



We are a learning community with the spirit to succeed

## Holywell Primary School

### Data Security Policy

(based on Herts Model Policy for eSafety and Data Security issued January 2016)

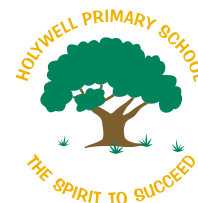
<b>Status:</b>	Statutory
<b>Approval Body:</b>	Governing Body
<b>Review Frequency:</b>	2 Years
<b>Last Review:</b>	June 2022
<b>Next Review:</b>	Summer 2024

## CONTENTS

Introduction .....	1
Monitoring .....	1
Breaches.....	2
Incident Reporting.....	2
Computer viruses .....	2
Data security .....	3
Security .....	3
Protective Marking.....	4
Relevant Responsible Persons.....	4
Information Asset Owner (IAO) .....	5
Disposal of redundant ict equipment policy .....	5
E-mail.....	7
Managing e-mail .....	7
Sending e-mails.....	8
Receiving e-mails .....	8
E-mailing Personal, Sensitive, Confidential or Classified Information .....	8
Internet access .....	9
Managing the Internet.....	9
Internet Use.....	9
Infrastructure.....	10
Managing other online technologies .....	10
Passwords and password security .....	11
Passwords.....	11
Password Security .....	12
Zombie Accounts.....	12
Personal or sensitive information .....	13
Protecting Personal, Sensitive, Confidential and Classified Information.....	13
Storing/Transferring Personal, Sensitive, Confidential or Classified Information Using Removable Media.....	13
Remote access.....	14
Safe use of images.....	14
Consent of Adults Who Work at the School.....	14
Publishing Pupil’s Images and Work .....	14

Storage of Images .....	<b>15</b>
Webcams and CCTV.....	1
Video Conferencing.....	16
School ict equipment including portable & mobile ict equipment & removable media.....	17
School ICT Equipment.....	<b>17</b>
Portable & Mobile ICT Equipment .....	<b>18</b>
Mobile Technologies .....	<b>18</b>
Removable Media .....	<b>19</b>
Servers.....	19
Systems and access .....	20
Telephone services.....	21
Reviewing this policy.....	21
Further help and support .....	22
Current legislation.....	22
Acts Relating to Monitoring of Staff email .....	<b>22</b>
Acts Relating to the Protection of Personal Data .....	<b>23</b>
Appendix 1 – Information risk actions form .....	24

**Data Security Policy**



**1. Introduction**

Schools hold personal data on learners, staff and others 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 community 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.

**2. Monitoring**

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, video 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.

**3. 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.

For staff any policy breach is grounds for disciplinary action in accordance with the school Disciplinary Procedure or, for Support Staff, in their Probationary Period as stated.

Policy breaches may also lead to criminal or civil proceedings.

The Information Commissioner's 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 Coert van Straaten (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 the relevant responsible person. The relevant responsible individual in the school is as follows: Coert van Straaten (Headteacher).

## **4. 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.
- If your machine is not routinely connected to the school network, you must make provision for regular virus updates through or SITTS.
- 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.

## 5. Data Security

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

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
- 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
- Staff have read the relevant guidance documents available on the SITSS website concerning GDPR, data protection and Freedom of Information (FOI) available on the grid at - <http://www.thegrid.org.uk/info/dataprotection/index.shtml#securedata>)
- Leadership have identified relevant responsible persons 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
- HCC 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

### **Relevant responsible persons**

Senior members of staff should be familiar with information risks and the school's response. Sometimes called a SIRO, there should be a member of the senior leadership team who has the following responsibilities:

- they lead on the information risk policy and risk assessment
- they advise school staff on appropriate use of school technology
- they act as an advocate for information risk management

### **Information Asset Owner (AIO)**

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. A responsible member of staff should be able to identify across the school:

- 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 of

As a result this manager is able to manage and address risks to the information and make sure that information handling complies with legal requirements.

However, it should be clear to all staff that 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.

