

# Fiddlers Lane

## Community Primary School

### E–Safety Policy

Approved by	
Name: Jayne Tighe Chair of Governors Signature:	Date: 04 July 2018
<b>Last reviewed on: July 2017</b>	
<b>Next review due by: July 2019</b>	

Fiddlers Lane Primary School believes that the use of information and communication technologies in schools brings great benefits. Recognising the e-Safety issues and planning accordingly will help all users to ensure appropriate, effective and safer use of electronic communications.

## Introduction

### **Why Fiddlers Lane has an e-Safety Policy.**

In today's society, children, young people and adults interact with technologies such as mobile phones, games consoles and the Internet on a daily basis and experience a wide range of opportunities, attitudes and situations. The exchange of ideas, social interaction and learning opportunities involved are greatly beneficial to all, but can occasionally place children, young people and adults in danger.

E-Safety covers issues relating to children and young people as well as adults and their safe use of the Internet, mobile phones and other electronic communications technologies, both in and out of school. It includes education for all members of the school community on risks and responsibilities and is part of the 'duty of care' which applies to everyone working with children.

The 2014 curriculum states that at KS1:

Pupils should be taught to communicate safely and respectfully online, keep personal information private, and recognise common uses of information technology beyond school. At KS2 Pupils should be taught to describe how internet search engines find and store data; use search engines effectively; be discerning in evaluating digital content; respect individuals and intellectual property; use technology responsibly, securely and safely. These curricular changes have been incorporated into our computing lessons to make sure pupils stay safe at home and at school.

At Fiddlers Lane we are aware that there must be a balance between controlling access to the internet and technology, setting rules and boundaries and educating students and staff about responsible use. We are aware that children and staff cannot be completely prevented from being exposed to risks both on and offline. Therefore children should be empowered and educated so that they are equipped with the skills to make safe and responsible decisions as well as to feel able to report any concerns. All members of staff need to be aware of the importance of good e-Safety practice in the classroom in order to educate and protect the children in their care. Members of staff also need to be informed about how to manage their own professional reputation online and demonstrate appropriate online behaviours compatible with their role.

Breaches of an e-Safety policy can and have led to civil, disciplinary and criminal action being taken against staff, pupils and members of the wider school community. It is crucial that all settings are aware of the offline consequences that online actions can have.

At Fiddlers Lane all staff are aware of the legal obligations to safeguard and protect children on and offline and the accountability of these decisions sit with the Head Teacher and the Governing body.

- Fiddlers Lane Primary school has appointed an e-Safety Coordinator.
- The e-Safety Policy and its implementation will be reviewed annually.
- Our e-Safety Policy has been written by the school, building on the Salford e-Safety Policy and government guidance.

- Our School Policy has been agreed by the Senior Leadership Team and approved by governors and other stakeholders.
- The School has appointed a member of the Governing Body to take lead responsibility for e-Safety
- E-safety is incorporated into the computing curriculum at Fiddlers Lane.

## 1.2 Teaching and learning

### 1.2.1 Why Internet use is important.

#### **At Fiddlers Lane:**

- The Internet is a part of everyday life for education, business and social interaction.
- The school has a duty to provide students with quality Internet access as part of their learning experience.
- Pupils use the Internet widely outside school and need to learn how to evaluate Internet information and to take care of their own safety and security.
- The purpose of Internet use in school is to raise educational standards, to promote pupil achievement, to support the professional work of staff and to enhance the school's management functions.
- Internet access is an entitlement for students who show a responsible and mature approach to its use.
- Internet use is part of the statutory curriculum and is a necessary tool for learning.

### 1.2.2 How Internet use benefits education.

#### **At Fiddlers Lane benefits of using the Internet in education include:**

- access to worldwide educational resources including museums and art galleries;
- inclusion in the National Education Network which connects all UK schools;
- educational and cultural exchanges between pupils worldwide;
- vocational, social and leisure use in libraries, clubs and at home;
- access to experts in many fields for pupils and staff;
- professional development for staff through access to national developments, educational materials and effective curriculum practice;
- collaboration across networks of schools, support services and professional associations;
- improved access to technical support including remote management of networks and automatic system updates;
- exchange of curriculum and administration data with Salford LA and DfE;
- access to learning wherever and whenever convenient.

