INFORMATION SECURITY POLICY

This is a Category 1 Policy (Full Delegation)

This policy is in force until further notice from:	October 2023
This policy must be reviewed by:	October 2024
Policy Author(s):	Shamita Kumar
Date policy reviewed by Compliance & Governance Officer:	October 2023
Date compliance with GDPR assured:	October 2023
Location of publication of policy:	The Trust Website/ Governor Hub/ Internal Records & Intranet
Under the Trust's Scheme of Delegation this policy must be approved by PEOPLE, COMPLIANCE & GOVERNANCE COMMITTEE Such approval was given on:	People & Governance Committee on behalf of the Trust Board November 2023

1. Introduction

1.1 Our electronic communications systems and equipment are intended to promote effective communication and working practices throughout Avanti Schools Trust ("the Trust") and are critical to the success of our provision of an excellent service.

1.2 This policy outlines the standards that the Trust and its Schools require all users of these systems to observe, the circumstances in which the Trust will monitor use of these systems and the action the Trust will take in respect of any breaches of these standards.

1.3 The use by staff and monitoring by the Trust and its schools of its electronic communications systems will involve the processing of personal data and is therefore regulated by the UK General Data Protection Regulation and the Data Protection Act 2018. Staff are referred to the Trust's Data Protection Policy for further information.

2. Policy Scope

This policy applies to all staff including employees and temporary staff such as agency workers. It does not form part of any employee's terms and conditions of employment and is not intended to have contractual effect. It is provided for guidance to all members of staff at the Trust and its Schools who are required to familiarise themselves and comply with its contents. The Trust reserves the right to amend its content at any time.

3. Equipment security and passwords

3.1 All members of staff are responsible for the security of the equipment allocated to or used by them and must not allow it to be used by anyone other than in accordance with this policy.

3.2 Passwords are unique to each user and must be changed regularly to ensure confidentiality. Staff are required to select a strong password. Passwords which relate to children, pets, or any other information which is easily identifiable (e.g. via social media) should not be used.

3.3 Passwords must be kept confidential and must not be made available to anyone else unless authorised by a member of the Senior Leadership Team. Any member of staff who discloses his or her password to another employee in the absence of express authorisation will be liable to disciplinary action under the School's Disciplinary Policy and Procedure.

3.4 Under no circumstances should any staff member log on to a computer using another member of staff's password. Such breaches may result in disciplinary action being taken.

3.5 If given access to the School email system or to the internet, staff are responsible for the security of their terminals. Staff are required to log off/lock screen when they are leaving the terminal unattended or when leaving the office to prevent unauthorised users accessing the system in their absence. The Senior Leadership Team may perform spot checks from time to time to ensure compliance with this requirement.

3.6 Staff should be aware that if they fail to log off/lock screen and leave their terminals unattended they may be held responsible for another user's activities on their terminal in breach of this policy, the Trust's Data Protection Policy and/or the requirement for confidentiality in respect of certain information.

3.7 Logging off/locking screen prevents another member of staff accessing the system in the user's absence and may help demonstrate in the event of a data breach that he or she was not the party responsible.

3.8 Staff without authorisation should only be allowed to use terminals under supervision. Desktop PCs and cabling for telephones or computer equipment should not be moved or tampered with.

3.9 Members of staff who have been issued with a laptop or tablet must ensure that it is kept secure at all times, especially when travelling (e.g. stored safely in boot of car). Passwords must be used to secure access to data kept on such equipment to ensure that confidential data is protected in the event that the machine is lost or stolen. Staff should also observe basic safety rules when using such equipment e.g. ensuring that they do not use or display such equipment in isolated or dangerous areas. Staff should also be fully aware that if using equipment on public transport, documents can be easily read by other passengers.

4. Systems use and data security

4.1 Members of staff should not delete, destroy or modify any of the Trust's existing systems, programs, information or data which could have the effect of harming or exposing to risk or harm the School, its staff, pupils, or any other party.

4.2 All members of staff are prohibited from downloading, installing or running software from external sources without obtaining prior authorisation from the IT department who will consider genuine requests for work purposes. Please note that this includes instant messaging programs, screen savers, photos, video clips, games, music files, and opening any documents or communications from unknown origins.

4.3 Where consent is given all files and data should always be virus checked before they are downloaded onto the Trust's systems. If in doubt, the employee should seek advice from the IT department.

4.4 The following must never be accessed from the network because of their potential to overload the system or to introduce viruses:

- audio and video streaming (unless used for educational purposes from a reputable website);
- instant messaging;
- chat rooms;
- social networking sites; and
- personal email (such as Hotmail or Gmail).

4.5 No device or equipment should be attached to our systems without the prior approval of the IT department. This includes, but is not limited to, any telephone, USB device, digital camera, MP3 player, infra-red, Bluetooth connection device or any other device.