## 6. Disposal of Redundant ICT Equipment Policy

- All redundant ICT equipment will be disposed of through an authorised agency. 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 overwritten 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/si2006/uksi_20063289_en.pdf)

[http://www.opsi.gov.uk/si/si2007/pdf/uksi\\_20073454\\_en.pdf?lang=e](http://www.opsi.gov.uk/si/si2007/pdf/uksi_20073454_en.pdf?lang=e)

Data Protection Act 1998

<https://ico.org.uk/for-organisations/education/>

Electricity at Work Regulations 1989

[http://www.opsi.gov.uk/si/si1989/uksi\\_19890635\\_en\\_1.htm](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

Further information available at:

## **Waste Electrical and Electronic Equipment (WEEE) Regulations**

### **Environment Agency web site**

Introduction

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

The Waste Electrical and Electronic Equipment Regulations 2006

[http://www.opsi.gov.uk/si/si2006/uksi\\_20063289\\_en.pdf](http://www.opsi.gov.uk/si/si2006/uksi_20063289_en.pdf)

The Waste Electrical and Electronic Equipment (Amendment) Regulations 2007

[http://www.opsi.gov.uk/si/si2007/pdf/uksi\\_20073454\\_en.pdf?lang=e](http://www.opsi.gov.uk/si/si2007/pdf/uksi_20073454_en.pdf?lang=e)

### **Information Commissioner website**

<https://ico.org.uk/>

### **Data Protection Act – data protection guide, including the 8 principles**

<https://ico.org.uk/for-organisations/education/>

### **PC Disposal – SITSS Information**

[http://www.thegrid.org.uk/info/traded/sitss/services/computer\\_management/pc\\_disposal/](http://www.thegrid.org.uk/info/traded/sitss/services/computer_management/pc_disposal/)

## 7. 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 how to behave responsible online.

### Managing email

- 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
- The school requires a standard disclaimer to be attached to all e-mail correspondence, stating that, 'the views expressed are not necessarily those of the school or the LA'. The responsibility for adding this disclaimer lies with the account holder
- All e-mails should be written and checked carefully before sending, in the same way as a letter written on school headed paper
- Staff sending e-mails to external organisations, parents or pupils are advised to cc. the Headteacher, line manager or designated line manager
- Pupils may only use school approved accounts on the school system 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
- Pupils must immediately tell a teacher/ trusted adult if they receive an offensive or upsetting e-mail
- Staff must inform (the eSafety co-ordinator or line manager) if they receive an offensive e-mail

- Pupils are introduced to e-mail as part of the Computing Programme of Study
- 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 **Error! Reference source not found.**
- 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
- Please do not open attachments from suspicious or untrustworthy source/email as these may be of a fraudulent nature. For examples of recent fraudulent events please see here: <https://thegrid.org.uk/finance/shared-anti-fraud-service/recent-fraud-alerts>
- 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 and deletion 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.
    - 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 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

## 8. 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. All internet use through the HICS network (Hertfordshire Internet Connectivity Service) is logged and the logs are randomly but regularly monitored. Whenever any inappropriate use is detected it will be followed up.

### Managing the internet

- The school provides pupils with supervised access to Internet resources (where reasonable) through the school's fixed and mobile internet connectivity
- Staff will preview any recommended sites, online services, software and apps before use
- Searching for images through open search engines is 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

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

### **Infrastructure**

- Hertfordshire Local Authority has a monitoring solution via the Hertfordshire Grid for Learning where web-based activity is monitored and recorded
- School internet access is controlled through the HICS web filtering service. For further information relating to filtering please go to <http://www.thegrid.org.uk/eservices/safety/filtered.shtml>
- Holywell Primary 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 internet activity can be monitored and explored further if required
- The school does not allow pupils access to internet logs
- The school uses management control tools for controlling and monitoring workstations
- It is the responsibility of the school, by delegation to the network manager, SITTS , to ensure that anti-virus protection is installed and kept up-to-date on all school machines
- Pupils and staff are not permitted to download programs or files on school based technologies without seeking prior permission from the Headteacher .
- If there are any issues related to viruses or anti-virus software, the network manager should be informed through the ICT log that is saved on the Staff Drive

## **9. Managing other online 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 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
- Services such as Facebook and Instagram have a 13+ age rating which should not be ignored <http://www.coppa.org/comply.htm>

## 10. Passwords and password security

### Passwords

#### Requirements:

- All system-level passwords (Administrator, etc.) must be changed from any generic default, and then reset when required (e.g. after a suspected breach).
- All user-level passwords (e.g. email, web, desktop computer, etc.) must be changed from any generic default, and then reset when required (e.g. after a suspected breach, or after a change in staffing).
- All user-level and system-level passwords must conform to the standards described below.

