

Acceptable Use of ICT, Mobile Phone and Internet Policy

Policy in effect from: September 2023
Review Date: September 2025





Statement of intent

Mighty Oaks Academy Trust 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.
- A process is in place for claiming financial payments when electronic devices are lost or damaged by members of staff.

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.

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:

- Data Protection Policy
- Freedom of Information Policy
- Complaints Procedures Policy
- Disciplinary Policy and Procedure
- Online Safety Policy
- Loaning School Equipment Policy
- Photography and Images Policy
- Data and Cyber-security Breach Prevention and Management Plan
- Finance Policy
- Records Management Policy

2. Roles and responsibilities

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

The Head of School 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.
- Using 'SENSO' to monitor inappropriate content / language used by staff on their school devices.

The ICT technician is responsible for:

- Carrying out 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 Head of School.
- 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 Head of School.
- Assisting the Head of School 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 DPO.

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:

- Requesting permission from the Head of School or ICT technician, subject to their approval, before using school-owned devices for personal reasons during school hours.
- Requesting permission to loan school equipment and devices from the headteacher or DEL.
- Requesting permission from the Head of School, subject to their approval, before using personal devices during school hours.
- Reporting misuse of ICT facilities or devices, by staff or pupils, to the Head of School.
- 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 CFO 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.
- Monitoring purchases made under the Finance Policy.
- 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
- Fax equipment
- 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 Head of School.

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 Head of School.

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.
- 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.
- Use personal devices without pre-approval from the Head of School

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 Head of School 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 Head of School.

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.

Use of a school-owned phone for personal use will be permitted for necessary calls lasting less than 5 minutes. A charge may be requested as a result of calls exceeding this time.

Should staff need to use the telephones for longer than this, authorisation will be sought from the Head of School. This authorisation will be requested on each occasion. The exception to authorisation is the use of the telephone system to make personal emergency calls; however, staff will notify the Head of School after the call.

Personal use of school-owned equipment can be denied by the Head of School at any time. This will typically be because of improper use or over-use of school facilities for personal reasons. A charge may be made for using equipment if the values are significant.

Where permission has been given to use the school equipment for personal reasons, this use will take place during the employee's own time, e.g. during lunchtime or after school. Where this is not possible, or in the case of an emergency, equipment can be used for personal reasons during work hours provided that disruption to the staff member's work, and the work of others, is minimal.

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 Head of School.

More details about acceptable use can be found in the staff Technology 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 such as initials for students' names.

The school will be liable for any defamatory information circulated either within the school or to external contacts.

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 that are sent or received will be retained within the school for a period of 18 months dependent on the information contained. More information can be found in the Records Management Policy. The timeframe will be altered where an inbox becomes full.

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 Head of School's approval, will sign the Device User Agreement and submit their devices for routine security checks on a termly basis.

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 Head of School, 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 CFO. This is in addition to any purchasing arrangement followed according to the school's Finance Policy.

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

6. Portable equipment

All data on school-owned equipment will be synchronised with the school server and backed up once per month.

Portable school-owned electronic devices will not be left unattended, and instead will be kept out of sight and securely locked in the IT cupboard/School Office 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.

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 Head of School 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.

Approved devices will be secured with a strong password, which is not shared with any other party.

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 Head of School.

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.

During lesson times, unless required for the teaching activity being undertaken, personal devices will be kept in personal bags etc.

8. Removable media

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

- DVDs
- CDs

USBS ARE <u>NOT</u> PERMITTED TO BE USED

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 and disposed of after no more than 18 months.

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 schoolowned devices will raise the matter initially with the Head of School, 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 Head of School.
- 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 Head of School. Certain items are asset registered and security marked;
 their location is recorded by the CFO for accountability. Once items are moved after
 authorisation, staff will be responsible for notifying the cFO 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.
- 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 Head of School.
- 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 Head of School. 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 Head of School. 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 Head of School. 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 Head of School. 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 Head of School.
- 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 Head of School.

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.

Loans will be requested using the <u>Loan Request Form</u> and must give at least three working days' notice prior to the requested loan date.

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 <u>Staff Declaration Form</u>.

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

Once a request has been authorised, the staff member will be required to undergo any training required to use the requested equipment, including how to store, handle and undertake any maintenance, e.g. changing batteries.

The maximum loan period will be five working days; however, where required, this can be extended following discussion with the CFO and Head of School.

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

Staff members will be made aware that, at the discretion of the Head of School, late returns may incur a penalty fee.

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 Trustees, will be available each year on request from the CFO.

Requests for equipment or electronic devices will be made in writing to the CFO using the Purchase Request Form.

Requests will be submitted in sufficient detail for an informed decision to be made.

Requests will be responded to within 10 working days. If sufficient detail is not provided or other conditions specified by the CFO are not met, the request will not be processed.

Requests made for equipment or electronic devices that exceed the predetermined amount allocated will require discussion and authorisation by the Trust Board.

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 Head of School.

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

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 CFO 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 CFO 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 CFO, 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 the Data and Cyber-security Breach Prevention and Management Plan.

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 regularly updated.

The school will use mail security technology to detect and block any malware transmitted via email.

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.

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.

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

Further security arrangements are outlined in the Data and Cyber-security Breach Prevention and Management Plan.

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

The school's insurance will cover school-owned electronic devices that are damaged or lost, during school hours, if they are being used on the school premises.

Staff members will use school-owned electronic devices within the parameters of the school's insurance cover – if a school-owned electronic device is damaged or lost outside of school hours and/or off-site, the member of staff at fault may be responsible for paying damages.

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 Head of School 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.

If it is decided that a member of staff is liable for the damage, they will be required to pay 50 percent of the total repair or replacement cost. A written request for payment will be submitted to the member of staff who is liable to pay for damages.

If the member of staff believes that the request is unfair, they can make an appeal to the Head of School, who will make a final decision within 10 school days.

In cases where the Head of School decides that it is fair to seek payment for damages, the member of staff will be required to make the payment within six weeks of receiving the request.

Payments will be made to the CFO via the main office, and a receipt is given to the member of staff.

The school will accept payments made via bank transfer or cash.

A record of the payment will be made and stored in the main office for future reference.

The Head of School may accept the payment in instalments.

If the payment has not been made after six weeks, the fee will increase by five percent and continues for a maximum of six months – at which point formal disciplinary procedures will begin.

The member of staff will not be permitted to access school-owned electronic devices until the payment has been made.

In cases where a member of staff repeatedly damages school-owned electronic devices, the Head of School 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 Head of School.

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 telephone system will be logged and monitored.

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

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

Unsuccessful and successful software installations, security changes and items sent to the printer will also be logged.

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.

User accounts will be accessible by the Head of School and the ICT technician.

Users will ensure that critical information is not stored solely within the school's computer system. Hard copies will be kept or stored separately on the system. If necessary, documents will be password protected.

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 every three years by the Trust Board.

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

Loan Request Form

This form should be completed by staff members when requesting to loan school-owned equipment.

Staff members must detail the specific equipment or device which is requested, as well as provide a reason, and where necessary, evidence, as to why the equipment or device is required.

The completed form should be returned to the designated equipment lead (DEL) for authorisation.

Name	Department	
Equipment required		
Reason		
First date of loan	Return date	
Authorised (if rejected, detail why)		
Signed (CFO)		
Job role	Date	