IT Security and Acceptable Use Policy

Earl Sterndale CE Primary School

Version 1

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Reviewed By	**FGB – Min. No. 18**
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This document will be reviewed annually and sooner when significant changes are made to the law.

Guidance from the Department for Education about school policies can be found here: https://www.gov.uk/government/publications/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts

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7.1 Introduction

- The school's IT (Information Technology) infrastructure and digital resources are essential to the effective delivery of education and other activities, but they also present risks to data protection, online safety and safeguarding. We are committed to using IT facilities in a way that meets legal requirements and upholds confidentiality and peoples' privacy rights.
- This policy supports business continuity, data protection and cyber security, and explains how we use technology in line with the General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018), the Departments for Educational Digital and Technology standards in schools and colleges and other relevant legislation.

7.2 Scope and Responsibilities

This policy applies to:

- The use of school-provided (or provided for the school's use) IT hardware, software, devices, digital content, networks and communications.
- Non-school owned devices which are used for accessing school Internet or information systems or used in a way which impacts on the school or school community.
- All those who access school systems including pupils, staff, visitors, governors. These are all referred to as "Users" throughout this policy.

All Users are responsible for reading, understanding and complying with this procedure if they have access to IT. Whilst this policy applies to all Users, the school understands that pupils will need additional support to understand how to use IT systems safely and securely.

7.3 IT Acceptable Use Standards

All Users must:

1. Protect school IT resources by careful and considerate use of equipment and networks, reporting faults and minimising the risk of introducing computer viruses or similar to the system.
2. Protect individuals from harmful or inappropriate material accessible via the Internet or electronic media.
3. Protect the confidentiality of individuals and of school matters and safeguard Users by complying with relevant legislation, including:
    - Data Protection Act 2018 and General Data Protection Regulation
    - Privacy and Electronic Communications Regulations
    - Copyright, Designs and Patent Act 1988
    - Computer Misuse Act 1990

- Counter-Terrorism and Security Act 2015 (encompassing the “Prevent Duty”)
- The Regulation of Investigatory Powers Act (RIPA) 2000
- Waste Electrical and Electronic Equipment Regulations 2006, the Environmental Protection Act 1990, the Waste Management Regulations 2006.
- The Department for Education
    - Cyber security standards for schools and colleges
    - Broadband internet standards for schools and colleges
    - Switch standards for schools and colleges
    - Network cabling standards for schools and colleges
    - Wireless network standards for schools and colleges

Users should understand and adhere to their signed Acceptable Use Agreement.

7.4 Roles and Responsibilities

Everyone who works for Earl Sterndale CE Primary School has a responsibility to ensure that data is collected, accessed, stored and handled appropriately and lawfully. Every user must ensure that they adhere to this policy in order to meet the legal obligations of the school and their individual obligations.

The school’s Board of Governors, whilst ultimately responsible for ensuring the school meets its legal obligations, is assisted directly by the senior leadership team.

Breaches of this policy should be reported to the Headteacher in the first instance.

7.5 Principles of Use

For the purpose of this policy, the use of the internet will include associated internet-enabled technologies such as cloud-based systems (MS 365, Integris MIS, Safeguarding, Remote learning platforms), emails, video calls, video messaging, instant messaging, webinar applications or conferencing applications.

- Internet and email use is integral to the effective delivery of services provided by the school. Nothing in this policy should be read as restricting the proper use of email, Internet or associated technologies for school purposes.
- Limited personal use of the school’s Internet is permitted subject to these principles and guidance notes.
- Personal use of the Internet is only permitted in your own time (e.g. before or after work and during your lunchtime) and limited to browser-based activities.
    - Any personal use must not, in any way, distract staff from the effective performance of their duties. Improper or inappropriate personal use of the school's email, Internet and associated systems may result in disciplinary action.