4.6 The Trust monitors all emails passing through its systems for viruses. Staff should be cautious when opening emails from unknown external sources or where for any reason an email appears suspicious (such as ending in .exe' or '.pdf' or clicking on any links which ask to re-enter your password or look suspicious). The IT department should be informed immediately if a suspected virus is received. The School reserves the right to block access to attachments to email for the purpose of effective use of the system and compliance with this policy. The Trust also reserves the right not to transmit any email message.

4.7 Staff should not attempt to gain access to restricted areas of the network or to any password-protected information unless they are specifically authorised to do so.

4.8 Misuse of the Trust's computer systems may result in disciplinary action up to and including summary dismissal. For further guidance on what constitutes misuse please see the section entitled "Inappropriate Use of the School's Systems" and guidance under "Email etiquette and content" below.

5. Email etiquette and content

5.1 Email is a vital business tool, but often lapses inappropriately into an informal means of communication and should therefore be used with care and discipline.

5.2 The Trust's email facility is intended to promote effective communication within the Trust on matters relating to trust and its' school's activities and access to the Trust's email facility is provided for work purposes only.

5.3 Staff are permitted to make reasonable personal use of the Trust's email facility provided such use is in strict accordance with this policy (see "Personal Use" below). Personal subscriptions using the Trust email facility may open the system to phishing and it is the responsibility of all staff to protect the system by minimising personal use. Excessive or inappropriate personal use of the Trust's email facility will be treated as a disciplinary offence resulting in disciplinary action up to and including summary dismissal depending on the seriousness of the offence.

5.4 Staff should always consider if email is the appropriate medium for a particular communication. The Trust encourages all members of staff to make direct contact with

individuals rather than communicate by email wherever possible to maintain and enhance good working relationships.

5.5 Messages sent on the email system should be written as professionally as a letter or fax message and should be concise and directed only to relevant individuals on a need to know basis. The content and language used in the message must be consistent with the Trust's best practice.

5.6 Emails should never be sent in the heat of the moment or without first checking the content and language and considering how the message is likely to be received. As a rule of thumb if a member of staff would not be happy for the email to be read out in public or subjected to scrutiny then it should not be sent. Copies of emails should be retained on the appropriate file.

5.7 Email messages may of course be disclosed in legal proceedings or via a subject access request in the same way as paper documents. Deletion from a user's inbox or archives does not mean that an email is obliterated and all email messages should be treated as potentially retrievable, either from the main server or using specialist software. This should be borne in mind when considering whether email is an appropriate form of communication in the circumstances of the case and if so the content and language used.

5.8 Staff should assume that email messages may be read by others and not include in them anything which would offend or embarrass any reader, or themselves, if it found its way into the public domain. The Trust standard disclaimer should always be used on every email.

5.9 Staff should ensure that they access their emails at least once every working day, stay in touch by remote access when travelling or working out of the office and should use an out of office response when away from the office for more than a day. Staff should endeavour to respond to emails marked 'high priority' as soon as is reasonably practicable.

5.10 Members of staff are strictly forbidden from sending abusive, obscene, discriminatory, racist, harassing, derogatory or defamatory messages. If such messages are received, they should not be forwarded and should be reported to a member of the Senior Leadership Team immediately. If a recipient asks you to stop sending them personal messages, then always stop immediately. Where appropriate, the sender of the email should be referred to this policy and asked to stop sending such material.

5.11 If you feel that you have been harassed or bullied, or are offended by material sent to you by a colleague via email, you should inform your line manager who will usually seek to resolve the matter informally in the first instance. You can refer to our Equal Opportunities and Diversity Policy and the Anti-Harassment and Bullying Policy for further information and guidance.

6. Use of the web and the internet

6.1 When a website is visited, devices such as cookies, tags or web beacons may be deployed to enable the site owner to identify and monitor visitors. If the website is an inappropriate one such a marker could be a source of embarrassment to the Trust. Staff may even be committing a criminal offence if, for example, the material is pornographic in nature.

6.2 Staff must not therefore access from the Trust's system any web page or any files (whether documents, images or other) downloaded from the web which, on the broadest meaning of those terms, could be regarded as illegal, offensive, in bad taste or immoral. While content may be legal in the UK it may be in sufficient bad taste to fall within this prohibition.

6.3 As a general rule, if any person within the Trust (whether intending to view the page or not) might be offended by the contents of a page, or if the fact that the Trust's software has accessed the page or file might be a source of embarrassment if made public, then viewing it will be a breach of this policy.

6.4 Staff should not under any circumstances use Trust systems to participate in any internet chat room, post messages on any internet message board or set up or log text or information even in their own time.

