



# **eSafety and Data Security Policy**

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## Introduction

ICT in the 21<sup>st</sup> Century is 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
- Learning Platforms and Virtual Learning Environments
- E-mail and Instant Messaging
- Chat Rooms and Social Networking
- Blogs and Wikis
- Podcasting
- Video Broadcasting
- Music Downloading
- Gaming
- Mobile/ Smart phones with text, video and/ or web functionality
- Other mobile devices with web functionality

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.

At Castle Camps, we understand the responsibility to educate our pupils on eSafety 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 PCs, laptops, personal digital assistants (PDAs), tablets, webcams, whiteboards, voting systems, digital video equipment, etc); and technologies owned by pupils and staff, but brought onto school premises (such as laptops, mobile phones, camera phones, PDAs and portable media players, etc).

## Monitoring and Breaches

The Head Teacher may inspect any ICT equipment owned or leased by the School at any time without prior notice.

The Head Teacher also reserves the right to 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 the school's employees or contractors, 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.

All monitoring, surveillance or investigative activities conducted by the Head Teacher must 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 Cambridgeshire County Council staff.

### **Breaches and Incident Reporting**

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 Cambridgeshire County Council Disciplinary Procedure.

Policy breaches may also lead to criminal or civil proceedings.

Any security breaches or attempts, loss of equipment and any unauthorised use or suspected misuse of ICT must be immediately reported to the Head Teacher. Additionally, all security breaches, lost/stolen equipment or data, virus notifications, unsolicited emails, misuse or unauthorised use of ICT and all other policy non-compliance must be reported to the Head Teacher.

See flowcharts on pages 29 & 30 for dealing with both illegal and non-illegal incidents

## Data Security

- All files downloaded from the Internet, received via e-mail or on removable media (e.g. floppy disk, CD) must be checked for any viruses using school provided anti-virus software before using them
- 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

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

The school follows Department for Education guidelines <http://www.education.gov.uk/schools/pupilsupport/pastoralcare/b00198456/principles-of-e-safety> and the Local Authority guidance documents listed below

The safe use of new technologies - Ofsted  
<http://www.ofsted.gov.uk/resources/safe-use-of-new-technologies>

e-Safety Audit Tool - Information for Governors, Management and Teachers  
[http://www.nen.gov.uk/hot\\_topic](http://www.nen.gov.uk/hot_topic)

In relation to data security, the Castle Camps Primary School adheres to the following guidelines:

- The school gives relevant staff access to its Management Information System, with a unique ID 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 EGfL website
- Leadership have identified Senior Information Risk Owner (SIRO) and Asset Information Owner(s) (AIO)
- 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.



## Disposal of Redundant ICT Equipment Policy

- All redundant ICT equipment will be disposed off through an authorised agency only. 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/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

[http://www.ico.gov.uk/what\\_we\\_cover/data\\_protection.aspx](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](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 e.g. 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**

<http://www.ico.gov.uk/>

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

[http://www.ico.gov.uk/for\\_organisations/data\\_protection\\_guide.aspx](http://www.ico.gov.uk/for_organisations/data_protection_guide.aspx)

## 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.

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### 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 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 account
- 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. However the school has set up a dummy account (***specify address***) to allow pupils to forward any chain letters causing them anxiety. No action will be taken with this account by any member of the school community

- All pupil e-mail users are expected to adhere to the generally accepted rules of netiquette particularly in relation to the use of appropriate language and not revealing any personal details about themselves or others in e-mail communication, or arrange to meet anyone without specific permission, virus checking attachments
- Staff must inform the Head Teacher 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
- The use of Hotmail, BTInternet, AOL or any other Internet based webmail service for sending, reading or receiving business related e-mail is not permitted

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## **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
- If you are required to send an e-mail from someone else's account, always sign on through the 'Delegation' facility within your e-mail software so that you are identified as the sender (if available within your software)
- 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
- An outgoing e-mail greater than ten megabytes (including any attachments) is likely to be stopped automatically. This size limit also applies to incoming e-mail
- School e-mail is not to be used for personal advertising

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## Receiving e-Mails

- Check your e-mail regularly
- Use the 'Delegation' facility within your e-mail software so that your e-mail can be handled by someone else while you are not at work (if available within your software)
- Never open attachments from an untrusted source; Consult your network manager first.
- The automatic forwarding to personal accounts is not allowed

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## e-mailing Personal, Sensitive, Confidential or Classified Information

- The use of Hotmail, BTInternet, AOL or any other Internet based webmail service for sending e-mail containing sensitive information is not permitted
- 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:
    - 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) – preferably by telephone
  - Do not identify such information in the subject line of any e-mail
  - Request confirmation of safe receipt

In exceptional circumstances, the County Council makes provision for secure data transfers to specific external agencies. Such arrangements are currently in place with: Cambridgeshire Police, Cambridgeshire NHS Trusts and Cambridgeshire County Council.