### 1.2.3 How Internet use enhances learning.

#### **At Fiddlers Lane:**

- The school's Internet access is designed to enhance and extend education.
- Pupils are taught what Internet use is acceptable and what is not and given clear objectives for Internet use.
- Fiddlers Lane School will ensure that the copying and subsequent use of Internet-derived materials by staff and pupils complies with copyright law.
- Access levels to the internet will be reviewed to reflect the curriculum requirements and the age and ability of pupils.
- Staff should guide pupils to online activities that will support the learning outcomes planned for the pupils' age and ability.

- Pupils will be educated in the effective use of the Internet in research, including the skills of knowledge location, retrieval and evaluation.
- Pupils will be taught to acknowledge the source of information used and to respect copyright when using Internet material in their own work.

### 1.2.4 How pupils learn how to evaluate Internet content.

#### At Fiddlers Lane:

- The evaluation of online materials is a part of teaching and learning in every subject and will be viewed as a whole-school requirement across the curriculum.
- Pupils will use age-appropriate tools to research Internet content.
- At upper Key Stage 2 pupils will be taught to be critically aware of the materials they read and shown how to validate information before accepting its accuracy.

## 1.3 Managing Information Systems

### 1.3.1 How information systems security are maintained.

#### At Fiddlers Lane:

- Fiddlers Lane Primary School's ICT is managed by RM.
- RM uses a filtering system which is up dated daily
- Staff users and pupils must take responsibility for their network use. Flouting electronic use policy is regarded as a reason for dismissal of staff.
- Servers are located securely and physical access is restricted.
- The server operating system is secured and kept up to date by RM.
- Virus protection for the whole network is managed by RM, it is installed and current.
- Access by wireless devices are proactively managed and secured by RM managed service.

#### Wide Area Network (WAN) security issues include:

- RM Broadband firewalls and local CPEs are configured to prevent unauthorised access between schools.
- Decisions on WAN security are made on a partnership between schools and RM.
- Permission to access blocked sites must be requested
- The security of the school information systems and users is reviewed regularly by RM.
- Virus protection is updated regularly by RM.
- Personal data sent over the Internet or taken off site is encrypted.
- Portable media may not used without specific permission followed by an anti-virus / malware scan.
- Unapproved software will not be allowed in work areas or attached to emails.
- Files held on the school's network are regularly checked by RM managed service.
- The ICT coordinator/network manager will reviews system capacity regularly.
- The use of user logins and passwords to access the school network is enforced.
- Staff have access to normally controlled content through Proxy settings so that school Face book, Twitter and accounts can be used. There are security settings on this resource so that access is restricted.

### 1.3.2 How email is managed.

Email is an essential means of communication for both staff and pupils. Directed email use can bring significant educational benefits; interesting projects between schools in neighbouring villages and in different continents can be created, for example.

#### **At Fiddlers Lane:**

- Pupils may only use approved email accounts for school purposes. (RM Unify)
- Pupils must immediately tell a designated member of staff if they receive offensive email.
- Pupils are taught, in key stage 2, not reveal personal details of themselves or others in email communication, or arrange to meet anyone without specific permission from an adult.
- Staff email addresses are used for communication outside of the school.
- Staff only use official school provided email accounts to communicate with pupils and parents/carers, as approved by the Senior Leadership Team.
- Access in school to external personal email accounts may be blocked.
- Excessive social email use can interfere with learning and will be restricted.
- Email sent to external organisations should be written carefully and authorised before sending, in the same way as a letter written on school headed paper would be.
- The forwarding of chain messages is not permitted.
- Staff should not use personal email accounts during school hours or for professional purposes.

### 1.3.3 How published content is managed.

#### **At Fiddlers Lane:**

- The Fiddlers Lane website enables pupils to publish work.
- Our Website celebrates pupils' work, promotes the school and publishes resources for projects.
- The contact details on the website are the school address, email and telephone number. Staff or pupils' personal information are not published.
- The head teacher will take overall editorial responsibility for online content published by the school and will ensure that content published is accurate and appropriate.
- The school website complies with the school's guidelines for publications including respect for intellectual property rights, privacy policies and copyright.

