Holy Trinity Freedom of Information (Jan 2

Our Christian faith emphasises the value and worth of every individual with their own distinctive character, gifts and abilities.

Christ's command to 'Love one another' calls us to respect and help other people. This provides the foundation for our school and all we aim to achieve.

Email, Internet and E-Safety Policy for Staff, Pupils, Parents and Governors

As part of the Computing program at Holy Trinity C of E Primary School, pupils may be offered access to both Internet, email and VLE (Virtual Learning Environment) facilities. We believe that the Internet offers a wonderful environment for children to learn and have fun. However, we are mindful of the harm that can be caused to children online, including cyber bullying, pornography and the threat of radicalisation. This policy is written in conjunction with Holy Trinity C of E Primary Social Media Procedure.

Scope of the Policy

This policy applies to all members of the 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 the school.

The Education and Inspections Act 2006 empowers Headteachers 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 school will deal with such incidents within this policy and associated behaviour and anti-bullying policies and will, where known, inform parents / carers of incidents of inappropriate e-safety behaviour that take place out of school.

It is the school's number one priority to keep children safe and that includes whilst 'connected' and involved in our virtual environments. The school uses the September 2023 "Keeping Children Safe in Education" as a primary source for this policy (Annexe D, page 150).

The three categories of risk are as follows:

• **content:** being exposed to illegal, inappropriate or harmful material; for example pornography, fake news, racist or radical and extremist views;

• **contact**: being subjected to harmful online interaction with other users; for example commercial advertising as well as adults posing as children or young adults; and

• **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images, or online bullying.

Roles and Responsibilities
The following section outlines the e-safety roles and responsibilities of individuals and groups within the school:

Governors:
Governors and proprietors should ensure that, as part of the requirement for staff to undergo regularly updated safeguarding training and the requirement to ensure children are taught about safeguarding, including online, that online safety training for staff is integrated, aligned and considered as part of the overarching safeguarding approach.

Head Teacher and Senior Leaders:

The Senior Leadership Team is responsible for the approval of the E-Safety Policy and for reviewing the effectiveness of the policy. This will be carried out having receiving regular information about e-safety incidents and monitoring reports.

- regular meetings with the E-Safety Leader
- regular monitoring of E-Safety incident logs
- The Head Teacher has a duty of care for ensuring the safety (including E-Safety) of members of the school community, though the day to day responsibility for e-safety will be delegated to the E-Safety Leader.
- The Head Teacher and the Senior Leadership Team should be aware of the procedures to be followed in the event of a serious E-Safety allegation being made against a member of staff. (see flow chart on dealing with e-safety incidents – included in a later section – "Responding to incidents of misuse")
- The Senior Leaders are responsible for ensuring that the E-Safety Leader and other relevant staff receive suitable guidance to enable them to carry out their E-Safety roles as relevant.
- The Head Teacher and Senior Leaders will ensure that there is a system in place to allow for monitoring and support of those in school who carry out the internal E-Safety monitoring role. This is to provide a safety net and also support to those colleagues who take on important monitoring roles.
- The Senior Leadership Team will receive regular monitoring reports from the E-Safety Leader.
- Smoothwall is monitored by Cybersupport, the school network managing company should any incidents arise alerting them to web traffic events that violate our policy. They would be informed by Smoothwall immediately if there was a breach or if an attempt is made to access a blacklisted site which falls into a restricted category (see Prevent Risk Assessment, Holy Trinity C of E Primary School's Child Protection and Safeguarding Policy and Procedures)

E-Safety Leader:
Annette Streames-Smith

- takes day to day responsibility for E-Safety issues and has a leading role in establishing and reviewing the school E-Safety policies / documents
- ensures that all staff are aware of the procedures that need to be followed in the event of an E-Safety incident taking place.
- provides advice for staff
- liaises with the relevant body
- liaises with school technical staff
- responds immediately to Smoothwall alerts following an attempt to access restricted sites
- receives reports of E-Safety incidents and creates a log of incidents to inform future E-Safety developments
- reports regularly to Senior Leadership Team

Network Manager:
Cybersupport Ltd
The Network Manager is responsible for ensuring:

- that the school's technical infrastructure is secure and is not open to misuse or malicious attack
- that the school meets required E-Safety technical requirements and any E-Safety Policy / Guidance that may apply.
- that users may only access the networks and devices through a properly enforced password protection policy, in which passwords are regularly changed.

To ensure that the school has appropriate filters and monitoring systems in place to limit children's exposure to the three areas of risk from the school's IT system. (Three Areas of Risk are defined as Content: being exposed to illegal, inappropriate or harmful material; Contact: being subjected to harmful online interaction with other users; Conduct: personal online behaviour that increases the likelihood of, or causes, harm (Keeping Children Safe in Education September 2023). The UK Safer Internet Centre has published guidance as to what appropriate looks like (UK Safer Internet Centre: Appropriate Filtering & Monitoring).

- To ensure that a reporting mechanism is in place and is maintained.
- In order to report inappropriate content for access or blocking, Cybersupport have put in place (via Smoothwall) a service whereby the company monitor the web traffic and report to Annette Streames-Smith (School Business Manager, DDSL) and Anna Smith (Head Teacher, DSL), alerting them to web traffic events that violate our policy.
- Smoothwall notifications will alert the school immediately if there is a breach e.g. attempts to access an inappropriate website by a single user. See Prevent Risk Assessment, Holy Trinity C of E Primary School's Child Protection and Safeguarding Policy and Procedures
- To advise the school on the above points so that the school can do all that it reasonably can to limit children's exposure to risks from its IT system, as required by the Prevent Duty.

Teaching and Support Staff
are responsible for ensuring that:

- they report any suspected misuse or problem to the Head Teacher / E-Safety Leader who will investigate / action / sanction
- all digital communications with pupils / parents / carers should be on a professional level and only carried out using official school systems
- E-Safety issues are embedded in all aspects of the curriculum and other activities
- pupils understand and follow the E-Safety and acceptable use policies
- they monitor the use of digital technologies, mobile devices, cameras etc. in lessons and other school activities (where allowed) and implement current policies with regard to these device
- ensure that they always directly supervise children whilst using technology including the Internet.
- in lessons where internet use is pre-planned pupils should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches

Safeguarding Officers:
Anna Smith, Annette Streames-Smith, Amy Buckley and Fiona O'Reilly
should be aware of the potential for serious child protection / safeguarding issues to arise from:

- sharing of personal data
- access to inappropriate materials (including pornography and material that poses a threat of radicalisation)
- inappropriate on-line contact with adults / strangers
- potential or actual incidents of grooming
- cyber-bullying
- ensure that the school has appropriate filters and monitoring systems in place to limit children's exposure to the three areas of risk from the school's IT system in line with Prevent Duty

Pupils:

- are responsible for using the school digital technology systems in accordance with the Pupil Acceptable Use Policy
- 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.
- should understand that the school has monitoring and filtering systems in place and that access and usage is carefully scrutinised

Parents / Carers
Parents / Carers 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 parents' evenings, newsletters, letters, website and information about national / local E-Safety campaigns / literature. Parents and carers will be encouraged to support the *school* in promoting good e-safety practice and to follow guidelines on the appropriate use of:

- digital and video images taken at school events
- their children's personal devices in the school

Policy Statements

Education – pupils
Whilst regulation and technical solutions are very important, their use must be balanced by educating pupils to take a responsible approach. The education of pupils in E-Safety is therefore an essential part of the school's E-Safety provision. Children and young people need the help and support of the school to recognise and avoid E-Safety risks and build their resilience.

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. An effective approach to online safety empowers a school or college to protect and educate the whole school community in their use of technology and establishes mechanisms to identify, intervene in and escalate any incident where appropriate.

E-Safety should be a focus in all areas of the curriculum and staff should reinforce E-Safety messages across the curriculum. The E-Safety curriculum should be broad, relevant and provide progression, with opportunities for creative activities and will be provided in the following ways:

- A planned E-Safety curriculum should be provided as part of Computing / Personal, Social, Health and Citizenship Education lessons/ other lessons and should be regularly revisited
- Key E-Safety messages should be reinforced as part of a planned programme of assemblies and tutorial / pastoral activities
- Pupils should be helped to understand the need for the Pupil Acceptable Use Agreement and encouraged to adopt safe and responsible use both within and outside school
- Staff should act as good role models in their use of digital technologies the internet and mobile devices
- In lessons where internet use is pre-planned, it is best practice that pupils should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches.
- Where pupils are allowed to freely search the internet, staff should be vigilant in monitoring the content of the websites the young people visit.

Education – parents / carers

Many parents and carers have only a limited understanding of E-Safety risks and issues, yet they play an essential role in the education of their children and in the monitoring / regulation of the children's on-line behaviours. Parents may underestimate how often children and young people come across potentially harmful and inappropriate material on the internet and may be unsure about how to respond.

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

- Letters, newsletters, web site
- Parents / Carers evenings / sessions
- High profile events / campaigns e.g. Safer Internet Day
- Reference to the relevant web sites / publications e.g. www.swgfl.org.uk www.saferinternet.org.uk/ http://www.childnet.com/parents-and-carers (see appendix for further links / resources)

Education & Training – Staff / Volunteers

It is essential that all staff receive E-Safety training and understand their responsibilities, as outlined in this policy. Training will be offered as follows:

- A planned programme of formal E-Safety training (Paul Hay, PCLS Training) will be made available to staff. This will be regularly updated and reinforced. An audit of the E-Safety training needs of all staff will be carried out regularly.
- The E-Safety Leader (or other nominated person) will receive regular updates through attendance at external training events (e.g. from LA or other relevant organisations) and by reviewing guidance documents released by relevant organisations.
- This E-Safety policy and its updates will be presented to and discussed by staff in staff / team meetings / INSET days.
- The E-Safety Leader (or other nominated person) will provide advice / guidance / training to individuals as required.

