**ICT Security Policy**

1. **Introduction**
   1. It is a necessary part of everyday working life within school to allow staff and pupils to access desktop computers, laptops, tablets or other digital devices to carry out work and research. We must ensure that such use is carried out in a safe and secure manner with regard for the need to protect any personal information contained on such systems.

This policy sets out the following information:

* The purpose and scope of the policy
* Definitions of key terms used in the policy
* Roles and responsibilities
* Management of the policy
* Physical security
* Legitimate use
* Security breaches
* Implications of non-compliance with the policy

1. **Purpose and scope of the policy**
   1. The purpose of this policy to protect the school’s information stored electronically from all threats (internal and external) be these deliberate or accidental.
   2. In order to carry out the purpose at 2.1 above, it is imperative that all staff are aware of the need for ICT and data security to be an integral part of the day to day operation of the school.
   3. The school will ensure that:
      1. ICT and information stored electronically will be protected against unauthorised access
      2. Information, in particular personal data, is kept confidential
      3. Integrity of information will be assured
      4. Regulatory and legislative requirements are complied with
      5. ICT security or data protection training is made available to all staff.
   4. All staff must ensure that the equipment and any data is adequately protected against action that could adversely impact the school.
   5. All staff should be made aware of, and fully comply with, all relevant legislation relating to information and ICT security.
   6. This policy is for all staff members, governors and volunteers who have access to, or supervise children’s use of, ICT equipment belonging to the school. Additional requirements and policies covering pupils ICT system usage are covered by the school’s ‘Acceptable Use of Digital Technologies Online (e-Safety) Policy 2019.’

**Definitions**

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| ICT/ICT systems | means any device or combination of devices used for the storage or processing of data, including: desktop computer, laptop computer, netbook, notebook, IPad, tablet or any other similar device. |
| ICT data | any information stored and processed within the ICT system including documents, programs, text, pictures and sound. |
| ICT use | applies to any school employee, governor, volunteer, pupil or other authorized person who uses the school’s ICT systems. |
| Authorised Personnel | as above |

1. **Roles and Responsibilities**
   1. The ICT security policy should be followed by all staff but it is the responsibility of the Governing body and the Head Teacher to ensure that the policy is complied with.
   2. The Governing body has the ultimate responsibility for ensuring that the school complies with the legislative requirements relating to the use of ICT systems and data security.
   3. The Head Teacher is responsible for the day-to-day implementation and compliance with the policy.
   4. The Head Teacher is responsible for ensuring that users of the systems are familiar with this policy and adhere to the requirements of it, and associated policies.
   5. The day-to-day functions relating to ICT security are delegated to the contracted IT support provider and are managed internally by the ICT Manager.
   6. The IT support provider/ICT Manager are responsible for the practical aspects of ICT protection such as maintaining the integrity of the data, producing the requisite back-up copies of data and protection of the physical access to systems and data.
   7. The ICT Manager will be the point of contact for ICT security issues and is responsible for notifying the Head Teacher (or Chair of Governors) and Data Protection Officer of any suspected or actual breach of ICT security. Further information about breaches is set out in section 7 of this policy.
   8. The ICT Manager, with support from the IT support provider, is responsible for maintaining, repairing and proactively supporting the ICT System so that it can meet the requirements of the ICT Security Policy. The ICT Manager will also monitor the ICT system for breaches of security.
   9. The Data Protection Officer (DPO) is responsible for ensuring that the policy is being adhered to in order to comply with the data security requirements and current data protection laws.
   10. Users are those employees, governors, pupils, volunteers or other authorised personnel of the school who make use of the ICT system to support them in their work. All users of the school’s ICT systems and data must comply with this policy. The school also has an ‘Acceptable Use Policy’ which sets out additional responsibilities of such users.
   11. Users are responsible for notifying (optionally via the ICT Manager) the Head Teacher and DPO of any suspected or actual breach of the ICT security.
   12. Users are responsible for the equipment they use and should ensure the physical security, data security, their password security and that their work is protected/backed up at all times.
2. **Management of the Policy**
   1. Sufficient resources should be allocated each year to ensure the security of the school’s ICT systems and to enable users to comply fully with the legal requirements and other matters covered in this policy. If insufficient resources are available to fully implement this policy, then the potential risks must be documented and reported to Governors by the Head Teacher.
   2. Suitable training for all ICT users and documentation to promote the proper use of ICT systems will be provided. Users will also be given adequate information on the policies, procedures and facilities to help safeguard these systems and related data. A record of the training provided through the school to each individual user will be maintained.
   3. Users will be made aware of the value and importance of such ICT systems and data, particularly data of a confidential or sensitive nature, and be made aware of their personal responsibilities for ICT security.
   4. The Head Teacher should be responsible for ensuring that any new members of staff are aware of the requirements of this policy and that they have read and signed the school ‘Acceptable Use Policy’.
   5. The Head Teacher should liaise with the ICT Manager/IT support provider in order to set up the individual user and manage the access rights that the user has including any necessary limitations of access/use of data.
   6. The Head Teacher is responsible for ensuring that any staff member leaving a post returns any ICT equipment provided to them for their time in post.
3. **Physical Security**
   1. The school should ensure that the adequate security measures are put in place to protect rooms containing ICT equipment (including the server and any cabling). If possible, only authorised personnel should be allowed access to rooms containing servers; if this is not possible then adequate security measures need to be in place to protect servers.