### 1.3.4 How pupils' images or work is published.

#### **At Fiddlers Lane:**

- Images or videos that include pupils will be selected carefully and do not provide material that could be reused.
- Pupils' full names are not be used anywhere on the website, particularly in association with photographs.
- Written permission from parents or carers is obtained annually before images/videos of pupils are electronically published.
- Written consent is kept by the school where pupils' images are used for publicity purposes, until the image is no longer in use.

### 1.3.5 How social networking, social media and personal publishing is managed.

#### **At Fiddlers Lane:**

- The School has a Facebook site, Twitter account and Pintrest pages.
- The school controls access to the Facebook page and no person under thirteen can be a friend of the school site (see social media policy).
- Through e-safety lessons, pupils are advised never to give out personal details of any kind which may identify them and/or their location. Examples would include real name, address, mobile or landline phone numbers, school attended, IM and email addresses, full names of friends/family, specific interests and clubs etc.
- Pupils are made aware that social network sites should only be used by those over the age of 13.
- Pupils at Key Stages 1 & 2 are advised on security and privacy online and are encouraged to set passwords, deny access to unknown individuals and to block unwanted communications. Pupils are encouraged to approve and invite known friends only on social networking sites and to deny access to others by making profiles private.
- All members of the school community are advised not to publish specific and detailed private thoughts, especially those that may be considered threatening, hurtful or defamatory.
- Newsgroups will be blocked unless a specific use is approved.
- Concerns regarding students' use of social networking, social media and personal publishing sites (in or out of school) will be raised with their parents/carers, particularly when concerning students' underage use of sites.
- Staff personal use of social networking, social media and personal publishing sites will be discussed as part of staff induction and safe and professional behaviour will be outlined in the school Acceptable Use Policy.
- Staff follow the school's social media policy
- Staff can access Facebook, Pintrest and Twitter by logging on the network but should not log onto these sites in classrooms when pupils are present.

### 1.3.6 How filtering is managed.

RM the school's managed ICT service filters all unsuitable sites.

School recognises that filtering is not 100% effective. There are ways to bypass filters (such as using proxy websites, using a device not connected to the network e.g. mobile phone).

#### **At Fiddlers Lane:**

- The school's broadband access includes filtering appropriate to the age and maturity of pupils.
- The school will work with Salford LA and RM team to ensure that filtering policy is continually reviewed.
- The school has a clear procedure for reporting breaches of filtering technician
- All members of the school community (all staff and all pupils) are aware of this procedure.
- If staff or pupils discover unsuitable sites, the URL will be reported to the School e-Safety Coordinator / ICT co-ordinator or ICT technician who will then record the incident and escalate the concern as appropriate.
- A request to unblock a site can be made to RM.
- Any material that the school believes is illegal will be reported to RM who will appropriate agencies.

- The school's access strategy is designed by RM to suit the age and curriculum requirements of the pupils.

### 1.3.8 How emerging technologies are managed.

#### **At Fiddlers Lane:**

- Emerging technologies are examined for educational benefit and a risk assessment will be carried out before use in school is allowed.
- Pupils will be instructed about safe and appropriate use of personal devices both on and off site in accordance with the school Acceptable Use Policy.
- Pupils are not permitted to use mobile phones at school.

### 1.3.9 How personal data is protected?

The quantity and variety of data held on pupils, families and on staff is expanding quickly. While this data can be very useful in improving services, data could be mishandled, stolen or misused.

The Data Protection Act 1998 ("the Act") gives individuals the right to know what information is held about them and provides a framework to ensure that personal information is handled properly. It promotes openness in the use of personal information.

Under the Act every organisation that processes personal information (personal data) must notify the Information Commissioner's Office, unless they are exempt. The Data Protection Act 2018 (DPA 2018) applies to anyone who handles or has access to information concerning individuals. Everyone in the workplace has a legal duty to protect the privacy of information relating to individuals. The Act sets standards (eight data protection principles), which must be satisfied when processing personal data (information that will identify a living individual). The Act also gives rights to the people the information is about i.e. subject access rights let individuals find out what information is held about them. The eight principles are that personal data must be:

- Processed fairly and lawfully
- Processed for specified purposes
- Adequate, relevant and not excessive
- Accurate and up-to-date
- Held no longer than is necessary
- Processed in line with individual's rights
- Kept secure
- Transferred only to other countries with suitable security measures.

#### **At Fiddlers Lane:**

- Personal data will be recorded, processed, transferred and made available according to the Data Protection Act 2018 (DPA 2018) as set out in the [Data Protection Bill](#).