Technical – infrastructure / equipment, filtering and monitoring
The school will be responsible for ensuring that the school infrastructure / network is as safe and secure as is reasonably possible and that policies and procedures approved within this policy are implemented. It will also need to ensure that the relevant people named in the above sections will be effective in carrying out their E-Safety responsibilities:

- School technical systems will be managed in ways that ensure that the school meets recommended technical requirements
- There will be regular reviews and audits of the safety and security of school technical systems
- Servers, wireless systems and cabling must be securely located and physical access restricted (locked server room)
- All users will have clearly defined access rights to school technical systems and devices.
- All users will be provided with a username and password.
- The "master / administrator" passwords for the school ICT system, used by the Network Manager (or other person) must also be available to the Computing Leader Thomas Redjeb.
- Cybersupport are responsible for ensuring that software licence logs are accurate and up to date and that regular checks are made to reconcile the number of licences purchased against the number of software installations
- Internet access is filtered for all users. Illegal content is filtered by the broadband or filtering provider by actively employing the Internet Watch Foundation CAIC list. Content lists are regularly updated and internet use is logged and monitored. There is a clear process in place to deal with requests for filtering changes
- The school has provided enhanced / differentiated user-level filtering
- School technical staff (Cybersupport) regularly monitor and record the activity of users on the school technical systems in accordance with DFE Guidance. https://www.gov.uk/government/news/new-measures-to-keep-children-safe-online-at-school-and-at-home Users are made aware of this in the Acceptable Use Agreement
- An appropriate system is in place for users to report any actual / potential technical incident / security breach to the relevant person, as agreed).
- Appropriate security measures are in place to protect the servers, firewalls, routers, wireless systems, work stations, mobile devices etc. from accidental or malicious attempts which might threaten the security of the school systems and data. These are tested regularly. The school infrastructure and individual workstations are protected by up to date virus software.
- An agreed policy is in place for the provision of temporary access of guests (e.g. trainee teachers, supply teachers, visitors) onto the school systems.

Use of digital and video images
The development of digital imaging technologies has created significant benefits to learning, allowing staff and pupils instant use of images that they have recorded themselves or downloaded from the internet. However, staff, parents / carers and pupils need to be aware of the risks associated with publishing digital images on the internet. Such images may provide avenues for cyberbullying to take place. Digital images may remain available on the internet forever and may cause harm or embarrassment to individuals in the short or longer term. The school will inform and educate users about these risks and will implement policies to reduce the likelihood of the potential for harm:

- When using digital images, staff should inform and educate pupils about the risks associated with the taking, use, sharing, publication and distribution of images. In particular they should recognise the risks attached to publishing their own images on the internet e.g. on social networking sites.

- In accordance with guidance from the Information Commissioner's Office, parents / carers are welcome to take videos and digital images of their children at school events for their own personal use (as such use is not covered by the Data Protection Act). To respect everyone's privacy and in some cases protection, these images should not be published / made publicly available on social networking sites, nor should parents / carers comment on any activities involving other pupils in the digital / video images.

- Staff and volunteers are allowed to take digital / video images to support educational aims, but must follow school policies concerning the sharing, distribution and publication of those images. Those images should only be taken on school equipment, the personal equipment of staff should not be used for such purposes.
- Care should be taken when taking digital / video images that pupils are appropriately dressed and are not participating in activities that might bring the individuals or the school into disrepute.
- Pupils must not take, use, share, publish or distribute images of others without their permission
- Photographs published on the website, or elsewhere that include pupils will be selected carefully and will comply with good practice guidance on the use of such images.
- Pupils' full names will not be used anywhere on a website or blog.
- Written permission from parents or carers will be obtained before photographs of pupils are published on the school website
- Pupil's work can only be published with the permission of the pupil and parents or carers.

Data Protection

Personal data will be recorded, processed, transferred and made available according to the Data Protection Act 1998 and it is based on guidance published by the Information Commissioners office and model privacy notices published by the Department for Education. It also takes into account the expected provisions of the General Data Protection Regulations (GDPR) as of May 2018. Personal data must be:

- Fairly and lawfully processed
- Processed for limited purposes
- Adequate, relevant and not excessive
- Accurate
- Kept no longer than is necessary
- Processed in accordance with the data subject's rights
- Secure
- Only transferred to others with adequate protection.

The school must ensure that:

- It will hold the minimum personal data necessary to enable it to perform its function and it will not hold it for longer than necessary for the purposes it was collected for.
- Every effort will be made to ensure that data held is accurate, up to date and that inaccuracies are corrected without unnecessary delay.
- All personal data will be fairly obtained in accordance with the "Privacy Notice" and lawfully processed in accordance with the "Conditions for Processing".
- It has a Data Protection Policy & Privacy Notice
- It is registered as a Data Controller for the purposes of the Data Protection Act (DPA)
- There is a policy for reporting, logging, managing and recovering from information risk incidents

Staff must ensure that they:

- At all times take care to ensure the safe keeping of personal data, minimising the risk of its loss or misuse. It could be a minimum fine of £500,000 if the school in in breach of this.
- Use personal data only on secure password protected computers and other devices, ensuring that they are properly "logged-off" at the end of any session in which they are using personal data. All computers and keys are locked or securely encrypted.

Communications

A wide range of rapidly developing communications technologies has the potential to enhance learning. The following table shows how the school currently considers the benefit of using these technologies for education outweighs their risks / disadvantages:

	Staff & other adults			Pupils				
Communication Technologies	Allowed	Allowed at certain times	Allowed for selected staff	Not allowed	Allowed	Allowed at certain times	Allowed with staff permission	Not allowed
Mobile phones may be brought to school	√						√	
Use of mobile phones in lessons		√		√				
Use of mobile phones in social time	√			√				
Taking photos on mobile phones / cameras		√		√				
Use of other mobile devices e.g. tablets, gaming devices		√				√		
Use of personal email addresses in school, or on school network		√		√				
Use of school email for personal emails		√		√				
Use of messaging apps		√					√	
Use of social media		√					√	
Use of blogs		√					√	

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

- The official school email service may be regarded as safe and secure and is monitored. Users should be aware that email communications are monitored. Staff and pupils should therefore use only the school email service to communicate with others when in school, or on school systems (e.g. by remote access).
- Users must immediately report, to the nominated person – in accordance with the school policy, the receipt of any communication that makes them feel uncomfortable, is offensive, discriminatory, threatening or bullying in nature and must not respond to any such communication.
- Any digital communication between staff and pupils or parents / carers (email) must be professional in tone and content.
- Pupils should be taught about E-Safety issues, such as the risks attached to the sharing of personal details. They should also be taught strategies to deal with inappropriate communications and be reminded of the need to communicate appropriately when using digital technologies.

- Personal information should not be posted on the school website and only official email addresses should be used to identify members of staff.

Social Media - Protecting Professional Identity

All schools, academies and local authorities have a duty of care to provide a safe learning environment for pupils and staff. Schools and local authorities could be held responsible, indirectly for acts of their employees in the course of their employment. Staff members who harass, cyberbully, discriminate on the grounds of sex, race or disability or who defame a third party may render the school or local authority liable to the injured party. Reasonable steps to prevent predictable harm must be in place.

The school provides the following measures to ensure reasonable steps are in place to minimise risk of harm to pupils, staff and the school through limiting access to personal information:

- Training to include: acceptable use; social media risks; checking of settings; data protection; reporting issues.
- Clear reporting guidance, including responsibilities, procedures and sanctions
- Risk assessment, including legal risk

School staff should ensure that:

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

The school's use of social media for professional purposes will be checked regularly by the E-Safety coordinator to ensure compliance with the Social Media, Data Protection, Communications, Digital Image and Video Policies.

Unsuitable / inappropriate activities

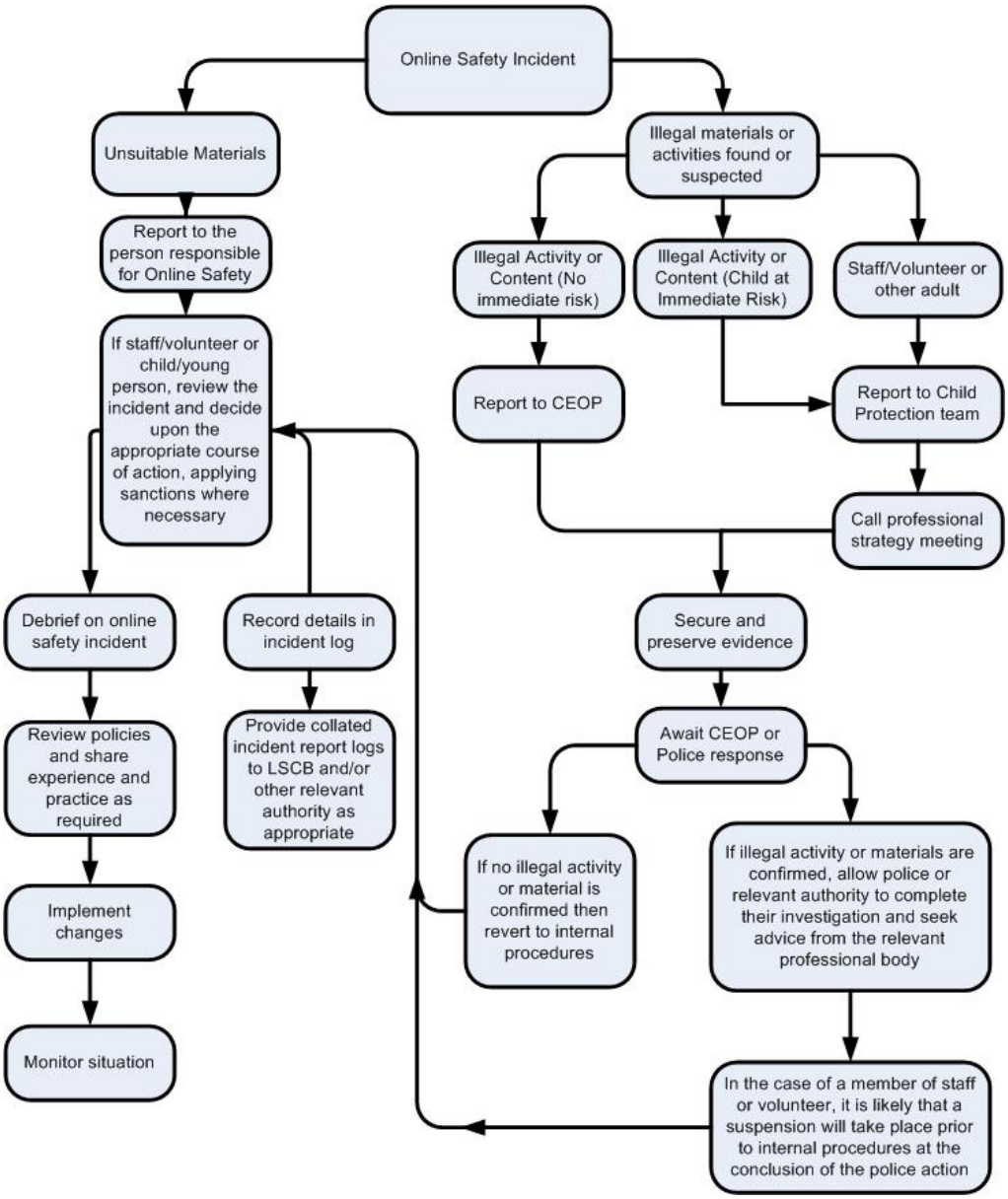
The school believes that the activities referred to in the following section would be inappropriate in a school context and that users, as defined below, should not engage in these activities in school or outside school when using school equipment or systems. The school policy restricts usage as follows:

User Actions		Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
Users shall not visit Internet sites, make, post, download, upload, data transfer, communicate or pass on, material, remarks, proposals or comments that contain or relate to:	Child sexual abuse images –The making, production or distribution of indecent images of children. Contrary to The Protection of Children Act 1978					X
	Grooming, incitement, arrangement or facilitation of sexual acts against children Contrary to the Sexual Offences Act 2003.					X
	Possession of an extreme pornographic image (grossly offensive, disgusting or otherwise of an obscene character) Contrary to the Criminal Justice and Immigration Act 2008					X
	criminally racist material in UK – to stir up religious hatred (or hatred on the grounds of sexual orientation) - contrary to the Public Order Act 1986					X
	pornography				X	
	promotion of any kind of discrimination				X	
	threatening behaviour, including promotion of physical violence or mental harm				X	
	any other information which may be offensive to colleagues or breaches the integrity of the ethos of the school or brings the school into disrepute				X	
Using school systems to run a private business					X	
Using systems, applications, websites or other mechanisms that bypass the filtering or other safeguards employed by the school					X	
Infringing copyright					X	
Revealing or publicising confidential or proprietary information (e.g. financial / personal information, databases, computer / network access codes and passwords)					X	
Creating or propagating computer viruses or other harmful files					X	
Unfair usage (downloading / uploading large files that hinders others in their use of the internet)					X	
On-line gaming (educational)		X				
On-line gaming (non educational)			X			
On-line gambling					X	
On-line shopping / commerce			X			
File sharing			X	X		
Use of social media			X			
Use of messaging apps			X			
Use of video broadcasting e.g. You Tube			X			

Holy Trinity C of E Primary School's Child Protection & Safeguarding Policy and Procedures details how the school IT system is monitored and filtered. It also contains a list of content that is automatically blocked.

Responding to incidents of misuse
This guidance is intended for use when staff need to manage incidents that involve the use of online services. It encourages a safe and secure approach to the management of the incident. Incidents might involve illegal or inappropriate activities (see "User Actions" above).

Illegal Incidents
If there is any suspicion that the web site(s) concerned may contain child abuse images, or if there is any other suspected illegal activity, refer to the right hand side of the Flowchart (below) for responding to online safety incidents and report immediately to the police.



Other Incidents

It is hoped that all members of the school community will be responsible users of digital technologies, who understand and follow school policy. However, there may be times when infringements of the policy could take place, through careless or irresponsible or, very rarely, through deliberate misuse.

In the event of suspicion, all steps in this procedure should be followed:

- Have more than one senior member of staff involved in this process. This is vital to protect individuals if accusations are subsequently reported.
- Conduct the procedure using a designated computer that will not be used by young people and if necessary can be taken off site by the police should the need arise. Use the same computer for the duration of the procedure.
- It is important to ensure that the relevant staff should have appropriate internet access to conduct the procedure, but also that the sites and content visited are closely monitored and recorded (to provide further protection).
- Record the URL (Uniform Resource Locator) of any site containing the alleged misuse and describe the nature of the content causing concern. It may also be necessary to record and store screenshots of the content on the machine being used for investigation. These may be printed, signed and attached to the form (except in the case of images of child sexual abuse – see below)
- Once this has been completed and fully investigated the group will need to judge whether this concern has substance or not. If it does then appropriate action will be required and could include the following:
    - Internal response or discipline procedures
    - Involvement by Local Authority or national / local organisation (as relevant).
    - Police involvement and/or action
- If content being reviewed includes images of Child abuse then the monitoring should be halted and referred to the Police immediately. Other instances to report to the police would include:
    - incidents of 'grooming' behaviour
    - the sending of obscene materials to a child
    - adult material which potentially breaches the Obscene Publications Act
    - criminally racist material
    - other criminal conduct, activity or materials
- Isolate the computer in question as best you can. Any change to its state may hinder a later police investigation.

It is important that all of the above steps are taken as they will provide an evidence trail for the school and possibly the police and demonstrate that visits to these sites were carried out for child protection purposes. The completed form should be retained by the group for evidence and reference purposes.

School Actions & Sanctions

It is more likely that the school will need to deal with incidents that involve inappropriate rather than illegal misuse. It is important that any incidents are dealt with as soon as possible in a proportionate manner, and that members of the school community are aware that incidents have been dealt with. It is intended that incidents of misuse will be dealt with through normal behaviour / disciplinary procedures as follows:

Pupils	**Actions / Sanctions**						
Incidents:	Refer to class teacher	Refer to the Head Teacher	Refer to Police	Refer to technical support staff for action re filtering / security etc	Inform parents / carers	Warning	Further sanction e.g. exclusion
Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on unsuitable / inappropriate activities).		x	x				
Unauthorised use of non-educational sites during lessons	x						
Unauthorised use of mobile phone / digital camera / other mobile device	x				x		
Unauthorised use of social media / messaging apps / personal email	x				x		
Unauthorised downloading or uploading of files	x						
Sending an email, text or message that is regarded as offensive, harassment or of a bullying nature	x	x			x	x	
Continued infringements of the above, following previous warnings or sanctions	x	x			x	x	x
Actions which could bring the school into disrepute or breach the integrity of the ethos of the school	x	x			x	x	x
Accidentally accessing offensive or pornographic material and failing to report the incident	x	x		x	x		
Deliberately accessing or trying to access offensive or pornographic material	x	x		x	x	x	

Staff **Actions / Sanctions**

Incidents:	Refer to the Head Teacher	Refer to HR (Strictly Education)	Refer to Police	Refer to Technical Support Staff for action re filtering etc	Warning	Suspension	Disciplinary action
Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on unsuitable / inappropriate activities).	x	x	x				
Inappropriate personal use of the internet / social media / personal email	x						
Unauthorised downloading or uploading of files	x			x			
Deliberate actions to breach data protection or network security rules	x	x		x	x	x	x
Corrupting or destroying the data of other users or causing deliberate damage to hardware or software	x	x	x	x	x	x	x
Sending an email, text or message that is regarded as offensive, harassment or of a bullying nature	x	x			x	x	x
Using personal email / social networking / instant messaging / text messaging to carrying out digital communications with pupils	x	x		x	x		
Actions which could compromise the staff member's professional standing	x				x		
Actions which could bring the school into disrepute or breach the integrity of the ethos of the school	x				x	x	x
Using proxy sites or other means to subvert the school's filtering system	x	x		x	x	x	x
Accidentally accessing offensive or pornographic material and failing to report the incident	x	x		x	x		
Deliberately accessing or trying to access offensive or pornographic material	x	x		x	x	x	x
Breaching copyright or licensing regulations	x			x	x		
Continued infringements of the above, following previous warnings or sanctions	x	x		x	x	x	x

Related Policies
Social Media Policy
Data Protection Policy
Child Protection & Safeguarding Policy and Procedures
Privacy Notice for Parents

The Governing Body approved this policy on date: 25th January 2024

Signed: Chair of Governors

Signed: Head Teacher

Appendix 1

Pupil Acceptable Use Policy Agreement

This is how we stay safe when we use computers:

I will ask a teacher or suitable adult if I want to use the computers

I will only use activities that a teacher or suitable adult has told or allowed me to use.

I will take care of the computer and other equipment

I will ask for help from a teacher or suitable adult if I am not sure what to do or if I think I have done something wrong.

I will tell a teacher or suitable adult if I see something that upsets me on the screen.

I know that the school has a system that checks all the websites that I go on to.

I know that if I break the rules I might not be allowed to use a computer.

Signed (child):……

Appendix 2

Staff (and Volunteer) Acceptable Use Policy Agreement

School Policy

New technologies have become integral to the lives of children and young people in today's society, both within schools and in their lives outside school. The internet and other digital information and communications technologies are powerful tools, which open up new opportunities for everyone. These technologies can stimulate discussion, promote creativity and stimulate awareness of context to promote effective learning. They also bring opportunities for staff to be more creative and productive in their work. All users should have an entitlement to safe internet access at all times.

This Acceptable Use Policy is intended to ensure:

- that staff and volunteers will be responsible users and stay safe while using the internet and other communications technologies for educational, personal and recreational use.
- that school ICT systems and users are protected from accidental or deliberate misuse that could put the security of the systems and users at risk.
- that staff are protected from potential risk in their use of ICT in their everyday work.

The school will try to ensure that staff and volunteers will have good access to ICT to enhance their work, to enhance learning opportunities for pupils learning and will, in return, expect staff and volunteers to agree to be responsible users.

Acceptable Use Policy Agreement

I understand that I must use school ICT systems in a responsible way, to ensure that there is no risk to my safety or to the safety and security of the ICT systems and other users. I recognise the value of the use of ICT for enhancing learning and will ensure that pupils receive opportunities to gain from the use of ICT. I will, where possible, educate the young people in my care in the safe use of ICT and embed e-safety in my work with young people.

