Catch22 Independent Schools Policy

Online E-Safety Policy

Catch22 Include Norfolk

Contents

This policy will be reviewed annually.

Catch22 reserves the right to amend this policy, following consultation, where appropriate.

Policy Owner:	Headteacher
Queries to:	Jamie Nielsen
Date created:	August 2019
Date of last review:	August 2025
Date of next review:	August 2027
Catch22 group, entity, hub:	Catch22 Education
4Policies level (all staff or managers only)	All Education

Catch 22 Independent Schools

Education Intent Statement

Catch22's Vision:
To deliver better social outcomes through transforming public service through the 3Ps:

Place
Supporting people to find, retain, transition safely into homes and communities

Purpose
Working with people to achieve their purpose in education, employment or training

People
Building networks of people around individuals

Our Education Mission:
To enable young people to progress and succeed in sustained education, training or employment.

We do this through engaging young **people** positively with their **purpose** through learning and future life aspirations. All our pupils achieve positive outcomes, thrive and enjoy a quality education that is delivered by skilled, passionate **people** with high expectations in a **place** that is safe, high quality and appropriate.

Our schools and academies cater for young people aged 4-16 who are outside of mainstream education, many of whom have troubled and challenging backgrounds. We embody our vision in all we do to ensure our pupils are supported fully to achieve these goals.

Our Educational Intent:

	Evidenced in this policy?
Brilliant basics, magic moments	
• Support pupils to gain academic qualifications, experiences and the skills needed to move successfully to the next stage in life.	✓
• Provide a values-based curriculum, working with pupils to build their spiritual, moral, social and cultural capital and personal development	✓
Relationships beat structures	
• Treat pupils as individuals and help them to build bright futures in both their personal and professional lives	✓

Things about you, built with you, are for you • Understand pupils' unique needs and help them overcome their barriers to learning • Engage pupils with a broad and rich curriculum so they can realise their ambitions • Make our pupils' voices heard and harness participation to benefit pupils and help our schools to improve.	✓
Unleash Greatness • Have high aspirations for our pupils so they leave us prepared for life in modern Britain and the wider world. • Instil belief in pupils so they can progress and succeed in education, training and employment	✓
Let robots be robots and humans be human • Ensure pupils have a rounded understanding of themselves and the world around them. • Harness curiosity and nurture a love of learning. • Support and protect our pupils to be safe and feel safe online and offline.	✓ ✓
Incubate, accelerate, amplify Embrace the values of 'Rights Respecting Schools'; helping pupils thrive as individuals both as members of their school and the wider community.	✓

1. What is the policy about?

This Policy was written to ensure that children and young people can use the internet and related communication technologies appropriately, as part of the wider duty of care to which all who work in education are bound. In addition, this policy enables staff to identify and manage risks, safeguard and support staff, pupils and parents/Carers by promoting the safe use of technology.

Keeping Children Safe in Education outlines the responsibility that schools, academies and Designated Safeguarding Leads (DSL) have in ensuring that all pupils, young people and staff use electronic technologies in a safe and productive way. Furthermore the Department for Education (DFE) have recently released the guidance on Teaching Online Safety in School 2019, this policy has been updated to reflect this guidance.

Technology is advancing quickly and can be used in a beneficial and positive way to educate and develop the young people we work with. However, measures must be taken, and procedures and processes followed to ensure the safeguarding of all young people who use this technology. In addition, technology and social media play an important part in the social development and learning of young people. It is the DSL's responsibility to ensure leaders, managers and staff are fully aware of statutory updates and requirements to safeguard young people.

The DSL is responsible for the delivery of Information, advice and guidance for young people and parents/carers to ensure:

- They are informed and empowered to use technology and social media in a safe way;
- They know that they can disclose concerns, particularly surrounding grooming, Child Sexual Exploitation (CSE), sexting, the sharing of illicit images and online bullying, in a safe and confident way.

This policy is intended to be used in conjunction with the Catch22 Safeguarding Policy.

