Staff ICT and Electronic Devices Policy

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Statement of intent

Royal Cross Primary School believes that ICT plays an important part in both teaching and learning over a range of subjects, and the school accepts that both school-owned and personal electronic devices are widely used by members of staff. The school is committed to ensuring that both staff and pupils have access to the necessary facilities and support to allow them to carry out their work.

The school has a sensible and practical approach that acknowledges the use of devices, and this policy is intended to ensure that:

- Members of staff are responsible users and remain safe while using the internet.
- School ICT systems and users are protected from accidental or deliberate misuse which could put the security of the systems and/or users at risk.
- Members of staff are protected from potential risks in their everyday use of electronic devices.

Personal use of ICT equipment and personal devices is permitted at the school; however, this is strictly regulated and must be done in accordance with this policy, and the Social Media Policy and Online Safety Policy.

For the purpose of this policy the ICT Technician role is undertaken by the School Business Manager (SBM).

The role of the Data Protection Manager (DPM) is shared between the Headteacher/ SBM and Chair of Governors.

1. Legal framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- Data Protection Act 2018
- Computer Misuse Act 1990
- Communications Act 2003
- Freedom of Information Act 2000
- Human Rights Act 1998
- Voyeurism (Offences) Act 2019
- The UK General Data Protection Regulation (UK GDPR)

This policy operates in conjunction with the following school policies (however they are not limited to, the following):

- Data Protection Policy
- Disciplinary Policy and Procedure
- Online Safety Policy
- Loaning School Equipment Agreement
- Whistle blowing Policy
- Low Level Concerns Policy

2. Roles and responsibilities

The governing board has the responsibility for the overall implementation of this policy, ensuring it remains compliant with relevant legislation.

The headteacher is responsible for:

- Reviewing and amending this policy with the ICT technician and DPO, taking into account new legislation, government guidance and previously reported incidents, to improve procedures.
- The day-to-day implementation and management of the policy.
- The overall allocation and provision of resources. This duty is carried out daily by the designated equipment lead (DEL).
- Handling complaints regarding this policy as outlined in the school's Complaints Procedures Policy.
- Informing staff that the school reserves the right to access personal devices for the purpose of ensuring the effectiveness of this policy.

The ICT technician is responsible for:

- Carrying out daily checks on internet activity of all user accounts and to report any inappropriate use to the headteacher.

- Monitoring the computer logs on the school's network and to report any logged inappropriate use to the headteacher.
- Remotely viewing or interacting with any of the computers on the school's network. This may be done randomly to implement this policy and to assist in any difficulties.
- Ensuring routine security checks are carried out on all school-owned and personal devices that are used for work purposes to check that appropriate security measures and software have been updated and installed.
- Ensuring that, though appropriate steps will be taken to ensure personal information is not seen during security checks, staff are made aware of the potential risks.
- Accessing files and data to solve problems for a user, with their authorisation.
- Adjusting access rights and security privileges in the interest of the protection of the school's data, information, network and computers.
- Disabling user accounts of staff who do not follow this policy, at the request of the headteacher.
- Assisting the headteacher in all matters requiring reconfiguration of security and access rights and in all matters relating to this policy.
- Assisting staff with authorised use of the ICT facilities and devices, if required.
- Immediately reporting any breach of personal devices to the Headteacher.

The DPO is responsible for:

- Ensuring that all school-owned and personal electronic devices have security software installed, to protect sensitive data in cases of loss or theft.
- Ensuring that all school-owned devices are secured and encrypted in line with the school's Data Protection Policy.
- Ensuring that all devices connected to the school network and internet are encrypted.
- Ensuring all staff are aware of, and comply with, the data protection principles outlined in the school's Data Protection Policy.

Staff members are responsible for:

- Only use their personal devices in the approved agreed places and at the agreed times.
- They must ensure their personal devices are not connected to the school network.
- Requesting permission from the headteacher or ICT technician, subject to their approval, before using school-owned devices for personal reasons during school hours.
- Reporting misuse of ICT facilities or devices, by staff or pupils, to the headteacher.
- Reading and signing a Device User Agreement to confirm they understand their responsibilities and what is expected of them when they use school-owned and personal devices.

The SBM is responsible for:

- Maintaining a Fixed Asset Register to record and monitor the school's assets.
- Ensuring value for money is secured when purchasing electronic devices.
- Overseeing purchase requests for electronic devices.