For my professional and personal safety:

- I understand that the school will monitor my use of the ICT systems, email and other digital communications.
- I understand that the rules set out in this agreement also apply to use of school ICT systems (e.g. laptops, email, etc.) out of school, and to the transfer of personal data (digital or paper based) out of school
- I understand that the school ICT systems are primarily intended for educational use and that I will only use the systems for personal or recreational use within the policies and rules set down by the school.
- I will not disclose my username or password to anyone else, nor will I try to use any other person's username and password. I understand that I should not write down or store a password where it is possible that someone may steal it.
- I will immediately report any illegal, inappropriate or harmful material or incident, I become aware of, to the appropriate person.

I will be professional in my communications and actions when using school ICT systems:

- I will not access, copy, remove or otherwise alter any other user's files, without their express permission.
- I will communicate with others in a professional manner, I will not use aggressive or inappropriate language and I appreciate that others may have different opinions.
- I will ensure that when I take and / or publish images of others I will do so with their permission and in accordance with the school's policy on the use of digital / video images. I will not use my personal equipment to record these images, unless I have permission to do so. Where these images are published (e.g. on the school website) it will not be possible to identify by name, or other personal information, those who are featured.
- I will only use chat and social networking sites in school in accordance with the school's policies.
- I will only communicate with pupils and parents / carers using official school systems. Any such communication will be professional in tone and manner.
- I will not engage in any on-line activity that may compromise my professional responsibilities.

The school has the responsibility to provide safe and secure access to technologies and ensure the smooth running of the school:

- When I use my mobile devices (PDAs / laptops / mobile phones / USB devices etc.) in school, I will follow the rules set out in this agreement, in the same way as if I was using school equipment. I will also follow any additional rules set by the school about such use. I will ensure that any such devices are protected by up to date anti-virus software and are free from viruses.
- I will not use personal email addresses on the school ICT systems.
- I will not open any hyperlinks in emails or any attachments to emails, unless the source is known and trusted , or if I have any concerns about the validity of the email (due to the risk of the attachment containing viruses or other harmful programmes)
- I will ensure that my data is regularly backed up, in accordance with relevant school policies.
- I will not try to upload, download or access any materials which are illegal (child sexual abuse images, criminally racist material, adult pornography covered by the Obscene Publications Act) or inappropriate or may cause harm or distress to others. I will not try to use any programmes or software that might allow me to bypass the filtering / security systems in place to prevent access to such materials.
- I will not try (unless I have permission) to make large downloads or uploads that might take up internet capacity and prevent other users from being able to carry out their work.
- I will not install or attempt to install programmes of any type on a machine, or store programmes on a computer, nor will I try to alter computer settings, unless this is allowed in school policies.
- I will not disable or cause any damage to school equipment, or the equipment belonging to others.
- I will only transport, hold, disclose or share personal information about myself or others, as outlined in the School Personal Data Policy (or other relevant policy). Where digital personal data is transferred outside the secure local network, it must be encrypted. Paper based Protected and Restricted data must be held in lockable storage.
- I understand that data protection policy requires that any staff or pupil data to which I have access, will be kept private and confidential, except when it is deemed necessary that I am required by law or by school policy to disclose such information to an appropriate authority.
- I will immediately report any damage or faults involving equipment or software, however this may have happened.

When using the internet in my professional capacity or for school sanctioned personal use:

- I will ensure that I have permission to use the original work of others in my own work
- Where work is protected by copyright, I will not download or distribute copies (including music and videos).

I understand that I am responsible for my actions in and out of the school:

- I understand that this Acceptable Use Policy applies not only to my work and use of school ICT equipment in school, but also applies to my use of school ICT systems and equipment off the premises and my use of personal equipment on the premises or in situations related to my employment by the school
- I understand that if I fail to comply with this Acceptable Use Policy Agreement, I could be subject to disciplinary action. This could include a warning, a suspension, referral to Governors and / or the Local Authority and in the event of illegal activities the involvement of the police.

I have read and understand the above and agree to use the school ICT systems (both in and out of school) and my own devices (in school and when carrying out communications related to the school) within these guidelines.

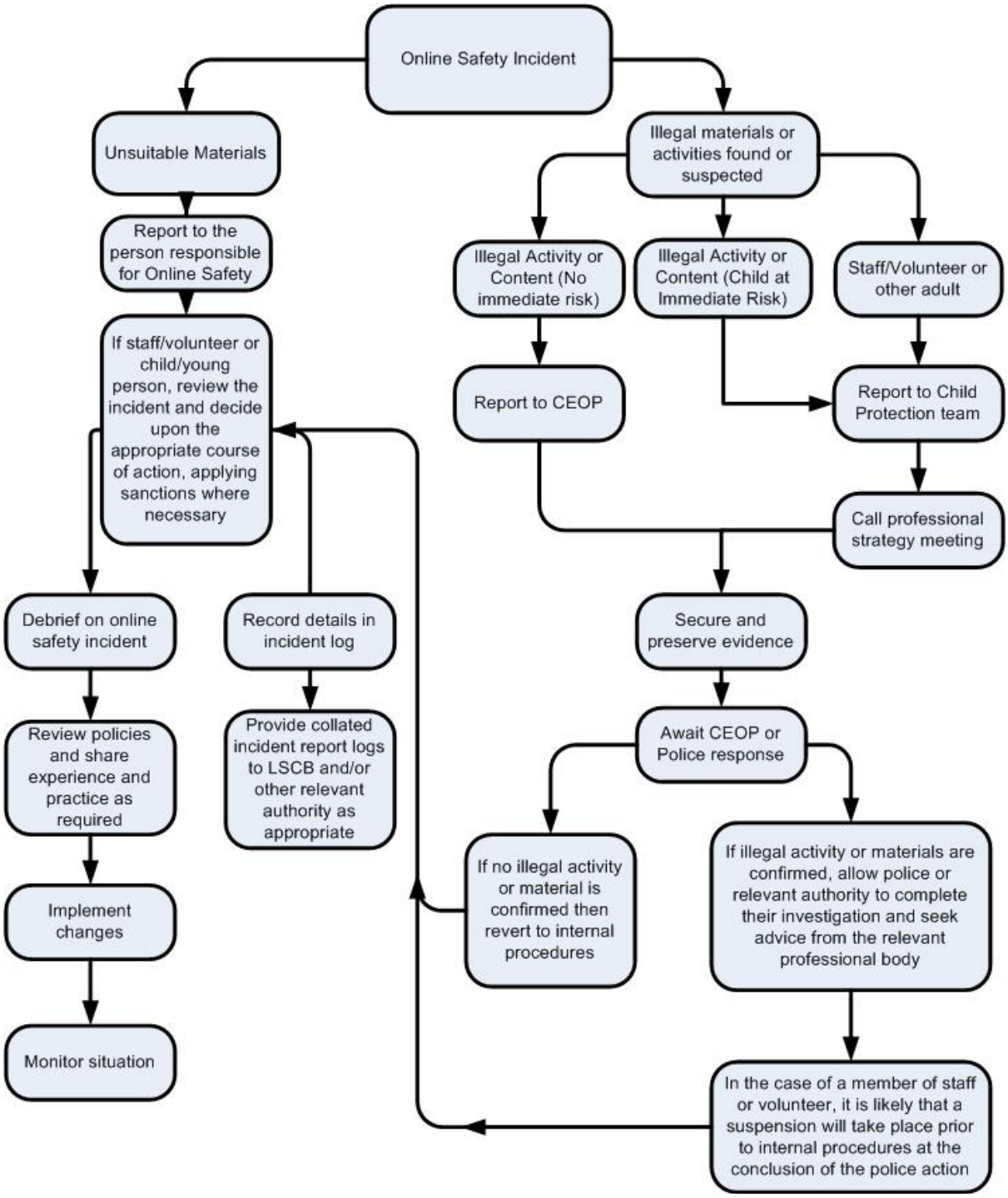
Staff / Volunteer Name

Signed

Date

Appendix 3

Responding to incidents of misuse – flow chart



Appendix 4

Record of Reviewing Sites (for internet misuse)

Name	
Position	
Signature	

Record of reviewing devices / internet sites (responding to incidents of misuse)

Group	
Date	
Reason for investigation	

Details of first reviewing person

Details of second reviewing person

Name	
Position	
Signature	

Name and location of computer used for review (for web sites)

Web site(s) address / device	**Reason for concern**

Conclusion and Action proposed or taken

Appendix 5

School Reporting Log Template

Reporting Log Group	Date	Time	Incident	Action taken		Incident Reported by	Signature
				What?	By whom?		

Appendix 6

School Training Needs Audit Template

Training Needs Audit Log
Group ..... Date .....

Name	Position	Relevant training in last 12 months	Identified training need	To be met by:	Cost	Review date

Appendix 7

School Technical Security Policy Template (including filtering and passwords)

Introduction
Effective technical security depends not only on technical measures, but also on appropriate policies and procedures and on good user education and training. The school will be responsible for ensuring that the school infrastructure / network is as safe and secure as is reasonably possible and that:

- users can only access data to which they have right of access
- no user should be able to access another's files (other than that allowed for monitoring purposes within the school's policies).
- access to personal data is securely controlled in line with the school's personal data policy
- logs are maintained of access by users and of their actions while users of the system
- there is effective guidance and training for users
- there are regular reviews and audits of the safety and security of school computer systems
- there is oversight from senior leaders and these have impact on policy and practice.

Responsibilities
The management of technical security will be the responsibility of Cybersupport.