Standards - All users should be aware of how to select strong passwords. Strong passwords have the following characteristics:

- Contain at least eight alphanumeric characters.
- The password is NOT a word found in a dictionary (English or foreign).
- The password is NOT a name or common pattern (e.g. 12345678).
- Passwords could also contain several of the five following character classes Lower case characters; Upper case characters; Numbers; Punctuation; "Special"

characters (e.g. @\$%^&\*()\_+|~-=\`{}[]:”’;<>/). However, this should only be used in conjunction with the above rules (‘P4ssw0rd’ is no more secure than ‘Password’).

- 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 Head immediately**
- Passwords must contain a minimum of six characters and be difficult to guess
- Passwords should contain a mixture of upper and lowercase letters, numbers and symbols
- User ID and passwords for staff and pupils who have left the school are removed from the system within **one week**

**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.

- Users are provided with an individual network, email, learning platform and Management Information System log-in username. From Year 1 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 or local storage devices of their peers, teachers or others
- 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. The automatic log-off time for the school network is 19.00

- 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)
- In our school, all ICT password policies are the responsibility of **the** Headteacher and all staff and pupils are expected to comply with the policies at all times

### **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 unauthorised access (Microsoft® advise every 42 days)

## **11. 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, and remove any portable media from computers when not attended.
- 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

Please refer to the document on the grid for guidance on How to Encrypt Files

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

## **12. 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, eg 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

### 13. Safe use of images

#### Consent of adults who work at the school

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

#### Publishing pupil's images and work

On a child's entry to the school, 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 the school prospectus and other printed publications that the school may produce for promotional purposes
- recorded/ transmitted on a video or webcam
- on the school's learning platform or Virtual Learning Environment
- 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 the entire period that the child attends this school 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. Consent must also be given in writing and will be kept on record by the school.

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.

Before posting student work on the Internet, a check needs to be made to ensure that permission has been given for work to be displayed.

Only the Headteacher, can authority to upload to the internet.

For further information relating to issues associated with school websites and the safe use of images in Hertfordshire schools, see

<http://www.thegrid.org.uk/schoolweb/safety/index.shtml>

<http://www.thegrid.org.uk/info/csf/policies/index.shtml#images>

### **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 (eg, 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
- All staff have 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 uses CCTV for security and safety. The only people with access to this is the Headteacher. Notification of CCTV use is displayed at the front of the school. Please refer to the hyperlink below for further guidance <https://ico.org.uk/about-the-ico/consultations/cctv-code-of-practice-revised/>
- We do not use publicly accessible webcams in school
- Webcams will not be used for broadcast on the internet without prior parental consent
- 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)
  - Webcams can be found **in the ICT suite**. Notification is given in this/these area(s) filmed by webcams by signage
  - Consent is sought from parents/carers and staff on joining the school, in the same way as for all images
- Webcams include any camera on an electronic device which is capable of producing video. School policy should be followed regarding the use of such personal devices

For further information relating to webcams and CCTV, please see <http://www.thegrid.org.uk/schoolweb/safety/webcams.shtml>

### **Video conferencing**

- Permission is sought from parents and carers if their children are involved in video conferences with end-points outside of the school
- 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 to

end-points beyond the 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 3<sup>rd</sup> party organisations may not be DBS (previously CRB) 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

For further information and guidance relating to Video Conferencing, please see

<http://www.thegrid.org.uk/learning/ict/technologies/videoconferencing/index.shtml>

#### **14. 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
- It is recommended that a time locking screensaver is applied to all machines. Any device

accessing personal data must have a locking screensaver as must any user profiles

- Privately owned ICT equipment should not be used on a school network
- On termination of employment, resignation or transfer, return all ICT equipment to your Manager. 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 appropriate Line Manager. Authorising Managers are responsible for:
  - maintaining control of the allocation and transfer within their unit
  - recovering and returning equipment when no longer needed
- 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
- Synchronise all locally stored data, including diary entries, with the central school network server on a frequent basis
- 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. Under no circumstances does the school allow a member of staff to contact a pupil or parent/ carer using their personal device
- Pupils are allowed to bring personal mobile devices/phones to school but must not use them for personal purposes within lesson time. At all times the device must be switched onto silent
- This technology may be used for educational purposes, as mutually agreed with the Headteacher. The device user, in this instance, must always ask the prior permission of the bill payer
- 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
- The school strongly advises against image or sound recordings to be made on these devices of any member of the school community, if for whatever reason this is required, clear justification and permission is required before the activity is carried out.
- 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 '**Error! Reference source not found.**' - Page 13