## 1.4 Policy Decisions

### 1.4.1 Internet access.

#### **At Fiddlers Lane:**

- All staff read and sign the School Acceptable Use Policy
- All staff and pupils with accounts have internet access.

- Parents are asked to read the School Acceptable Use Policy for pupil access and discuss it with their child, where appropriate.
- E-safety policy is discussed with new staff and volunteers as part of their induction.

## 1.4.2 How risks are assessed.

### **At Fiddlers Lane:**

- The school will take all reasonable precautions to ensure that users access only appropriate material. However, due to the global and connected nature of Internet content, it is not possible to guarantee that access to unsuitable material will never occur via a school computer. Neither the school nor Salford LA can accept liability for the material accessed, or any consequences resulting from Internet use.
- The school will audit ICT use to establish if the e–Safety policy is adequate and that the implementation of the e–Safety policy is appropriate.
- The use of computer systems without permission or for inappropriate purposes could constitute a criminal offence under the Computer Misuse Act 1990 and breaches will be reported to the Police.
- Methods to identify, assess and minimise risks will be reviewed regularly.

## 1.4.3 How school responds to any incidents of concern.

### **At Fiddlers Lane:**

- All members of the school community are informed about the procedure for reporting e-Safety concerns (such as breaches of filtering, cyberbullying, illegal content etc).
- The e-Safety Coordinator will record all reported incidents and actions taken in the behaviour log and other in any relevant areas e.g. Bullying or Child protection log.
- The Designated Child Protection Coordinator will be informed of any e-Safety incidents involving Child Protection concerns, which will then be escalated appropriately.
- Staff will manage e-Safety incidents in accordance with the school discipline/behaviour policy where appropriate.
- Staff will inform parents/carers of any incidents of concerns as and when required.
- After any investigations are completed, staff will debrief, identify lessons learnt and implement any changes required.
- Where there is cause for concern or fear that illegal activity has taken place or is taking place then the school will contact the Children’s Safeguard Team or e-Safety officer and escalate the concern to the Police
- If the school is unsure how to proceed with any incidents of concern, then the incident may be escalated to the Area Children’s Officer or the LA e-Safety Officer.
- If an incident of concern needs to be passed beyond the school then the concern will be escalated to the e-Safety officer to communicate to other schools in Salford.

## 1.4.4 How e–Safety complaints are handled.

- Complaints about Internet misuse will be dealt with under the School’s complaints procedure.

- Any complaint about staff misuse will be referred to the headteacher.
- All e-Safety complaints and incidents will be recorded by the school, including any actions taken.
- Pupils and parents are informed of the complaints procedure.
- Parents and pupils work in partnership with the staff to resolve issues.
- All members of the school community are made aware of the importance of confidentiality and the need to follow the official school procedures for reporting concerns.

#### 1.4.5 How the Internet used across the community.

- The school will be sensitive to Internet-related issues experienced by pupils out of school, e.g. social networking sites, and offer appropriate advice.
- The school will provide appropriate levels of supervision for students who use the internet and technology whilst on the school site.

#### 1.4.6 How Cyber bullying is managed?

Cyberbullying can be defined as “The use of Information Communication Technology, particularly mobile phones and the internet to deliberately hurt or upset someone” DCSF 2007

##### **At Fiddlers Lane:**

- Cyberbullying (along with all other forms of bullying) of any member of the school community will not be tolerated. Full details are set out in the school’s policy on anti-bullying and behaviour.
- There are clear procedures in place to support anyone in the school community affected by cyberbullying.
- All incidents of cyberbullying reported to the school will be recorded.
- There will be clear procedures in place to investigate incidents or allegations of Cyberbullying.
- Pupils, staff and parents/carers will be advised to keep a record of the bullying as evidence.
- The school will take steps to identify the bully, where possible and appropriate. This may include examining school system logs, identifying and interviewing possible witnesses, and contacting the service provider and the police, if necessary.
- Pupils, staff and parents/carers will be required to work with the school to support the approach to cyberbullying and the school’s e-Safety ethos.

