



Interaction &
Communication

— Academy Trust —

ICAT ICT and Internet Acceptable Use Policy

Date Published	November 2021
Approved Date	November 2021
Review Cycle	3-yearly
Review Date	November 2024

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1. Introduction and aims

Information and communications technology (ICT) is an integral part of the way our Trust works, and is a critical resource for pupils, staff, all governance levels, volunteers and visitors. IT supports teaching and learning, pastoral and administrative functions of the Trust.

However, the ICT resources and facilities our Trust uses also pose risks to data protection, online safety and safeguarding.

This policy aims to:

- Set guidelines and rules on the use of Trust ICT resources for staff, pupils, parents and all governance bodies
- Establish clear expectations for the way all members of the Trust community engage with each other online
- Support the Trust's policy on data protection
- Support the Trust and Trust's online safety and safeguarding
- Prevent disruption to the Trust through the misuse, or attempted misuse, of ICT systems
- Support the Trust in teaching safe and effective internet and ICT use

This policy covers all users of our Trust's ICT facilities, including all governance bodies, staff, pupils, volunteers, contractors and visitors.

Breaches of this policy may be dealt with under our disciplinary policy/behaviour policy/staff discipline policy/staff code of conduct/etc.

2. Relevant legislation and guidance

This policy refers to, and complies with, the following legislation and guidance:

- [Data Protection Act 2018](#)
- [The General Data Protection Regulation](#)

- [Computer Misuse Act 1990](#)
- [Human Rights Act 1998](#)
- [The Telecommunications \(Lawful Business Practice\) \(Interception of Communications\) Regulations 2000](#)
- [Education Act 2011](#)
- [Freedom of Information Act 2000](#)
- [The Education and Inspections Act 2006](#)
- [Keeping Children Safe in Education 2021](#)
- [Searching, screening and confiscation: advice for Trusts](#)
- [National Cyber Security Centre \(NCSC\)](#)
- [Education and Training \(Welfare of Children Act\) 2021](#)

3. Definitions

- “Trust” refers to both the Multi-Academy Trust and all related schools
- **“ICT facilities”**: includes all facilities, systems and services including but not limited to network infrastructure, desktop computers, laptops, tablets, phones, music players or hardware, software, websites, web applications or services, and any device system or service which may become available in the future which is provided as part of the ICT service
- **“Users”**: anyone authorised by the Trust to use the ICT facilities, including governors, staff, pupils, volunteers, contractors and visitors
- **“Personal use”**: any use or activity not directly related to the users' employment, study or purpose
- **“Authorised personnel”**: employees authorised by the Trust to perform systems administration and/or monitoring of the ICT facilities
- **“Materials”**: files and data created using the ICT facilities including but not limited to documents, photos, audio, video, printed output, web pages, social networking sites and blogs

See appendix 2 for a glossary of cyber security terminology.

4. Unacceptable use

The following is considered unacceptable use of the Trust's ICT facilities by any member of the Trust community. Any breach of this policy may result in disciplinary or behaviour proceedings (see section 4.2 below).

Unacceptable use of the Trust's ICT facilities includes but is not limited to:

- Using the Trust's ICT facilities to breach intellectual property rights or copyright
- Using the Trust's ICT facilities to bully or harass someone else, or to promote unlawful discrimination
- Breaching the Trust's policies or procedures
- Any illegal conduct, or statements which are deemed to be advocating illegal activity
- Online gambling, inappropriate advertising, phishing and/or financial scams

- Accessing, creating, storing, linking to or sending material that is pornographic, offensive, obscene or otherwise inappropriate or harmful
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos and/or livestreams (also known as sexting or youth-produced sexual imagery)
- Activity which defames or disparages the Trust, or risks bringing the Trust into disrepute
- Sharing confidential information about the Trust, its pupils, or other members of the Trust community
- Connecting any device to the Trust's ICT network without approval from authorised personnel
- Setting up any software, applications or web services on the Trust's network without approval by authorised personnel, or creating or using any program, tool or item of software designed to interfere with the functioning of the ICT facilities, accounts or data
- Gaining, or attempting to gain, access to restricted areas of the network, or to any password-protected information, without approval from authorised personnel
- Allowing, encouraging or enabling others to gain (or attempt to gain) unauthorised access to the Trust's ICT facilities
- Causing intentional damage to ICT facilities
- Removing, deleting or disposing of ICT equipment, systems, programs or information without permission by authorised personnel
- Causing a data breach by accessing, modifying, or sharing data (including personal data) to which a user is not supposed to have access, or without authorisation
- Using inappropriate or offensive language
- Promoting a private business, unless that business is directly related to the Trust
- Using websites or mechanisms to bypass the Trust's filtering mechanisms
- Engaging in content or conduct that is radicalised, extremist, racist, anti-Semitic or discriminatory in any other way

This is not an exhaustive list. The Trust reserves the right to amend this list at any time. The CEO, Principal or any other relevant member of staff will use professional judgement to determine whether any act or behaviour not on the list above is considered unacceptable use of the Trust's ICT facilities.

