

Lowick and Holy Island C of E First Schools

E-safety Policy

2020-2021

Reviewed by	Governing Body (electronic communication)
Signed by	 (Chair)
Date of review:	Summer term 2020
Date of next review	Summer term 2021

E-Safety and Data Security Policy

ICT in the 21st Century is seen as an essential resource to support learning and teaching, as well as playing an important role in the everyday lives of children, young people and adults. Consequently, schools need to build in the use of these technologies in order to arm our young people with the skills to access life-long learning and employment.

Information and Communications Technology covers a wide range of resources including; web-based and mobile learning. It is also important to recognise the constant and fast paced evolution of ICT within our society as a whole. Currently the internet technologies children and young people are using both inside and outside of the classroom include:

- Websites
- E-mail, Instant Messaging and chat rooms
- Social Media, including Facebook and Twitter
- Mobile/ Smart phones with text, video and/ or web functionality
- Other mobile devices with web functionality
- Gaming, especially online
- Learning Platforms and Virtual Learning Environments
- Blogs and Wikis
- Podcasting
- Video Broadcasting
- Music Downloading

Whilst exciting and beneficial both in and out of the context of education, much ICT, particularly web-based resources, are not consistently policed. All users need to be aware of the range of risks associated with the use of these Internet technologies and that some have minimum age requirements, usually 13 years.

Within our schools we understand the responsibility to educate our pupils on e-safety issues; teaching them the appropriate behaviours and critical thinking skills to enable them to remain both safe and legal when using the internet and related technologies, in and beyond the context of the classroom.

Schools hold personal data on learners, staff and other people to help them conduct their day-to-day activities. Some of this information is sensitive and could be used by another person or criminal organisation to cause harm or distress to an individual. The loss of sensitive information can result in media coverage, and potentially damage the reputation of the school. This can make it more difficult for your school to use technology to benefit learners.

Everybody in the school has a shared responsibility to secure any sensitive information used in their day to day professional duties and even staff not directly involved in data handling should be made aware of the risks and threats and how to minimise them.

Both this policy and the Acceptable Use Agreement (for all staff, governors, visitors and pupils) are inclusive of both fixed and mobile internet; technologies provided by the school (such as tablets, cameras, PCs, laptops, mobile devices, webcams, whiteboards, voting systems, digital video equipment, etc); and technologies owned by pupils and staff, but brought onto school premises (such as laptops, games consoles, mobile phones, smart phones and other mobile devices).

Authorised ICT staff may inspect any ICT equipment owned or leased by the school at any time without prior notice. If you are in doubt as to whether the individual requesting such access is authorised to do so, please ask for their identification badge and contact their department. Any ICT authorised staff member will be happy to comply with this request.

ICT authorised staff may monitor, intercept, access, inspect, record and disclose telephone calls, e-mails, instant messaging, internet/intranet use and any other electronic communications (data, voice or image) involving its employees or contractors, without consent, to the extent permitted by law. This may be to confirm or obtain school business related information; to confirm or investigate compliance with school policies, standards and procedures; to ensure the effective operation of school ICT; for quality control or training purposes; to comply with a Subject Access Request under the Data Protection Act 1998, or to prevent or detect crime.

ICT authorised staff may, without prior notice, access the e-mail or voice-mail account where applicable, of someone who is absent in order to deal with any business-related issues retained on that account.

All monitoring, surveillance or investigative activities are conducted by ICT authorised staff and comply with the Data Protection Act 1998, the Human Rights Act 1998, the Regulation of Investigatory Powers Act 2000 (RIPA) and the Lawful Business Practice Regulations 2000.

Please note that personal communications using School ICT may be unavoidably included in any business communications that are monitored, intercepted and/or recorded.

All internet activity is logged by the school's internet provider. These logs may be monitored by authorised NCC staff.

Breaches

A breach or suspected breach of policy by a school employee, contractor or pupil may result in the temporary or permanent withdrawal of school ICT hardware, software or services from the offending individual.

Any policy breach is grounds for disciplinary action in accordance with the school Disciplinary Procedure or, where appropriate, the HCC Disciplinary Procedure or Probationary Service Policy.

Policy breaches may also lead to criminal or civil proceedings.

The ICO's new powers to issue monetary penalties came into force on 6 April 2010, allowing the Information Commissioner's office to serve notices requiring organisations to pay up to £500,000 for serious breaches of the Data Protection Act.

The data protection powers of the Information Commissioner's Office are to:

- Conduct assessments to check organisations are complying with the Act;
- Serve information notices requiring organisations to provide the Information Commissioner's Office with specified information within a certain time period;
- Serve enforcement notices and 'stop now' orders where there has been a breach of the Act, requiring organisations to take (or refrain from taking) specified steps in order to ensure they comply with the law;
- Prosecute those who commit criminal offences under the Act;
- Conduct audits to assess whether organisations processing of personal data follows good practice,
- Report to Parliament on data protection issues of concern

Incident Reporting

Any security breaches or attempts, loss of equipment and any unauthorised use or suspected misuse of ICT must be immediately reported to the school's E-safety Designated Person (the Headteacher). Additionally, all security breaches, lost/stolen equipment or data (including remote access SecureID tokens and PINs), virus notifications, unsolicited emails, misuse or unauthorised use of ICT and all other policy non-compliance must be reported to your NCC: Richard Bishop.