Technical Security

Policy statements

The school will be responsible for ensuring that the school infrastructure / network is as safe and secure as is reasonably possible and that policies and procedures approved within this policy are implemented. It will also need to ensure that the relevant people will receive guidance and training and will be effective in carrying out their responsibilities:

- School technical systems will be managed in ways that ensure that the school meets recommended technical requirements
- There will be regular reviews and audits of the safety and security of school technical systems
- Servers, wireless systems and cabling must be securely located and physical access restricted
- Appropriate security measures are in place to protect the servers, firewalls, switches, routers, wireless systems, work stations, mobile devices etc. from accidental or malicious attempts which might threaten the security of the school systems and data.
- Responsibilities for the management of technical security are clearly assigned to appropriate and well trained staff (Cybersupport).
- All users will have clearly defined access rights to school technical systems. Details of the access rights available to groups of users will be recorded by the Network Manager / Technical Staff (Cybersupport) and will be reviewed, at least annually.
- Users will be made responsible for the security of their username and password, must not allow other users to access the systems using their log on details and must immediately report any suspicion or evidence that there has been a breach of security.
- Cybersupport are responsible for ensuring that software licence logs are accurate and up to date and that regular checks are made to reconcile the number of licences purchased against the number of software installations
- Mobile device security and management procedures are in place
- Cybersupport monitor and record the activity of users on the school technical systems and users are made aware of this in the Acceptable Use Agreement.
- Remote management tools are used by staff to control workstations and view users activity
- An appropriate system is in place for users to report any actual / potential technical incident to the E-Safety Leader/ Head Teacher
- An agreed policy is in place regarding the extent of personal use that users (staff / pupils / community users) and their family members are allowed on school devices that may be used out of school.
- The school infrastructure and individual workstations are protected by up to date software to protect against malicious threats from viruses, worms, trojans etc..

Password Security
A safe and secure username / password system is essential if the above is to be established and will apply to all school technical systems, including networks, devices and email.

Policy Statements

- All users will have clearly defined access rights to school technical systems and devices. Details of the access rights available to groups of users will be recorded by the Network Manager and will be reviewed, at least annually.
- All school networks and systems will be protected by secure passwords that are regularly changed
- The "master / administrator" passwords for the school systems, used by the technical staff must also be available to the Head Teacher or other nominated senior leader and kept in a secure place e.g. school safe. Consideration should also be given to using two factor authentication for such accounts.
- Passwords for new users, and replacement passwords for existing users will be allocated by Cybersupport. Any changes carried out must be notified to the manager of the password security policy.
- All users (adults and young people) will have responsibility for the security of their username and password, must not allow other users to access the systems using their log on details and must immediately report any suspicion or evidence that there has been a breach of security.

Staff passwords:

- **All staff users will be provided with a username and password** by Cybersupport who will keep an up to date record of users and their usernames.
- the password should be a minimum of 8 characters long and must include three of – uppercase character, lowercase character, number, special characters
- the account should be "locked out" following six successive incorrect log-on attempts
- temporary passwords e.g. used with new user accounts or when users have forgotten their passwords, shall be enforced to change immediately upon the next account log-on
- passwords shall not be displayed on screen, and shall be securely hashed (use of one-way encryption)
- passwords should be different for different accounts, to ensure that other systems are not put at risk if one is compromised and should be different for systems used inside and outside of school
- should be different for different accounts, to ensure that other systems are not put at risk if one is compromised
- should be different for systems used inside and outside of school

Training / Awareness
Members of staff will be made aware of the school's password policy:

- at induction
- through the school's E-Safety policy and password security policy
- through the Acceptable Use Agreement

Pupils will be made aware of the school's password policy:

- in lessons
- through the Acceptable Use Agreement

Audit / Monitoring / Reporting / Review
The responsible person (insert title) will ensure that full records are kept of:

- User Ids and requests for password changes
- User log-ons
- Security incidents related to this policy

Filtering

Introduction

The filtering of internet content provides an important means of preventing users from accessing material that is illegal or is inappropriate in an educational context. The filtering system cannot, however, provide a 100% guarantee that it will do so, because the content on the web changes dynamically and new technologies are constantly being developed. It is important, therefore, to understand that filtering is only one element in a larger strategy for E-Safety and acceptable use. It is important that the school has a filtering policy to manage the associated risks and to provide preventative measures which are relevant to the situation in this school.

Responsibilities

The responsibility for the management of the school's filtering policy will be held by Cybersupport. They will manage the school filtering, in line with this policy and will keep records / logs of changes and of breaches of the filtering systems.

All users have a responsibility to report immediately to Head Teacher any infringements of the school's filtering policy of which they become aware or any sites that are accessed, which they believe should have been filtered.

Users must not attempt to use any programmes or software that might allow them to bypass the filtering / security systems in place to prevent access to such materials.

Policy Statements

Internet access is filtered for all users. Differentiated internet access is available for staff and customised filtering changes are managed by the school and Cybersupport. Illegal content is filtered by the broadband or filtering provider by actively employing the Internet Watch Foundation CAIC list and other illegal content lists . Filter content lists are regularly updated and internet use is logged and frequently monitored. The monitoring process alerts the school to breaches of the filtering policy, which are then acted upon. There is a clear route for reporting and managing changes to the filtering system.

- The school maintains and supports the managed filtering service provided by the Internet Service Provider
- In the event of the technical staff needing to switch off the filtering for any reason, or for any user, this must be logged and carried out by a process that is agreed by the Head of School.
- Any filtering issues should be reported immediately to the filtering provider.
- Requests from staff for sites to be removed from the filtered list will be considered by the technical staff. If the request is agreed, this action will be recorded.

Education / Training / Awareness

Pupils will be made aware of the importance of filtering systems through the E-Safety education programme. They will also be warned of the consequences of attempting to subvert the filtering system.

Staff users will be made aware of the filtering systems through:

- the Acceptable Use Agreement
- staff meetings, briefings, Inset.

Changes to the Filtering System

Users who gain access to, or have knowledge of others being able to access, sites which they feel should be filtered (or unfiltered) should report this in the first instance to the E-Safety Leader who will decide whether to make school level changes.

Monitoring

No filtering system can guarantee 100% protection against access to unsuitable sites. The school will therefore monitor the activities of users on the school network and on school equipment as indicated in the School E-Safety Policy and the Acceptable Use Agreement.

Audit / Reporting

Logs of filtering change controls and of filtering incidents will be made available to:

- E-Safety Leader
- Senior Leadership Team
- Cybersupport / Local Authority / Police on request

Appendix 8

School Personal Data Handling Policy Template

School Personal Data Handling Policy
Introduction
Schools and their employees should do everything within their power to ensure the safety and security of any material of a personal or sensitive nature

It is the responsibility of all members of the school community to take care when handling, using or transferring personal data that it cannot be accessed by anyone who does not:

- have permission to access that data, and/or
- need to have access to that data.

Data breaches can have serious effects on individuals and / or institutions concerned, can bring the school into disrepute and may well result in disciplinary action, criminal prosecution and fines imposed by the Information Commissioners Office for the school and the individuals involved. Particularly, all transfer of data is subject to risk of loss or contamination.

Anyone who has access to personal data must know, understand and adhere to this policy, which brings together the legal requirements contained in relevant data protection legislation and relevant regulations and guidance (where relevant from the Local Authority).

Policy Statements
The school will hold the minimum personal data necessary to enable it to perform its function and it will not hold it for longer than necessary for the purposes it was collected for.

Every effort will be made to ensure that data held is accurate, up to date and that inaccuracies are corrected without unnecessary delay.

Personal Data

The school and individuals will have access to a wide range of personal information and data. The data may be held in a digital format or on paper records. Personal data is defined as any combination of data items that identifies an individual and provides specific information about them, their families or circumstances. This will include:

- Personal information about members of the school community – including pupils, members of staff and parents / carers e.g. names, addresses, contact details, legal guardianship contact details, health records, disciplinary records
- Curricular / academic data e.g. class lists, pupil progress records, reports
- Professional records e.g. employment history, taxation and national insurance records, appraisal records and references
- Any other information that might be disclosed by parents / carers or by other agencies working with families or staff members.

Responsibilities
Everyone in the school has the responsibility of handling protected or sensitive data in a safe and secure manner.

Governors are required to comply fully with this policy in the event that they have access to personal data, when engaged in their role as a Governor.

Training & awareness
All staff will be made aware of their responsibilities, as described in this policy through:

- Staff meetings / briefings / Inset
- Day to day support and guidance from Senior Leaders

Secure Storage of and access to data
The school will ensure that ICT systems are set up so that the existence of protected files is hidden from unauthorised users and that users will be assigned a clearance that will determine which files are accessible to them. Access to protected data will be controlled according to the role of the user. Members of staff will not, as a matter of course, be granted access to the whole management information system.

Personal data may only be accessed on machines that are securely password protected. Any device that can be used to access data must be locked if left (even for very short periods) and set to auto lock if not used for five minutes. All storage media must be stored in an appropriately secure and safe environment that avoids physical risk, loss or electronic degradation.

Personal data can only be stored on school equipment (this includes computers and portable storage media (server back-up hard drives). Private equipment (i.e. owned by the users) must not be used for the storage of personal data.

When personal data is stored on any portable computer system, USB stick or any other removable media:

- the data must be encrypted and password protected, the data must be securely deleted from
- the device, in line with school policy (below) once it has been transferred or its use is complete.

The school has clear policy and procedures for the automatic backing up, accessing and restoring all data held on school systems, including off-site backups.

All paper based Protected and Restricted (or higher) material must be held in lockable storage, whether on or off site.

The school recognises that under Section 7 of the DPA, http://www.legislation.gov.uk/ukpga/1998/29/section/7 data subjects have a number of rights in connection with their personal data, the main one being the right of access. Procedures are in place to deal with Subject Access Requests i.e. a written request to see all or a part of the personal data held by the data controller in connection with the data subject. Data subjects have the right to know: if the data controller holds personal data about them; a description of that data; the purpose for which the data is processed; the sources of that data; to whom the data may be disclosed; and a copy of all the personal data that is held about them. Under certain circumstances the data subject can also exercise rights in connection with the rectification; blocking; erasure and destruction of data.

Secure transfer of data and access out of school
The school recognises that personal data may be accessed by users out of school, or transferred to the LA or other agencies. In these circumstances:

- Users may not remove or copy sensitive or restricted or protected personal data from the school or authorised premises without permission and unless the media is encrypted and password protected and is transported securely for storage in a secure location
- Users must take particular care that computers or removable devices which contain personal data must not be accessed by other users (e.g. family members) when out of school
- When restricted or protected personal data is required by an authorised user from outside the organisation's premises (for example, by a member of staff to work from their home), they should preferably have secure remote access to the management information system or learning platform;
- If secure remote access is not possible, users must only remove or copy personal or sensitive data from the organisation or authorised premises if the storage media, portable or mobile device is encrypted and is transported securely for storage in a secure location;
- Users must protect all portable and mobile devices, including media, used to store and transmit personal information using approved encryption software; and

Disposal of data
The school will comply with the requirements for the safe destruction of personal data when it is no longer required.
The disposal of personal data, in either paper or electronic form, must be conducted in a way that makes reconstruction highly unlikely. Electronic files must be securely overwritten, in accordance with government guidance and other media must be shredded, incinerated or otherwise disintegrated for data.

