

# DATA ACCEPTABLE USE POLICY

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## 1. Introduction and aims

Information and communications technology (ICT) is an integral part of the way our school works, and is a critical resource for Students, staff (including the senior leadership team), governors, volunteers, visitors and Reintegration Centres (Primary School – delete RIC). It supports teaching and learning, and the pastoral and operational functions of the school.

However, the ICT resources and facilities our school uses could also pose risks to data protection, online safety and safeguarding.

This policy aims to:

- Set guidelines and rules on the use of school ICT resources for staff, Students, parents, and governors.
- Establish clear expectations for the way all members of the school community engage with each other online
- Support the school's policies on data protection, online safety and safeguarding
- Prevent disruption that could occur to the school through the misuse, or attempted misuse, of ICT systems

- Support the school in teaching Students safe and effective internet and ICT use.

This policy covers all users of our school's ICT facilities, including governors, staff, Students, volunteers, contractors, and visitors.

Breaches of this policy may be dealt with under our disciplinary policy (with reference to the staff code of conduct) and behaviour policy.

## 2. Relevant legislation and guidance

This policy refers to, and complies with, the following legislation and guidance:

- [Data Protection Act 2018](#)
- The UK General Data Protection Regulation (UK GDPR) – the EU GDPR was incorporated into UK legislation, with some amendments, by [The Data Protection, Privacy and Electronic Communications \(Amendments etc\) \(EU Exit\) Regulations 2020](#)
- [Computer Misuse Act 1990](#)
- [Human Rights Act 1998](#)
- [The Telecommunications \(Lawful Business Practice\) \(Interception of Communications\) Regulations 2000](#)
- [Education Act 2011](#)
- [Freedom of Information Act 2000](#)
- [Education and Inspections Act 2006](#)
- [Keeping children safe in education 2023 \(publishing.service.gov.uk\)](#)
- [Searching, screening and confiscation: advice for schools 2022](#)
- [National Cyber Security Centre \(NCSC\): Cyber Security for Schools](#)
- [Education and Training \(Welfare of Children\) Act 2021](#)
- UKCIS guidance on [sharing nudes and semi-nudes: advice for education settings working with children and young people](#)
- [Meeting digital and technology standards in schools and colleges](#)

## 3. Definitions

- **ICT facilities:** all facilities, systems and services including but not limited to network infrastructure, desktop computers, laptops, tablets, phones, music players or hardware, software, websites, web applications or services, and any device system or service which may become available in the future which is provided as part of the school's ICT service
- **Users:** anyone authorised by the school to use the school's ICT facilities, including governors, staff, Students, volunteers, contractors and visitors
- **Personal use:** any use or activity not directly related to the users' employment, study or purpose agreed by an authorised user
- **Authorised personnel:** employees authorised by the school to perform systems administration and/or monitoring of the ICT facilities

- **Materials:** files and data created using the school's ICT facilities including but not limited to documents, photos, audio, video, printed output, web pages, social networking sites and blogs

See appendix 6 for a glossary of cyber security terminology.

## 4. Unacceptable use

The following is considered unacceptable use of the school's ICT facilities. Any breach of this policy may result in disciplinary or behaviour proceedings (see section 4.2 below).

Unacceptable use of the school's ICT facilities includes:

- Using the school's ICT facilities to breach intellectual property rights or copyright
- Using the school's ICT facilities to bully or harass someone else, or to promote unlawful discrimination
- Breaching the school's policies or procedures
- Any illegal conduct, or statements which are deemed to be advocating illegal activity
- Online gambling, inappropriate advertising, phishing and/or financial scams
- Accessing, creating, storing, linking to or sending material that is pornographic, offensive, obscene or otherwise inappropriate or harmful
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos and/or livestreams
- Activity which defames or disparages the school, or risks bringing the school into disrepute
- Sharing confidential information about the school, its Students, or other members of the school community
- Connecting any device to the school's ICT network without approval from authorised personnel
- Setting up any software, applications or web services on the school's network without approval by authorised personnel, or creating or using any programme, tool or item of software designed to interfere with the functioning of the school's ICT facilities, accounts or data
- Gaining, or attempting to gain, access to restricted areas of the network, or to any password-protected information, without approval from authorised personnel
- Allowing, encouraging or enabling others to gain (or attempt to gain) unauthorised access to the school's ICT facilities
- Causing intentional damage to the school's ICT facilities
- Removing, deleting or disposing of the school's ICT equipment, systems, programmes or information without permission from authorised personnel
- Causing a data breach by accessing, modifying, or sharing data (including personal data) to which a user is not permitted by authorised personnel to have access, or without authorisation
- Using inappropriate or offensive language
- Promoting a private business, unless that business is directly related to the school
- Using websites or mechanisms to bypass the school's filtering or monitoring mechanisms

- Engaging in content or conduct that is radicalised, extremist, racist, antisemitic or discriminatory in any other way
- Storing of data on a personal cloud (Dropbox, Google Drive, etc) without an exception being granted in 4.1
- Writing or storing of data to unencrypted memory sticks.
- Using AI tools and generative Large Language Model (such as ChatGPT and Google Bard), with the exception of staff using Chat AI modules, providing they are not uploading personal information and are verifying the information the AI is providing :
  - During assessments, including internal and external assessments, and coursework
  - To write their homework or class assignments, where AI-generated text or imagery is presented as their own work

This is not an exhaustive list. The school reserves the right to amend this list at any time. The Headteacher or Data Protection Officer will use their professional judgement to determine whether any act or behaviour not on the list above is considered unacceptable use of the school's ICT facilities.