#### 1.4.7 How the Learning Platform is managed.

##### **At Fiddlers Lane:**

- The School learning platform is accessed through RM Unify
- RM managed service monitor the usage of the RM Unify by pupils and staff in all areas, in particular message and communication tools and publishing facilities.
- Pupils/staff are advised about acceptable conduct and use when using the RM Unify.
- Only members of the current pupil, parent/carers and staff community will have access to the RM Unify.
- All users will be mindful of copyright issues and will only upload appropriate content onto the RM Unify.
- When staff, pupils etc leave the school their account or rights to specific school areas will be disabled or transferred to their new establishment.

## 1.4.8 How mobile phones and personal devices be managed.

### At Fiddlers Lane:

- Pupils are not permitted to use mobile phones in school.
- If a pupil breaches the school policy then the phone or device will be confiscated and will be held in a secure place in the school office. Mobile phones and devices will be released to parents/carers in accordance with the school policy.
- Pupils at KS2 will be taught e-safety lessons concerning use and safety regarding mobile phones.

### Staff Use of Personal Devices

- Staff are not permitted to use their own personal phones or devices for contacting children, young people and their families within or outside of the setting in a professional capacity.
- Staff should not use personal devices such as mobile phones or cameras to take photos or videos of pupils and will only use work-provided equipment for this purpose.
- If a member of staff breaches the school policy then disciplinary action may be taken.
- See mobile phone and camera policy for more detail.

## 1.5 Communication Policy

### 1.5.1 How the policy is introduced to pupils.

#### At Fiddlers Lane:

Useful e-Safety programmes include:

- Think U Know: [www.thinkuknow.co.uk](http://www.thinkuknow.co.uk)
  - Childnet: [www.childnet.com](http://www.childnet.com)
  - Kidsmart: [www.kidsmart.org.uk](http://www.kidsmart.org.uk)
  - Orange Education: [www.orange.co.uk/education](http://www.orange.co.uk/education)
  - Safe: [www.safesocialnetworking.org](http://www.safesocialnetworking.org)
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- All users will be informed that network and Internet use will be monitored.
  - An e-Safety training programme will be established across the school to raise the awareness and importance of safe and responsible internet use amongst pupils.
  - Pupil instruction regarding responsible and safe use will precede Internet access.
  - An e-Safety module will be included in the PSHE, Citizenship and/or computing programmes covering both safe school and home use.
  - e-Safety training will be part of the transition programme across the Key Stages and when moving between establishments.
  - e-Safety rules or copies of the student Acceptable Use Policy will be accessible to all members of the school community.
  - Safe and responsible use of the Internet and technology will be reinforced across the curriculum and subject areas, and through display.
  - Particular attention to e-Safety education will be given where pupils are considered to be vulnerable.

### 1.5.2 How is the policy be discussed with staff?

### At Fiddlers Lane:

- The e–Safety Policy is formally provided to and discussed with all members of staff.
- To protect all staff and pupils, the school will implement Acceptable Use Policies.
- Staff will be made aware that Internet traffic can be monitored and traced to the individual user. Discretion and professional conduct is essential.
- Up-to-date and appropriate staff training in safe and responsible Internet use, both professionally and personally, will be provided for all members of staff.
- Staff who manage filtering systems and monitor ICT have clear procedures for reporting issues.
- The School will highlight useful online tools which staff should use with children in the classroom. These tools will vary according to the age and ability of the pupils.
- All members of staff will be made aware that their online conduct out of school could have an impact on their role and reputation within school. Civil, legal or disciplinary action could be taken if they are found to bring the profession or institution into disrepute, or if something is felt to have undermined confidence in their professional abilities.

### 1.5.3 How is parents’ support be enlisted?

#### At Fiddlers Lane:

- Parents’ attention will be drawn to the school e–Safety Policy in newsletters, the school prospectus and on the school website.
- A partnership approach to e-Safety at home and at school with parents will be encouraged.
- Parents are requested to sign an e–Safety/Internet agreement as part of the Home School Agreement.
- Parents are encouraged to read the school Acceptable Use Policy for pupils and discuss it’s implications with their children.
- Information and guidance for parents on e–Safety will be made available to parents in a variety of formats.
- Advice on useful resources and websites, filtering systems and educational and leisure activities which include responsible use of the Internet will be made available to parents.
- Interested parents will be referred to organisations listed in the “e–Safety Contacts and References section”.

## Monitoring

This policy and its impact will be monitored by the governing body, and will be reviewed every 3 years unless there is a change in statutory guidance.