- Users are not allowed use of the school's email system for personal communication.
- If you feel you may have accidentally breached this policy, you should contact your line manager immediately, or, in their absence, a more senior manager who will address the situation. See Unacceptable Use – Section 5.
- The school reserves the right to maintain and review usage logs of the school IT services including the internet and associated internet-enabled technologies including emails, video calls, video messaging, instant messaging, webinar applications or conferencing applications and email use. Auditing and monitoring of the use of school IT services may form part of disciplinary procedures.
- The school has in place a process to block categories of internet sites and individual sites if it is deemed appropriate. Users must not attempt to bypass security measures or processes.
- Any personal information sent via email, the Internet and associated internet-enabled services is covered by Data Protection legislation. All staff are required to handle personal information in accordance with the Data Protection Act 2018 and the UK GDPR.
- Emails, including conversations recorded using facilities such as video calls, instant messaging or conferencing applications, are covered by the Freedom of Information (FOI) Act and may be disclosed as part of an FOI request for information, or as part of any legal proceedings. Always exercise the same caution on email content, video calls, instant messaging or conferencing applications as you would in more formal correspondence.
- Whilst school security provides additional protection and real-time scanning, our security measures cannot guarantee that external communications do not contain malicious content or links. All staff with access to the IT network must take basic cyber security training annually in line with DfE Cyber Security Standards.
- Consent from all parties must be obtained before recording conversations when using facilities such as video calls, instant messaging or conferencing applications.
- The school reserves the right to withdraw Internet access or email use or any access to the School's computer or communications network, if the User is found to be in breach of this policy.
- Desktop and document sharing capabilities via facilities such as video calls or conferencing applications, must only be used with colleagues of the school for collaboration purposes. If you allow changes to be made to these documents during a desktop sharing session as the 'sharer' of the document, it is your responsibility to ensure that the documentation is used correctly and saved appropriately.

7.6 Email

7.6.1 Personal Use

Personal use of school email is not permitted. However, communication with a Trade Union is not considered personal use.

It is inappropriate to use your school address for personal use as it may give the impression that any business is on behalf of the school.

If a genuine emergency arises Users should inform their line manager at the earliest opportunity that they have responded to the email and managers will make a note of it. Users should inform the sender that personal use of the school's email system is not permitted and provide an alternative email address or an alternate method of communication.

7.6.2 Email Usage

Users are not permitted to send and receive school related information from personal email accounts. Users must only use school provided email systems. However, staff are permitted to forward emails to their Trade Union representative via their personal email account, for the purposes of seeking advice.

If Users receive an email that is inappropriate or abusive, they must report it to their line manager immediately, who will take the appropriate action. If the sender is known to the user, they should inform the sender to cease sending the material.

Users must not use anonymous mailing services to conceal their identity or falsify (spoof) emails to make them appear as if they have been sent from someone else.

All employees are required to maintain the good reputation of the school when using Internet and email. Users must not use the email system in any way that is unprofessional inappropriate or harmful.

Use of email and the Internet which brings the school into disrepute may result in disciplinary action.

7.6.3 Email Disclaimer

A disclaimer is automatically attached to all emails sent from the school system informing the recipient that the email is intended solely for them, is confidential, may be legally privileged and may contain personal views that are not those of the School.

7.6.4 Access to email

When an employee is absent, the employee's line manager can authorise access to a school email account to obtain messages that are work-related. The manager will inform the employee of this access on the employee's return.

The content of all emails may be viewed by the school in certain circumstances; for example, in connection with disciplinary investigations or audit reviews.

7.6.5 Email Security

Emails containing sensitive personal data, or otherwise sensitive information, must be sent securely. Any personal data sent externally by email must be sent with encryption enabled or via a password protected file with the password sent via alternative means e.g. telephone.

All senders must ensure the appropriate secure email method is chosen according to the circumstances of the destination of the email.

Senders of any controlled/restricted email must be extremely vigilant about verifying the recipient's email address to ensure sensitive data is not sent to the wrong individual/s, leading to a data breach.

Personal data sent to the incorrect recipient should be reported in line with school's Data Breach Procedure.

When emailing multiple recipients, the 'TO' box should be addressed to an address within the organisation (eg info@school.sch.uk) and the BCC option (blind copy) chosen to add multiple email addresses so addresses are not disclosed.

7.6.6 Email Retention

All electronic communications, whilst they are held by the school, are potentially disclosable under data protection legislation and anything within an email could be released in response to a Subject Access Request.

7.6.7 Out of Office

Email accounts should return an Out of Office message during school holidays. This will indicate whether or not emails will be monitored and when the school reopens. Similarly, during periods of extended staff absence an Out of Office message should refer senders to an alternative or general school email address.

7.7 Instant Messaging (IM)

Instant Messaging is a form of real time communication between two or more people based on typed text. The text is conveyed via devices connected over the Internet or an internal network/intranet. Messages are retained in your conversation history in your email folder list or are saved as emails in your inbox if the recipient does not respond immediately.

You must only use School-provided internet messaging (IM) services. IM should not be used as a substitute for email. IM should be used only for questions or announcements that are short and need to be communicated immediately.

Private use of instant messaging for any purpose is not permitted.

More information on the use of other social media can be found in the School's Social Media Policy.