Please refer to the relevant section on Incident Reporting, E -safety Incident Log & Infringements.

Staff Professional Responsibilities

The HSCB eSafety subgroup group have produced a clear summary of **professional responsibilities related to the use of ICT** which has been endorsed by unions. To download visit <http://www.thegrid.org.uk/eservices/safety/policies.shtml>

Computer Viruses

- All files downloaded from the Internet, received via e-mail or on removable media such as a memory

stick must be checked for any viruses using school provided anti-virus software before being used

- Never interfere with any anti-virus software installed on school ICT equipment that you use
- If your machine is not routinely connected to the school network, you must make provision for regular virus updates through your IT team
- If you suspect there may be a virus on any school ICT equipment, stop using the equipment and contact your ICT support provider immediately. The ICT support provider will advise you what actions to take and be responsible for advising others that need to know

Data Security

The accessing and appropriate use of school data is something that the school takes very seriously.

The school is aware of the Becta guidelines found at <http://tinyurl.com/76gj9xr> (published Spring 2009, please note that this organisation was closed in 2011 but the guidance is still useful), the advice and guidance given by the Information Commissioner's Office (ICO)

http://www.ico.gov.uk/for_organisations/data_protection/security_measures.aspx

and the Local Authority guidance documents listed below

- Headteacher's Guidance – Data Security in Schools – Dos and Don'ts
- Network Manager/MIS Administrator or Manager Guidance – Data Security in Schools
- Staff Guidance – Data Security in Schools – Dos and Don'ts
- SIRO/IAO Guidance – Data Security in Schools - Dos and Don'ts

Security

- The school gives relevant staff access to its Management Information System, with a unique username and password
- It is the responsibility of everyone to keep passwords secure
- Staff are aware of their responsibility when accessing school data
- Staff have been issued with the relevant guidance documents and the Policy for ICT Acceptable Use
- Leadership have identified Senior Information Risk Owner (SIRO) and Asset Information Owner(s) (AIO) as defined in the guidance documents on the SITSS website (available - <http://www.thegrid.org.uk/info/traded/sitss/>)
- Staff keep all school related data secure. This includes all personal, sensitive, confidential or classified data
- Staff should avoid leaving any portable or mobile ICT equipment or removable storage media in unattended vehicles. Where this is not possible, keep it locked out of sight
- Staff should always carry portable and mobile ICT equipment or removable media as hand luggage, and keep it under your control at all times
- It is the responsibility of individual staff to ensure the security of any personal, sensitive, confidential and classified information contained in documents faxed, copied, scanned or printed. This is particularly important when shared copiers (multi-function print, fax, scan and copiers) are used

Protective Marking

- Appropriate labelling of data should help schools secure data and so reduce the risk of security incidents
- Applying too high a protective marking can inhibit access, lead to unnecessary and expensive protective controls, and impair the efficiency of an organisation's business

- Applying too low a protective marking may lead to damaging consequences and compromise of the asset
- The sensitivity of an asset may change over time and it may be necessary to reclassify assets. If a document is being de-classified or the marking changed, the file should also be changed to reflect the highest marking within its contents
- NCC recommend 3 levels of labelling
 - Unclassified (or if unmarked) – this will imply that the document contains no sensitive or personal information and will be a public document
 - Protect – this should be the default setting and be applied to documents containing any sensitive or personal data. Marking documents as Protect will demonstrate an awareness of the Data Protection Act and the school's responsibilities
 - Restricted – documents containing any ultra sensitive data for even one person should be marked as Restricted

Senior Information Risk Owner (SIRO)

The SIRO is a senior member of staff who is familiar with information risks and the school's response. Typically, the SIRO should be a member of the senior leadership team and have the following responsibilities:

- they own the information risk policy and risk assessment
- they appoint the Information Asset Owner(s) (IAOs)
- they act as an advocate for information risk management

The Office of Public Sector Information has produced [Managing Information Risk](http://www.nationalarchives.gov.uk/services/publications/information-risk.pdf), [\[http://www.nationalarchives.gov.uk/services/publications/information-risk.pdf\]](http://www.nationalarchives.gov.uk/services/publications/information-risk.pdf) to support SIROs in their role.

The SIRO in our schools is Rebecca Simpson & Wendy Goddard.

Information Asset Owner (IAO)

Any information that is sensitive needs to be protected. This will include the personal data of learners and staff; such as assessment records, medical information and special educational needs data. Please refer to the appendix at the back of this document showing examples of information assets a school may hold. Schools should identify an Information Asset Owner. For example, the school's Management Information System (MIS) should be identified as an asset and should have an Information Asset Owner. In this example the MIS Administrator or Manager could be the IAO.

The role of an IAO is to understand:

- what information is held, and for what purposes
- what information needs to be protected how information will be amended or added to over time
- who has access to the data and why
- how information is retained and disposed off

As a result, the IAO is able to manage and address risks to the information and make sure that information handling complies with legal requirements. In a Secondary School, there may be several IAOs, whose roles may currently be those of e-safety coordinator, ICT manager or Management Information Systems administrator or manager.

Although these roles have been explicitly identified, the handling of secured data is everyone's responsibility – whether they are an employee, consultant, software provider or managed service provider. Failing to apply appropriate controls to secure data could amount to gross misconduct or even legal action.