## 4.1 Exceptions from unacceptable use

Where the use of school ICT facilities (on the school premises and/or remotely) is required for a purpose that would otherwise be considered an unacceptable use, exemptions to the policy may be granted at the Headteacher's discretion.

Should this situation arise, staff members must seek approval from the Headteacher in advance of the school ICT facilities being used for this purpose.

- Students may use AI tools and generative chatbots:
  - As a research tool to help them find out about new topics and ideas
  - When specifically studying and discussing AI in schoolwork, for example in IT lessons or art homework about AI-generated images. All AI-generated content must be properly attributed

## 4.2 Sanctions

Students and staff who engage in any of the unacceptable activity listed above may face disciplinary action in line with the school's policies on behaviour, discipline or code of conduct. Copies of these policies can be found on the school website or school staff network.

Sanctions such as revoking permissions to the school's systems may be considered.

# 5. Staff (including governors, volunteers, and contractors)

## 5.1 Access to school ICT facilities and materials

The Academy's Network Manager and Trust ICT Manager (or contracted IT professionals) manages access to the school's ICT facilities and materials for school staff. That includes, but is not limited to:

- Computers, tablets, mobile phones and other devices
- Access permissions for certain programmes or files

Staff will be provided with unique login/account information and passwords that they must use when accessing the school's ICT facilities.

Staff who have access to files that they are not authorised to view or edit, or who need their access permissions updated or changed, should contact the Academy Network Manager, Trust ICT Manager or contracted IT professionals.

## **5.1.1 Use of phones and email**

The school provides each member of staff with an email address.

This email account should be used for work purposes only.

All work-related business should be conducted using the email address the school has provided.

Staff must not share their personal email addresses with parents and Students, and must not send any work-related materials using their personal email account.

Staff must take care with the content of all email messages, as incorrect or improper statements can give rise to claims for discrimination, harassment, defamation, breach of confidentiality or breach of contract.

Email messages are required to be disclosed in legal proceedings or in response to requests from individuals under the Data Protection Act 2018 in the same way as paper documents. Deletion from a user's inbox does not mean that an email cannot be recovered for the purposes of disclosure. All email messages should be treated as potentially retrievable.

Staff must take extra care when sending sensitive or confidential information by email outside of the organisation. Any attachments containing sensitive or confidential information should be encrypted so that the information is only accessible by the intended recipient.

If staff receive an email in error, the sender should be informed and the email deleted. If the email contains sensitive or confidential information, the user must not make use of that information or disclose that information.

If staff send an email in error that contains the personal information of another person, they must immediately add this as a breach to the GDPRiS system (or tracker on SharePoint for Primary Academies) and inform the Data Protection Lead within the Academy, along with the Network Manager/contracted IT professional, following our data breach procedure.

Staff must not give their personal phone number(s) to parents or Students. Staff must use phones provided by the school to conduct all work-related business wherever possible. In the case of Primary Academies, the prior agreement of the Headteacher and Trust IT Manager must be sought prior to use of a personal device and systems such as using 141 should be implemented in all cases.

School phones must not be used for personal matters.

Staff who are provided with mobile phones as equipment for their role must abide by the same rules for ICT acceptable use as set out in section 4.

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Many Academies can record incoming and outgoing phone conversations. If and when a call is being recorded, the caller(s) **must** be made aware that the conversation is being recorded and the reason for doing so

Explain when you record phone conversations and why. For instance:

- "All calls to the school office are recorded to aid administrators"
- "Calls are recorded for use in staff training"

All non-standard recordings of phone conversations must be **pre-approved** by the Academy Data Protection Lead/Trust Data Protection Officer and consent obtained from all parties involved.

The recording of a phone conversation may be considered for situations such as:

- Discussing a complaint raised by a parent/carer or member of the public
- Calling parents to discuss behaviour or sanctions
- Taking advice from relevant professionals regarding safeguarding, special educational needs (SEN) assessments, etc.
- Discussing requests for term-time holidays

But in all cases, consent must be obtained from all parties in advance of the call taking place.

## 5.2 Personal use

Staff are permitted to occasionally use school ICT facilities for personal use, subject to certain conditions set out below. This permission must not be overused or abused. The Headteacher may withdraw or restrict this permission at any time and at their discretion.

Personal use is permitted provided that such use:

- Does not take place during contact time/teaching time/non-break time
- Does not constitute 'unacceptable use', as defined in section 4
- Takes place when no Students are present
- Does not interfere with their jobs, or prevent other staff or Students from using the facilities for work or educational purposes.

Staff may not use the school's ICT facilities to store personal, non-work-related information or materials (such as music, videos or photos).