7.8 Recording calls / meetings / online lessons / staff training

Recording calls, meetings, online lessons, etc will generate personal data including pupil images, names, contributions, and contact details and will be protected, processed and retained in the same way as all personal data, in line with the school's Data Protection Policies and Privacy Notices and in accordance with our other policies including Off Site Working and Bring Your Own Device policies, as well as our Retention Schedule. The school recognises that recording staff whilst at work may be considered to be privacy intrusive and therefore careful safeguards will be put in place should recording be deemed necessary. In particular, the school must ensure that the Data Protection principles as set out in the Data Protection Policy ("Our DP rules") are adhered to.
We will never record calls, meetings, online lessons or staff training in a covert manner.

Recordings in these circumstances will be carried out in line with our HR policies. (Ensure you refer to the Recording Guidance Note when setting up a recorded meeting)

7.8.1 Recording telephone calls

We do not record incoming and outgoing telephone calls.

7.8.2 Recording meetings

We do not record meetings.

7.8.3 Recording online lessons

We do not record online lessons.

7.8.4 Recording staff training

We do not record staff training.

7.9 Internet Use

7.9.1 Personal Use

Personal use of the Internet is not allowed during working hours. You can use the Internet, for browser-based activities only, before you start work, during your lunchtime, or after work. You must not, in any way, distract others from their work.

You must not use the School's Internet or email systems for trading or personal business purposes.

You are advised not to conduct online payments. This is due to the information being stored locally on your computer, which potentially could be compromised, putting the user at financial risk. If you use the Internet to buy goods or services, the school will not accept liability for default of payment or for security of any personal information you provide. Goods must not be delivered to a school address.

All Internet browsing sessions should be terminated as soon as they are concluded.

7.9.2 Filtering Content

Many Internet sites that contain unacceptable content are blocked automatically by the school's systems. However, it is not possible to block all "unacceptable" sites electronically in all circumstances.

Attempting to bypass or disabling filtering, proxy or security settings is strictly forbidden without written authorisation from the Headteacher.

Where it is necessary to disable services temporarily, the business need for the action will be documented and the risks assessed. Approval from the Headteacher must be sought and services must be re-enabled / any open ports closed, as soon as possible.

Filtering requirements form part of the Prevent Duty, as enacted in the Counter-Terrorism and Security Act 2015.

7.9.3 Downloading Material

Users must not download-video, music files, games, software files and other computer programs. These types of files consume large quantities of storage space on the system (and can slow it down considerably) and may violate copyright laws.

Streaming media, such as radio or TV programmes, for non-work related purposes is not permitted.

If you are in doubt about software use or installation, seek guidance from the Data Protection Officer.

7.9.4 Accidental Access to Inappropriate Material

You may receive an email or mistakenly visit an Internet site that contains unacceptable material. If this occurs, you must inform the Headteacher immediately.

The Headteacher will ask you for details of the incident including how the event occurred. This information may be required later for management and audit purposes.

7.9.5 Copyright

Most sites contain a copyright notice detailing how material may be used.

If you are in any doubt about downloading and using material for official purposes, you should seek legal advice to ensure compliance with the Copyright, Designs and Patents Act 1988

You may be in violation of copyright laws if you simply cut and paste material from one source to another. All sources used for research purposes should be referenced appropriately and credited.

7.9.6 Unacceptable Use

You must not deliberately view, copy, create, download, save, print or distribute any material that:

- is sexually explicit or obscene
- is racist, sexist, homophobic, harassing or in any other way discriminatory or offensive
- contains material the possession of which would constitute a criminal offence
- promotes any form of criminal activity
- contains unwelcome propositions
- involves gambling, multi-player games or soliciting for personal gain or profit
- contains images, cartoons or jokes that may cause offence
- appears to be a chain letter
- brings the school into disrepute or exposes it to legal action

This list is not exhaustive and the school may define other areas of unacceptable use.

Unacceptable use may be reported to the police if likely to constitute a breach of the Computer Misuse Act 1990.

7.10 Monitoring

The school is able to produce monitoring information, which may include email usage statistics, frequent email contacts, file sizes and may lead to making further enquiries.

The school is also able to record the details of all Internet traffic to protect the School and its employees from security breaches, including hacking, and to ensure that "unacceptable" sites are not being visited.

Any potential infringement will be referred to Senior Leaders as part of routine reviews.

The school may read and inspect individual emails and attachments for specific business purposes or during disciplinary investigations including:

- Establishing the content of transactions,
- Ensuring employees are complying both with the law and with the school's email policy, and
- Checking emails when employees are on leave, absent or for other supervisory purposes.