Disposal of Redundant ICT Equipment Policy

- All redundant ICT equipment will be disposed off through an authorised agency or via a proper disposal scheme. This should include a written receipt for the item including an acceptance of responsibility for the destruction of any personal data

- All redundant ICT equipment that may have held personal data will have the storage media over written multiple times to ensure the data is irretrievably destroyed. Or if the storage media has failed it will be physically destroyed. We will only use authorised companies who will supply a written guarantee that this will happen
- Disposal of any ICT equipment will conform to:

The Waste Electrical and Electronic Equipment Regulations 2006

The Waste Electrical and Electronic Equipment (Amendment) Regulations 2007

<http://www.environment-agency.gov.uk/business/topics/waste/32084.aspx>

http://www.opsi.gov.uk/si/si2006/uksi_20063289_en.pdf

http://www.opsi.gov.uk/si/si2007/pdf/uksi_20073454_en.pdf?lang=e

Data Protection Act 1998

http://www.ico.gov.uk/what_we_cover/data_protection.aspx

Electricity at Work Regulations 1989

http://www.opsi.gov.uk/si/si1989/uksi_19890635_en_1.htm

- The school will maintain a comprehensive inventory of all its ICT equipment including a record of disposal
- The school's disposal record will include:
 - Date item disposed of
 - Authorisation for disposal, including:
 - verification of software licensing
 - any personal data likely to be held on the storage media *
 - How it was disposed of eg waste, gift, sale
 - Name of person & / or organisation who received the disposed item

* if personal data is likely to be held the storage media will be over written multiple times to ensure the data is irretrievably destroyed.

- Any redundant ICT equipment being considered for sale / gift will have been subject to a recent electrical safety check and hold a valid PAT certificate

e-Mail

The use of e-mail within most schools is an essential means of communication for both staff and pupils. In the context of school, e-mail should not be considered private. Educationally, e-mail can offer significant benefits including; direct written contact between schools on different projects, be they staff based or pupil based, within school or international. We recognise that pupils need to understand how to style an e-mail in relation to their age and good network etiquette; 'netiquette'. In order to achieve ICT level 4 or above, pupils must have experienced sending and receiving e-mails.

Managing e-Mail

- The school gives all staff their own e-mail account to use for all school business as a work based tool This is to protect staff, minimise the risk of receiving unsolicited or malicious e-mails and avoids the risk of personal profile information being revealed
- It is the responsibility of each account holder to keep the password secure. For the safety and security of users and recipients, all mail is filtered and logged; if necessary e-mail histories can be traced. The school email account should be the account that is used for all school business

- Under no circumstances should staff contact pupils, parents or conduct any school business using personal e-mail addresses
- All e-mails should be written and checked carefully before sending, in the same way as a letter written on school headed paper
- Pupils may only use school approved accounts on the school system, if any at all, and only under direct teacher supervision for educational purposes
- E-mails created or received as part of your school job will be subject to disclosure in response to a request for information under the Freedom of Information Act 2000. You must therefore actively manage your e-mail account as follows:
 - Delete all e-mails of short-term value
 - Organise e-mail into folders and carry out frequent house-keeping on all folders and archives
- The forwarding of chain letters is not permitted in school.
- Staff must inform (the eSafety designated person) if they receive an offensive e-mail
- However you access your school e-mail (whether directly, through webmail when away from the office or on non-school hardware) all the school e-mail policies apply

Sending e-Mails

- If sending e-mails containing personal, confidential, classified or financially sensitive data to external third parties or agencies, refer to the Section e-mailing Personal, Sensitive, Confidential or Classified Information
- Use your own school e-mail account so that you are clearly identified as the originator of a message
- Keep the number and relevance of e-mail recipients, particularly those being copied, to the minimum necessary and appropriate
- Do not send or forward attachments unnecessarily. Whenever possible, send the location path to the shared drive rather than sending attachments
- School e-mail is not to be used for personal advertising

Receiving e-Mails

- Check your e-mail regularly
- Activate your 'out-of-office' notification when away for extended periods
- Never open attachments from an untrusted source;
- Do not use the e-mail systems to store attachments. Detach and save business related work to the appropriate shared drive/folder
- The automatic forwarding of e-mails is not allowed

e-mailing Personal, Sensitive, Confidential or Classified Information

- Where your conclusion is that e-mail must be used to transmit such data:
 - Obtain express consent from your manager to provide the information by e-mail
 - Exercise caution when sending the e-mail and always follow these checks before releasing the e-mail:
 - Encrypt and password protect. See <http://www.thegrid.org.uk/info/dataprotection/#securedata>

- Verify the details, including accurate e-mail address, of any intended recipient of the information
- Verify (by phoning) the details of a requestor before responding to e-mail requests for information
- Do not copy or forward the e-mail to any more recipients than is absolutely necessary
- Do not send the information to any body/person whose details you have been unable to separately verify (usually by phone)
- Send the information as an encrypted document **attached** to an e-mail
- Provide the encryption key or password by a **separate** contact with the recipient(s)
- Do not identify such information in the subject line of any e-mail
- Request confirmation of safe receipt

Equal Opportunities

Pupils with Additional Needs

The school endeavours to create a consistent message with parents for all pupils and this in turn should aid establishment and future development of the schools' e-safety rules.