Appendix 9

Legislation

Schools should be aware of the legislative framework under which this E-Safety Policy template and guidance has been produced. It is important to note that in general terms an action that is illegal if committed offline is also illegal if committed online.
It is recommended that legal advice is sought in the advent of an e safety issue or situation.

Computer Misuse Act 1990
This Act makes it an offence to:

- Erase or amend data or programs without authority;
- Obtain unauthorised access to a computer;
- "Eavesdrop" on a computer;
- Make unauthorised use of computer time or facilities;
- Maliciously corrupt or erase data or programs;
- Deny access to authorised users.

Data Protection Act 1998
This protects the rights and privacy of individual's data. To comply with the law, information about individuals must be collected and used fairly, stored safely and securely and not disclosed to any third party unlawfully. The Act states that personal data must be:

- Fairly and lawfully processed.
- Processed for limited purposes.
- Adequate, relevant and not excessive.
- Accurate.
- Not kept longer than necessary.
- Processed in accordance with the data subject's rights.
- Secure.
- Not transferred to other countries without adequate protection.

General Data Protection Regulation (GDPR)

This regulation was introduced in May 2018 and builds on the principles of the Data Protection Act 1998. It protects the rights and privacy of individual's data. To comply with the law, information about individuals must be collected and used fairly, stored safely and securely and not disclosed to any third party unlawfully. The Act has seven principles which must be complied with.

- Lawfulness, fairness and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality (security
- Accountability

Freedom of Information Act 2000
The Freedom of Information Act gives individuals the right to request information held by public authorities. All public authorities and companies wholly owned by public authorities have obligations under the Freedom of Information Act. When responding to requests, they have to follow a number of set procedures.

Communications Act 2003
Sending by means of the Internet a message or other matter that is grossly offensive or of an indecent, obscene or menacing character; or sending a false message by means of or persistently making use of the Internet for the purpose of causing annoyance, inconvenience or needless anxiety is guilty of an offence liable, on conviction, to imprisonment. This wording is important because an offence is complete as soon as the message has been sent: there is no need to prove any intent or purpose.

Malicious Communications Act 1988
It is an offence to send an indecent, offensive, or threatening letter, electronic communication or other article to another person.

Regulation of Investigatory Powers Act 2000
It is an offence for any person to intentionally and without lawful authority intercept any communication. Monitoring or keeping a record of any form of electronic communications is permitted, in order to:

- Establish the facts;
- Ascertain compliance with regulatory or self-regulatory practices or procedures;
- Demonstrate standards, which are or ought to be achieved by persons using the system;
- Investigate or detect unauthorised use of the communications system;
- Prevent or detect crime or in the interests of national security;
- Ensure the effective operation of the system.
- Monitoring but not recording is also permissible in order to:
- Ascertain whether the communication is business or personal;
- Protect or support help line staff.
- The school reserves the right to monitor its systems and communications in line with its rights under this act.

Trade Marks Act 1994
This provides protection for Registered Trade Marks, which can be any symbol (words, shapes or images) that are associated with a particular set of goods or services. Registered Trade Marks must not be used without permission. This can also arise from using a Mark that is confusingly similar to an existing Mark.

Copyright, Designs and Patents Act 1988
It is an offence to copy all, or a substantial part of a copyright work. There are, however, certain limited user permissions, such as fair dealing, which means under certain circumstances permission is not needed to copy small amounts for non-commercial research or private study. The Act also provides for Moral Rights, whereby authors can sue if their name is not included in a work they wrote, or if the work has been amended in such a way as to impugn their reputation. Copyright covers materials in print and electronic form, and includes words, images, and sounds, moving images, TV broadcasts and other media (e.g. YouTube).

Telecommunications Act 1984
It is an offence to send a message or other matter that is grossly offensive or of an indecent, obscene or menacing character. It is also an offence to send a message that is intended to cause annoyance, inconvenience or needless anxiety to another that the sender knows to be false.

Criminal Justice & Public Order Act 1994
This defines a criminal offence of intentional harassment, which covers all forms of harassment, including sexual. A person is guilty of an offence if, with intent to cause a person harassment, alarm or distress, they:

- Use threatening, abusive or insulting words or behaviour, or disorderly behaviour; or
- Display any writing, sign or other visible representation, which is threatening, abusive or insulting, thereby causing that or another person harassment, alarm or distress.

Racial and Religious Hatred Act 2006
This Act makes it a criminal offence to threaten people because of their faith, or to stir up religious hatred by displaying, publishing or distributing written material which is threatening. Other laws already protect people from threats based on their race, nationality or ethnic background.

Protection from Harassment Act 1997
A person must not pursue a course of conduct, which amounts to harassment of another, and which he knows or ought to know amounts to harassment of the other. A person whose course of conduct causes another to fear, on at least two occasions, that violence will be used against him is guilty of an offence if he knows or ought to know that his course of conduct will cause the other so to fear on each of those occasions.

Protection of Children Act 1978
It is an offence to take, permit to be taken, make, possess, show, distribute or advertise indecent images of children in the United Kingdom. A child for these purposes is a anyone under the age of 18. Viewing an indecent image of a child on your computer means that you have made a digital image. An image of a child also covers pseudo-photographs (digitally collated or otherwise). A person convicted of such an offence may face up to 10 years in prison

Sexual Offences Act 2003
The new grooming offence is committed if you are over 18 and have communicated with a child under 16 at least twice (including by phone or using the Internet) it is an offence to meet them or travel to meet them anywhere in the world with the intention of committing a sexual offence. Causing a child under 16 to watch a sexual act is illegal, including looking at images such as videos, photos or webcams, for your own gratification. It is also an offence for a person in a position of trust to engage in sexual activity with any person under 18, with whom they are in a position of trust. (Typically, teachers, social workers, health professionals, connexions staff fall in this category of trust). Any sexual intercourse with a child under the age of 13 commits the offence of rape.

Public Order Act 1986
This Act makes it a criminal offence to stir up racial hatred by displaying, publishing or distributing written material which is threatening. Like the Racial and Religious Hatred Act 2006 it also makes the possession of inflammatory material with a view of releasing it a criminal offence. Children, Families and Education Directorate page 38 April 2007.

Obscene Publications Act 1959 and 1964
Publishing an “obscene” article is a criminal offence. Publishing includes electronic transmission.

Human Rights Act 1998
This does not deal with any particular issue specifically or any discrete subject area within the law. It is a type of “higher law”, affecting all other laws. In the school context, human rights to be aware of include:

- The right to a fair trial
- The right to respect for private and family life, home and correspondence
- Freedom of thought, conscience and religion
- Freedom of expression
- Freedom of assembly
- Prohibition of discrimination
- The right to education

These rights are not absolute. The school is obliged to respect these rights and freedoms, balancing them against those rights, duties and obligations, which arise from other relevant legislation.

The Education and Inspections Act 2006
Empowers Headteachers, 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.

The Education and Inspections Act 2011
Extended the powers included in the 2006 Act and gave permission for Headteachers (and nominated staff) to search for electronic devices. It also provides powers to search for data on those devices and to delete data.
http://www.education.gov.uk/schools/pupilsupport/behaviour/behaviourpolicies/f0076897/screening-searching-and-confiscation

The Protection of Freedoms Act 2012
Requires schools to seek permission from a parent / carer to use Biometric systems

The School Information Regulations 2012
Requires schools to publish certain information on its website:

Appendix 10

Links to other organisations or documents

The following links may help those who are developing or reviewing a school e-safety policy.

UK Safer Internet

www,saferinternet.org.uk
SWGfL - Safety & Security Online
Childnet - https://www.childnet.com/cyberbullying-guidance
Internet Watch Foundation

CEOP

http://ceop.police.uk/
http://www.thinkuknow.co.uk/

Others:

INSAFE - http://www.saferinternet.org/ww/en/pub/insafe/index.htm
UK Council for Child Internet Safety (UKCCIS) - www.education.gov.uk/ukccis
Guide for Parents -ukccis_guide-final__3_.pdf (publishing.service.gov.uk)
Netsmartz - http://www.netsmartz.org/index.aspx
https://www.disrespectnobody.co.uk/
www.internetmatters.org
www.pshe-association.org.uk
www.educateagainsthate.com
www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation

Cyberbullying

Scottish Anti-Bullying Service, Respectme - http://www.respectme.org.uk/
Scottish Government Better relationships, better learning, better behaviour
DCSF Safe To Learn guides | Anti-Bullying Alliance (anti-bullyingalliance.org.uk)
DfE – Preventing & Tackling Bullying – Advice to school leaders, staff and Governing Bodies
Anti-Bullying Network - http://www.antibullying.net/cyberbullying1.htm
Cyberbullying.org - http://www.cyberbullying.org/

Social Networking

Digizen – Social Networking
Microsoft Word - fbparents2012 (connectsafely.org)
Facebookguideforeducators.pdf (ednfoundation.org)

Data Protection

Information Commissioners Office:
Information Commision Office
ICO Guidance Data Protection Practical Guide to IT Security
Home Page - London Grid for Learning (lgfl.net)
NEN – The Education Network

Professional Standards / Staff Training

Teaching online safety in schools - GOV.UK (www.gov.uk)

Working with parents and carers

Digital Parenting | Vodafone
Parent and Carer Toolkit - Childnet
Get Safe Online - resources for parents
Finding and Appraising Information and Evidence on the Internet - Cerebra
Learning Disabilities, Autism and Internet Safety - Cerebra
Online safety guides and resources centre | Internet Matters
Cybersmile – Cyberbullying