Staff should be aware that use of the school's ICT facilities for personal use may put personal communications within the scope of the school's ICT monitoring activities (see section 5.5). Where breaches of this policy are found, disciplinary action may be taken.

Staff are also permitted to use their personal devices (such as mobile phones or tablets) in line with the Online Safety Policy which includes mobile technology.

Staff should be aware that personal use of ICT (even when not using school ICT facilities) can impact on their employment by, for instance, putting personal details in the public domain, where students and parents could see them.

Staff should take care to follow the school's guidelines on use of social media (see appendix 1 and the Staff Code of Conduct) and use of email (see section 5.1.1) to protect themselves online and avoid compromising their professional integrity.

## 5.2.1 Personal social media accounts

Members of staff should make sure their use of social media, either for work or personal purposes, is appropriate at all times.

The school has guidelines for staff on appropriate security settings for Facebook accounts (see appendix 1).

## 5.3 Remote access

We allow staff to access the school's ICT facilities and materials remotely. They should dial in using a virtual private network (VPN) or access via OneDrive.

Remote access is managed by the Network Manager or contracted IT professional.

**Explain the remote access system you use, including:**

- > Who manages it
- > Security arrangements
- > Protocols for remote access
- > How staff can request remote access

Staff accessing the school's ICT facilities and materials remotely must abide by the same rules as those accessing the facilities and materials on site. Staff must be particularly vigilant if they use the school's ICT facilities outside the school and take such precautions as the Trust may require against importing viruses or compromising system security.

Our ICT facilities contain information which is confidential and/or subject to data protection legislation. Such information must be treated with extreme care and in accordance with our data protection policy.

A copy of the Data Protection Policy can be located on the Trust and Academy websites.

## 5.4 School social media accounts

The Academy has an official Facebook/Twitter/Instagram account, managed by [insert relevant member(s) of staff]. Staff members who have not been authorised to manage, or post to the account, must not access, or attempt to access, the account.



The school has guidelines for what may and must not be posted on its social media accounts. Those who are authorised to manage, or post to, the account must make sure they abide by these guidelines at all times.

## 5.5 Monitoring and filtering of the school network and use of ICT facilities

To safeguard and promote the welfare of children and provide them with a safe environment to learn, the school reserves the right to filter and monitor the use of its ICT facilities and network. This includes, but is not limited to, the filtering and monitoring of:

- Internet sites visited
- Bandwidth usage
- Email accounts
- Telephone calls
- User activity/access logs
- Any other electronic communications

Only authorised ICT personnel may filter, inspect, monitor, intercept, assess, record and disclose the above, to the extent permitted by law. [information has been added which is generic across the Trust, but additional details should be added where necessary for system e.g. Impero, where applicable, giving details of how you monitor online use and how you communicate this information to parents and staff.]

**Internet** – all internet usage is recorded, we retain all meta data (access time, web address including trailing path, content of the page accessed). Filtering is in place using Schools Broadband who categorise all sites accessed and allow or deny access as per our policies. Alterations to the filtering is approved by the Principal or Designated Safeguarding Lead and actioned by the Academy Network Manager/Trust ICT Manager/contracted IT professional as appropriate.

**Email** – emails are filtered using Microsoft Defender and ensures that malware and viruses are blocked from delivery, further to this Microsoft filters spam and junk mail using their own internal systems and will remove or quarantine emails. These can be overridden by the Trust ICT Manager. From time to time, we may be required to search for mail relating to an incident, disciplinary, subject access, safeguarding or police request. Access to this is limited to; Trust ICT Manager, Trust ICT Strategy Manager and Jenny Bray (Network Manager Redhill Academy). These searches are targeted using Microsoft's content search tools.

**User Activity** – access, modifications and deletions for files stored on office 365 (OneDrive, SharePoint, Email, and other services) are recorded within the Microsoft Audit tools.

**SENSO** – student and Staff use of computers is recorded (logon times and keystrokes) and automatic safeguarding indicators are used to alert Designated Safeguarding Leads about potential issues that need investigating, when an indicator is triggered, a screenshot is taken of the screen that the user is on.

**Notification of staff** – This is carried out through this policy as well as during staff induction to the academy.

The effectiveness of any filtering and monitoring will be regularly reviewed.

Where appropriate, authorised personnel may raise concerns about monitored activity with the school's designated safeguarding lead (DSL) and ICT manager, as appropriate.

The school monitors ICT use in order to:

- Obtain information related to school business
- Investigate compliance with school policies, procedures and standards
- Ensure effective school and ICT operation
- Conduct training or quality control exercises
- Prevent or detect crime
- Comply with a subject access request, Freedom of Information Act request, or any other legal obligation

The school may therefore access staff members' email accounts and documents in their absence or following them leaving the organisation, with the prior authorisation of the Headteacher/Trust Data Protection Officer.

The Local Academy Board will regularly review the effectiveness of the school's monitoring and filtering systems.