4.1 Exceptions from unacceptable use

Where the use of Trust ICT facilities (on the Trust premises and/or remotely) is required for a purpose that would otherwise be considered an unacceptable use, exemptions to the policy may be granted at the CEO/Principal's discretion.

A formal request must be made in writing at least 5 working days prior to access being required.

4.2 Sanctions

Pupils and staff who engage in any of the unacceptable activity listed above may face disciplinary action in line with the Trust's policies on behaviour/discipline/staff discipline/staff code of conduct/etc.

5. Staff (including governance bodies, volunteers, and contractors)

5.1 Access to Trust ICT facilities and materials

The Trust's ICT managers manage access to the Trust's ICT facilities and materials for Trust staff. That includes, but is not limited to:

- Computers, tablets, mobile phones, and other devices
- Access permissions for certain programmes or files

Staff will be provided with unique log-in/account information and passwords that they must use when accessing the Trust's ICT facilities.

Staff who have access to files they are not authorised to view or edit, or who need their access permissions updated or changed, should contact the relevant ICT manager.

5.1.1 Use of phones and email

The Trust provides each member of staff and governance member with an email address.

This email account should be used for work purposes only. Everyone as directed by the ICT Manager should enable multi-factor authentication on their email accounts.

All work-related/Trust business should be conducted using the email address the Trust has provided.

Staff must not share their personal email addresses with parents and pupils and must not send any work-related materials using their personal email account.

Staff must take care with the content of all email messages, as incorrect or improper statements can give rise to claims for discrimination, harassment, defamation, breach of confidentiality or breach of contract.

Email messages are required to be disclosed in legal proceedings or in response to requests from individuals under the Data Protection Act 2018 in the same way as paper documents. Deletion from a user's inbox does not mean that an email cannot be recovered for the purposes of disclosure. All email messages should be treated as potentially retrievable.

Staff must take extra care when sending sensitive or confidential information by email. Any attachments containing sensitive or confidential information should be encrypted so that the information is only accessible by the intended recipient.

If staff receive an email in error, the sender should be informed, and the email deleted. If the email contains sensitive or confidential information, the user must not make use of that information or disclose that information.

If staff send an email in error that contains the personal information of another person, they must inform the relevant ICT manager immediately and follow our data breach procedure, the Data Protection Officer should also be notified.

Staff must not give their personal phone numbers to parents or pupils. Staff must use phones provided by the Trust to conduct all work-related business.

Trust phones must not be used for personal matters.

Staff who are provided with mobile phones as equipment for their role must abide by the same rules for ICT acceptable use as set out in section 4.

5.2 Personal use

Staff are permitted to occasionally use Trust ICT facilities for personal use subject to certain conditions set out below. Personal use of ICT facilities must not be overused or abused. The ICT manager/Principal of the school may withdraw permission for it at any time or restrict access at their discretion.

Personal use is permitted provided that such use:

- Does not constitute 'unacceptable use', as defined in section 4
- Takes place when no pupils are present

- Does not interfere with their jobs, or prevent other staff or pupils from using the facilities for work or educational purposes

Staff may not use the Trust's ICT facilities to store personal non-work-related information or materials (such as music, videos or photos).

Staff should be aware that use of the Trust's ICT facilities for personal use may put personal communications within the scope of the Trust's ICT monitoring activities (see section 5.5). Where breaches of this policy are found, disciplinary action may be taken.

Staff should be aware that personal use of ICT (even when not using Trust ICT facilities) can impact on their employment by, for instance, putting personal details in the public domain, where pupils and parents could see them.

Staff should take care to follow the Trust's guidelines on social media (see appendix 1) and use of email (see section 5.1.1) to protect themselves online and avoid compromising their professional integrity.

5.2.1 Personal social media accounts

Members of staff should ensure their use of social media, either for work or personal purposes, is appropriate at all times.

The Trust has guidelines for staff on appropriate security settings for Facebook accounts (see appendix 1).

5.3 Remote access

We allow staff to access the Trust's ICT facilities and materials remotely. They should dial in using a virtual private network (VPN) this can only be used on Trust owned devices.