Catch22 have been supporting Redthread to educate young people about how to use technology and social media positively within the Social Switch project, supported by Google and Facebook. The project aims to switch the narrative on social media's relationship with youth violence; to ensure it is understood, tackled and solved. Catch22 Include will ensure that pupils and adults working in schools receive regular and up to date information in order to be able to support these goals in our communities.

2. Who does this policy apply to?

This policy applies to all staff including the governing body, teachers, support staff, external contractors, visitors, volunteers and other individuals who work for or provide services on behalf of Catch22 Education (collectively referred to as 'staff' in this policy) as well as young people and parents/carers.

3. Policy requirements

As outlined in Keeping Children Safe in Education, the use of technology has become a significant component in many safeguarding issues; including child sexual exploitation, radicalisation, sexual predation, and country lines- where technology can often provide the platform that facilitates harm. An effective approach to online safety empowers a school or academy to protect and educate the community in their use of technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate. This policy outlines the actions the school will take to ensure its pupils are educated on the safe use of the internet. Furthermore, it outlines the Curriculum guidance that will be used to ensure that teaching is at an age appropriate level of understanding, with regard to the young people we work with.

Our approach to online safety is based on addressing the following categories of risk:

- Content – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
- Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or

young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

- Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scam

3.1 Making use of ICT and the Internet in Education

The DFE have produced the document, '[Education for a Connected World]', which outlines the age related expectations for the young people we work with. The internet is used in school to raise educational standards; to promote pupil achievement; to support the professional work of staff; and to enhance the school's management functions. Technology is advancing rapidly and is now a huge part of everyday life, education and business. Our pupils need to be equipped with all the necessary ICT skills that they will need in order to enable them to progress confidently in their educational careers, and onward towards their working environments when they leave.

Some of the benefits of using ICT and the internet in schools are:

For Pupils:

- Unlimited access to worldwide educational resources and institutions such as art galleries, museums and libraries;
- Contact with schools and academies in other countries;
- Access to subject experts, role models, inspirational people and organisations. The internet can provide a great opportunity for pupils to interact with people that they otherwise would never be able to meet;
- An enhanced curriculum, interactive learning tools, collaboration, locally, nationally, and globally;
- Self-evaluation, feedback and assessment, updates on current affairs as they happen;

- Access to learning whenever and wherever convenient;
- Freedom to be creative and explore the world from within a classroom;
- Social inclusion, in class and online;
- Access to case studies, videos and interactive media to enhance understanding;
- Individualised access to learning.

For Staff:

- Professional development through access to national developments, educational materials and examples of effective curriculum practice and classroom strategies;
- Immediate professional and personal support through networks and associations;
- Improved access to technical support;
- The ability to provide immediate feedback to pupils and parents;
- Class management, attendance records, assessment and assignment tracking.
- Providing online alternative provision where necessary due to school closures or other factors.

For Parents:

Communication between the school and parents/carers may be through e-mail and telephone messages. This form of contact can often be more effective, reliable and economic. Text messages and letters will also inform parent/carers of details relating to attendance, behaviour and other appropriate matters.

3.2 Roles and Responsibilities

The School Online-Safety Coordinators are: Designated Safeguarding Leads

Technical: Catch22 IT

Safeguarding: DSL: Jamie Nielsen

The Role of Governors/The Proprietor:

Governors and proprietors are responsible for the approval of the E-Safety Policy and for reviewing its effectiveness. They receive regular information about online-safety incidents

and monitoring reports. A member of the Governing/Proprietor Body has taken on the role of E-Safety Governor, duties of which will include:

- Regular monitoring of online-safety incident logs;
- Regular monitoring of filtering/change control logs.

The Role of the Headteacher and Senior Management:

- Have a duty of care for ensuring the E-Safety of members of the school community, although the day to day responsibility will be delegated to the E-Safety Co-ordinator(s);
- Are aware of the procedures to be followed in the event of a serious E-Safety allegation being made against a member of staff;
- Are responsible for ensuring that the E-Safety Co-ordinators and all other members of staff receive suitable training to enable them to carry out their E-Safety roles (usually Local Safeguarding Partnership (LSP) DSL training);
- Will receive, as appropriate, monitoring reports from the E-Safety Co-ordinator.