## 6. Students

### 6.1 Access to ICT facilities

Students may have access to the following ICT facilities:

- Computers and equipment in the school's ICT suites or general classrooms, under the supervision of a staff member
- Specialist ICT equipment, such as that used for music, or design and technology, under the supervision of a staff member
- Individual login for electronic devices and individual area on the school server to save their work
- Students will be provided with an account linked to the school's virtual learning environment, which they can access from any device using the following URL **XXXXXXXX (Delete this point if your school does not have a VLE).**

### 6.2 Search and deletion

**Adapt the below to reflect your school's behaviour policy, including specifying which staff are authorised to search, and delete from, an electronic device – remember that any authorised staff should be trained appropriately in how to search lawfully and safely.**

Under the Education Act 2011, the Headteacher, and any member of staff authorised to do so by the Headteacher, can search Students and confiscate their mobile phones, computers or other devices that the authorised staff member has reasonable grounds for suspecting:

- Poses a risk to staff or Students, **and/or**

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- Is identified in the school rules as a banned item for which a search can be carried out, **and/or**
- Is evidence in relation to an offence

This includes, but is not limited to (amend to reflect whether Primary or Secondary as examples given may not be suitable for Primary):

- Pornography
- Abusive messages, images or videos
- Indecent images of children
- Evidence of suspected criminal behaviour (such as threats of violence or assault)

Before a search, if the authorised staff member is satisfied that they have reasonable grounds for suspecting any of the above, they will also:

- Make an assessment of how urgent the search is and consider the risk to other students and staff. If the search is not urgent, they will seek advice from the Headteacher and Designated Safeguarding Lead
- Explain to the student why they are being searched, and how and where the search will happen, and give them the opportunity to ask questions about it
- Seek the student's co-operation (if the student refuses to co-operate, you should proceed according to the behaviour policy)

The authorised staff member should:

- Inform the DSL (or deputy) of any searching incidents where they had reasonable grounds to suspect a student was in possession of a banned item.
- Involve the DSL (or deputy) without delay if they believe that a search has revealed a safeguarding risk

Authorised staff members may examine, and in exceptional circumstances erase, any data or files on a device that they have confiscated where they believe there is a 'good reason' to do so.

When deciding whether there is a 'good reason' to examine data or files on a device, the staff member should only do so if they reasonably suspect that the data has, or could be used to:

- Cause harm, **and/or**
- Undermine the safe environment of the school or disrupt teaching, **and/or**
- Commit an offence

If inappropriate material is found on the device, it is up to the staff member in conjunction with the DSL and Headteacher to decide on a suitable response. If there are images, data or files on the device that staff reasonably suspect are likely to put a person at risk, they will first consider the appropriate safeguarding response.

When deciding if there is a good reason to erase data or files from a device, staff members will consider if the material may constitute evidence relating to a suspected offence. In these instances, they will not delete the material, and the device will be handed to the police as soon as reasonably practicable. If the material is not suspected to be evidence in relation to an offence, staff members may delete it if:

- They reasonably suspect that its continued existence is likely to cause harm to any person, **and/or**
- The Student and/or the parent refuses to delete the material themselves

If a staff member **suspects** a device **may** contain an indecent image of a child (also known as a nude or semi-nude image), they will:

- **Not** view the image
- **Not** copy, print, share, store or save the image
- Confiscate the device and report the incident to the DSL (or deputy) immediately, who will decide what to do next. The DSL will make the decision in line with the DfE's latest guidance on [searching, screening and confiscation](#) and the UK Council for Internet Safety (UKCIS) guidance on [sharing nudes and semi-nudes: advice for education settings working with children and young people](#)

Any searching of Students will be carried out in line with:

- The DfE's latest guidance on [searching, screening and confiscation](#)
- UKCIS guidance on [sharing nudes and semi-nudes: advice for education settings working with children and young people](#)
- Our behaviour policy (make sure that your searches and confiscation policy reflects the updated DfE guidance, which came into force on 1 September 2022)

Any complaints about searching for, or deleting, inappropriate images or files on students' devices will be dealt with through the school complaints procedure.

## 6.3 Unacceptable use of ICT and the internet outside of school

The school will sanction Students, in line with the behaviour policy and/or Online Safety Policy, if a student engages in any of the following **at any time** (even if they are not on school premises):

- Using ICT or the internet to breach intellectual property rights or copyright
- Using ICT or the internet to bully or harass someone else, or to promote unlawful discrimination
- Breaching the school's policies or procedures
- Any illegal conduct, or making statements which are deemed to be advocating illegal activity
- Accessing, creating, storing, linking to or sending material that is pornographic, offensive, obscene or otherwise inappropriate
- Consensual or non-consensual sharing of nude and semi-nude images and/or videos and/or livestreams (also known as sexting or youth produced sexual imagery)
- Activity which defames or disparages the school, or risks bringing the school into disrepute
- Sharing confidential information about the school, other Students, or other members of the school community
- Gaining or attempting to gain access to restricted areas of the network, or to any password-protected information, without approval from authorised personnel
- Allowing, encouraging, or enabling others to gain (or attempt to gain) unauthorised access to the school's ICT facilities
- Causing intentional damage to the school's ICT facilities or materials

- Causing a data breach by accessing, modifying, or sharing data (including personal data) to which a user and/or those they share it with are not supposed to have access, or without authorisation
- Using inappropriate or offensive language

You may wish to set out what kinds of sanctions might apply if Students do any of the above. Or you can direct Students and parents to section 4.2 above (if applicable) or to your school's behaviour/discipline policy.