The school's email system records details of all emails sent and received. The system filters the use of certain prohibited words and may limit file sizes.

Monitoring logs may include:

- The network identifier (username) of the user
- The address of the Internet site being accessed
- Where access was attempted and blocked by the system
- The web page visited and its content
- The name of any file accessed and/or downloaded
- The identity of the computer on the network and the date and time

Any excessive or inappropriate use may result in disciplinary action being taken.

Interception of communications must be carried out in compliance with the Investigatory Powers Act 2016.

7.11 Passwords

Access to applications and information is controlled to protect Users and the school.

Passwords must be strong and safe enough to keep data secure. In line with the DfE Cyber Standards a password should be 12 characters.

'Strong passwords' include a combination of upper and lower case letters, numbers and special characters like asterisks or currency symbols.

Passwords must not be written down or shared. Passwords must be difficult for others to guess; don't choose a password based on any personal data such as your name, age, or your address.

Multi-factor authentication must be enabled in School in line with the DFE Cyber Security Standards for school and colleges.

Advice on choosing a secure password is available from the NCSC.

7.12 Loaned IT Equipment

Devices issued to staff remain the property of the school and is provided to Users on a loaned basis. The device must not be used by anyone other than the authorised user to whom it has been allocated.

Any device property identification must not be altered or removed for any reason.

Users who borrow equipment from the school must sign for it and bear the responsibility for its care.

All reasonable care should be taken to prevent loss, damage, theft or unauthorised use of IT equipment. Devices should never be left in a vehicle or other unsecured, vulnerable situation. See the Offsite Working Procedure for more guidance.

Any loss or damage to equipment on loan should be immediately reported to the Headteacher in the first instance and any theft or criminal damage should be reported to the Police.

Where there is evidence that the equipment has not been used in accordance with policy, a charge may be made for the replacement or repair of any school equipment whilst on loan.

7.13 Bring Your Own Device (BYOD)

To prevent data loss and ensure consistent application of School policies, no personally owned equipment should be attached to the school's network without the permission of the Headteacher.

Please refer to the separate the Bring Your Own Device (BYOD) Policy

7.14 Software, Updates and Patching

School devices have a predetermined list of software installed on the hard drive.

Users should use software in accordance with applicable licence agreements. It is a criminal offence to copy software or any supporting documentation protected by copyright.

The use, or possession of unlicensed copies or "pirated" versions of software is illegal and is expressly prohibited by the school.

No addition or deletion of any software or hardware (except peripherals) is permitted without the express permission of the Headteacher. This includes the setting up of web-based accounts.

Software and web-based accounts that use personal data may be subject to a Data Protection Impact Assessment and so must not be installed or set up until this has been carried out.

To ensure that security patches and virus definitions are up to date staff must connect devices to the school network on a regular basis. Updates must be allowed to run and should not be interrupted.

Staff should make careful, considerate use of the school's IT resources, report faults and work in a way that minimises the risk of introducing computer viruses into the system.

7.15 Network Access and Data Security

7.15.1 Users' Authorisation

Those accessing information systems, data or services will be authorised to do so by an appropriate authority, usually their line manager.

Changes to access must be requested and authorised. Users who believe they have access to systems they no longer need, must report this to their line manager.

Users must only access information held on the school's computer systems if authorised to do so and the information is needed to carry out their work.

Line managers will only request the minimum access required for the user to carry out their work.

A record of user access to systems will be maintained and periodically reviewed.

7.15.2 Starters, Movers and Leavers (Account Creation, Approval and Removal process)

School must ensure that access to IT Systems is only available to employees during their period of employment and withdrawn as soon as employment is terminated.

The same principles apply to pupils joining and leaving the school.

A new starter, mover and leaver process must be in place in school which may include external suppliers, a record of this should detail:

1. The names of the systems Users have been given access to
2. The date the access was enabled
3. The level of access (role)
4. The name of the authoriser

This process should also include changed access due to promotion, secondment, or demotion.

When a contract of employment at the school ends, the member of staff must return all equipment, including peripherals, to the school in full working condition.

It is the responsibility of the user to backup any data or documents they may require, prior to returning the device. Any data pertaining directly to the school or members of the school community **must not** be retained.

Retaining any personal data without the authorisation of the school is an offence under the Data Protection Act 2018.

The user account and all personal work stored on the laptop will be securely deleted upon return.

7.15.3 External Support Access

Staff providing temporary guest logins for external support services providers must ensure that system access does not extend beyond the requirements for the provision of services.

Those requesting/providing temporary access must also ensure that system access is withdrawn as soon as the affiliate's relationship with the school ceases.