Staff accessing the Trust's ICT facilities and materials remotely must abide by the same rules as those accessing the facilities and materials on-site. Staff must be particularly vigilant if they use the Trust's ICT facilities outside the Trust and take such precautions as the ICT manager may require from time to time against importing viruses or compromising system security.

Our ICT facilities contain information which is confidential and/or subject to data protection legislation. Such information must be treated with extreme care and in accordance with our data protection policy.

Please refer to the ICAT Data Protection/GDPR policy for further information.

5.4 Trust social media accounts

The Trust has an official Facebook/Twitter page, managed by the relevant member(s) of staff. Staff members who have not been authorised to manage, or post to, the account, must not access, or attempt to access the account.

Senior Leadership Team (SLT) approval should be sought prior to publication. Those who are authorised to manage the account must ensure they abide by these guidelines at all times.

5.5 Monitoring of Trust network and use of ICT facilities

The Trust reserves the right to monitor the use of its ICT facilities and network. This includes, but is not limited to, monitoring of:

- Internet sites visited
- Bandwidth usage
- Email accounts
- Telephone calls
- User activity/access logs

- Any other electronic communications

Only authorised ICT staff may inspect, monitor, intercept, assess, record and disclose the above, to the extent permitted by law.

The Trust monitors ICT use in order to:

- Obtain information related to Trust business
- Investigate compliance with Trust policies, procedures and standards
- Ensure effective Trust and ICT operation
- Conduct training or quality control exercises
- Prevent or detect crime
- Comply with a subject access request, Freedom of Information Act request, or any other legal obligation

6. Pupils

6.1 Access to ICT facilities

Pupils access to ICT facilities will be subject to individual school policies – see Online Safety policies for further information.

6.2 Search and deletion

Under the Education Act 2011, and in line with the Department for Education's [guidance on searching, screening and confiscation](#), the Trust has the right to search pupils' phones, computers or other devices for pornographic images or any other data or items banned under Trust rules or legislation.

The Trust can, and will, delete files and data found on searched devices if we believe the data or file has been, or could be, used to disrupt teaching or break the Trust's rules.

Staff members may also confiscate devices for evidence to hand to the police, if a pupil discloses that they are being abused and that this abuse contains an online element.

6.3 Unacceptable use of ICT and the internet inside/outside of Trust

The Trust will sanction pupils, in line with the behaviour policy, if a pupil engages in any of the following **at any time** (even if they are not on Trust premises):

- Using ICT or the internet to breach intellectual property rights or copyright
- Using ICT or the internet to bully or harass someone else, or to promote unlawful discrimination
- Breaching the Trust's policies or procedures
- Any illegal conduct, or statements which are deemed to be advocating illegal activity
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos and/or livestreams (also known as sexting or youth produced sexual imagery)
- Activity which defames or disparages the Trust, or risks bringing the Trust into disrepute
- Gaining or attempting to gain access to restricted areas of the network, or to any password protected information, without approval from authorised personnel
- Allowing, encouraging, or enabling others to gain (or attempt to gain) unauthorised access to the Trust's ICT facilities
- Causing intentional damage to ICT facilities or materials

- Causing a data breach by accessing, modifying, or sharing data (including personal data) to which a user is not supposed to have access, or without authorisation

7. Parents

7.1 Access to ICT facilities and materials

Parents do not have access to the Trust's ICT facilities as a matter of course.

However, parents working for, or with the Trust in an official capacity (for instance, as a volunteer or as a member of the PTA) may be granted an appropriate level of access, or be permitted to use the Trust's facilities at the Principal's/CEO's discretion.

Where parents are granted access in this way, they must abide by this policy as it applies to staff.

7.2 Communicating with or about the Trust online

We believe it is important to model for pupils, and help them learn, how to communicate respectfully with, and about, others online.

Parents play a vital role in helping model this behaviour for their children, especially when communicating with the Trust through our website and social media channels.

8. Data security

The Trust is responsible for making sure it has the appropriate level of security protection and procedures in place. It therefore takes steps to protect the security of its computing resources, data and user accounts. However, the Trust cannot guarantee security. Staff, pupils, parents and others who use the Trust's ICT facilities should use safe computing practices at all times.

8.1 Passwords

All users of the Trust's ICT facilities should set strong passwords for their accounts and keep these passwords secure.

Users are responsible for the security of their passwords and accounts, and for setting permissions for accounts and files they control.

Members of staff or pupils who disclose account or password information may face disciplinary action. Parents or volunteers who disclose account or password information may have their access rights revoked.