The Role of the E-Safety Co-ordinator (who is normally the DSL, see below):

- Has day-to-day responsibility for E-Safety issues and has a leading role in establishing and reviewing the E-Safety policies and documents, including the curriculum, against https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/759003/Education_for_a_connected_world_PDF.PDF - to ensure that the curriculum is meeting the needs of the young people we work with.
- Ensures that all staff are aware of the procedures that need to be followed in the event of an E-Safety incident;
- Provides advice for staff as required and advises young people and parents/carers on E-safety;
- Liaises with the Local Authority through the completion of the Annual E-Safety Audit Tool and similar safeguarding audits when required;
- Receives reports of E-Safety incidents and creates a log of incidents to inform future developments (following Catch22 Safeguarding reporting procedures);
- Reports regularly to the Senior Leadership Team (SLT).

The Role of Technical Staff

- Ensure that the school's technical infrastructure is secure and is not open to misuse or malicious attack;
- Ensure that the school meets required safety technical requirements and any Local Authority E-Safety Guidance that may apply;
- Ensure that users may only access the networks and devices through a properly enforced password protection policy in which passwords are regularly changed;
- Ensure that the filtering policy is applied;
- Ensure that they keep up to date with E-Safety technical information in order to effectively carry out their E-Safety role and to inform and update others, as appropriate;
- Ensure that the use of the network, internet, Virtual Learning Environment, remote access, e-mail, and software systems are regularly monitored so that any misuse or attempted misuse can be reported;
- Ensure that any loss of service/filtering is reported to the Education SLT/Headteacher immediately.

The Role of Teaching and Support Staff

- Have an up to date awareness of E-Safety matters from the DSL and the current school's E-Safety policy and practices;
- Have read, understood and signed the Staff Acceptable Use Agreement (AUA);
- Report any suspected misuse or problem to the Headteacher and E–Safety Co-ordinator (DSL) for investigation;
- Ensure that all digital communications with pupils/parents/carers are on a professional level and only carried out using the school's systems;
- Embed E-Safety in all aspects of the curriculum and other activities;
- Ensure pupils understand and follow the E-Safety and Acceptable Use Agreements;
- Ensure pupils have a good understanding of research skills, the need to avoid plagiarism, and the need to uphold copyright regulations;

- Monitor the use of digital technologies, mobile devices, cameras, etc. in lessons and other in-school activities, and implement current policies regarding these devices;
- Ensure that where internet use is pre-planned, pupils are guided to sites that have been checked as suitable and that processes are in place for dealing with any unsuitable material that is found in internet searches.

The Role of the Designated Safeguarding Lead(s)

To receive appropriate training (through the Local Safeguarding Partnership) on E-Safety issues and be aware of the potential serious safeguarding/child protection issues to arise from:

- The sharing of personal data;
- Access to illegal or inappropriate materials;
- Inappropriate on-line contact with adults and strangers;
- Access to age limited and harmful websites or online games;
- Potential or actual incidents of grooming;
- Cyber-bullying;
- Sexting and the sending of inappropriate images, including self-images.

N.B. It is important to emphasise that these are Child Protection and Safeguarding issues, not simply technical issues. The technology provides additional means for Child Protection issues to develop.

The Role of Pupils and Young People

Pupils and young people:

- Are responsible for using the school's digital technology systems in accordance with the Acceptable Use Agreement;
- Have a good understanding of research skills and the need to avoid plagiarism and hold copyright regulations;
- Need to understand the importance of reporting abuse, misuse or access to inappropriate materials and know how to do so;
- Will be expected to know, understand and comply with policies on the use of mobile devices and digital cameras;

- Will be expected to know, understand and comply with policies on the taking/use of images, sexting, and on cyber-bullying;
- Should understand the importance of adopting good E-Safety practices when using digital technologies outside of the school and realise that the E-Safety Policy covers their actions outside of the education setting, if related to their membership of the school.