6.5 Remember also that text, music and other content on the internet are copyright works. Staff should not download or email such content to others unless certain that the owner of such works allows this.

6.6 The Trust and its School's website is intended to convey our core values and excellence in the educational sector. All members of staff are encouraged to give feedback concerning the site and new ideas and inclusions are welcome. All such input should be submitted to the Senior Leadership Team in the first instance. Only expressly authorised and designated members of staff are permitted to make changes to the website.

7. Personal use of the Trust's systems

7.1 The Trust permits the incidental use of its internet, email and telephone systems to send personal email, browse the web and make personal telephone calls subject to certain conditions set out below.

7.2 Our policy on personal use is a privilege and not a right. The policy is dependent upon it not being abused or overused and we reserve the right to withdraw our permission or amend the scope of this policy at any time.

7.3 The following conditions must be met for personal usage to continue:

- use must be minimal and take place substantially out of normal working hours (that is, during the member of staff's usual break time or shortly, before or after normal working hours);
- personal emails must be labelled "personal" in the subject header;
- use must not interfere with business or office commitments;
- use must not commit the Trust to any marginal costs;
- use must comply at all times with the rules and guidelines set out in this policy;
- use must also comply with the Trust's other policies and procedures including but not limited to, the Equal Opportunities and Diversity Policy, Anti-Harassment and Bullying Policy, Data Protection Policy and Disciplinary Policy and Procedure.

7.4 Staff should be aware that any personal use of the systems may also be monitored (see below) and, where breaches of this policy are found, action may be taken under our Disciplinary Policy and Procedure. Excessive or inappropriate personal use of the Trust's email facility will be treated as a disciplinary offence resulting in disciplinary action up to and including summary dismissal depending on the seriousness of the offence.

7.5 The Trust reserves the right to restrict or prevent access to certain telephone numbers or internet sites if it considers that personal use is excessive or otherwise in breach of this policy.

8. Inappropriate use of equipment and systems

8.1 Misuse or abuse of our telephone or email system or inappropriate use of the internet in breach of this policy will be dealt with in accordance with the Trust's Disciplinary Policy and Procedure.

8.2 Misuse of the internet may, in certain circumstances, constitute a criminal offence. In particular, any of the following is prohibited:

- accessing pornographic material (that is writings, pictures, films, video clips of a sexually explicit or arousing nature), racist or other inappropriate or unlawful materials;
- transmitting a false and/or defamatory statement about any person or organisation;
- sending, receiving, downloading, displaying or disseminating material that is discriminatory, offensive, embarrassing or derogatory;
- transmitting confidential information about the Trust and any of its staff, pupils or associated third parties;
- transmitting any other statement which is likely to create any liability (whether criminal or civil, and whether for the employee or for the Trust;
- downloading or disseminating material in breach of copyright;
- copying, downloading, storing or running any software without the express prior authorisation of the IT Department;
- engaging in online chat rooms, instant messaging, social networking sites and online gambling;

- forwarding electronic chain letters and other materials;
- accessing, downloading, storing, transmitting or running any material that presents or could present a risk of harm to a child.

8.3 Any such action will be treated very seriously and may result in disciplinary action up to and including summary dismissal.

8.4 Where evidence of misuse is found the Trust may undertake a more detailed investigation in accordance with our Disciplinary Policy and Procedure, involving the examination and disclosure of documents, systems and monitoring records to those nominated to undertake the investigation and any witnesses or members of management involved in the disciplinary procedure.

8.5 If necessary, such information may be handed to the police in connection with a criminal investigation.

9. Taking information offsite

9.1 The Trust allows staff to take children's workbooks off site for the purposes of marking and assessment. These should be treated in the same way as laptops and tablets in that reasonable measures both at home and in transit should be made to keep them safe.

9.2 When taking pupils off site for educational visits, it is standard practice to take a hard copy of pupil contact details and health care plans etc. in case of emergency. Owing to the sensitivity of this kind of information, a greater degree of care should be taken to keep the information secure and confidential. For the avoidance of doubt, such information must never be left unattended (unless it is securely locked away) or left in a place where it can be accessed by others. Wherever possible, information should be kept in a lockable bag. On return, the hard copies must be handed back into the school office who will shred them.

9.3 There will be occasions when highly sensitive meetings cannot take place within the Trust or school building e.g. child protection conferences and strategy meetings. In these instances, it may be necessary to print off hard copies of highly confidential information for the purposes of the meeting. Only designated personnel (the Principal, SENCO and Pastoral Manager) have the automatic right to do this. Information taken off site must be logged and signed off and shredded on return to site. The same steps as documented in 9.2 should be taken to safeguard the information.

9.4 If other members of staff need to take hard copies of sensitive information out of the building, they must first seek approval of the Principal and SENCO or in their absence the Deputy or Assistant Principal.