## 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 eSafety co-ordinator in this school is *(name)* who has been designated this role as a member of the senior leadership team. All members of the school community have been made aware of who holds this post. It is the role of the eSafety co-ordinator to keep abreast of current issues and guidance through organisations such as Becta, CEOP (Child Exploitation and Online Protection) and Childnet.

Senior Management and Governors are updated by the Head/ eSafety co-ordinator 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

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### eSafety in the Curriculum

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

- The school has a framework for teaching eSafety skills in PSHE and computing lessons
- The school provides opportunities within a range of curriculum areas to teach about eSafety
- Educating pupils on the dangers of technologies that maybe encountered outside school is done informally when opportunities arise and as part of the eSafety 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 and respecting other people's information, images, etc through discussion, modeling and 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 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

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### **eSafety Skills Development for Staff**

- Our staff (and parents) receive regular information and training on eSafety issues in the form of yearly staff training and parent presentations.
- New staff receive information on the school's acceptable use policy as part of their induction
- All staff have been made aware of individual responsibilities relating to the safeguarding of children within the context of eSafety and know what to do in the event of misuse of technology by any member of the school community (see enclosed flowchart)
- All staff are encouraged to incorporate eSafety activities and awareness within their curriculum areas

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### **Managing the School eSafety Messages**

- We endeavour to embed eSafety messages across the curriculum whenever the internet and/or related technologies are used
- The eSafety policy will be introduced to the pupils at the start of each school year
- eSafety displays will be prominently displayed in each classroom

## Incident Reporting, eSafety 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 Head Teacher. 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 Head Teacher.

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### Misuse and Infringements

#### Complaints

Complaints and/ or issues relating to eSafety should be made to the eSafety co-ordinator or Headteacher. All incidents should be logged.

#### Inappropriate Material

- All users are aware of the procedures for reporting accidental access to inappropriate materials. The breach must be immediately reported to the eSafety co-ordinator
- Deliberate access to inappropriate materials by any user will lead to the incident being logged by the eSafety co-ordinator, 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)
- Users are made aware of sanctions relating to the misuse or misconduct through reading the 'Acceptable Use of Technology' Policy



## Internet Access

The internet is an open communication medium, available to all, 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.

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### Managing the Internet

- The school maintains students who will have supervised access to Internet resources (where reasonable) through the school's fixed and mobile internet technology
- Staff will preview any recommended sites before use
- 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

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### Internet Use

- You must not post personal, sensitive, confidential or classified information or disseminate such information in any way that may compromise its intended restricted audience
- Don't reveal names of colleagues, customers or clients or any other confidential information acquired through your job on any social networking site or blog
- On-line gambling or gaming is not allowed

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

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## Infrastructure

- Cambridgeshire County Council has a monitoring solution where web-based activity is monitored and recorded
- School internet access is controlled through the LA's web filtering service.
- Castle Camps 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
- 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 Head 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 are not permitted to download programs or files on school based technologies without seeking prior permission from the Head Teacher
- If there are any issues related to viruses or anti-virus software, the network manager should be informed through the Education ICT Service on 0300 300 000

## Managing Other Web 2 Technologies

Web 2, 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 sites to pupils within school
- All pupils are advised to be cautious about the information given by others on sites, 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 sites 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 such sites 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 profiles on such sites to maximum privacy and deny access to unknown individuals
- Pupils are encouraged to be wary about publishing specific and detailed private thoughts online
- Our pupils are asked to report any incidents of bullying to the school
- Staff may only create blogs, wikis or other web 2 spaces in order to communicate with pupils using the LA 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 eSafety both in and outside of school and also to be aware of their responsibilities. We regularly consult and discuss eSafety with parents/ carers and seek to promote a wide understanding of the benefits related to ICT and associated risks.

