms, during break and lunch times only. Year 9 and Lower School students should keep their mobiles locked up throughout the day.
- Staff may confiscate mobile phones that are being used during the day. Confiscated items are taken to the School Office in the Messer building. They can be collected at the end of the School day. Confiscation of a mobile phone will typically lead to a minus point being issued.

Students are asked not to bring other electronic devices into School (e.g., gaming devices, speakers) unless for a specific purpose agreed by staff. If found, these devices may be confiscated and sanctioned by staff as per mobile phones.

It is to be acknowledged that the widespread use of smartphones has meant that student access to the internet may have very few (if any) restrictions. The School's wireless network is strictly regulated, but students may access online services via mobile data. Therefore, staff are asked to be vigilant and aware of the significant risks that smartphones may pose. It is good practice to have open conversations with students about what they are accessing via smartphones and report pastoral concerns to Heads of Year. Depending on the nature of any content accessed, it may be necessary to follow the School's *Child Protection and Safeguarding Policy*. It is appropriate to challenge and confiscate, should a member of staff be sufficiently concerned by what a student is doing. Rarely, a mobile phone may be subject to a longer confiscation and search, but in such cases the rationale must be clearly recorded and communicated to the student and their parents (unless given specific advice to the contrary by the Police or other external agencies).

### 5. Digital communications

All students and staff will regularly communicate digitally, via School accounts; email and Microsoft Teams messages are widely used and legitimate means of communication. The careful use of passwords and secure devices is expected of all users, to ensure secure and appropriate communications.

5.1 <u>Communication between students and staff</u>: Communications should be appropriate and strictly limited to School accounts. Further details and expectations are set out in the RBC Staff Code of Conduct. Not only the means, but also the tone and language of communication should be appropriate, and staff have a responsibility to help students choose the right language and presentation of messages. Staff and students may 'chat' over Teams, but staff must ensure that over-familiarity or blurred boundaries are carefully avoided. Should any communication worry a member of staff, they should report it to the DSL for further advice.

5.2 <u>Expectations of students</u>: Students are expected to check their emails and Teams messages regularly (daily) and respond appropriately. They should not use school systems as an informal means of communication among their peer group. Students are asked to report any concerning behaviour or content to their tutor and Head of Year. Students should use polite and appropriate language in drafting messages; persistent and deliberate inappropriate communication will be escalated as a behavioural matter. Further guidance as to the boundaries and management of communication will be published to students from time-to-time, to ensure consistent, safe, and reasonable usage.

### 6. Behaviour and welfare online

As a general and guiding principle, all users should expect to maintain the same, high levels of behaviour in online interactions that they would use face-to-face. There is a risk that online communication may lead to some students feeling less inhibited or aware of the impact of their actions online, and therefore it is important for the School to take a proactive role in educating and challenging as issues arise.

Following the 2021 OFSTED *Review of Sexual Abuse in Schools and Colleges*, it is important for all staff to operate with the understanding that sexual abuse (including online sexual abuse) is pervasive in our society will affect students at RBC. Students may be the instigators of such abuse, complicit in it, or be the target for abusive behaviour and communications. To that end, it is crucial that staff engage with students with a sense of realism and awareness, as well as compassion, and understand that

concerns for e-safety are thoroughly enmeshed in issues of Child Protection and Safeguarding. All staff are asked to read this policy in conjunction with the *Child Protection and Safeguarding Policy* to gain a holistic understanding of how to support young people in staying safe online.

6.1 <u>General principles</u>: The School reserves the right to make decisions as per the circumstances and impact as to which online behaviours count as harmful or inappropriate. However, as a non-exhaustive list, students are not permitted to:

- Retrieve, store, send, copy, or display offensive or harmful messages or media.
- Use discriminatory language.
- Harass, insult or attack others, or incite another person to do so.
- Assume false identities, mislead, or use anonymity to harm others.
- Damage computers, computer systems or computer networks, or the devices of other members of the community.
- Ignore copyright laws or use technology for academic dishonesty.
- Compromise or use another user's password or other secure information.
- Go into another user's folders, work, files, or any other data.
- Exploit or steal online resources for financial gain or misuse.
- Use the School's network or accounts for commercial purposes.
- Participate in, promote, encourage, or glamorize any illegal activity, or activities that are contrary to the School's values or rules.