The Role of Parents/Carers

Parents/Carers play a crucial role in ensuring that their children/young people understand the need to use the internet and mobile devices in an appropriate way. The school will take every opportunity to help parents/carers understand these issues through home to school liaison. 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;
- Their children/young person's personal devices in the school.

3.2 Communicating School Policy:

This policy is available from the school office and on the school website for parents/carers and staff. Rules relating to the code of conduct when online and E-Safety guidelines are displayed around the site. E-Safety is integrated into the curriculum where the internet or technology is being used and during PSHE (Votes for Schools)- lessons where personal safety, responsibility, and/or development are being discussed.

Parents and carers play an essential role in the education of their children/young people and in the monitoring and regulation of their online behaviours. We will therefore seek to provide information and awareness to parents/carers through curriculum activities, high-profile events and campaigns (e.g. E-Safety Day).

A link to nationally recognised support such as the CEOP webpage will be placed on the school website, and this page will be updated to ensure that it reflects the ever-changing picture of online safety.

3.3 Training:

Staff:

It is essential that all staff receive e-safety training and understand their responsibilities, as outlined in this policy and on the Training Matrix. Training will be offered as follows:

- Annual e-safety training from the DSL and through National College Child Protection Awareness training and/or LSCB training;
- All new staff will receive E-Safety training as part of their induction, ensuring that they fully understand the school's E-Safety policy and Acceptable Use Agreements;
- The E-Safety Co-ordinator(s)/DSL(s) will receive regular updates through attendance at external training events and by reviewing guidance documents released by relevant organisations;
- This E-Safety Policy and its updates will be presented to and discussed by staff, as appropriate, on INSET days and in meetings;
- The E-Safety Co-ordinator(s)/DSL(s) will provide advice, guidance, and training to individuals as required.

Governors:

Governors will be invited to take part in E-safety training and awareness sessions- this being of particular relevance to those who are members of any committee involved in technology, e-safety, health and safety, and safeguarding/child protection. This may be offered in several ways:

- Attendance at training provided by the Local Authority/National Governors Association/or other relevant organisations;
- Participation in training/information sessions for staff or parents.

3.4 Learning to Evaluate Internet Content

With so much information available online it is important that pupils learn how to evaluate internet content for accuracy and intent. This is approached by the school as part of digital literacy across the curriculum. Pupils will be taught:

- To be critically aware of materials they read and shown how to validate information before accepting it as accurate;
- To use age-appropriate tools to search for information online;

- To acknowledge the source of information used and to respect copyright. Plagiarism is against the law and the school will take any intentional acts of plagiary very seriously. For pupils who are found to have plagiarised, appropriate action will be taken.

The school has a web filtering system in place to ensure that content is appropriate to the age and maturity of pupils. A list of safe sites has been produced and any website/content request for the school will need to be approved by the Executive Principal before it is added to the safe list.

If staff or pupils discover unsuitable sites, the URL will be reported to the school E-Safety Co-ordinator (DSL). Any material found by members of the school community that is believed to be unlawful will be reported in accordance with policies and procedures. Regular software and broadband checks will take place to ensure that filtering services are working effectively.

3.5 Managing Information Systems

The school is responsible for reviewing and managing the security of the computers and internet networks as a whole and takes the protection of data and personal protection of our community very seriously. This means protecting the school network as securely as practicably possible against viruses, hackers and other external security threats. The security of the school's information systems and users will be reviewed regularly by the Network Manager and virus protection software will be updated regularly. In order to safeguard our computer systems, the school will ensure that:

- All personal data sent over the internet or taken off site is encrypted or password protected;
- Unapproved software is not downloaded to any school computers;
- Files held on the school network are regularly checked for viruses;
- The use of user logins and passwords to access the school network are enforced;
- Portable media containing school data or programmes will not be taken off-site without specific permission from a member of the Senior Leadership Team;
- Regular reporting is given to Governors and the Catch22 Governance team.

For more information on data protection in school, please refer to the Catch22 Data Protection policy.