3. Classifications

School-owned and personal devices or ICT facilities include, but are not limited to, the following:

- Computers, laptops and software
- Monitors
- Keyboards
- Mouses
- Scanners
- Cameras
- Camcorders
- Other devices including furnishings and fittings used with them
- Mail systems (internal and external)
- Internet and intranet (email, web access and video conferencing)
- Telephones (fixed and mobile)
- Tablets and other portable devices
- Pagers
- Computers
- Photocopying, printing and reproduction equipment
- Recording and playback equipment
- Documents and publications (any type of format)

4. Acceptable use

This policy applies to any computer or other device connected to the school's network and computers.

The school will monitor the use of all ICT facilities and electronic devices. Members of staff will only use school-owned and approved personal devices for work duties and educational purposes. The duties for which use is permitted include, but are not limited to, the following:

- Preparing work for lessons, activities, meetings, reviews, etc.
- Researching any school-related task
- Any school encouraged tuition or educational use
- Collating or processing information for school business
- Communicating with other members of staff, such as contacting the school office for assistance.

Inappropriate use of school-owned and personal devices could result in a breach of the school's Data Protection Policy.

Inappropriate use of school-owned and personal devices could result in a breach of legislation, including the UK GDPR and Data Protection Act 2018.

Any member of staff found to have breached the school's Data Protection Policy or relevant legislation will face disciplinary action.

Staff will always be an example of good practice to pupils, serving as a positive role model in the use of ICT and related equipment.

Since ICT facilities are also used by pupils, the school will have acceptable use agreements in place for pupils – staff will ensure that pupils comply with these.

Pupils found to have been misusing the ICT facilities will be reported to the headteacher.

School-owned electronic devices will not be used to access any material which is illegal, inappropriate, or may cause harm or distress to others.

Any illegal, inappropriate or harmful activity will be immediately reported to the headteacher.

Members of staff will not:

- Open email attachments from unknown sources.
- Use programmes or software that may allow them to bypass the filtering or security systems.
- Upload or download large capacity files (over 500MB) without permission from the ICT technician.
- Give their home address, phone number, social networking details or email addresses to pupils or parents – contact with parents will be done through authorised school contact channels.

All data will be stored appropriately in accordance with the school's Data Protection Policy.

Members of staff will only use school-owned electronic devices to take pictures or videos of people who have given their consent.

School-owned electronic devices will not be used to access personal social media accounts.

Personal electronic devices will not be used to communicate with pupils or parents, including via social media.

Staff will ensure they:

- Express neutral opinions when representing the school online.
- Avoid disclosing any confidential information or comments regarding the school, or any information that may affect its reputability.
- Have the necessary privacy settings are applied to any social networking sites.

Images or videos of pupils, staff or parents will only be published online for the activities which consent has been sought.

Copyrighted material will not be downloaded or distributed.

School-owned devices will be taken home for work purposes only, once approval has been sought from the headteacher and ICT technician. Remote access to the school network will be given to staff using these devices at home.

School equipment that is used outside the premises, e.g. laptops, will be returned to the school when the employee leaves employment, or if requested to do so by the headteacher.

While there is scope for staff to utilise school equipment for personal reasons, this will not be done during working hours unless approved by the headteacher or in the case of a personal emergency.

Private business will not be mixed with official duties, e.g. work email addresses will be reserved strictly for work-based contacts only.

Personal use of school-owned equipment can be denied by the headteacher at any time. This will typically be because of improper use or over-use of school facilities for personal reasons.

Abuse of ICT facilities or devices could result in privileges being removed. Staff will be aware of acceptable ICT use, and misuse of the facilities, as defined in this policy, will be reported to the headteacher.

More details about acceptable use can be found in the staff Acceptable Use Agreement and Device User Agreement.

Failure to adhere to the rules described in this policy may result in disciplinary action, in line with the Disciplinary Policy and Procedure.

5. Emails and the internet

The school email system and internet connection are available for communication and use on matters directly concerned with school business.

Emails will not be used as a substitute for face-to-face communication, unless it is otherwise impossible.

Unprofessional messages will not be tolerated. All emails will be written in a professional tone and will be proof read by the staff member sending the email to ensure this prior to sending.

Abusive messages will not be tolerated – any instant of abuse may result in disciplinary action.

If any email contains confidential information, the user will ensure that the necessary steps are taken to protect confidentiality. .

The school email system and accounts will never be registered or subscribed to spam or other non-work-related updates, advertisements or other personal communications. School email addresses will not be shared without confirming that they will not be subjected to spam or sold on to marketing companies.