## 7. Parents/Carers

### 7.1 Access to ICT facilities and materials

Parents do not have access to the school's ICT facilities as a matter of course.

However, parents working for, or with, the school in an official capacity (for instance, as a volunteer, member of the Local Academy Board or as a member of the PTA) may be granted an appropriate level of access, or be permitted to use the school's facilities at the Headteacher's discretion. Similarly, in exceptional circumstances, a parent may be granted an appropriate level of access at the Headteacher's discretion if, for example, a parent is unable to access material routinely issued due to a disability or need.

Where parents are granted access in this way, they must abide by this policy as it applies to staff.

### 7.2 Communicating with or about the school online

We believe it is important to model for Students, and help them learn, how to communicate respectfully with, and about, others online.

Parents play a vital role in helping model this behaviour for their children, especially when communicating with the school through our website and social media channels.

We ask parents to sign the agreement in appendix 2.

### 7.3 Communicating with parents about Student activity

The school will ensure that parents and carers are made aware of any online activity that their children are being asked to carry out.

When we ask Students to use websites or engage in online activity, we will communicate the details of this to parents in the same way that information about homework tasks is shared.

In particular, staff will let parents know which (if any) person or people from the school Students will be interacting with online, including the purpose of the interaction.

Parents may seek any support and advice from the school to ensure a safe online environment is established for their child or, in the case of primary schools, parents/carers will be made aware at the start of the year of the types of online activities their child(ren) may be asked to carry out, for educational purposes, during that academic year. Permission for certain activities is sought from parents at the start of the academic year.

## 8. Data security

The school is responsible for making sure it has the appropriate level of security protection and procedures in place to safeguard its systems, staff and learners. It therefore takes steps to protect the security of its computing resources, data and user accounts. The effectiveness of these procedures is reviewed periodically to keep up with evolving cyber crime technologies.

Staff, Students, parents and others who use the school's ICT facilities should use safe computing practices at all times. We aim to meet the cyber security standards recommended by the Department for Education's guidance on [digital and technology standards in schools and colleges](#), including the use of:

- Firewalls
- Security features
- User authentication and multi-factor authentication (available for staff but not students)
- Endpoint Protection software

### 8.1 Passwords

All secondary school users of the school's ICT facilities should set strong passwords for their accounts and keep these passwords secure. [Add here if you have any password requirements, or how users can find out what the requirements are.]

In Primary schools, students will use generic passwords in line with the school's Online Safety Policy but will have individual passwords for platforms such as TT Rockstarts/Purple Mash etc.

Secondary school users are responsible for the security of their passwords and accounts, and for setting permissions for accounts and files they control. Logs of student passwords are retained in a secure location in each primary school to assist students should they forget their passwords.

Members of staff or Students who disclose account or password information may face disciplinary action. Parents, visitors or volunteers who disclose account or password information may have their access rights revoked.

All staff will use the password manager required by the Network Manager/ICT service provider to help them store their passwords securely. Remove the previous sentence if your school does not have a password manager in place. Teachers will generate passwords for Students using the required password manager or generator and keep these in a secure location in case Students lose or forget their passwords.

### 8.2 Software updates, firewalls and anti-virus software

All of the school's ICT devices that support software updates, security updates and anti-virus products will have these installed, and be configured to perform such updates regularly or automatically.

Users must not circumvent or make any attempt to circumvent the administrative, physical and technical safeguards we implement and maintain to protect personal data and the school's ICT facilities.

Any personal devices using the school's network must all be configured in this way.

## 8.3 Data protection

All personal data must be processed and stored in line with data protection regulations and the school's data protection policy, which is located on the Trust and Academy websites.

## 8.4 Access to facilities and materials

All users of the school's ICT facilities will have clearly defined access rights to school systems, files and devices.

These access rights are managed by the Academy Network Manager/Trust ICT Manager.

Users should not access, or attempt to access, systems, files or devices to which they have not been granted access. If access is provided in error, or if something a user should not have access to is shared with them, they should alert the Academy Network Manager/Trust ICT Manager immediately.

Users should always log out of systems or lock their equipment when they are not in use to avoid any unauthorised access.

## 8.5 Encryption

The school makes sure that its devices and systems have an appropriate level of encryption.

School staff may only use personal devices (including computers and encrypted USB drives) to access school data, work remotely, or take personal data (such as Student information) out of school if they have been specifically authorised to do so by the Headteacher.

Use of such personal devices will only be authorised if the devices have appropriate levels of security and encryption, as defined by the Academy Network Manager/Trust ICT Manager.

## 9. Protection from cyber attacks

Please see the glossary (appendix 6) to help you understand cyber security terminology.