6.2 <u>Cyberbullying</u>: Cyberbullying is a pernicious form of bullying because it can be so pervasive and potentially anonymous. There can be no safe haven for the victim who can be targeted at any time or place. The School's *Anti-Bullying Policy* describes the preventative measures and the procedures that will be followed when the School discovers cases of bullying. The following points summarise the RBC approach to cyberbullying:

- Education of students to ensure that they have a good understanding of the risks of cyberbullying, that it could happen to anyone, and that there are effective means to respond to it. Students should be encouraged to come forward and understand that they are not alone. Good relationships and open communication with staff (tutors, Heads of Year) will enable a flow of information about online behaviours that can reduce the risk of cyberbullying.
- RBC communicates a strong message of equal respect and inclusion for all, and students are expected to buy-into that message as 'active bystanders' to harassment and bullying, advocating for one another and notifying staff when worried about their peers or friends.
- Students are given different options to communicate their concerns or report that they are being cyberbullied in person, via email, anonymously, etc. This makes it easier for them to come forward and feel secure in sharing information.
- The response to cyberbullying is consistent with any other form of bullying it is not tolerated, is contrary to the School's values, and so may lead to significant sanctions in accordance with the *Behaviour, Rewards and Sanctions Policy, Anti-Bullying Policy* and *Student Manual.* Sanctions are decided on a case-by-case basis and may be more or less severe based on context. Established cases of cyberbullying will always receive a significant sanction (a detention or exclusion) and may be in some cases by classified as 'child-on-child abuse'. This deters cyberbullying and reinforces the message that it is wrong.
- Students are informed about online tools for countering cyberbullying during PSHE lessons for example, using block functions, reporting tools, etc.

6.3 <u>Online harms and welfare considerations</u>: Students may also be subject to risks and harms from online activities that are not related to or generated by other users at RBC. However, the School still has an important role to play in educating and protecting students from potential online harms and responding to incidents which arise. Proactive and reactive measures include:

- Training and education of students and staff, to identify a constantly evolving set of potential online harms, such as extremism, body image and health threats, promotion of self-harm, suicide, or other factors related to mental health, and new practices of grooming or exploitation.
- Open and timely communication with students and parents, and referral to additional sources of support both within the School and externally.
- Working as a pastoral team to ensure that there are 'eyes on' a child of concern, maximising information sharing, and considering a range of views tutor, Head of Year, Director of Section, Medical, Chaplain, etc.
- Rapid referral to the DSL and effective management of safeguarding cases, with inter-agency working or liaison with other schools, bodies, as required.

The School also recognises the positive role that online communication can play in promoting good welfare and well-being, as a source of advice, affirmation, and emotional support. Staff (for example, tutors and tutor groups) are encouraged to have an open and on-going conversation with students about the constructive and destructive opportunities of online interaction. Listening without judgement and asking questions is an important part of this process, to better understand what students are doing and help identify risks.

### 7. Digital Council Charter

A consultation of a student Digital Council in 2023 led to the formulation of a revised Charter, which reflects the views and concerns of students in terms of e-safety and online behaviour. The Charter is published to students in School documents and is as follows:

- 1. Everyone should treat people kindly and compassionately in just the same way in the online world as they would in the real world. It is important to focus on positive content online and use technology to support a positive atmosphere in the School.
- 2. Permission must always be given before using or uploading any information or media that involves another person.
- 3. Social media and communication groups should never be used as a medium for carrying out bullying or harassment. This includes deliberately excluding others, so they are left outside groups, as well as unwanted contact.
- 4. The School's systems should only be used for constructive and creative purposes. Systems like Teams chat or calls should not be abused or used in distracting, inappropriate ways.
- 5. Apart from in designated times and places for some year groups, phones should not be used or visible around School without the permission of a member of staff. This particularly applies in isolated areas where there is less visibility such as toilets.
- 6. Taking photos or videos of other people in the School community without their permission is not allowed.
- 7. Digital communication between all members of staff and students and their parents should only take place using the School email system and other designated systems, such as Teams . All members of the community should be understanding about response times and should not expect replies during the evening. Communication between students and staff via any private

social media platforms or personal email addresses is not allowed. Do not attempt to add or follow members of staff via social media.