3.6 E-mail

The use of e-mail is an essential part of school communication and is used to contact staff internally, and externally for contacting parents. It is also used to enhance the curriculum by initiating contact and projects with other schools/academies nationally and internationally. It may also be used to provide immediate feedback on work and requests for support where needed.

Staff and pupils should be aware that school email accounts should only be used for school related matters, i.e. for staff to contact parents, pupils, other members of staff, and other professionals for work purposes. This is important for confidentiality. The school has the right to monitor emails and their content but will only do so if it feels there is reason to.

3.7 School Email Accounts and Appropriate Use

Staff should be aware of the following when using email in school:

- Staff should only use official school-provided email accounts to communicate with pupils, parents or carers; personal email accounts should not be used to contact any of these people for school business;
- Emails sent from school accounts should be professionally and carefully written. Staff are always representing the school and should take this into account when entering into any communication;
- Staff must tell their Manager or a member of the Senior Leadership Team if they receive any offensive, threatening or unsuitable emails- either from within the school or from an external account- they should not attempt to deal with this themselves;
- The forwarding of chain messages is not permitted.

Pupils will be educated through the ICT curriculum to identify spam, phishing and virus emails and attachments that could cause harm to the school network or their personal wellbeing.

3.8 Published Content and the School Website

The school website is viewed as a useful tool for communicating our ethos and practice to the wider community. It is also a valuable resource for parents/carers and pupils by providing information.

The website is in the public domain and can be viewed by anybody online. Any information published on the website will be carefully considered in terms of safety for the school community, copyrights and privacy policies. No personal information concerning staff or pupils will be published, and details for contacting the school will be for the school office only.

3.9 Policy and Guidance of Safe Use of Pupil's Photographs and Work

Catch22 believes that celebrating the achievement of children and young people in school is an important part of their learning experience and personal development. Taking photographs and videos of pupils for internal display and displaying pupil work for educational use enables us to celebrate individual and group successes as a community. Colour photographs and pupils' work bring our school to life, showcase our pupils' talents and add interest to school publications both online and in print. However, the school has safety precautions in place to prevent the misuse of such material:

Photographs, images and videos of the school and pupils will only be used in accordance with the Data Protection Act 1998 and with prior parental/carer consent, as outlined in the Home/School Agreement which is drawn up on admission to the school. On admission, parents/carers will also be asked to sign an Acceptable Use Agreement which incorporates digital/video permissions.

By signing this form parents/carers will be consenting to the use of images of their child being used in the following outlets:

- All school and Catch22 publications;

- On the school website;
- In newspapers as allowed by the school;
- In videos made by the school or in class for projects.

The consent lasts for the duration of the pupil's time at the school. Once the pupil leaves the school, photographs and videos may be archived within the school but will not be re-published without renewed consent. In circumstances where the pupil is aged 18 or above, personal consent will be required from the pupil in addition to parental authorisation. Pupil's full names will never be published externally with their photographs, but may be published internally (for example, on display with their work).

Using Photographs of Individual Pupils:

Pupils may not be approached about being photographed while in school or engaging in school activities without the school's permission. The school follows these general rules on the use of photographs of individual pupils:

- Parental consent must be obtained for external/promotional use- see above.
- Electronic and paper images will be stored securely.
- Images will be carefully chosen to ensure that they do not pose a risk of misuse. This includes ensuring that photographs are appropriate for the public domain.
- For public documents, including in newspapers, full names will not be published alongside images of the child. Groups may be referred to collectively by year group or form name.
- Parents/ carers are not permitted to take photographs or videos whilst on the school premises.
- Pupils are encouraged to tell a member staff if they are concerned or uncomfortable with any photographs that are taken of them, or events they are being asked to participate in.
- Any official photographers that are commissioned by the school will be fully briefed on Child Protection matters in relation to their work, will always wear identification, and will not have unsupervised access to pupils at any time.

Complaints of Misuse of Photographs or Video

Parents/carers should follow the standard Catch22 complaints procedure if they have a concern or complaint regarding the misuse of photographs in school. The complaints policy can be found on the school website or is available on request from the Headteacher.