- Parents/ carers are asked to read through and sign acceptable use agreements on behalf of their child on admission to school
- Parents/ carers are required to make a decision as to whether they consent to images of their child being taken/ used in the public domain (e.g., on school website)
- Parents/ carers are expected to sign a Home School agreement
- The school disseminates information to parents relating to eSafety where appropriate in the form of;
  - Information and celebration evenings
  - Posters
  - Website
  - Newsletter items
  - Learning platform training
  - FaceBook

## Passwords and Password Security

### Passwords

- Always use your own personal passwords to access computer based services
- 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
- User ID and passwords for staff and pupils who have left the School are removed from the system within a week of leaving

**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**

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### 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 secret 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
- Pupils are provided with a log-in username which is not personal to them and allows monitored access to the School's Laptops
- Pupils are not allowed to deliberately access on-line materials or files on the school network, of their peers, teachers or others

- Staff are aware of their individual responsibilities to protect the security and confidentiality of 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 **(fill in)**
- Due consideration should be given when logging into the Learning Platform to the browser/cache options (shared or private computer)
- In our school, all ICT password policies are the responsibility of all staff and pupils are expected to comply with the policies at all times

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## 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 unauthorised access
- Regularly change generic passwords to avoid unauthorised access (Microsoft© advise every 42 days)

Further advice available <http://www.itgovernance.co.uk/>

## 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.
- 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 labelling

### Storing/Transferring Information Using Removable Media

- Store all removable media securely and, where possible, encrypt files
- 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

## 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 the others, 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 pupil's device

### 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 and school's FaceBook page
- on the school's Learning Platform
- in the school prospectus and other printed publications that the school may produce for promotional purposes
- recorded/ transmitted on a video or webcam
- in display material that may be used in the school's communal areas



- in display material that may be used in external areas, i.e. exhibition promoting the school
- general media appearances, e.g. 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, e.g. divorce of parents, custody issues, etc.

Parents/ carers may withdraw permission, in writing, at any time. Consent has to be given by both parents in order for it to be deemed valid.

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 authorised staff are able to upload to the schools website site.

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## **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 Head Teacher
- Rights of access to this material are restricted to the teaching staff and pupils within the confines of the school network
- All staff have the responsibility of deleting the images when they are no longer required, or the pupil has left the school

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

### School ICT Equipment

- As a user of ICT, you are responsible for any activity undertaken on the school's ICT equipment provided to you
- 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 drive. You are responsible for the backup and restoration of any of your data that is not held on the school's network drive
- Personal or sensitive data should not be stored on the local drives of desktop PCs. 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 PCs etc 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 the Head Teacher. 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)
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## **Portable & Mobile ICT Equipment**

This section covers such items as laptops, PDAs 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 school's 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
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## **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. Many existing mobile technologies such as portable media players, PDAs, gaming devices, mobile and Smart phones are familiar to children outside of school too. 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, however 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
- 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 PDAs 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

## Servers

- Newly installed servers holding personal data should be encrypted, therefore password protecting data. SIMs Database Servers installed by SITSS since April 2009 are supplied with encryption software
- Always keep servers in a locked and secure environment
- Limit access rights to ensure the integrity of the standard build
- Always password protect and lock the server
- Existing servers should have security software installed appropriate to the machine's specification
- Back up tapes should be encrypted by appropriate software
- Data must be backed up regularly
- Back up tapes/discs 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.
- Regular updates of anti-virus and anti-spyware should be applied
- Records should be kept of when and which patches have been applied
- Ensure that web browsers and other web based applications are operated at a minimum of 128 BIT cipher strength

## 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, libelous, pornographic, obscene, defamatory, intimidating, misleading or disruptive to the school or may bring the school or CCC 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 a 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 of 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 Cambridgeshire County Council 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
- 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 your unit manager

## 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.legislation.gov.uk/ukpga/1998/29/contents>

#### ***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.legislation.gov.uk/ukpga/2000/23/contents>

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

<http://www.legislation.gov.uk/ukpga/1998/42/contents>



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## Other Acts Relating to eSafety

### ***Racial and Religious Hatred Act 2006***

It is a criminal offence to threaten people because of their faith; or to stir up religious hatred by displaying, publishing or distributing written material which is threatening. Other laws already protect people from threats based on their race, nationality or ethnic background.