## Schools e-Safety Audit

This self-audit is completed by the member of the Senior Leadership Team (SLT) responsible for e-safety policy. Staff that contribute to the audit include: Designated Child Protection Coordinator, SENCO, e-Safety Coordinator, Network Manager and Head Teacher.

Has the school an e-Safety Policy that complies with guidance?	Y/N
Date of latest update:	
Date of future review:	
The school e-safety policy was agreed by governors on:	
The policy is available for staff to access on: Staff shared drive	

The policy is available for parents/carers to access at: Fiddlers Lane Web site	
The responsible member of the Senior Leadership Team is: Ms S Cooper	
The governor responsible for e-Safety is:	
The Designated Child Protection Coordinator is: Ms B Cohen Mrs G O'Neill	
The e-Safety Coordinator is: Ms S Cooper	
Were all stakeholders (e.g. pupils, staff and parents/carers) consulted with when updating the school e-Safety Policy?	Y/N
Has up-to-date e-safety training been provided for all members of staff? (not just teaching staff)	Y/N
Do all members of staff sign an Acceptable Use Policy on appointment?	Y/N
Are all staff made aware of the schools expectation around safe and professional online behaviour?	Y/N
Is there a clear procedure for staff, pupils and parents/carer to follow when responding to or reporting an e-Safety incident of concern?	Y/N
Have e-safety materials from CEOP, Childnet and UKCCIS etc. been obtained?	Y/N
Is e-Safety training provided for all pupils (appropriate to age and ability and across all Key Stages and curriculum areas)?	Y/N
Are e-safety rules displayed in all rooms where computers are used and expressed in a form that is accessible to all pupils?	Y/N
Do parents/carers or pupils sign an Acceptable Use Policy?	Y/N
Are staff, pupils, parents/carers and visitors aware that network and Internet use is closely monitored and individual usage can be traced?	Y/N
Has an ICT security audit been initiated by SLT?	Y/N
Is personal data collected, stored and used according to the principles of the Data Protection Act?	Y/N
Is Internet access provided by an approved educational Internet service provider which complies with DfE requirements (e.g. KPSN)?	Y/N
Has the school filtering been designed to reflect educational objectives and been approved by SLT?	Y/N
Are members of staff with responsibility for managing filtering, network access and monitoring systems adequately supervised by a member of SLT?	Y/N
Does the school log and record all e-Safety incidents, including any action taken?	Y/N
Are the Governing Body and SLT monitoring and evaluating the school e-Safety policy and ethos on a regular basis?	Y/N

## e-Safety Contacts and References

**CEOP** (Child Exploitation and Online Protection Centre): [www.ceop.police.uk](http://www.ceop.police.uk)

**Childline:** [www.childline.org.uk](http://www.childline.org.uk)

**Childnet:** [www.childnet.com](http://www.childnet.com)

**Click Clever Click Safe Campaign:** <http://clickcleverclicksafe.direct.gov.uk>

**Cybermentors:** [www.cybermentors.org.uk](http://www.cybermentors.org.uk)

**Digizen:** [www.digizen.org.uk](http://www.digizen.org.uk)

**EiS** - ICT Support for Schools and ICT Security Advice: [www.eiskent.co.uk](http://www.eiskent.co.uk)

**Internet Watch Foundation** (IWF): [www.iwf.org.uk](http://www.iwf.org.uk)

**Kidsmart**: [www.kidsmart.org.uk](http://www.kidsmart.org.uk)

**RM service desk**: School number is 1709

Telephone 0845 0745724

Email [SalfordPrimary@RM.com](mailto:SalfordPrimary@RM.com)

Support website [www.RMeducation.com/support](http://www.RMeducation.com/support)

**Schools e–Safety Blog**: [www.kenttrustweb.org.uk?esafetyblog](http://www.kenttrustweb.org.uk?esafetyblog)

**Teach Today**: <http://en.teachtoday.eu>

**Think U Know website**: [www.thinkuknow.co.uk](http://www.thinkuknow.co.uk)

**Virtual Global Taskforce** — Report Abuse: [www.virtualglobaltaskforce.com](http://www.virtualglobaltaskforce.com)

The School e-Safety Coordinator is ...Ms S Cooper

Policy approved by Head Teacher: ..... Date: .....

The date for the next policy review is June 2019