3.10 Social Networking, Social Media and Personal Publishing

The school follows the following rules on the use of social media and social networking sites:

- Pupils are educated on the dangers of social networking sites and how to use them in safe and productive ways. They are all made aware of the school's code of conduct regarding the use of ICT and technologies, and behaviour online- including sexting. This is delivered through PSHE lessons and the delivery of Votes for Schools.
- Any sites that are to be used in class will be risk-assessed by the teacher in charge prior to the lesson, to ensure that the site is age-appropriate and safe for use.
- Official school blogs created by staff or pupils/year groups/ clubs as part of the school's curriculum will be password-protected and run with the approval of a member of staff and will be moderated by a member of staff.
- Pupils and staff are not to publish specific and detailed private thoughts, especially those that might be considered hurtful, harmful or defamatory. The school expects all staff and pupils to remember that they are always representing the school and must act appropriately.
- Safe and professional behaviour of staff online will be discussed during the staff induction process.

3.11 Mobile Phones and Personal Devices

While mobile phones and personal communication devices are common place in today's society, their use and the responsibility for using them should not be taken lightly. Some issues surrounding the possession of these devices are:

- They can make pupils and staff more vulnerable to cyberbullying;
- They can be used to access inappropriate internet material;
- They can be a distraction in the classroom;
- They are valuable items that could be stolen, damaged, or lost;

- They can have integrated cameras, which can lead to child protection, bullying and data protection issues, including the sharing of inappropriate or illicit images and sexting.

The school adopts a zero-tolerance policy in relation to electronic devices owned by pupils and brought onto the premises for the purpose of making and/or distributing images and/or recordings of pupils and staff.

We do however understand that a parent/carer may wish for their child to have a mobile phone for their journey to and from school. In this situation a pupil should adhere to the following procedure:

- The phone will be handed in at the school gate on entry to the site.
- The phone will be kept locked in the admin office for the duration of the day.
- The phone will be given back to the child at the end of the learning day.
- Children will not have access to their mobile phone during the learning day.

Emergencies:

- If a pupil needs to contact his parents/carers, a phone will be made available.
- If parents/carers need to contact their child urgently they should phone the school office and a message will be relayed promptly.

Responsibility:

- Catch22 accepts no responsibility whatsoever for theft, loss or damage relating to phones/devices including those handed in.
- Catch22 will not investigate the theft, loss or damage relating to pupil phones/devices.

Staff

- Under no circumstances should staff use their own personal devices to contact pupils or parents, either in or out of school time, unless in an emergency.

- Staff are not permitted to take photos or videos of pupils on personal devices. If photos or videos are being taken as part of the school's curriculum or for a professional capacity, the school's equipment will be used for this.
- The school expects staff will lead by example: personal mobile phones will be switched off or placed on 'silent' and stored away in a safe location during school hours.
- Any breach of school policy may result in disciplinary action being taken against that member of staff.

3.12 Cyberbullying

Cyberbullying, as with any other form of bullying, is taken very seriously by the school. If an allegation of bullying does arise, the school will:

- Take it seriously;
- Act as quickly as possible to establish the facts. It may be necessary to examine school systems and logs or contact the service provider in order to identify the perpetrator;
- Record and report the incident;
- Provide support and reassurance to the victim;
- Make it clear to the perpetrator that this behaviour will not be tolerated. Appropriate action will be taken, as necessary;
- Follow the Anti-Bullying Procedure.

3.13 Managing Emerging Technologies

Technology is progressing rapidly, and new technologies are emerging all the time. The school will risk-assess any new technologies before they are allowed into school and will consider any educational benefits that they might have. The school keeps up to date with new technologies and is prepared to quickly develop appropriate strategies for dealing with new technological developments.

3.14 Protecting Personal Data

Catch22 believe that protecting the privacy of our staff and pupils and regulating their safety through data management. Control and evaluation is vital to whole-school and individual progress. The school collects personal data from pupils, parents, and staff and processes it in order to support teaching and learning; monitor and report on pupil and teacher progress; and strengthen our pastoral provision.