However, staff are aware that some pupils may require additional support or teaching including reminders, prompts and further explanation to reinforce their existing knowledge and understanding of e-safety issues.

Where a pupil has poor social understanding, careful consideration is given to group interactions when raising awareness of e-safety. Internet activities are planned and well managed for these children and young people.

eSafety

eSafety - Roles and Responsibilities

As eSafety is an important aspect of strategic leadership within the school, the Head and governors have ultimate responsibility to ensure that the policy and practices are embedded and monitored. The named e-safety designated person in our school is Rebecca Simpson. All members of the school community have been made aware of who holds this post. It is the role of the e-safety co-ordinator to keep abreast of current issues and guidance through organisations such as NCC LA, CEOP (Child Exploitation and Online Protection) and Childnet.

Staff and governors are updated by the Head and all governors have an understanding of the issues and strategies at our school in relation to local and national guidelines and advice.

This policy, supported by the school's acceptable use agreements for staff, governors, visitors and pupils, is to protect the interests and safety of the whole school community. It is linked to the following mandatory school policies: child protection, health and safety, home-school agreements, and behaviour/pupil discipline (including the anti-bullying) policy and PSHE

e-safety in the Curriculum

ICT and online resources are increasingly used across the curriculum. We believe it is essential for e-safety guidance to be given to the pupils on a regular and meaningful basis. E-safety is embedded within our curriculum and we continually look for new opportunities to promote e-safety.

- The school has a framework for teaching internet skills in ICT/ PSHE lessons
- Educating pupils about the online risks that they may encounter outside school is done informally when opportunities arise and as part of the e-safety curriculum
- Pupils are aware of the relevant legislation when using the internet such as data protection and intellectual property which may limit what they want to do but also serves to protect them
- Pupils are taught about copyright, respecting other people's information, safe use of images and other important areas through discussion, modeling and appropriate activities
- Pupils are aware of the impact of cyberbullying and know how to seek help if they are affected by any form of online bullying. Pupils are also aware of where to seek advice or help if they experience problems when using the internet and related technologies; i.e. parent/ carer, teacher/ trusted staff member, or an organisation such as Cybermentors, Childline or CEOP report abuse button

- Pupils are taught to critically evaluate materials and learn good searching skills through cross curricular teacher models, discussions and via the ICT curriculum

E-safety Skills Development for Staff

- Our staff receive regular information on e-safety and how they can promote the 'Stay Safe' online messages in the form of CPD on training days and in staff meetings
- New staff receive information on the school's acceptable use policy
- All staff have been made aware of their individual responsibilities relating to the safeguarding of children within the context of e-safety and know what to do in the event of misuse of technology by any member of the school community (see enclosed flowcharts)
- All staff are encouraged to incorporate e-safety activities and awareness within their curriculum areas as appropriate.

Managing the School e-safety Messages

- We endeavour to embed e-safety messages across the curriculum whenever the internet and/or related technologies are used
- The e-safety advice will be introduced to the pupils at the start of each school year
- The key e-safety advice will be promoted widely through school displays, newsletters, class activities and so on

Incident Reporting, e-safety Incident Log & Infringements

Incident Reporting

Any security breaches or attempts, loss of equipment and any unauthorised use or suspected misuse of ICT must be immediately reported to the school's SIRO (the Headteacher). Additionally, all security breaches, lost/stolen equipment or data (including remote access SecureID tokens and PINs), virus notifications, unsolicited emails, misuse or unauthorised use of ICT and all other policy non-compliance must be reported to your Senior Information Risk Owner.

E-safety Incident Log

Keeping an incident log can be a good way of monitoring what is happening and identify trends or specific concerns. (see appendices). This can be done electronically using the county monitoring system

Misuse and Infringements

Complaints

Complaints and/ or issues relating to e-safety should be made to the e-safety designated person and/or Headteacher. Incidents should be logged and the **Northumberland Flowcharts for Managing an eSafety Incident** should be followed.

Inappropriate Material

- All users are aware of the procedures for reporting accidental access to inappropriate materials. The breach must be immediately reported to the e-safety designated person.
- Deliberate access to inappropriate materials by any user will lead to the incident being logged by the e-safety designated person, depending on the seriousness of the offence; investigation by the Headteacher/ LA immediate suspension, possibly leading to dismissal and involvement of police for very serious offences (see flowchart)

Internet Access

The internet is an open worldwide communication medium, available to everyone, at all times. Anyone can view information, send messages, discuss ideas and publish material which makes it both an invaluable resource for education, business and social interaction, as well as a potential risk to young and vulnerable people.

Managing the Internet

- The school provides pupils with supervised access to Internet resources (where reasonable) through the school's fixed and mobile internet connectivity
- Where possible Staff will preview any recommended sites before use,
- Raw image searches are discouraged when working with pupils
- If Internet research is set for homework, specific sites will be suggested that have previously been checked by the teacher. It is advised that parents recheck these sites and supervise this work. Parents will be advised to supervise any further research
- All users must observe software copyright at all times. It is illegal to copy or distribute school software or illegal software from other sources
- All users must observe copyright of materials from electronic resources

Internet Use

- You must not post personal, sensitive, confidential or classified information or disseminate such information in any way that may compromise the intended restricted audience
- Do not reveal names of colleagues, pupils, others or any other confidential information acquired through your job on any social networking site or other online application
- On-line gambling or gaming is not allowed

It is at the Headteacher's discretion as to what internet activities are permissible for staff and pupils and how this is disseminated.