The school will:

- Work with governors, the IT department and/or contracted IT professionals to make sure cyber security is given the time and resources it needs to make the school secure
- Provide annual training for staff (and include this training in any induction for new starters, if they join outside of the school's annual training window) on the basics of cyber security, including how to:
  - Check the sender address in an email
  - Respond to a request for bank details, personal information or login details
  - Verify requests for payments or changes to information
- Make sure staff are aware of its procedures for reporting and responding to cyber security incidents
- Investigate whether our IT software needs updating or replacing to be more secure

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- Not engage in ransom requests from ransomware attacks, as this would not guarantee recovery of data
- Put controls in place that are:
  - **Multi-layered**: everyone will be clear on what to look out for to keep our systems safe
  - **Up to date**: with a system in place to monitor when the school needs to update its software
  - **Regularly reviewed and tested**: to make sure the systems are as effective and secure as they can be
- Back up critical data [insert frequency – this should be regularly and ideally at least once a day (it can be automatic)] and store these backups on [cloud-based backup systems/external hard drives that aren't connected to the school network and which can be stored off the school premises]
- Delegate specific responsibility for maintaining the security of our management information system (MIS) to [our cloud-based provider/our IT department (if you use an on-premises provider)]
- Make sure staff:
  - Dial into our network using a virtual private network (VPN) when working from home
  - Enable multi-factor authentication where they can, on things like school email accounts
  - Store passwords securely using a password manager
- Make sure ICT staff conduct regular access reviews to make sure each user in the school has the right level of permissions and admin rights
- Have a firewall in place that is switched on
- Check that its supply chain is secure, for example by asking suppliers about how secure their business practices are and checking if they have the [Cyber Essentials](#) certification
- Develop, review and test an incident response plan with the IT department including, for example, how the school will communicate with everyone if communications go down, who will be contacted and when, and who will notify [Action Fraud](#) of the incident. This plan will be reviewed and tested [insert frequency – this should be at least annually though ideally every 6 months] and after a significant event has occurred, using the NCSC's '[Exercise in a Box](#)'

## 10. Internet access

The school's internet connection is secure.

Add further details about your school's WiFi arrangements. For instance:

- Whether you use filtering
- Whether you have separate connections for staff/Students/parents/the public

If you use filtering, be aware that filters aren't foolproof. You may wish to include details of how to report inappropriate sites that the filter hasn't identified (or appropriate sites that have been filtered in error) to the relevant member of staff/service provider.

### 10.1 Students

Explain your school's approach to the use of WiFi by Students, including:

- If, and where, WiFi is available



- Any security or filtering settings you use
- How Students can request access
- What the use of WiFi is limited to

## 10.2 Parents and visitors

Parents and visitors to the school may be granted guest WiFi access under the following circumstances:

- Parents are working with the school in an official capacity (e.g. as a volunteer or as a member of the PTA/Local Academy Board)
- Visitors need to access the school's WiFi in order to fulfil the purpose of their visit (for instance, to access materials stored on personal devices as part of a presentation or lesson plan)

Staff must not give the WiFi password to anyone who is not authorised to have it. Doing so could result in disciplinary action.

## 11. Monitoring and review

The Headteacher and Network Manager and Trust ICT Manager monitor the implementation of this policy, including ensuring it is updated to reflect the needs and circumstances of the school.

This policy will be reviewed every 3 years as a minimum.

The Executive Board is responsible for approving this policy.

## 12. Related policies

This policy should be read alongside the school's policies on:

- E-Safety
- Staff Code of Conduct
- Safeguarding and Child Protection
- Behaviour
- Staff Disciplinary
- Data protection
- Remote education

## Appendix 1: Facebook cheat sheet for staff

**Do not accept friend requests from pupils on social media**

### 10 rules for school staff on Facebook

1. Change your display name – use your first and middle name, use a maiden name, or put your surname backwards instead
2. Change your profile picture to something unidentifiable, or if you don't, ensure that the image is professional
3. Check your privacy settings regularly
4. Be careful about tagging other staff members in images or posts
5. Don't share anything publicly that you wouldn't be just as happy showing your Students
6. Don't use social media sites during school hours
7. Don't make comments about your job, your colleagues, our school or your Students online – once it's out there, it's out there
8. Don't associate yourself with the school on your profile (e.g. by setting it as your workplace, or by 'checking in' at a school event)
9. Don't link your work email address to your social media accounts. Anyone who has this address (or your personal email address/mobile number) is able to find you using this information
10. Consider uninstalling the Facebook app from your phone. The app recognises WiFi connections and makes friend suggestions based on who else uses the same WiFi connection (such as parents or Students)

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### Check your privacy settings

- Change the visibility of your posts and photos to **'Friends only'**, rather than 'Friends of friends'. Otherwise, Students and their families may still be able to read your posts, see things you've shared and look at your pictures if they're friends with anybody on your contacts list
- Don't forget to check your **old posts and photos** – go to [bit.ly/2MdQXMN](https://bit.ly/2MdQXMN) to find out how to limit the visibility of previous posts
- The public may still be able to see posts you've **'liked'**, even if your profile settings are private, because this depends on the privacy settings of the original poster
- **Google your name** to see what information about you is visible to the public
- Prevent search engines from indexing your profile so that people can't **search for you by name** – go to [bit.ly/2zMdVht](https://bit.ly/2zMdVht) to find out how to do this