We take responsibility for ensuring that any data that we collect, or process, is used correctly and only as is necessary.

For full and comprehensive information on how the school safeguards data, refer to the Catch22 Data Protection policy.

3.15 Unsuitable/ inappropriate activities:

Any of the following activities are deemed inappropriate in school:

- The accessing of pornography;
- The promotion of any kind of discrimination;
- The use of threatening behaviour, including promotion of physical violence or mental harm;
- Using any other information which may be offensive to colleagues or breaches the integrity of the school ethos, or brings the school into disrepute;
- Using school systems to run a private business;
- Using systems, applications, websites or other mechanisms that bypass the filtering or other safeguards employed by the school;
- Infringing copyright;
- Revealing or publicising confidential or proprietary information e.g. financial, personal information, data bases, computer / network access codes and passwords;
- Creating or propagating computer viruses or other harmful files;
- Unfair usage;
- Online gaming, educational and non-educational;
- Online gambling;
- The use of social media without permission;
- The use of messaging apps without permission;
- The use of videoing broadcasting or YouTube without permission;

4.16 Responding to Incidents of Misuse

Managers should refer to the Catch22 Data Protection Policy, Catch22 Safeguarding Children and Young People Policy and Catch22 HR conduct procedures.

Illegal incidents

If there is any suspicion that the website(s) concerned may contain child abuse images, or if there is any other suspected illegal activity Catch22 reporting procedures should be followed as outlined in the Catch22 Safeguarding Children and Young People policy.

Other incidents

It is hoped that all members of the school community will be responsible users of digital technologies, who understand and follow Catch22 policy. However, there may be times when infringements of the policy could take place, through careless, irresponsible, or deliberate misuse.

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

- More than one senior member of staff should be involved in the process and the incident reported following the Catch22 Safeguarding Policy. This is vital to protect individuals if accusations are subsequently reported.
- The procedure should be conducted using a designated computer that will not be used by pupils and, if necessary, can be taken off site by the police if needed. The same computer should be used for the duration of the process.
- Relevant staff should have appropriate internet access to conduct the procedure, and sites and content visited closely monitored and recorded to provide further protection.
- The ULR of any site containing the alleged misuse and the nature of the content causing concern should be recorded. It may also be necessary to record and store screenshots of the content on the machine being used for investigation. This may be printed, signed and attached to the form (except in cases of child sexual abuse).

- Once fully investigated the group should 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 organisations (as appropriate);
    - Police involvement and/ or action.

If content being reviewed includes images of child abuse, then the matter should be 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 and from child to child;
- The inclusion of adult material which potentially breaches the Obscene Publications Act;
- Criminally racist material;
- Other criminal conduct, activity or material.

Isolate the computer in question as best you can. Any changes to its state may hinder a later police investigation.

It is important that all the above steps are taken as they will provide an evidence trail for the school and the police and demonstrate that visits to these sites were carried out for child protection purposes.

School Actions and 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 an appropriate 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 Catch22 behaviour/ disciplinary procedures and could include:

Pupils:

- Referral to class teacher / tutor, DSL, Headteacher or Police;

- Referral to Technical Support staff for action re filtering/ security and removal of network / internet access rights;
- Informing parents / carers;
- Revised Risk Assessment;
- Issue of a Warning, detention or sanction or possible exclusion.

Staff:

- Referral to Line Manager, Headteacher and Catch22 HR;
- Referral to Technical Support staff for action re filtering and removal of network/internet access rights;
- Disciplinary action following the Catch22 Disciplinary Policy (this could include dismissal);
- Referral to the Police or LADO.

4 Definitions

N/A

5 Related policies

This policy must be read in conjunction with other relevant school policies including (but not limited to):

- Safeguarding Policy;
- Anti-bullying Policy
- Behaviour Policy;
- Photographic Image Use;
- Acceptable Use Policies;
- Confidentiality, Screening and Searching;
- Data Management and Protection Policy.

In addition, it relates to the delivery of PSHE (Votes for Schools), SMSC and IT.