Infrastructure

- Northumberland Local Authority has a monitoring solution where web-based activity is monitored and recorded
- School internet access is controlled through the LA's web filtering service.
- The School is aware of its responsibility when monitoring staff communication under current legislation and takes into account; Data Protection Act 1998, The Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000, Regulation of Investigatory Powers Act 2000, Human Rights Act 1998
- Staff and pupils are aware that school based email and/or internet activity can be monitored and explored further if required
- The school does not allow pupils access to internet logs
- If staff or pupils discover an unsuitable site, the screen must be switched off/ closed and the incident reported immediately to the e-safety coordinator or teacher as appropriate
- It is the responsibility of the school, by delegation to the network manager, to ensure that anti-virus protection is installed and kept up-to-date on all school machines
- Pupils and Staff using personal removable media are responsible for measures to protect against viruses, for example making sure that additional systems used have up-to-date virus protection software. It is not the school's responsibility nor the network manager's to install or maintain virus

protection on personal systems. If pupils wish to bring in work on removable media it must be given to the teacher for a safety check first

- Pupils and staff are not permitted to download programs or files on school based technologies without seeking prior permission from the Headteacher/ /ICT subject leader

Managing Other Web 2 Technologies

Online technologies, including social networking sites, if used responsibly both outside and within an educational context can provide easy to use, creative, collaborative and free facilities. However it is important to recognise that there are issues regarding the appropriateness of some content, contact, culture and commercialism. To this end, we encourage our pupils to think carefully about the way that information can be added and removed by all users, including themselves, from these sites.

- At present, the school endeavors to deny access to social networking and online games websites that are not part of their curricular work to pupils within school
- All pupils are advised to be cautious about the information given by others on such websites, for example users not being who they say they are
- Pupils are taught to avoid placing images of themselves (or details within images that could give background details) on such websites and to consider the appropriateness of any images they post due to the difficulty of removing an image once online
- Pupils are always reminded to avoid giving out personal details on websites which may identify them or where they are (full name, address, mobile/ home phone numbers, school details, IM/ email address, specific hobbies/ interests)
- Our pupils are advised to set and maintain their online profiles to maximum privacy and deny access to unknown individuals
- Pupils are encouraged to be wary about publishing specific and detailed private thoughts and information online
- Our pupils are asked to report any incidents of Cyberbullying to the school
- Staff may only create blogs, wikis or other online areas in order to communicate with pupils using the school learning platform or other systems approved by the Headteacher

Parental Involvement

We believe that it is essential for parents/carers to be fully involved with promoting e-safety both in and outside of school and to be aware of their responsibilities. We regularly consult and discuss e-safety with parents/ carers and seek to promote a wide understanding of the benefits of new technologies, together with the associated risks.

- Parents/carers are asked to read through and sign acceptable use agreements on behalf of their child on admission to the school
- Parents/carers are required to make a decision as to whether they consent to images of their child being taken and used in the public domain (e.g., on school website)
- The school disseminates information to parents relating to e-safety where appropriate in the form of;
 - Information and celebration evenings
 - Information booklets on Facebook/social networking
 - Practical training sessions e.g. How to adjust the privacy settings on games
 - Posters
 - School website

- Newsletter items

Passwords and Password Security

Passwords

Please refer to the document on the grid for guidance on How to Encrypt Files which contains guidance on creating strong passwords and password security

<http://www.thegrid.org.uk/info/dataprotection/index.shtml#securedata>

- **Always use your own** personal passwords
- Make sure you enter your personal passwords each time you logon. Do not include passwords in any automated logon procedures
- Staff should change temporary passwords at first logon
- Change passwords whenever there is any indication of possible system or password compromise
- Do not record passwords or encryption keys on paper or in an unprotected file
- **Only disclose your personal password to authorised ICT support staff when necessary, and never to anyone else.** Ensure that all personal passwords that have been disclosed are changed once the requirement is finished
- **Never tell a child or colleague your password**
- **If you aware of a breach of security with your password or account inform the Headteacher immediately**
- Passwords should be difficult to guess
- Passwords should contain a mixture of upper and lowercase letters, numbers and symbols

If you think your password may have been compromised or someone else has become aware of your password report this to your ICT support team

Password Security

Password security is essential for staff, particularly as they are able to access and use pupil data. Staff are expected to have secure passwords which are not shared with anyone. The pupils are expected to keep their passwords private and not to share with others, particularly their friends. Staff and pupils are regularly reminded of the need for password security.

- All users read and sign an Acceptable Use Agreement to demonstrate that they have understood the school's e-Safety Policy and Data Security
- Users are provided with an individual network, email, learning platform and Management Information System (where appropriate) log-in username. From **Year 5** they are also expected to use a personal password and keep it private
- Pupils are not allowed to deliberately access on-line materials or files on the school network, of their peers, teachers or others unless these have been set up in order to share information
- Staff are aware of their individual responsibilities to protect the security and confidentiality of the school networks, MIS systems and/or learning platform, including ensuring that passwords are not shared and are changed periodically. Individual staff users must also make sure that workstations are not left unattended and are locked.
- Due consideration should be given when logging into the school learning platform, virtual learning environment or other online application to the browser/cache options (shared or private computer)

Zombie Accounts

Zombie accounts refers to accounts belonging to users who have left the school and therefore no longer have authorised access to the school's systems. Such Zombie accounts when left active can cause a security threat by allowing unauthorised access.