# Data Acceptable Use Policy

- Remember that **some information is always public**: your display name, profile picture, cover photo, user ID (in the URL for your profile), country, age range and gender

## What to do if ...

### A Student adds you on social media

- In the first instance, ignore and delete the request. Block the Student from viewing your profile
- Check your privacy settings again, and consider changing your display name or profile picture
- If the Student asks you about the friend request in person, tell them that you're not allowed to accept friend requests from Students and that if they persist, you'll have to notify senior leadership and/or their parents. If the Student persists, take a screenshot of their request and any accompanying messages
- Notify the senior leadership team or the Headteacher about what's happening

### A parent adds you on social media

- It is at your discretion whether to respond. Bear in mind that:
  - Responding to 1 parent's friend request or message might set an unwelcome precedent for both you and other teachers at the school
  - Students may then have indirect access through their parent's account to anything you post, share, comment on or are tagged in
- If you wish to decline the offer or ignore the message, consider drafting a stock response to let the parent know that you're doing so

### You're being harassed on social media, or somebody is spreading something offensive about you

- **Do not** retaliate or respond in any way
- Save evidence of any abuse by taking screenshots and recording the time and date it occurred
- Report the material to Facebook or the relevant social network and ask them to remove it
- If the perpetrator is a current Student or staff member, our mediation and disciplinary procedures are usually sufficient to deal with online incidents
- If the perpetrator is a parent or other external adult, a senior member of staff should invite them to a meeting to address any reasonable concerns or complaints and/or request they remove the offending comments or material
- If the comments are racist, sexist, of a sexual nature or constitute a hate crime, you or a senior leader should consider contacting the police

## Appendix 2: Acceptable use of the internet: agreement for parents and carers

### Acceptable use of the internet: agreement for parents and carers

**Name of parent/carers:**

**Name of child:**

Online channels are an important way for parents/carers to communicate with, or about, our school.

The school uses the following channels:

- Our official Facebook page
- Email/text groups for parents (for school announcements and information)
- Our virtual learning platform
- Instagram
- Twitter
- Our official website

Parents/carers also set up independent channels to help them stay on top of what's happening in their child's class. For example, class/year Facebook groups, email groups, or chats (through apps such as WhatsApp).

When communicating with the school via official communication channels, or using private/independent channels to talk about the school, I will:

- Be respectful towards members of staff, and the school, at all times
- Be respectful of other parents/carers and children
- Direct any complaints or concerns through the school's official channels, so they can be dealt with in line with the school's complaints procedure

I will not:

- Use private groups, the school's Facebook page, or personal social media to complain about or criticise members of staff. This is not constructive and the school can't improve or address issues unless they are raised in an appropriate way
- Use private groups, the school's Facebook page, or personal social media to complain about, or try to resolve, a behaviour issue involving other Students. I will contact the school and speak to the appropriate member of staff if I'm aware of a specific behaviour issue or incident
- Upload or share photos or videos on social media of any child other than my own, unless I have the permission of the other children's parents/carers

**Signed:**

**Date:**

## Appendix 3: Acceptable use agreement for older Students

### Acceptable use of the school's ICT facilities and internet: agreement for Students and parents/carers

**Name of Student:**

**When using the school's ICT facilities and accessing the internet in school, I will not:**

- Use them for a non-educational purpose
- Use them without a teacher being present, or without a teacher's permission
- Use them to break school rules
- Access any inappropriate websites
- Access social networking sites (unless my teacher has expressly allowed this as part of a learning activity)
- Use chat rooms
- Open any attachments in emails, or follow any links in emails, without first checking with a teacher
- Use any inappropriate language when communicating online, including in emails
- Share any semi-nude or nude images, videos or livestreams, even if I have the consent of the person or people in the photo/video
- Share my password with others or log in to the school's network using someone else's details
- Bully other people

I understand that the school will monitor the websites I visit and my use of the school's ICT facilities and systems.

I will immediately let a teacher or other member of staff know if I find any material which might upset, distress or harm me or others.

I will always use the school's ICT systems and internet responsibly.

I understand that the school can discipline me if I do certain unacceptable things online, even if I'm not in school when I do them.

**Signed (Student):**

**Date:**

**Parent/carers agreement:** I agree that my child can use the school's ICT systems and internet when appropriately supervised by a member of school staff. I agree to the conditions set out above for Students using the school's ICT systems and internet, and for using personal electronic devices in school, and will make sure my child understands these.

**Signed (parent/carers):**

**Date:**

## Appendix 4: Acceptable use agreement for younger Students

### Acceptable use of the school's ICT facilities and internet: agreement for Students and parents/carers

**Name of Student:**

**When I use the school's ICT facilities (like computers and equipment) and go on the internet in school, I will not:**

- Use them without asking a teacher first, or without a teacher in the room with me
- Use them to break school rules
- Go on any inappropriate websites
- Go on Facebook or other social networking sites (unless my teacher said I could as part of a lesson)
- Use chat rooms
- Open any attachments in emails, or click any links in emails, without checking with a teacher first
- Use mean or rude language when talking to other people online or in emails
- Send any photos, videos or livestreams of people (including me) without a staff member's consent
- Share my password with others or log in using someone else's name or password
- Bully other people

I understand that the school will check the websites I visit and how I use the school's computers and equipment. This is so that they can help keep me safe and make sure I'm following the rules.