All emails being sent to external recipients will contain the school standard confidentiality notice. That notice will normally be configured as a signature by the ICT technician and will not be removed.

Personal email accounts will only be accessed via school computers outside of work hours and only if they have built-in anti-virus protection approved by the ICT technician. Staff will ensure that access to personal emails never interferes with work duties.

Staff linking work email accounts to personal devices, subject to the headteacher's approval, will sign the Device User Agreement.

The types of information sent through emails to a personal device will be limited to ensure the protection of personal data, e.g. pupils' details.

Contracts sent via email or the internet are as legally binding as those sent on paper. An exchange of emails can lead to a contract being formed between the sender, or the school, and the recipient. Staff will never commit the school to any obligations by email or the internet without ensuring that they have the authority to do so.

Purchases for school equipment will only be permitted to be made online with the permission of the headteacher, and a receipt will be obtained in order to comply with monitoring and accountability.

Hard copies of the purchase will be made for the purchaser and the SBM. This is in addition to any purchasing arrangement followed according to the school's Financial Regulations.

Any suspicious emails will be recorded in the incident log and will be reported to the headteacher. All incidents will be responded to in accordance with the Online Safety Policy.

6. Portable equipment

Portable school-owned electronic devices will not be left unattended, and instead will be kept out of sight and securely locked in location when they are not in use.

Portable equipment will be transported in its protective case, if supplied.

Where the school provides mobile technologies, such as phones, laptops and personal digital assistants, for off-site visits and trips, staff will only use these devices.

When using the school mobile phone, the ICT coordinator, headteacher, DSL and the DPO will assess and ensure that the necessary software is in place to meet data protection and safeguarding requirements.

Parents will be discouraged from calling the phones. In emergencies, parents will contact school's emergency contact number, not the classroom phone. Parents will be permitted to text the number for justified reasons, such as being late to collect a child at the end of the day.

7. Personal devices

Staff members will use personal devices in line with the school's Data and Cyber-security Breach Prevention and Management Plan.

All personal devices that are used to access the school's online portal, systems or email accounts, e.g. laptops or mobile phones, will be declared and approved by the headteacher before use and submitted for the routine checks outlined in Safety and security section of this policy.

Staff using their own devices will sign an agreement stating that they understand the requirement for routine security checks to take place and the possibility of their personal information being seen by the ICT technician. They will be required to provide consent to their device being accessed – if consent is refused, they will not be permitted to use a personal device.

Members of staff will not contact pupils or parents using their personal devices.

Personal devices will only be used for off-site educational purposes when mutually agreed with the headteacher.

Inappropriate messages will not be sent to any member of the school community.

Permission will be sought from the owner of a device before any image or sound recordings are made on their personal device. Consent will also be obtained from staff, pupils and other visitors if photographs or recordings are to be taken.

Members of staff bringing personal devices into school will ensure that there is not any inappropriate or illegal content on their device.

A zero tolerance policy is in place with regards to personal or work related mobile communication devices by any individual in these areas:

- All classrooms / corridors
- Resource room / medical room
- Playgrounds
- Changing areas / toilets

Designated mobile communication device use areas situated within the setting are:

- Staffroom
- School office
- Headteachers / Deputies office
- Conference room / meetings / dinnertimes
- Reception area

8. Removable media

Only recommended removable media will be used including, but not limited to, the following:

- USB drives
- DVDs
- CDs

All removable media will be securely stored location when not in use.

Personal and confidential information will not be stored on any removable media.

The ICT technician will encrypt all removable media with appropriate security measures.

Removable media will be disposed of securely by the ICT technician.

9. Cloud-based storage

Data held in remote and cloud-based storage is still required to be protected in line with the UK GDPR and DPA 2018; therefore, members of staff will ensure that cloud-based data is kept confidential and no data is copied, removed or adapted.

10. Storing messages

Emails and messages stored on school-owned devices will be stored digitally or in a suitable hard copy file.

Information and data on the school’s network and computers will be kept in an organised manner and should be placed in a location of an appropriate security level.

If a member of staff is unsure about the correct message storage procedure, help will be sought from the ICT technician.

Employees who feel that they have cause for complaint as a result of any communications on school-owned devices will raise the matter initially with the headteacher, as appropriate. The complaint will then be raised through the grievance procedure in line with the Grievance Policy.