7.15.4 Confidentiality

Under no circumstances should personal or other confidential information held on the school network or IT equipment be disclosed to unauthorised persons. If you accidentally access information which you are not entitled to view report this immediately to the Headteacher as a data breach.

Staff must ensure that confidential or sensitive data is not accessible to unauthorised persons by logging off or locking the computer when it is left unattended.

In classrooms, screens must be set to **extend** to the Interactive whiteboard rather than **duplicate** and when using screen sharing facilities, Users should fully close or minimise screens with any sensitive data / emails.

7.15.5 Security of Portable Devices

The school allows the use of USBs / removable storage devices.

Sensitive or confidential information should be accessed via the network and should not be permanently stored on portable devices e.g. memory sticks / laptops / tablets.

Where the use of a memory stick to transfer or store data temporarily is unavoidable, this must be done using an encrypted memory stick provided by the school.

All school devices used to store personal information will be fully encrypted.

7.15.6 Physical Security

Building access and physical controls protect areas where sensitive or confidential information is processed. Server access and access to network equipment, telecoms and network access points is restricted to those staff with authorisation.

7.15.7 Administrative Access

- Administrative accounts and credentials must use strong authentication / complex passwords. Current guidance on the authentication and security measures that should be put into place for network devices, filtering and monitoring services and administrative accounts can be found in the DfE Cyber Security Standards.
- Administrative accounts must not be used for general activities, especially those of high-risk, such as browsing the internet or emailing.
- Administrative access is only provided to designated staff and a review of administrators for each system will be carried out termly, including administrative accounts that have not been used for a prolonged period of time, in line with the DfE Cyber Security Standards.

7.16 Disposal of Computing Resources

Computing resources will be disposed of in line with WEEE regulations, The Hazardous Waste Act, The Environmental Protection Act 1990, The Environment Act 1995 and The Data Protection Act 2018

1. Governor approval will be sought before Computing resources are disposed.
2. Following Governor approval, all equipment which contains sensitive files will have their hard disk drives wiped and all sensitive or confidential data and licensed software will be irretrievably deleted during the disposal process.
3. Damaged devices containing sensitive or confidential data will undergo assessment to determine if the device should be destroyed, repaired or discarded.
4. If a third party contractor is used, suppliers will be suitably accredited and disposal certification will be obtained.
5. Finally, the school's inventory will be updated.

7.17 Backup Procedures

If software/hardware problems arise, a device may need to be restored to its original settings. Work files may be lost during the restore process, therefore it is the responsibility of all Users to ensure that files are saved to network drives or cloud-based networks.

Removable storage, such as encrypted USBs are not backed up by the routine backup process and Users take responsibility for carrying out a manual backup process.

The school ensures that systematic backup of data is completed on a regular basis so that recovery of essential data can be managed in the event of loss of data files or system failure.

School Process	**On-site / off-site**	**Frequency** (daily/weekly/monthly)
Main File Server	Cloud-based	Daily
School MIS	Cloud-based	Daily
Email Server	Cloud-based	Daily
Curriculum Files	Cloud-based	Daily
Administration Files	Cloud-based	Daily
Website	Cloud-based	Daily

There should be at least three backup copies of important data, on at least two separate devices one of which must be off site. Backup copies will be securely stored against theft, corruption or physical damage, so that in the event of a major incident a backup copy is available.

The backup is cloud based and protected in the event of an incident.

7.18 Disaster Recovery Procedures

In the case of a disaster staff should refer to the Disaster Recovery Plan. The plan should include the following as per the DfE Cyber Security Standards:

- staff responsibilities
- out of hours contacts and procedures
- internal and external reporting and communications plans
- priorities for service restoration
- the minimum operational IT requirements
- where you can find additional help and resources

Hard copies of key information should be kept in case of total system failure, and the plans should be regularly tested and reviewed.

The school should ensure all items are appropriately insured.

7.19 Breaches of Policy

Breaches of this policy and/or security incidents can be defined as events which could have, or have resulted in, loss or damage to School assets, or an event which is in breach of the school's security procedures and policies.

All School employees, supply staff, governors, contractors, and volunteers have a responsibility to report security incidents and breaches of this policy as quickly as possible through the school's Incident Reporting Procedure. This obligation also extends to any external organisation contracted to support or access the Information Systems of the School

The school will take appropriate measures to remedy any breach of the policy and its associated procedures and guidelines through the relevant frameworks in place.

Suspected misuse of the school's computer systems by a member of staff will be considered by the Headteacher/Governors. In the case of an individual then the matter may be dealt with under the disciplinary process.