8.2 Software updates, firewalls and anti-virus software

All of the Trust's ICT devices that support software updates, security updates and anti-virus products will be configured to perform such updates regularly or automatically.

Users must not circumvent or make any attempt to circumvent the administrative, physical and technical safeguards we implement and maintain to protect personal data and the Trust's ICT facilities.

Any personal devices using the Trust's network must all be configured in this way.

8.3 Data protection

All personal data must be processed and stored in line with data protection regulations and the Trust's data protection policy.

Please refer to the ICAT GDPR policy for further information.

8.4 Access to facilities and materials

All users of the Trust's ICT facilities will have clearly defined access rights to Trust systems, files and devices.

These access rights are managed by the relevant ICT Manager.

Users should not access, or attempt to access, systems, files or devices to which they have not been granted access. If access is provided in error, or if something a user should not have access to is shared with them, they should alert the relevant person immediately.

Users should always log out of systems and lock their equipment when they are not in use to avoid any unauthorised access. Equipment and systems should always be logged out of and closed down completely at the end of each working day.

8.5 Encryption

The Trust ensures that its devices and systems have an appropriate level of encryption where possible.

Trust staff may use personal devices (including computers and USB drives) to access Trust data, work remotely, but not to remove personal data (such as pupil information) out of Trust if they have been specifically authorised to do so by the Principal/CEO.

Use of Trust email on personal devices will only be authorised if the devices have appropriate levels of security and encryption where possible, as defined by the ICT manager.

9. Protection from cyber attacks

Please see the glossary (appendix 2) to help you understand cyber security terminology.

The Trust will:

- Work with Directors and the IT departments to make sure cyber security is given the time and resources it needs to make the Trust secure
- Provide annual training for staff (and include this training in any induction for new starters, if they join outside of the Trust's annual training window) on the basics of cyber security, including how to:
 - Check the sender address in an email
 - Respond to a request for bank details, personal information or login details
 - Verify requests for payments or changes to information
 - Make sure staff are aware of its procedures for reporting and responding to cyber security incidents
- Investigate whether our IT software needs updating or replacing to be more secure
- Not engage in ransom requests from ransomware attacks, as this would not guarantee recovery of data
- Put controls in place that are:
 - **'Proportionate'**: the Trust will verify this using a third-party audit bi-annually, to objectively test that what it has in place is up to scratch
 - **Multi-layered**: everyone will be clear on what to look out for to keep our systems safe
 - **Up-to-date**: with a system in place to monitor when the Trust needs to update its software

- **Regularly reviewed and tested:** to make sure the systems are as up to scratch and secure as they can be

Back up critical data daily and store these backups on cloud-based backup systems and an external hard drive that isn't connected to the Trust network and which can be stored off the Trust premises

- Delegate specific responsibility for maintaining the security of our management information system (MIS) to our MIS provider
- Make sure staff:
 - Dial into our network using a virtual private network (VPN) when working from home
 - Enable multi-factor authentication where they can, on things like Trust email accounts
- Make sure ICT staff conduct regular access reviews to make sure each user in the Trust has the right level of permissions and admin rights
- Have a firewall in place that is switched on
- Check that its supply chain is secure, for example by asking suppliers about how secure their business practices are
- Develop, review and test an incident response plan with the IT department, for example, including how the Trust will communicate with everyone if communications go down, who will be contacted when, and who will notify Action Fraud of the incident.

10. Internet access

The Trust wireless internet connection is appropriately secured. The Trust uses filtering and separate connections for guests/staff/pupils, wireless isolation is also in place where required.

11. Monitoring and review

The Director of Operations will monitor the implementation of this policy, including ensuring it is updated to reflect the needs and circumstances of the Trust.

This policy will be reviewed every 3 years.

The Board of Directors is responsible for approving this policy.

12. Related policies

This policy should be read alongside the Trust's policies on:

- Online safety
- Safeguarding and child protection
- Behaviour
- Staff discipline
- Data protection
- Remote learning

Appendix 1: Facebook Cheat Sheet for Staff

Don't accept friend requests from pupils on social media

Advice for Trust staff on Facebook

1. Change your display name – use your first and middle name, use a maiden name, or put your surname backwards instead
2. Change your profile picture to something unidentifiable, or if not, ensure that the image is professional
3. Check your privacy settings regularly
4. Be careful about tagging other staff members in images or posts
5. Don't share anything publicly that you wouldn't be just as happy showing your pupils/pupils parents/carers
6. Don't make comments about your job, your colleagues, our Trust or your pupils online – once it's out there, it's out there
7. Don't associate yourself with the Trust on your profile (e.g. by setting it as your workplace, or by 'checking in' at a Trust event)
8. Don't link your work email address to your social media accounts. Anyone who has this address (or your personal email address/mobile number) is able to find you using this information