* 1. The ICT Manager shall be responsible for ensuring the safe and secure removal of any ICT equipment. If the ICT equipment is to be destroyed this shall be done in a safe and secure manner, safeguarding any data.
  2. The location of laptops, computers or other ICT devices that are used to access and process personal data should be considered to avoid screens being viewed by anyone who is not authorised to have sight or access to that personal data.
  3. Staff members should lock computers/other digital devices when leaving these unattended.
  4. Any hard copies of personal data should not be left out on desks when the desk is unattended.
  5. The ICT Manager, in accordance with the School’s financial regulations, shall ensure that an inventory of all ICT equipment is maintained and that all items are accounted for; this review should take place at least once in the school year.
  6. Any ICT equipment taken off site must be kept secure at all times.

1. **Legitimate Use**
   1. All staff members must ensure that ICT facilities are not used in any way that breaks the law or breaches the school’s ‘Acceptable Use Policy’.
   2. It is important to note that risks can occur from the use of unlicensed or unprotected software. The user should ensure that any software used within school and on school systems is authorised by the ICT Manager/IT support provider, who should in turn, as needed, confirm GDPR compliance with the DPO.
   3. Only authorised personnel who have agreed to use ICT systems in compliance with the school’s ICT policies should be allowed access to the ICT systems. If a staff member, volunteer or other authorised person has failed to sign the ‘Acceptable Use Policy’ then they should not be permitted to use the ICT systems until they have read and signed to agree that they will comply with that policy.
   4. Laptop/computer, drive encryption and email passwords must be a minimum of 15 characters, including a mix of letters (upper/lower case), numbers and symbols. The ICT Manager should set up procedures to ensure that all staff are reminded to change such passwords at least once every academic year.
   5. Passwords should be memorized. If a password is written down it must not be kept with the device.
   6. All ICT systems should be protected by passwords, users locking devices when they leave them, this being time-activated following no more than 10 minutes of inactivity.
   7. If a staff member leaves the school any accounts accessed by should them closed, any shared staff passwords they had access to, changed, both upon the date of departure. If an individual suspects that their password has been compromised or that their access to a system has been breached, their password must be changed as soon as possible and the staff member (optionally via the ICT Manager) inform the Head Teacher and DPO.
   8. Staff members must not give their passwords out to other people including other authorised personnel.
   9. Only devices approved by the ICT Manager should be permitted to be connected to the network. Where devices are connected to the network the wireless network must be secure. Open Access Wireless Access Points must not be connected to the school’s network.
   10. Mobile devices may connect to the network but only when permitted and with full compliance with the this policy and the ‘Acceptable Use Policy’.
   11. Encryption is applied to wireless networks, encryption keys should be kept secure and remain the secure property of the ICT Manager/IT support provider.
   12. Access to the internet for children should be filtered using an approved system. It is the responsibility of the ICT manager to monitor effectiveness of the filtering system and report any issues, including breaches or suspected breaches, to the Head Teacher.
   13. In case of an ICT system failure, back-up copies of stored data will be taken at regular intervals as determined by the ICT Manager.
   14. Data essential for the day-to-day running of the school should be stored on the school’s network.
   15. Any physical drive backups containing data that must be protected should be clearly marked stating what they are and when they were taken, encrypted and stored securely, whether on or offsite.
   16. The ICT Manager/IT support provider must ensure that all ICT systems are protected with appropriate anti-virus software and take precautions to avoid malicious software that may destroy or corrupt data.
   17. All users need to be aware that any ICT system device suspected of being infected with a virus must be disconnected from the network and reported to the ICT manager as soon as possible. The ICT manager/IT support provider must then take steps to remove the virus and protect the system.
   18. Any third-party laptops/mobile devices not normally connected to the school network must be checked by the ICT Manager for viruses and anti-virus software before being allowed to connect to the network.
   19. All personal data held on ICT systems including USB sticks and other portable ICT equipment must be confidentially and permanently destroyed in line with the Records Management and Retention Policy prior to a device being destroyed.
   20. If any ICT equipment is no longer in use by the school and is to be disposed of in any way, then the ICT Manager must ensure that all personal data has been removed from that system prior to its disposal.
   21. If any ICT equipment is damaged and repairs are to be carried out by a third party then the equipment must be assessed to see what, if any, personal data is held on that equipment. Any personal data should be protected before the equipment is provided to the third party for repair.
   22. The school should avoid duplication of personal data in multiple locations and should therefore avoid saving and storing anything containing personal data on device desktops.
2. **Security Breaches**
   1. All suspected or actual breaches of ICT security shall be reported to the ICT Manager, the Head Teacher and the Data Protection Officer in line with Section 3 above.
   2. Steps must be taken by the ICT Manager or designated person, to ensure that the adequate protections are put in place as soon as a breach is suspected.
   3. Steps must be taken to identify the cause of the breach and to update any policies and procedures to try and avoid the breach occurring in the future.
   4. Any risk to personal data caused by the breach must be reported to the Data Protection Officer and the necessary steps under the Data Protection Policy for dealing with breaches should be followed.

#### **Breach of Policy**

#### The ICT Manager, Head Teacher and the DPO are responsible for reviewing and monitoring compliance with this policy in line with section 3 above.

#### 8.2 Any reports of staff, governors or third parties breaching this policy, or its associated policies, should be reported to the ICT Manager/Head Teacher and investigated fully. Any breaches will be taken seriously.

**Relationship with existing policies**

This policy should be read in conjunction with the following policies:

* ‘Acceptable Use Policy’
* Data Protection policy

Any member of staff who fails to comply with the requirements of this policy, and these associated policies, may be subject to disciplinary action.

Policy to be reviewed April 2020.