- 8. Everyone must look out for others in the online world in the same way as in the real world. If they are concerned about themselves or someone else, they should report them to the School to ensure that everyone is safe. Ideally, members of our community shouldbe 'active bystanders' online and challenge behaviours that are wrong.
- 9. Technology should be used in appropriate and fair ways for academic work. Artificial Intelligence should only be used to support academic work with the advice or suggestions given by members of staff. You should never copy-and-paste material from online and pretend it is your work. You should also make sure that technology does not distract you or prevent you from working.
- 10. Everyone must ensure that potentially addictive online activities (such as gaming) that are disruptive to well-being are kept in moderation, so they do not have an adverse impact on sleep, academic progress, and relationships with others.

The Charter will be reviewed and revised again in 2026.

### 8. Advice and resources

All members of the community are warmly invited to raise questions and concerns, and seek further advice from SLT. General advice and resources can be found below. Staff are encouraged to use and share this information with students.

8.1 <u>Advice and resources for students</u>: The following advice will help students to navigate their way through online life safely:

- Always respect others in what you say and do, and consider the impact of your actions online upon other people.
- Think before you send or share. What will this lead to? Will you have control of the situation? Who might see it? If in doubt stop, then think again.
- Guard your information and passwords. Do not share your passwords or secure information, make passwords are hard to guess, and change them regularly. If someone gets into your accounts, change your password and report immediately. Only give out your mobile number and other contact information to trusted friends.
- Block bullies, inappropriate people, people you don't know or who make you feel uncomfortable. Most sites and services allow you to do this and to report.
- Do not retaliate or reply cyberbullying is often intended to get a reaction and provoke.
- Save the evidence make sure you know how to screenshot from your phone and other devices, and how to save evidence. Tell your teachers and parents that you have this evidence.
- Report and support make sure that you make people aware and get support if you are hurt by anything online: your tutor and Head of Year, your parents, or call helplines such as Childline (0800 1111) or the NSPCC (0808 800 5000). Remember that nobody deserves to suffer or be harmed by anything online.
- Get guidance and help from recommended services:
  - o <u>https://cyberbullying.org/resources/students</u>
  - o <a href="https://www.childnet.com/young-people/">https://www.childnet.com/young-people/</a>
  - o <u>https://www.digitalawarenessuk.com/resources</u>

8.2 <u>Advice and resources for adults</u>: The following advice is for parents and staff, to help them manage and respond to e-safety concerns about children:

- Have an open and on-going conversation with young people about safe and appropriate online activity.
- Assume that young people will have a stronger understanding of what goes on online than most adults respect their knowledge and do not patronise.
- Set out ground rules that are clear and consistent, as early as possible. It is always easier to relax a strict rule with children later on than to impose a new, firmer rule when things 'get out of hand'. The best rules apply to all members of the household, so consider whether that are shared points that all could accept (e.g., no phones in bedrooms).
- Encourage young people to share their experiences of what they see online and do not be too quick to judgement it is important to keep trust and not to close down channels of communication.
- Admit to your own mistakes and anxieties about life online; be human.
- If you become aware of a child being harmed or witnessing inappropriate behaviour online, be sure to help them access tools to respond to it blocking, recording, reporting, and getting help from pastoral staff at School.
- Get guidance and help from recommended services:
  - (Sites mentioned in student list above).
  - o <a href="https://parentzone.org.uk/">https://parentzone.org.uk/</a>
  - o <a href="https://www.ceop.police.uk/Safety-Centre/">https://www.ceop.police.uk/Safety-Centre/</a>

### 9. Policy review and related policies

Review schedule:

Author(s):	Guy Williams (Deputy Head [Pastoral])		
Date:	September 2023		
Review Frequency:	Annually		
Next Review Date:	September 2024		
References:	<ul> <li>Review of Sexual Abuse in Schools and Colleges (OFSTED, 2021) <u>https://www.gov.uk/government/publications/review-of-sexual-abuse-in-schools-and-colleges</u></li> <li>Meeting Digital and Technology Standards in Schools and Colleges (DfE, 2023)</li> </ul>		
Associated Policies	<ul> <li>Anti-Bullying</li> <li>Behaviour, Rewards and Sanctions</li> <li>Child Protection and Safeguarding</li> <li>Staff Code of Conduct</li> </ul>		
Agreed by:	Pete Thomas (Headmaster)		
Date of Agreement:	September 2023		

### **APPENDIX 1: Acceptable Use Policy**

#### Scope

This policy applies to all members of the school community (staff or students) who use school IT systems, as a condition of access. Access to school systems is not intended to confer any status of employment on any contractors.

#### **Online behaviour**

As a member of the School community you should follow these principles in all of your online activities:

- The School cannot guarantee the confidentiality of content created, shared and exchanged via school systems. Ensure that your online communications, and any content you share online, are respectful of others and composed in a way you would wish to stand by.
- Do not access, create or share content that is illegal, deceptive, or likely to offend other members of the school community (for example, content that is obscene, or promotes violence, discrimination, or extremism, or raises safeguarding issues).
- Respect the privacy of others. Do not share photos, videos, contact details, or other information about members of the school community, even if the content is not shared publicly, without going through official channels and obtaining permission.
- Do not access or share material that infringes copyright, and do not claim the work of others as your own.
- Do not use the internet to distribute malicious software, to damage, interfere with, or gain unauthorised access to the computer systems of others, or carry out illegal activities.
- Staff should not use their personal email, or social media accounts to contact students or parents, and students and parents should not attempt to discover or contact the personal email addresses or social media accounts of staff.

#### Using the School's IT systems

Whenever you use the school's IT systems (including by connecting your own device to the network) you should follow these principles:

- Only access school IT systems using your own username and password. Do not share your username or password with anyone else.
- Do not attempt to circumvent the content filters or other security measures installed on the School's IT systems, and do not attempt to access parts of the system that you do not have permission to access.
- Do not attempt to install software on, or otherwise alter, school IT systems.
- Do not use the School's IT systems in a way that breaches the principles of online behaviour set out above.
- Remember that the School monitors use of the School's IT systems, and that the School can view content accessed or sent via its systems.

#### Passwords

Passwords protect the School's network and computer system and are your responsibility. They should not be obvious (for example "password", 123456, a family name or birthdays), and nor should they be the same as your widely used personal passwords. You should not let anyone else know your password, nor keep a list of passwords where they may be accessed and must change it immediately if it appears to be compromised. You should not attempt to gain unauthorised access to anyone else's computer or to confidential information to which you do not have access rights.

Passwords must adhere to the following criteria

- Minimum 8 characters
- An uppercase letter
- A lowercase letter
- A number or special character
- Cannot match a previous password

All staff accounts with access to student and/or sensitive data must be protected by Two Factor Authentication (2FA).

#### **Use of Property**

Any property belonging to the School should be treated with respect and care, and used only in accordance with any training and policies provided. You must report any faults or breakages without delay to the IT department.

#### Use of school systems

The provision of school email accounts, Wi-Fi and internet access is for official school business, administration and education. Staff and students should keep their personal, family and social lives separate from their school IT use and limit as far as possible any personal use of these accounts. Again, please be aware of the School's right to monitor and access web history and email use.

#### Use of personal devices or accounts and working remotely

All official school business of staff must be conducted on school systems, and it is not permissible to use personal email accounts for school business. Any use of personal devices for school purposes, and any removal of personal data or confidential information from school systems – by any means including email, printing, file transfer, cloud or (encrypted) memory stick – must be registered and approved by the IT department.