6 Appendices

N/A

Annex 1: Equality Impact Assessment

1. Summary

This EIA is for:	Online E-Safety Policy
EIA completed by:	Head of Safeguarding
Date of assessment:	October 2020
Assessment approved by:	Education SLT

Catch22 is committed to always: avoiding the potential for unlawful discrimination, harassment and victimisation; advancing equality of opportunity between people who share a protected characteristic and those who do not; and, foster good relations between people who share a protected characteristic and those who do not.

An Equality Impact Assessment (EIA) is a tool for identifying whether or not strategies, projects, services, guidance, practices or policies have an adverse or positive impact on a particular group of people or equality group. Whilst currently only public bodies are legally required to complete EIA's under the Equality Act 2010, Catch22 has adopted the process in line with its commitment to continually improve our equality performance.

Policy owners are required to complete or review the assessment indicating whether the policy has a positive, neutral or negative impact for people who it applies to and who share one or more of the 9 protected characteristics under the Equality Act 2010.
Definitions are based on the Equality & Human Rights (EHRC) guidance.

Objectives and intended outcomes
This EIA has been completed in order to ensure that the implications and potential impact, positive and negative, of this policy have been fully considered and addressed, whether or not people share a protected characteristic.

2. Potential Impacts, positive and negative

Equality Area	Positive	Neutral	Negative	Please give details including any mitigation for negative impacts
Age Does this policy impact on any particular age groups or people of a certain age?	☐	☒	☐	The policy applies equally to all members of staff and pupils regardless of age. It is not considered that the policy includes any guidance or rules that may impact either positively or negatively on members of staff or pupils because of their age.
Disability Does this policy impact on people who have a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day to day activities?	☐	☒	☐	The policy applies equally to all members of staff and pupils regardless of any disability. It is not considered that the policy includes any guidance or rules that may impact either positively or negatively on members of staff or pupils because of any disability.
Gender reassignment (transsexual, transgender, trans) Does this policy impact on people who are transitioning from one gender to another (at any stage)	☐	☒	☐	The policy applies equally to all members of staff and pupils regardless of their gender at any given time. It is not considered that the policy includes any guidance or rules that may impact either positively or negatively on members of staff or pupils because of their gender.
Marriage and civil partnership Does this policy impact on people who are legally married or in a civil partnership?	☐	☒	☐	The policy applies equally to all members of staff and pupils regardless of marital status. It is not considered that the policy includes any guidance or rules that may impact either positively or negatively on members of staff or pupils because of their marital status.
Pregnancy and maternity (in work this is linked to maternity leave, non-work this is for 26 weeks after giving birth) Does this policy impact on people who are pregnant or in their maternity period	☐	☒	☐	It is not considered that the policy positive or negatively impacts on pregnant women or on staff on maternity or paternity leave.

following the birth of their child?				
Race Does this policy impact on people as defined by their race, colour and nationality (including citizenship) ethnic or national origins	☐	☒	☐	The policy applies equally to all members of staff and pupils regardless of their race, origin, colour or nationality. It is not considered that the policy includes any guidance or rules that may impact either positively or negatively in these respects.
Religion and belief Does this policy impact on people who practice a particular religion or none, or who hold particular religious or philosophical belief or none?	☐	☒	☐	The policy applies equally to all members of staff and pupils regardless of religion or beliefs. It is not considered that the policy includes any guidance or rules that may impact either positively or negatively in these respects.
Sex Does this policy impact on people because they are male or female?	☐	☒	☐	The policy applies equally to all members of staff and pupils regardless of their sex. It is not considered that the policy includes any guidance or rules that may impact either positively or negatively on members of staff or pupils because of their sex.
Sexual orientation Does this policy impact on people who are sexually attracted towards their own sex, the opposite sex or to both sexes?	☐	☒	☐	The policy applies equally to all staff and pupils regardless of their sexual orientation. It is not considered that the policy includes any guidance or rules that may impact either positively or negatively on members of staff or pupils because of their sexual orientation.

3. More information/notes

N/A