11. Unauthorised use

Staff will not be permitted, under any circumstances, to:

- Use the ICT facilities for commercial or financial gain without the explicit written authorisation from the headteacher.
- Physically damage ICT and communication facilities or school-owned devices.
- Relocate, take off-site, or otherwise interfere with the ICT facilities without the authorisation of the ICT technician or headteacher. Certain items are asset registered and security marked; their location is recorded by the SBM for accountability. Once items are moved after authorisation, staff will be responsible for notifying the SBM of the new location. The exception to this point is when items are moved to the designated secure room for insurance purposes over holiday periods.
- Use or attempt to use someone else's user account. All users of the ICT facilities will be issued with a unique user account and password. The password will be changed every six months. User account passwords will never be disclosed to or by anyone.
- Use the ICT facilities at any time to access, download, send, receive, view or display any of the following:
    - Any material that is illegal
    - Any message that could constitute bullying, harassment (including on the grounds of sex, race, religion/religious belief, sexual orientation or disability) or any negative comment about other persons or organisations
    - Online gambling
    - Remarks, which may adversely affect the reputation of any organisation or person, whether or not you know them to be true or false
    - Any sexually explicit content, or adult or chat-line phone numbers
- Generate messages or documents that appear to originate from someone else, or otherwise impersonate someone else.
- Install hardware or software without the consent of the ICT technician or the headteacher.
- Introduce any form of stand-alone software or removable hardware likely to cause malfunctioning of the ICT facilities or that will bypass, over-ride or overwrite the security parameters on the network or any of the school's computers.
- Use or attempt to use the school's ICT facilities to undertake any form of piracy, including the infringement of software licenses or other copyright provisions whether knowingly or not. This is illegal.
- Purchase any ICT facilities without the consent of the ICT technician or headteacher. This is in addition to any purchasing arrangements followed according to the Finance Policy.
- Use or attempt to use the school's phone lines for internet or email access unless given authorisation by the headteacher. This will include using or attempting to use any other form of hardware capable of telecommunication, regardless of ownership.
- Use any chat-lines, bulletin boards or pay-to-view sites on the internet. In addition, staff will not download or attempt to download any software of this nature.
- Use the internet for any auctioning activity or to purchase items unless given authority to do so by the headteacher. This is in addition to any purchasing arrangement followed according to the Finance Policy.
- Knowingly distribute or introduce a virus or harmful code onto the school's network or computers. Doing so may result in disciplinary action, including summary dismissal.

- Use the ICT facilities for personal use without the authorisation of the headteacher. This authorisation will be requested on each occasion of personal use.
- Copy, download or distribute any material from the internet or email that may be illegal to do so. This can include computer software, music, text, and video clips. If a staff member it is not clear that they have permission to do so, or if the permission cannot be obtained, they will not download the material.
- Use, or attempt to use, the communication facilities to call overseas without the authorisation of the headteacher.
- Obtain and post on the internet, or send via e-mail, any confidential information about other employees, the school, its customers or suppliers.
- Interfere with someone else's use of the ICT facilities.
- Be wasteful of ICT resources, particularly printer ink, toner and paper.
- Use the ICT facilities when it will interfere with their responsibilities to supervise pupils.
- Share any information or data pertaining to other staff or pupils at the school with unauthorised parties. Data will only be shared for relevant processing purposes.
- Operate equipment to record an image beneath a person's clothing with the intention of observing, or enabling another person to observe, the victim's genitals or buttocks without their knowledge or consent, whether exposed or covered by underwear – otherwise known as "upskirting".

Any unauthorised use of email or the internet will likely result in disciplinary action, including summary dismissal, in line with the Disciplinary Policy and Procedure.

If a member of staff is subjected to, or knows about harassment, upskirting or bullying that has occurred via staff email or through the use of school-owned devices, they will report this immediately to the headteacher.

12. Loaning electronic devices

School equipment, including electronic devices, will be loaned to staff members in line with the school's Loaning School Equipment Policy.

Equipment and devices will only be loaned to staff members who have read, signed and returned the terms of use, as set out in the Staff Declaration Form.

By loaning school equipment and electronic devices, staff members will be agreeing to act in accordance with the terms of acceptable use.

If the equipment or device is no longer required, staff members will return the equipment to the DEL as soon as possible, allowing the equipment to be made available to someone else.

Devices allowed for loan will be encrypted and protected to ensure the security of any data they hold.

13. Purchasing

Funding for electronic devices, predetermined by the governing board, will be available each year on request from the SBM.

Individual staff members will not be permitted to purchase equipment or devices, or process payments for such goods, on the school's behalf unless permission has been sought from the headteacher.