- Ensure that all user accounts are disabled once the member of the school has left
- Prompt action on disabling accounts will prevent unauthorized access
- Regularly change generic passwords to avoid unauthorized access (Microsoft© advise every 42 days)

Personal Information Promise

The Information Commissioner's Office launched a Personal Information Promise in January 2009.

The personal information promise is:

I (the Headteacher) on behalf of Lowick & Holy Island C of E First Schools promise that we will:

1. value the personal information entrusted to us and make sure we respect that trust;
2. go further than just the letter of the law when it comes to handling personal information, and adopt good practice standards;
3. consider and address the privacy risks first when we are planning to use or hold personal information in new ways, such as when introducing new systems;
4. be open with individuals about how we use their information and who we give it to;
5. make it easy for individuals to access and correct their personal information;
6. keep personal information to the minimum necessary and delete it when we no longer need it;
7. have effective safeguards in place to make sure personal information is kept securely and does not fall into the wrong hands;
8. provide training to staff who handle personal information and treat it as a disciplinary matter if they misuse or don't look after personal information properly;
9. put appropriate financial and human resources into looking after personal information to make sure we can live up to our promises; and
10. regularly check that we are living up to our promises and report on how we are doing

Personal or Sensitive Information

Protecting Personal, Sensitive, Confidential and Classified Information

- Ensure that any school information accessed from your own PC or removable media equipment is kept secure
- Ensure you lock your screen before moving away from your computer during your normal working day to prevent unauthorised access
- Ensure the accuracy of any personal, sensitive, confidential and classified information you disclose or share with others
- Ensure that personal, sensitive, confidential or classified information is not disclosed to any unauthorised person
- Ensure the security of any personal, sensitive, confidential and classified information contained in documents you fax, copy, scan or print. This is particularly important when shared copiers (multi-function print, fax, scan and copiers) are used and when access is from a non-school environment
- Only download personal data from systems if expressly authorised to do so by your manager
- You must not post on the internet personal, sensitive, confidential, or classified information, or disseminate such information in any way that may compromise its intended restricted audience
- Keep your screen display out of direct view of any third parties when you are accessing personal, sensitive, confidential or classified information
- Ensure hard copies of data are securely stored and disposed of after use in accordance with the document labeling

Storing/Transferring Personal, Sensitive, Confidential or Classified Information Using Removable Media

- Ensure removable media is purchased with encryption
- Store all removable media securely
- Securely dispose of removable media that may hold personal data
- Encrypt all files containing personal, sensitive, confidential or classified data
- Ensure hard drives from machines no longer in service are removed and stored securely or wiped clean

Remote Access

- You are responsible for all activity via your remote access facility
- Only use equipment with an appropriate level of security for remote access
- To prevent unauthorised access to school systems, keep all dial-up access information such as telephone numbers, logon IDs and PINs confidential and do not disclose them to anyone
- Select PINs to ensure that they are not easily guessed, e.g. do not use your house or telephone number or choose consecutive or repeated numbers
- Avoid writing down or otherwise recording any network access information. Any such information that is written down must be kept in a secure place and disguised so that no other person will be able to identify what it is
- Protect school information and data at all times, including any printed material produced while using the remote access facility. Take particular care when access is from a non-school environment

Safe Use of Images

Taking of Images and Film

Digital images are easy to capture, reproduce and publish and, therefore, misuse. We must remember that it is not always appropriate to take or store images of any member of the school community or public, without first seeking consent and considering the appropriateness.

With the written consent of parents (on behalf of pupils) and staff, the school permits the appropriate taking of images by staff and pupils with school equipment

- Staff are not permitted to use personal digital equipment, such as mobile phones and cameras, to record images of pupils, this includes when on field trips. However with the express permission of the Headteacher, images can be taken provided they are transferred immediately and solely to the school's network and deleted from the staff device
- Pupils are not permitted to use personal digital equipment, including mobile phones and cameras, to record images of pupils, staff and others without advance permission from the Headteacher
- Pupils and staff must have permission from the Headteacher before any image can be uploaded for publication

Consent of Adults Who Work at the School

- Permission to use images of all staff who work at the school is sought and a copy is located in the personnel file

Publishing Pupil's Images and Work

On a child's entry to the school and annually, all parents/carers will be asked to give permission to use their child's work/photos in the following ways:

- on the school web site

- in any printed publications that the school may produce for promotional purposes
- recorded/ transmitted on a video or webcam
- on the school's facebook page and social media
- in display material that may be used in the school's communal areas
- in display material that may be used in external areas, ie exhibition promoting the school
- general media appearances, eg local/ national media/ press releases sent to the press highlighting an activity (sent using traditional methods or electronically)

This consent form is considered valid for that academic year, unless there is a change in the child's circumstances where consent could be an issue, eg divorce of parents, custody issues, etc.

Parents or carers may withdraw permission, in writing, at any time.