Appendix 11

List Web Filtering Categories

Categories

Category	Block	Flag	Description	Edit
Abortion	☑	☑	Web pages that discuss abortion from a historical, medical, legal, or other not overtly biased point of view.	
Abortion - Pro Choice	☑	☑	Web pages that push the pro-choice viewpoint or otherwise overtly encourage abortions.	
Abortion - Pro Life	☑	☑	Web pages that condemn abortion or otherwise overtly push a pro-life agenda.	
Advocacy Groups & Trade Associations	☐	☐	Web pages dedicated to industry trade groups, lobbyists, unions, special interest groups, professional organizations and other associations comprised of members wi...	
Agriculture	☐	☐	Web pages devoted to the science, art, and business of cultivating soil, producing crops, raising livestock, and products, services, tips, tricks, etc. related to farming.	
Alcohol	☑	☑	Web pages that promote, advocate or sell alcohol including beer, wine and hard liquor.	
Anonymizer	☑	☑	Web pages that promote proxies and anonymizers for surfing websites with the intent of circumventing filters.	
Architecture & Construction	☐	☐	Web pages which involve construction, contractors, structural design, architecture and all businesses or services related to the design, building or engineering of str...	
Arts	☐	☐	Web pages related to the development or display of the visual arts.	
Astrology & Horoscopes	☐	☐	Web pages related to astrology, horoscopes, divination according to the stars, or the zodiac.	
Atheism & Agnosticism	☐	☐	Web pages that pursue an anti-religion agenda or that challenge religious, spiritual, metaphysical, or supernatural beliefs.	
Auctions & Marketplaces	☑	☑	Web pages devoted to person to person selling or trading of goods and services through classifieds, online auctions, or other means not including "traditional" online ...	
Banking	☐	☐	Web pages operated by or all about banks and credit unions, particularly online banking web applications, but excludes online brokerages.	
Biotechnology	☐	☐	Web pages which include genetics research, biotechnology firms and research institutions.	
Botnet	☑	☑	Web pages or compromised web servers running software that is used by hackers to send spam, phishing attacks and denial of service attacks.	
Businesses & Services (General)	☐	☐	Web pages that include Businesses and Services, generally used unless there is a more specific category that better describes the actual business or service.	
Cartoons, Anime & Comic Books	☐	☐	Web pages dedicated to animated TV shows and movies or to comic books and graphic novels.	
Catalogs	☐	☐	Web pages that have product listings and catalogs but do not have an online shopping option.	

Fitness & Recreation	☐	☐	Web pages with tips and information on fitness or recreational activities.
Food & Restaurants	☐	☐	Web pages related to food from restaurants and dining, to cooking and recipes.
Gambling	☑	☑	Web pages which promote gambling, lotteries, casinos and betting agencies involving chance.
Games	☑	☑	Web pages consisting of computer games, game producers and online gaming.
Gay, Lesbian or Bisexual	☑	☑	Web pages that cater to or discuss the gay, lesbian, bisexual or transgender lifestyle.
Government Sponsored	☐	☐	Web pages devoted to Government organizations, departments, or agencies. Includes police, fire (when employed by a city), elections commissions, elected represe...
Hacking	☑	☑	Web pages with information or tools specifically intended to assist in online crime such as the unauthorized access to computers, but also pages with tools and inform...
Hate Speech	☐	☑	Web pages that promote extreme right/left wing groups, sexism, racism, religious hate and other discrimination.
Health & Medical	☐	☐	Web pages dedicated to personal health, medical services, medical equipment, procedures, mental health, finding and researching doctors, hospitals and clinics.
Hobbies & Leisure	☐	☐	Web pages which include tips and information about crafts, and hobbies such as sewing, stamp collecting, model airplane building, etc.
Home & Office Furnishings	☐	☐	Web pages that include furniture makers, retail furniture outlets, desks, couches, chairs, cabinets, etc.
Home, Garden & Family	☐	☐	Web pages which cover activities in the home and pertaining to the family. Includes tips and information about parenting, interior decorating , gardening, cleaning, f...
Humor	☑	☑	Web pages which include comics, jokes and other humorous content.
Illegal Drugs	☑	☑	Web pages that promote the use or information of common illegal drugs and the misuse of prescription drugs and compounds.
Image Search	☑	☑	Web pages and internet search engines used to search pictures and photos found across the Internet where the returned results include thumbnails of the found im...
Information Security	☐	☐	Web pages and companies that provide computer and network security services, hardware, software or information.
Instant Messenger	☑	☑	Instant messaging software and web pages that typically involve staying in touch with a list of "buddies" via messaging services.
Insurance	☐	☐	Web pages the cover any type of insurance, insurance company, or government insurance program from Medicare to car insurance to life insurance.

Internet Phone & VOIP	☑	☑	Web pages that allow users to make calls via the web or to download software that allows users to make calls over the Internet.
Job Search	☑	☑	Web pages devoted to job searches or agencies, career planning and human resources.
Kid's Pages	☐	☐	Web pages specifically intended for young children (under 10) including entertainment, games, and recreational pages built with young children in mind.
Legislation, Politics & Law	☐	☐	Web pages covering legislation, the legislative process, politics, political parties, elections, elected officials and opinions on these topics.
Lingerie, Suggestive & Pinup	☑	☑	Web pages that refer specifically to photos and videos where the person who is the subject of the photo is wearing sexually provocative clothing such as lingerie.
Literature & Books	☐	☐	Web pages for published writings including fiction and non-fiction novels, poems and biographies.
Login Screens	☐	☐	Web pages which are used to login to a wide variety of services where the actual service is not known, but could be any of several categories (e.g. Yahoo and Googl...
Malware Call-Home	☑	☑	Web pages identified as spyware which report information back to a particular URL.
Malware Distribution Point	☑	☑	Web pages that host viruses, exploits, and other malware.
Manufacturing	☐	☐	Web pages devoted to businesses involved in manufacturing and industrial production.
Marijuana	☑	☑	Web pages about the plant or about smoking the marijuana plant. Includes web pages on legalizing marijuana and using marijuana for medicinal purposes, marijuana ...
Marketing Services	☐	☐	Web pages dedicated to advertising agencies and other marketing services that don't include online banner ads.
Military	☑	☑	Web pages sponsored by the armed forces and government controlled agencies.
Miscellaneous	☑	☑	Web pages that do not clearly fall into any other category.
Mobile Phones	☑	☑	Web pages which contain content for Mobile phone manufacturers and mobile phone companies' websites. Also includes sites that sell mobile phones and accessories.
Motorized Vehicles	☐	☐	Web pages which contain information about motorized vehicles including selling, promotion, or discussion. Includes motorized vehicle manufacturers and sites dedicat...
Music	☐	☐	Web pages that include internet radio and streaming media, musicians, bands, MP3 and media downloads.
Nature & Conservation	☐	☐	Web pages with information on environmental issues, sustainable living, ecology, nature and the environment.

News	☐	☐	Web pages with general news information such as newspapers and magazines.
No Content Found	☑	☑	Web pages which contain no discernable content which can be used for classification purposes.
Non-traditional Religion & Occult	☐	☐	Web pages for religions outside of the mainstream or not in the top ten religions practiced in the world. Also includes occult and supernatural, extraterrestrial, folk rel...
Nudity	☑	☑	Web pages that display full or partial nudity with no sexual references or intent.
Nutrition & Diet	☐	☐	Web pages on losing weight and eating healthy, diet plans, weight loss programs and food allergies.
Online Ads	☑	☑	Companies, web pages, and sites responsible for hosting online advertisements including advertising graphics, banners, and pop-up content. Also includes web page...
Online Financial Tools & Quotes	☐	☐	Web pages for investment quotes, online portfolio tracking, financial calculation tools such as mortgage calculators, online tax preparation software, online bill paym...
Online Information Management	☐	☐	Web pages devoted to online personal information managers such as web applications that manage to-do lists, calendars, address books, etc.
Online Shopping	☐	☐	Websites and web pages that provide a means to purchase online.
Online Stock Trading	☑	☑	Investment brokerage web pages that allow online trading of stocks, mutual funds and other securities.
Parked	☑	☑	Web pages that have been purchased to reserve the name but do not have any real content.
Parks, Rec Facilities & Gyms	☐	☐	Web pages which include parks and other areas designated for recreational activities such as swimming, skateboarding, rock climbing, as well as for non-professional ...
Pay To Surf	☑	☑	Web sites that offer cash to users who install their software which displays ads and tracks browsing habits effectively allowing users to be paid while surfing the web.
Peer-to-Peer	☑	☑	Web pages that provide peer-to-peer (P2P) file sharing software.
Personal Pages & Blogs	☐	☐	Web pages including blogs, or a format for individuals to share news, opinions, and information about themselves. Also includes personal web pages about an individ...
Personal Storage	☑	☑	Web sites used for remote storage of files, sharing of large files, and remote Internet backups.
Pets & Animals	☐	☐	Web pages with information or products and services for pets and other animals including birds, fish, and insects.
Pharmacy	☑	☑	Web pages which include prescribed medications and information about approved drugs and their medical use.
Philanthropic Organizations	☐	☐	Web pages with information regarding charities and other non-profit philanthropic organizations and foundations dedicated to altruistic activities.
Phishing/Fraud	☑	☑	Manipulated web pages and emails used for fraudulent purposes, also known as phishing.
Photo Sharing	☑	☑	Web pages that host digital photographs or allow users to upload, search, and exchange photos and images online.
Physical Security	☐	☐	Web pages devoted to businesses and services related to security products or other security aspects excluding computer security.
Piracy & Copyright Theft	☐	☐	Web pages that provide access to illegally obtained files such as pirated software (aka warez), pirated movies, pirated music, etc.
Pornography	☑	☑	Web pages which contain images or videos depicting sexual acts, sexual arousal, or explicit nude imagery intended to be sexual in nature.
Portal Sites	☐	☐	General web pages with customized personal portals, including white/yellow pages.
Private IP Address	☑	☑	Web pages for Private IP addresses are those reserved for use internally in corporations or homes.
Product Reviews & Price Comparisons	☐	☐	Web pages dedicated to helping consumers comparison shop or choose products or stores, but don't offer online purchasing options.
Profanity	☑	☑	Web pages that use either frequent profanity or serious profanity.
Professional Networking	☑	☑	Social networking web pages intended for professionals and business relationship building.
R-Rated	☑	☑	Web pages whose primary purpose and majority of content is child appropriate, but who have regular or irregular sections of the site with sexually themed, non-edu...
Real Estate	☐	☐	Web pages possessing information about renting, purchasing, selling or financing real estate including homes, apartments, office space, etc.
Redirect	☑	☑	Web pages that redirect to other pages on other web sites.
Reference Materials & Maps	☐	☐	Web pages which contain reference materials and are specific to data compilations and reference shelf material such as atlases, dictionaries, encyclopedias, census ...
Religions	☐	☐	Web pages which cover main-stream popular religions world-wide as well as general religion topics and theology.
Remote Access	☑	☑	Web pages that provide remote access to private computers or networks, internal network file shares, and internal web applications.
Retirement Homes & Assisted Living	☐	☐	Web pages containing information on retirement homes and communities including nursing care and hospice care.