Check your privacy settings

- Change the visibility of your posts and photos to **'Friends only'**, rather than 'Friends of friends'. Otherwise, pupils and their families may still be able to read your posts, see things you've shared and look at your pictures if they're friends with anybody on your contacts list
- Don't forget to check your **old posts and photos** – go to bit.ly/2MdQXMN to find out how to limit the visibility of previous posts
- The public may still be able to see posts you've **'liked'**, even if your profile settings are private, because this depends on the privacy settings of the original poster
- **Google your name** to see what information about you is visible to the public
- Prevent search engines from indexing your profile so that people can't **search for you by name** – go to bit.ly/2zMdVht to find out how to do this
- Remember that **some information is always public**; your display name, profile picture, cover photo, user ID (in the URL for your profile), country, age range and gender

What to do if...**A pupil adds you on social media**

- In the first instance, ignore and delete the request. Block the pupil from viewing your profile
- Check your privacy settings again, and consider changing your display name or profile picture
- If the pupil asks you about the friend request in person, tell them that you're not allowed to accept friend requests from pupils and that if they persist, you'll have to notify senior leadership and/or their parents. If the pupil persists, take a screenshot of their request and any accompanying messages
- Notify the senior leadership team or the Principal about what's happening

A parent adds you on social media

- It is at your discretion whether to respond. Bear in mind that:
 - Responding to one parent's friend request or message might set an unwelcome precedent for both you and other teachers at the Trust
 - Pupils may then have indirect access through their parent's account to anything you post, share, comment on or are tagged in
- If you wish to decline the offer or ignore the message, consider drafting a stock response to let the parent know that you're doing so

You're being harassed on social media, or somebody is spreading something offensive about you

- **Do not** retaliate or respond in any way
- Save evidence of any abuse by taking screenshots and recording the time and date it occurred
- Report the material to Facebook or the relevant social network and ask them to remove it
- If the perpetrator is a current pupil or staff member, our mediation and disciplinary procedures are usually sufficient to deal with online incidents
- If the perpetrator is a parent or other external adult, a senior member of staff should invite them to a meeting to address any reasonable concerns or complaints and/or request they remove the offending comments or material
- If the comments are racist, sexist, of a sexual nature or constitute a hate crime, you or a senior leader should consider contacting the police

Appendix 2: Glossary of cyber security terminology

These key terms will help you to understand the common forms of cyber-attack and the measures the Trust will put in place. They're from the National Cyber Security Centre (NCSC) [glossary](#).

TERM	DEFINITION
Antivirus	Software designed to detect, stop and remove malicious software and viruses.
Cloud	Where you can store and access your resources (including data and software) via the internet, instead of locally on physical devices.
Cyber attack	An attempt to access, damage or disrupt your computer systems, networks or devices maliciously.
Cyber incident	Where the security of your system or service has been breached.
Cyber security	The protection of your devices, services and networks (and the information they contain) from theft or damage.
Download attack	Where malicious software or a virus is downloaded unintentionally onto a device without the user's knowledge or consent.
Firewall	Hardware or software that uses a defined rule set to constrain network traffic – this is to prevent unauthorised access to or from a network.
Hacker	Someone with some computer skills who uses them to break into computers, systems, and networks.
Malware	Malicious software. This includes viruses, trojans or any code or content that can adversely impact individuals or organisations.
Patching	Updating firmware or software to improve security and/or enhance functionality.
Pentest	Short for penetration test. This is an authorised test of a computer network or system to look for security weaknesses.

TERM	DEFINITION
Phishing	Untargeted, mass emails sent to many people asking for sensitive information (like bank details) or encouraging them to visit a fake website.
Ransomware	Malicious software that stops you from using your data or systems until you make a payment.
Social engineering	Manipulating people into giving information or carrying out specific actions that an attacker can use.
Spear-phishing	A more targeted form of phishing where an email is designed to look like it's from a person the recipient knows and/or trusts.
Trojan	A type of malware/virus designed to look like legitimate software that can be used to hack a victim's computer.
Two-factor/multi-factor authentication	Using 2 or more different components to verify a user's identity.
Virus	Programs designed to self-replicate and infect legitimate software programs or systems.
Virtual Private Network (VPN)	An encrypted network which allows remote users to connect securely.
Whaling	Highly targeted phishing attacks (where emails are made to look legitimate) aimed at senior executives.