I will tell a teacher or a member of staff I know immediately if I find anything on a school computer or online that upsets me, or that I know is mean or wrong.

I will always be responsible when I use the school's ICT systems and internet.

I understand that the school can discipline me if I do certain unacceptable things online, even if I'm not in school when I do them.

**Signed (Student):**

**Date:**

**Parent/carers agreement:** I agree that my child can use the school's ICT systems and internet when appropriately supervised by a member of school staff. I agree to the conditions set out above for Students using the school's ICT systems and internet, and for using personal electronic devices in school, and will make sure my child understands these.

**Signed (parent/carers):**

**Date:**

## Appendix 5: Acceptable use agreement for staff, governors, volunteers and visitors

### Acceptable use of the school's ICT facilities and the internet: agreement for staff, governors, volunteers and visitors

**Name of staff member/governor/volunteer/visitor:**

When using the school's ICT facilities and accessing the internet in school, or outside school on a work device, I will not:

- Access, or attempt to access inappropriate material, including but not limited to material of a violent, criminal or pornographic nature (or create, share, link to or send such material)
- Use them in any way which could harm the school's reputation
- Access social networking sites or chat rooms
- Use any improper language when communicating online, including in emails or other messaging services
- Install any unauthorised software, or connect unauthorised hardware or devices to the school's network
- Share my password with others or log in to the school's network using someone else's details
- Share confidential information about the school, its Students or staff, or other members of the community
- Access, modify or share data I'm not authorised to access, modify or share
- Promote private businesses, unless that business is directly related to the school

I understand that the school will monitor the websites I visit and my use of the school's ICT facilities and systems.

I will take all reasonable steps to ensure that work devices are secure and password-protected when using them outside school, and keep all data securely stored in accordance with this policy and the school's data protection policy.

I will let the designated safeguarding lead (DSL) and ICT manager know if a Student informs me they have found any material which might upset, distress or harm them or others, and will also do so if I encounter any such material.

I will always use the school's ICT systems and internet responsibly, and ensure that Students in my care do so too.

**Signed (staff member/governor/volunteer/visitor):**

**Date:**

## Appendix 6: Glossary of cyber security terminology

These key terms will help you to understand the common forms of cyber attack and the measures the school will put in place. They're from the National Cyber Security Centre (NCSC) [glossary](#).

TERM	DEFINITION
<b>Antivirus</b>	Software designed to detect, stop and remove malicious software and viruses.
<b>Breach</b>	When your data, systems or networks are accessed or changed in a non-authorised way.
<b>Cloud</b>	Where you can store and access your resources (including data and software) via the internet, instead of locally on physical devices.
<b>Cyber attack</b>	An attempt to access, damage or disrupt your computer systems, networks or devices maliciously.
<b>Cyber incident</b>	Where the security of your system or service has been breached.
<b>Cyber security</b>	The protection of your devices, services and networks (and the information they contain) from theft or damage.
<b>Download attack</b>	Where malicious software or a virus is downloaded unintentionally onto a device without the user's knowledge or consent.
<b>Firewall</b>	Hardware or software that uses a defined rule set to constrain network traffic – this is to prevent unauthorised access to or from a network.
<b>Hacker</b>	Someone with some computer skills who uses them to break into computers, systems and networks.
<b>Malware</b>	Malicious software. This includes viruses, trojans or any code or content that can adversely impact individuals or organisations.



TERM	DEFINITION
<b>Patching</b>	Updating firmware or software to improve security and/or enhance functionality.
<b>Pentest</b>	Short for penetration test. This is an authorised test of a computer network or system to look for security weaknesses.
<b>Pharming</b>	An attack on your computer network that means users are redirected to a wrong or illegitimate website even if they type in the right website address.
<b>Phishing</b>	Untargeted, mass emails sent to many people asking for sensitive information (such as bank details) or encouraging them to visit a fake website.
<b>Ransomware</b>	Malicious software that stops you from using your data or systems until you make a payment.
<b>Social engineering</b>	Manipulating people into giving information or carrying out specific actions that an attacker can use.
<b>Spear-phishing</b>	A more targeted form of phishing where an email is designed to look like it's from a person the recipient knows and/or trusts.
<b>Trojan</b>	A type of malware/virus designed to look like legitimate software that can be used to hack a victim's computer.
<b>Two-factor/multi-factor authentication</b>	Using 2 or more different components to verify a user's identity.
<b>Virus</b>	Programmes designed to self-replicate and infect legitimate software programs or systems.

TERM	DEFINITION
<b>Virtual private network (VPN)</b>	An encrypted network which allows remote users to connect securely.
<b>Whaling</b>	Highly- targeted phishing attacks (where emails are made to look legitimate) aimed at senior people in an organisation.