The cost of any equipment or devices personally purchased by staff members will not be reimbursed by the school, unless otherwise specified by the headteacher.

In relation to devices for a specific project, project budget holders will provide evidence and a written statement requesting the necessary funds for the equipment required.

The SBM will seek advice from the ICT technician and professionals when purchasing equipment.

All equipment and electronic devices will be sourced from a reputable supplier.

The SBM will maintain a Fixed Asset Register which will be used to record and monitor the school's assets. All equipment and electronic devices purchased using school funds will be added to this register.

When devices are not fit for purpose, or are at least four years old, staff members may request new equipment. If their request is granted, the old equipment or electronic device will be returned to the SBM, including any accessories which were originally included with the device. Any old devices will then be disposed of or wiped clear by the ICT technician.

14. Safety and security

The school's network will be secured using firewalls in line with LCC Guidance.

Filtering of websites, as detailed in the Data and Cyber-security Breach Prevention and Management Plan, will ensure that access to websites with known malware are blocked immediately and reported to the ICT technician.

Approved anti-virus software and malware protection will be used on all approved devices and will be updated on a termly basis.

The school will use mail security technology to detect and block any malware transmitted via email – this will be reviewed on a termly basis.

Members of staff will ensure that all school-owned electronic devices are made available for anti-virus updates, malware protection updates and software installations, patches or upgrades, on a termly basis.

Records will be kept detailing the date and time, owner of a device and device type, on which the routine checks have taken place – these will be stored in location.

Programmes and software will not be installed on school-owned electronic devices without permission from the ICT technician.

Staff will not be permitted to remove any software from a school-owned electronic device without permission from the ICT technician.

Members of staff who install or remove software from a school-owned electronic device without seeking authorisation from the ICT technician, may be subject to disciplinary measures.

All devices will be secured by a password or biometric access control.

Passwords will be kept confidential and must not be shared with pupils, unauthorised members of staff or third parties.

Devices will be configured so that they are automatically locked after being left idle for a set time. This will be no more than 10 minutes for mobile or other portable devices and 15 minutes for desktop computers or laptops.

All devices must be encrypted using a method approved by the DPO.

15. Loss, theft and damage

For the purpose of this policy, **"damage"** is defined as any fault in a school-owned electronic device caused by the following:

- Connections with other devices, e.g. connecting to printers which are not approved by the ICT technician
- Unreasonable use of force
- Abuse
- Neglect
- Alterations
- Improper installation

Any incident that leads to a school-owned electronic device being lost will be treated in the same way as damage.

The ICT technician and headteacher will decide whether a device has been damaged due to the actions described above.

The ICT technician will be contacted if a school-owned electronic device has a technical fault.

In cases where a member of staff repeatedly damages school-owned electronic devices, the headteacher may decide to permanently exclude the member of staff from accessing devices.

If a school-owned device is lost or stolen, or is suspected of having been lost or stolen, the DPO will be informed as soon as possible to ensure the appropriate steps are taken to delete data from the device that relates to the school, its staff and its pupils, and that the loss is reported to the relevant agencies.

The school will not be responsible for the loss, damage or theft of any personal device, including phones, cameras, tablets, removable media, etc.

16. Implementation

Staff will report any breach of this policy to the headteacher.

Regular monitoring and recording of email messages will be carried out on a random basis. Hard copies of email messages can be used as evidence in disciplinary proceedings.

Use of the school internet connection will be recorded and monitored.

The SBM will conduct random checks of asset registered and security marked items.

The ICT technician will check computer logs on the school network on a termly basis.

The ICT technician may remotely view or interact with any of the computers on the school's network. This may be used randomly to implement this policy and to assist in any difficulties.

The school's network has anti-virus software installed with a centralised administration package; any virus found will be logged to this package.

The school's database systems are computerised. Unless given permission by the ICT technician, members of staff will not access the system. Failure to adhere to this requirement may result in disciplinary action.

User accounts will be accessible by the headteacher and the ICT technician.

Users will be required to familiarise themselves with the requirements of the UK GDPR and Data Protection Act 2018, and to ensure that they operate in accordance with the requirements of the regulations and the Data Protection Policy.

Any breach of the rules in this policy may result in disciplinary action, which may lead to dismissal.

A misuse or breach of this policy could also result in criminal or civil actions being brought against the persons involved or the school.

17. Monitoring and review

This policy will be reviewed annually by the ICT technician and the headteacher.

Any changes or amendments to this policy will be communicated to all staff members by the headteacher.