- 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

## **15. Servers**

- Always keep servers in a locked and 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
- Backup tapes should be encrypted by appropriate software
- Data must be backed up regularly
- Backup tapes/discs must be securely stored in a fireproof container
- Back up media stored off-site must be secure
- Remote backups should be automatically securely encrypted. SITSS provide an encrypted remote back up service. Please contact the SITSS helpdesk for further information – 01438 844777
- Newly installed Office Master PCs acting as servers and holding personal data should be encrypted, therefore password protecting data. At the moment SITSS do not encrypt servers, however Office PCs (including Office Master PCs) installed by SITSS are supplied with encryption software installed

## **16. 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
- Ensure you remove portable media from your computer when it is left unattended
- 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, libelous, pornographic, obscene, defamatory, intimidating, misleading or disruptive to the school or may bring the school or HCC 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.

## 17. Telephone services

- School telephones are provided solely for school business purposes and personal usage is not permitted.
- 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
- Follow the appropriate procedures in the event of receiving a telephone call containing a bomb threat. These procedures should be made readily available throughout your office. If you do not have a copy, please ask the Office Manager

## 18. Reviewing this policy

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 2 years and consideration given to the implications for future whole school development planning

The policy may be amended within the next reporting cycle 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, Headteacher and governors

## 19. Further help and support

Your organisation has a legal obligation to protect sensitive information under the Data Protection Act 1998. For more information visit the website of the Information Commissioner's Office <https://ico.org.uk/>

Further guidance -

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

School's toolkit is available - Record Management Society website –

<http://www.rms-gb.org.uk/resources/848>

Data Protection Team – Email:- [DPO@holywell.herts.sch.uk](mailto:DPO@holywell.herts.sch.uk)

## 20. Current legislation

### **Acts relating to monitoring of staff email**

#### ***Data Protection Act 1998***

The Act requires anyone who handles personal information to comply with important data protection principles when treating personal data relating to any living individual. The Act grants individuals rights of access to their personal data, compensation and prevention of processing.

<http://www.hms.gov.uk/acts/acts1998/19980029.htm>

### ***The Telecommunications (Lawful Business Practice)***

#### ***(Interception of Communications) Regulations 2000***

<http://www.hmso.gov.uk/si/si2000/20002699.htm>

#### ***Regulation of Investigatory Powers Act 2000***

Regulating the interception of communications and making it an offence to intercept or monitor communications without the consent of the parties involved in the communication. The RIP was enacted to comply with the Human Rights Act 1998. The Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000, however, permit a degree of monitoring and record keeping, for example, to ensure communications are relevant to school activity or to investigate or detect unauthorised use of the network. Nevertheless, any monitoring is subject to informed consent, which means steps must have been taken to ensure that everyone who may use the system is informed that communications may be monitored. Covert monitoring without informing users that surveillance is taking place risks breaching data protection and privacy legislation.

<http://www.hmso.gov.uk/acts/acts2000/20000023.htm>

#### ***The Computer Misuse Act 1990 (sections 1 – 3)***

Regardless of an individual's motivation, the Act makes it a criminal offence to gain:

- access to computer files or software without permission (for example using another person's password to access files)
- unauthorised access, as above, in order to commit a further criminal act (such as fraud)
- impair the operation of a computer or program

UK citizens or residents may be extradited to another country if they are suspected of committing any of the above offences.

#### ***Malicious Communications Act 1988 (section 1)***

This legislation makes it a criminal offence to send an electronic message (e-mail) that conveys indecent, grossly offensive, threatening material or information that is false; or is of an indecent or grossly offensive nature if the purpose was to cause a recipient to suffer distress or anxiety.

#### ***Human Rights Act 1998***

<http://www.hmso.gov.uk/acts/acts1998/19980042.htm>

#### **Acts relating to the protection of personal data**

***Data Protection Act 1998***

[http://www.opsi.gov.uk/acts/acts1998/ukpga\\_19980029\\_en\\_1](http://www.opsi.gov.uk/acts/acts1998/ukpga_19980029_en_1)

***The Freedom of Information Act 2000***

<https://ico.org.uk/for-organisations/guide-to-freedom-of-information/>