Pupils' names will not be published alongside their image and vice versa. E-mail and postal addresses of pupils will not be published. Pupils' full names will not be published.

Storage of Images

- Images/ films of children are stored on the school's network
- Pupils and staff are not permitted to use personal portable media for storage of images (e.g., USB sticks) without the express permission of the Headteacher
- Rights of access to this material are restricted to the teaching staff and pupils within the confines of the school network or other online school resource
- ***The Head Teachers and Senior Manager*** has the responsibility of deleting the images when they are no longer required, or when the pupil has left the school

Webcams and CCTV

- The school does not use CCTV.
- We do not use publicly accessible webcams in school
- Webcams in school are only ever used for specific learning purposes, i.e. animation, video conferencing and never using images of children or adults
- Misuse of the webcam by any member of the school community will result in sanctions (as listed under the ' inappropriate materials' section of this document)

Video Conferencing

- Permission is sought from parents and carers if their children are involved in video conferences
- All pupils are supervised by a member of staff when video conferencing
- The school keeps a record of video conferences, including date, time and participants.
- Approval from the Headteacher is sought prior to all video conferences within school
- The school conferencing equipment is not set to auto-answer and is only switched on for scheduled and approved conferences
- No part of any video conference is recorded in any medium without the written consent of those taking part

Additional points to consider:

- Participants in conferences offered by 3rd party organisations may not be DBS checked
- Conference supervisors need to be familiar with how to use the video conferencing equipment, particularly how to end a call if at any point any person taking part becomes unhappy with the content of the conference

School ICT Equipment including Portable & Mobile ICT Equipment & Removable Media

School ICT Equipment

- As a user of the school ICT equipment, you are responsible for your activity
- It is recommended that schools log ICT equipment issued to staff and record serial numbers as part of the school's inventory
- Do not allow your visitors to plug their ICT hardware into the school network points (unless special provision has been made). They should be directed to the wireless ICT facilities if available
- Ensure that all ICT equipment that you use is kept physically secure
- Do not attempt unauthorised access or make unauthorised modifications to computer equipment, programs, files or data. This is an offence under the Computer Misuse Act 1990
- It is imperative that you save your data on a frequent basis to the school's network. You are responsible for the backup and restoration of any of your data that is not held on the school's network
- Personal or sensitive data should not be stored on the local drives of desktop PC, laptop, USB memory stick or other portable device. If it is necessary to do so the local drive must be encrypted
- Privately owned ICT equipment should not be used on a school network, unless with the express permission of the Headteacher
- On termination of employment, resignation or transfer, return all ICT equipment to the school. You must also provide details of all your system logons so that they can be disabled
- It is your responsibility to ensure that any information accessed from your own PC or removable media equipment is kept secure, and that no personal, sensitive, confidential or classified information is disclosed to any unauthorised person
- All ICT equipment allocated to staff must be authorised by the Headteacher. All redundant ICT equipment is disposed of in accordance with Waste Electrical and Electronic Equipment (WEEE) directive and Data Protection Act (DPA)

Portable & Mobile ICT Equipment

This section covers such items as laptops, mobile devices and removable data storage devices. Please refer to the relevant sections of this document when considering storing or transferring personal or sensitive data

- All activities carried out on school systems and hardware will be monitored in accordance with the general policy
- Staff must ensure that all school data is stored on the school network, and not kept solely on the laptop. Any equipment where personal data is likely to be stored must be encrypted
- Equipment must be kept physically secure in accordance with this policy to be covered for insurance purposes. When travelling by car, best practice is to place the laptop in the boot of your car before starting your journey
- Ensure portable and mobile ICT equipment is made available as necessary for anti-virus updates and software installations, patches or upgrades
- The installation of any applications or software packages must be authorised by the ICT support team, fully licensed and only carried out by your ICT support

- In areas where there are likely to be members of the general public, portable or mobile ICT equipment must not be left unattended and, wherever possible, must be kept out of sight
- Portable equipment must be transported in its protective case if supplied

Mobile Technologies

Many emerging technologies offer new opportunities for teaching and learning including a move towards personalised learning and 1:1 device ownership for children and young people. Mobile technologies such as Smartphones, iPads, games players, are generally very familiar to children outside of school. They often provide a collaborative, well-known device with possible internet access and thus open up risk and misuse associated with communication and internet use. Emerging technologies will be examined for educational benefit and the risk assessed before use in school is allowed. Our school chooses to manage the use of these devices in the following ways so that users exploit them appropriately.

Personal Mobile Devices (including phones)

- The school allows staff to bring in personal mobile phones and devices for their own use. The school does not allow a member of staff to contact a pupil or parent/ carer using their personal device except with express permission of the Headteacher
- Pupils are not allowed to bring personal mobile devices/phones to school.
- The school is not responsible for the loss, damage or theft of any personal mobile device
- The sending of inappropriate text messages between any member of the school community is not allowed
- Permission must be sought before any image or sound recordings are made on these devices of any member of the school community
- Users bringing personal devices into school must ensure there is no inappropriate or illegal content on the device

School Provided Mobile Devices (including phones)

- The sending of inappropriate text messages between any member of the school community is not allowed
- Permission must be sought before any image or sound recordings are made on the devices of any member of the school community
- Where the school provides mobile technologies such as phones, laptops and iPads for offsite visits and trips, only these devices should be used
- Where the school provides a laptop for staff, only this device may be used to conduct school business outside of school