Philanthropic Organizations	☐	☐	Web pages with information regarding charities and other non-profit philanthropic organizations and foundations dedicated to altruistic activities.
Phishing/Fraud	☑	☑	Manipulated web pages and emails used for fraudulent purposes, also known as phishing.
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Remote Access	☑	☑	Web pages that provide remote access to private computers or networks, internal network file shares, and internal web applications.
Retirement Homes & Assisted Living	☐	☐	Web pages containing information on retirement homes and communities including nursing care and hospice care.

School Cheating	☑	☑	Web pages that contain test answers, pre-written term papers and essays, full math problem solvers that show the work and similar web sites that can be used to c...
Search Engines	☐	☐	Web pages supporting the searching of web, newsgroups, pictures, directories, and other online content.
Self-help & Addiction	☑	☑	Web pages which include sites with information and help on gambling, drug, and alcohol addiction as well as sites helping with eating disorders such as anorexia, bul...
Sex & Erotic	☑	☑	Web pages with sexual content or products or services related to sex, but without nudity or other explicit pictures on the page.
Sex Education & Pregnancy	☑	☑	Web pages with educational materials and clinical explanations of sex, safe sex, birth control, pregnancy, and similar topics aimed at teens and children.
Shipping & Logistics	☐	☐	Web pages that promote management of inventory including transportation, warehousing, distribution, storage, order fulfillment and shipping.
Social Networking	☑	☑	Social networking web pages and online communities built around communities of people where users "connect" to other users.
Social and Affiliation Organizations	☐	☐	Web pages built around communities of people where users "connect" to other users.
Software, Hardware & Electronics	☐	☐	Web pages with information about or makers of computer equipment, computer software, hardware, peripherals, data networks, computer services and electronics.
Spam	☑	☑	Products and web pages promoted through spam techniques.
Sport Fighting	☑	☑	Web pages dedicated to training and contests involving fighting disciplines and multi-person combat sports such as martial arts, boxing, wrestling, and fencing.
Sport Hunting	☐	☐	Web pages covering recreational hunting of live animals.
Sports	☐	☐	Web pages covering competitive sports in which multiple people or teams compete in both athletic (e.g. football) and non-athletic competitions (e.g. billards).
Spyware & Questionable Software	☑	☑	Web pages containing software that reports information back to a central server such as spyware or keystroke loggers.
Streaming & Downloadable Audio	☑	☑	Web pages with repositories of music or that provide streaming music or other audio files that may pose a bandwidth risk to companies.
Streaming & Downloadable Video	☑	☑	Web pages with repositories of videos or that provide in-browser streaming videos that may pose a bandwidth risk to companies.
Supplements & Compounds	☑	☑	Web pages containing information on vitamins and other over-the-counter unregulated supplements and compounds.
Swimsuits	☐	☐	Web pages containing pictures of people wearing swimsuits. Does not include pictures of swimsuits on manikins or by themselves.

Technology (General)	☐	☐	Web pages which include web design, internet standards (such as RFCs), protocol specifications, and other broad technology discussions or news.
Television & Movies	☐	☐	Web pages about television shows and movies including reviews, show times, plot summaries, discussions, teasers, marketing sites, etc.
Text Messaging & SMS	☑	☑	Web pages used to send or receive simple message service (SMS) text messages between a web page and a mobile phone.
Tobacco	☑	☑	Web pages promoting the use of tobacco related products (cigarettes, cigars, pipes).
Torrent Repository	☑	☑	Web pages that host repositories of torrent files, which are the instruction file for allowing a bit torrent client to download large files from peers.
Toys	☐	☐	Web pages dedicated to manufacturers of toys, including toy selling or marketing sites.
Translator	☐	☐	Web pages which translate languages from one to another.
Travel	☐	☐	Web pages which provide travel and tourism information, online booking or travel services such as airlines, car rentals, and hotels.
Unreachable	☑	☑	Web pages that give an error such as, "Network Timeout", "The server at example.com is taking too long to respond," or "Address Not Found".
Violence	☑	☑	Web pages that promote questionable activities such as violence and militancy.
Weapons	☑	☑	Web pages that include guns and weapons when not used in a violent manner.
Web Hosting, ISP & Telco	☐	☐	Web pages for web hosting and blog hosting sites, Internet Service Providers (ISPs) and telecommunications (phone) companies.
Web-based Email	☐	☐	Web pages which enable users to send and/or receive email through a web accessible email account.
Web-based Greeting Cards	☐	☐	Web pages that allow users to send or receive online greeting cards.
Wikis	☐	☐	Web pages or websites in which a community maintains a set of informational documents where anyone in the community can update the content.

Appendix 12

School Monitoring System

No monitoring can guarantee to be 100% effective we will ensure that our monitoring system is as robust as possible. It includes filtering for Key words, controlled by Smoothwall managed by Cybersupport, which automatically forces Safe Search and blocks access to inappropriate websites.

Our monitoring system covers the following content:

Content	Content or communications that:
Illegal	Is illegal (e.g. Child abuse images and terrorist content)
Bullying	Involves the repeated use of force, threat or coercion to abuse, intimidate or aggressively dominate others.
Child Exploitation	Is encouraging the child into a coercive/manipulative sexual relationship. This may include encouragement to meet.
Discrimination	Promotes the unjust or prejudicial treatment of people on the grounds of race, religion, age, sex, disability or gender identity.
Drugs / Substance abuse	Displays or promotes the illegal use of drugs or substances.
Extremism	Displays sexual acts or explicit images.
Self- Harm	Promotes or displays deliberate self- harm.
Violence	Displays or promotes the use of physical force intended to hurt or kill.
Suicide	Suggest the user is considering suicide.

A list of web filtering categories are in Appendix 1

We will ensure that our monitoring strategy meets the following principles:

Content	
Age appropriate	Includes the ability to implement variable monitoring appropriate to age. This will in turn define which alerts are prioritised and responded to.
Data retention	User accounts are disabled once pupils have left the school
Monitoring Policy (E-mail, E-Safety and Internet Policy)	Pupils are routinely reminded that their online access is monitored. They are taught about on-line safety and to behave appropriately and responsibly.
Impact	Cybersupport review regularly and monitor the impact of the systems. Serious breaches are notified immediately.
Prioritisation (How alerts are generated and prioritised to enable rapid response)	Smoothwall send an automated E- Mail alerting web traffic events that violate our policy .They would inform us immediately if there was a serious breach e.g. multiple attempts to access an inappropriate website by a single user.
Reporting	E-Mail send to A Streames-Smith (School Business Manager) / A Smith (Head of School) upon discovery of any form of violation

Schools in England (and Wales) are required "to ensure children are safe from Terrorist and extremist material when accessing the internet in school, including by establishing appropriate levels of filtering (Prevent Duty 2015)

We ensure that access to illegal content is blocked, specifically that the filtering providers are IWF members and block access to illegal Child Abuse Images and Content (CAIC) . Untangle.com are the manufacturer of our firewall/web filter. The filter automatically receives updates from a company called Zvelo who are members of the IWF.

Also that they integrate the police assessed list of unlawful terrorist content,

produced on behalf of the Home Office.

Recognising that no filter can guarantee to be 100% effective, our filtering system manages the following content (and web search):

Content	Content that :
Discrimination	Promotes the unjust or prejudicial treatment of people on the grounds of race, religion, age, or sex.
Drugs / Substance abuse	Displays or promotes the illegal use of drugs or substances.
Extremism	Promotes terrorism and terrorist ideologies, violence or intolerance.
Malware / Hacking	Promotes the compromising of systems including anonymous browsing and other filter bypass tools as well as sites hosting malicious content.
Pornography	Displays sexual acts or explicit images.
Piracy and copyright theft	Includes illegal provision of copyrighted material.
Self-Harm	Promotes or displays deliberate self- harm (including suicide and eating disorders).
Violence	Displays or promotes the use of physical force intended to hurt or kill.

We ensure that our system does not over block access so it does no lead to unreasonable restrictions and that our filtering system meets the following principles:

- Age appropriate, differentiated filtering – includes the ability to vary filtering strength appropriate to age and role; Student and staff are differentiated.
- Control - has the ability and ease of use that allows schools to control the filter themselves to permit or deny access to specific content; IT provider and onsite IT coordinator (R. Herr) have access to filtering controls.
- Filtering Policy – the filtering provider publishes a rationale that details their approach to filtering with classification and categorisation as well as over blocking.
- Identification - the filtering system should have the ability to identify users; filter is user and device aware (where possible)
- Mobile and App content – isn't limited to filtering web traffic and includes the blocking of inappropriate content via mobile and app technologies. Encrypted traffic sent by apps like WhatsApp cannot be intercepted by the filter, school provided device should/are not permitted to use apps of this nature.
- Multiple language support – the ability for the system to manage relevant languages.
- Network level - filtering should be applied at 'network level' i.e., not reliant on any software on user devices. Untangle.com works at the network level (Untangle.com are the Filter Manufacturer)
- Reporting mechanism – the ability to report inappropriate content for access or blocking. Smoothwall sends an automated weekly E- Mail to A Streames-Smith (School Business Manager, DDSL), A Smith (Head of School, DSL) and Amy Buckley (SENDco, DDSL, E-Safety Leader) alerting the school to web traffic events that violate our policy. See Prevent Risk Assessment Appendix 3
  Smoothwall would inform us immediately if there was a serious breach e.g. multiple attempts to access an inappropriate website by a single user.
- Reports – the system offers clear historical information on the websites visited by your users; Data is retained for 30 days.