Where permission is given for use of personal devices, these must be subject to appropriate safeguards in line with the School's policies, including [two-factor authentication, encryption etc.]

#### Monitoring and access

Staff, parents and students should be aware that school email and internet usage (including through school Wi-Fi) will be monitored for safeguarding, conduct and performance purposes, and both web history and school email accounts may be accessed by the School where necessary for a lawful purpose – including serious conduct or welfare concerns, extremism and the protection of others. Any personal devices used by students, whether or not such devices are permitted, may be confiscated and

examined under such circumstances. The School may require staff to conduct searches of their personal accounts or devices if they were used for school business in contravention of this policy, and in particular if there is any reason to suspect illegal activity or any risk to the wellbeing of any person.

The use of Virtual Private Networks (VPNs) and mobile hotspots to circumvent the School's filtering and monitoring systems is expressly forbidden. Compliance with related school policies.

To the extent they are applicable to you, you will ensure that you comply with the School's *E-Safety, Digital Communication and Student Device Policy, Child Protection and Safeguarding Policy, Anti-Bullying Policy, Data Protection Policy* and the *Student Manual*.

#### Retention of digital data

Staff and students must be aware that all emails sent or received on school systems should be routinely deleted after 3 years or kept in an archive. Email accounts will be closed and the contents archived within 1 month of that person leaving the School.

Student Account	Password changed within 7 days of leaving.	•	Email/OneDrive backed-up and stored Account deleted within 4 weeks
Staff Account	Password changed within 7 days of leaving.	•	Email/OneDrive backed-up and stored Account deleted within 4 weeks (unless longer access requested).

Any information from email folders that is necessary for the School to keep for longer, including personal information (e.g. for a reason set out in the School Privacy Notice), should be held on the relevant personnel or student file. Important records should not be kept in personal email folders, archives or inboxes, nor in local files. Hence it is the responsibility of each account user to ensure that information is retained in the right place or, where applicable, provided to the right colleague. That way no important information should ever be lost as a result of the School's email deletion protocol. If you consider that reasons exist for the protocol not to apply, or need assistance in how to retain and appropriately archive data, please contact Barry Hines, Head of IT (bjh@rbcs.org.uk).

### Breach reporting

The law requires the School to notify personal data breaches, if they are likely to cause harm, to the authorities and, in some cases, to those affected. A personal data breach is a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.

This will include almost any loss of, or compromise to, personal data held by the school regardless of whether the personal data falls into a third party's hands. This would include:

- loss of an unencrypted laptop, USB stick or a physical file containing personal data;
- any external hacking of the school's systems, eg through the use of malware;
- application of the wrong privacy settings to online systems;
- misdirected post, fax or email;

- failing to bcc recipients of a mass email; and
- unsecure disposal.

The School must generally report personal data breaches to the ICO without undue delay (i.e. within 72 hours), and certainly if it presents a risk to individuals. In addition, controllers must notify individuals affected if that risk is high. In any event, the School must keep a record of any personal data breaches, regardless of whether they need to notify the ICO.

If either staff or students become aware of a suspected breach, they must report it immediately to the Data Protection Co-Ordinator (the Bursar).

Data breaches will happen to all organisations, but the School must take steps to ensure they are as rare and limited as possible and that, when they do happen, the worst effects are contained and mitigated. This requires the involvement and support of all staff and students. The School's primary interest and responsibility is in protecting potential victims and having visibility of how effective its policies and training are. Accordingly, falling victim to a data breach, either by human error or malicious attack, will not always be the result of a serious conduct issue or breach of policy; but failure to report a breach will be a disciplinary offence.

#### **Breaches of this policy**

A deliberate breach of this policy by staff or students will be dealt with as a disciplinary matter using the school's usual applicable procedures. In addition, a deliberate breach by any person may result in the School restricting that person's access to school IT systems.

If you become aware of a breach of this policy or the *E-Safety, Digital Communications and Student Device Policy,* or you are concerned that a member of the School community is being harassed or harmed online you should report it to the Second Master. Reports will be treated in confidence wherever possible.