Removable Media

If storing or transferring personal, sensitive, confidential or classified information using Removable Media please refer to the section '**Storing/Transferring Personal, Sensitive, Confidential or Classified Information Using Removable Media**'

- Always consider if an alternative solution already exists
- Only use recommended removable media
- Encrypt and password protect
- Store all removable media securely
- Removable media must be disposed of securely by your ICT support team

Servers

- Always keep servers in a secure environment
- Limit access rights
- Always password protect and lock the server
- Existing servers should have security software installed appropriate to the machine's specification
- Back up media should be encrypted by appropriate software
- Data must be backed up regularly
- Back up media must be securely stored in a fireproof container
- Back up media stored off-site must be secure
- Remote back ups should be automatically securely encrypted.
- Newly installed Office Master PCs acting as servers and holding personal data should be encrypted, therefore password protecting data.

Social Media, including Facebook and Twitter

Facebook, Twitter and other forms of social media are increasingly becoming an important part of our daily lives.

- Staff are not permitted to access their personal social media accounts using school equipment except where staff are permitted to access the school facebook page if required with the permission of the Headteacher.
- Pupils are not permitted to access their social media accounts whilst at school
- Staff, governors, pupils, parents and carers are regularly provided with information on how to use social media responsibly and what to do if they are aware of inappropriate use by others
- Staff, governors, pupils, parents and carers are aware that the information, comments, images and video they post online can be viewed by others, copied and stay online forever
- Staff, governors, pupils, parents and carers are aware that their online behaviour should at all times be compatible with UK law

Systems and Access

- You are responsible for all activity on school systems carried out under any access/account rights assigned to you, whether accessed via school ICT equipment or your own PC
- Do not allow any unauthorised person to use school ICT facilities and services that have been provided to you
- Use only your own personal logons, account IDs and passwords and do not allow them to be used by anyone else
- Keep your screen display out of direct view of any third parties when you are accessing personal, sensitive, confidential or classified information
- Ensure you lock your screen before moving away from your computer during your normal working day to protect any personal, sensitive, confidential or otherwise classified data and to prevent unauthorised access
- Ensure that you logoff from the PC completely when you are going to be away from the computer for a longer period of time

- Do not introduce or propagate viruses
- It is imperative that you do not access, load, store, post or send from school ICT any material that is, or may be considered to be, illegal, offensive, libellous, pornographic, obscene, defamatory, intimidating, misleading or disruptive to the school or may bring the school or NCC into disrepute. This includes, but is not limited to, jokes, chain letters, files, emails, clips or images that are not part of the school's business activities; sexual comments or images, nudity, racial slurs, gender specific comments, or anything that would offend someone on the basis of their age, sexual orientation, religious or political beliefs, national origin, or disability (in accordance with the Sex Discrimination Act, the Race Relations Act and the Disability Discrimination Act)
- Any information held on School systems, hardware or used in relation to School business may be subject to The Freedom of Information Act
- Where necessary, obtain permission from the owner or owning authority and pay any relevant fees before using, copying or distributing any material that is protected under the Copyright, Designs and Patents Act 1998
- It is essential that any hard drives which may have held personal or confidential data are 'scrubbed' in way that means the data can no longer be read. It is not sufficient to simply delete the files or reformat the hard drive. Whoever you appoint to dispose of the equipment must provide a **written guarantee** that they will irretrievably destroy the data by multiple over writing the data.

Telephone Services

- You may make or receive personal telephone calls provided:
 1. They are infrequent, kept as brief as possible and do not cause annoyance to others
 2. They are not for profit or to premium rate services
 3. They conform to this and other relevant HCC and school policies.
- School telephones are provided specifically for school business purposes and personal usage is a privilege that will be withdrawn if abused
- Be aware that the laws of slander apply to telephone calls. Whilst a telephone call may seem to have a temporary and private existence it still qualifies as admissible evidence in slander law cases
- Ensure that your incoming telephone calls can be handled at all times

Mobile Phones

- Report the loss or theft of any school mobile phone equipment immediately
- The school remains responsible for all call costs until the phone is reported lost or stolen
- You must read and understand the user instructions and safety points relating to the use of your school mobile phone prior to using it
- School SIM cards must only be used in school provided mobile phones
- All school mobile phones are barred from calling premium rate numbers and any numbers outside of the UK as the default
- You must not send text messages to premium rate services
- You must reimburse the school for the cost of any personal use of your school mobile phone. This includes call charges incurred for incoming calls whilst abroad. [To assist you in identifying personal use, add * to the end of the number being contacted, these will be shown separately on your bill]. Payment arrangements should be made through your finance administrator

- Never use a hand-held mobile phone whilst driving a vehicle. Only genuine 999 or 112 emergency calls may be made if it would be unsafe to stop before doing so.

Review Procedure

There will be on-going opportunities for staff to discuss with the e-safety designated person any e-safety issue that concerns them

There will be on-going opportunities for staff to discuss with the SIRO/AIO any issue of data security that concerns them

This policy will be reviewed every (12) months and consideration given to the implications for future whole school development planning

The policy will be amended if new technologies are adopted or Central Government change the orders or guidance in any way

This policy has been read, amended and approved by the staff, head teacher and governors.