<http://www.legislation.gov.uk/ukpga/2006/1/contents>

### ***Sexual Offences Act 2003***

The new grooming offence is committed if you are over 18 and have communicated with a child under 16 at least twice (including by phone or using the Internet) it is an offence to meet them or travel to meet them anywhere in the world with the intention of committing a sexual offence. Causing a child under 16 to watch a sexual act is illegal, including looking at images such as videos, photos or webcams, for your own gratification. It is also an offence for a person in a position of trust to engage in sexual activity with any person under 18, with whom they are in a position of trust. Schools should already have a copy of “*Children & Families: Safer from Sexual Crime*” document as part of their child protection packs.

<http://www.legislation.gov.uk/ukpga/2003/42/contents>

For more information [www.teachernet.gov.uk](http://www.teachernet.gov.uk)

### ***Communications Act 2003 (section 127)***

Sending by means of the Internet a message or other matter that is grossly offensive or of an indecent, obscene or menacing character; or sending a false message by means of or persistently making use of the Internet for the purpose of causing annoyance, inconvenience or needless anxiety is guilty of an offence liable, on conviction, to imprisonment. This wording is important because an offence is complete as soon as the message has been sent: there is no need to prove any intent or purpose.

<http://www.legislation.gov.uk/ukpga/2003/21/contents>

### ***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 persons 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.

<http://www.legislation.gov.uk/ukpga/1990/18/contents>

### ***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.

<http://www.legislation.gov.uk/ukpga/1988/27/contents>

### ***Copyright, Design and Patents Act 1988***

Copyright is the right to prevent others from copying or using work without permission. Works such as text, music, sound, film and programs all qualify for copyright protection. The author of the work is usually the copyright owner, but if it was created during the course of employment it belongs to the employer. Copyright infringement is to copy all or a substantial part of anyone's work without obtaining their author's permission. Usually a licence associated with the work will allow a user to copy or use it for limited purposes. It is advisable always to read the terms of a licence before you copy or use someone else's material. It is also illegal to adapt or use software without a licence or in ways prohibited by the terms of the software licence.

<http://www.legislation.gov.uk/ukpga/1988/48/contents>

### ***Public Order Act 1986 (sections 17 – 29)***

This Act makes it a criminal offence to stir up racial hatred by displaying, publishing or distributing written material which is threatening. Like the Racial and Religious Hatred Act 2006 it also makes the possession of inflammatory material with a view of releasing it a criminal offence.

<http://www.legislation.gov.uk/ukpga/1986/64/contents>

### ***Protection of Children Act 1978 (Section 1)***

It is an offence to take, permit to be taken, make, possess, show, distribute or advertise indecent images of children in the United Kingdom. A child for these purposes is anyone under the age of 18. Viewing an indecent image of a child on your computer means that you have made a digital image. An image of a child also covers pseudo-photographs (digitally collated or otherwise). A person convicted of such an offence may face up to 10 years in prison.

<http://www.legislation.gov.uk/ukpga/1978/37/contents>

### ***Obscene Publications Act 1959 and 1964***

Publishing an “obscene” article is a criminal offence. Publishing includes electronic transmission.

1964 - <http://www.legislation.gov.uk/ukpga/1964/74/contents>

1959 - <http://www.legislation.gov.uk/ukpga/Eliz2/7-8/66/contents>

### ***Protection from Harassment Act 1997***

A person must not pursue a course of conduct, which amounts to harassment of another, and which he knows or ought to know amounts to harassment of the other. A person whose course of conduct causes another to fear, on at least two occasions, that violence will be used against him is guilty of an offence if he knows or ought to know that his course of conduct will cause the other so to fear on each of those occasions.

<http://www.legislation.gov.uk/ukpga/1997/40/contents>

### ***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)

[http://www.ico.gov.uk/for\\_organisations/data\\_protection/the\\_guide.aspx](http://www.ico.gov.uk/for_organisations/data_protection/the_guide.aspx)

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

<http://www.legislation.gov.uk/ukpga/2000/36/contents>

[http://www.ico.gov.uk/for\\_organisations/freedom\\_of\\_information\\_guide.aspx](http://www.ico.gov.uk/for_organisations/freedom_of_information_guide.aspx)