The Active Learning Trust

ACTIVE LEARNERS · ACTIVE LEADERS · ACTIVE CITIZENS

ICT SECURITY POLICY

This policy is reviewed on an annual basis by the Trust Board

History of Document

Issue No	Author/Owner	Date Written	Approved by Trust Board	Comments
1	Director of Finance & Operations / DPO	May 2018	12 July 2018	1st formal issue
2	Director of Finance & Operations / DPO	Nov 2018	13 December 2018	Minor amendment 4.6
3	Director of Finance & Operations / DPO	February 2019	14 February 2019	Add 12.2 and 18.2
4	Director of Finance & Operations / DPO	Nov 2020	17 December 2020	Minor amendments 5.3.1,5.3.2,8.3,9.5
5	Director of Finance & Operations / DPO	November 2021	9 December 2021	Add 8.13,8.15,9.2,9.6-9.9,18,19.5,20
6	Director of Finance & Operations / DPO	April 2022	7 April 2022	Amend 20.1

1. INTRODUCTION

1.1 ICT enables and enhances the Active Learning Trust's ("Trust") educational and organisational vision and objectives. Information stored on school ICT assets and related systems represents one of the Trust's most valuable assets and must be protected to preserve its confidentiality, integrity and availability in order to enable the Trust's vision and objectives to be achieved.

2. PURPOSE OF THE POLICY

2.1 The purpose of the ICT Security Policy ("Policy") is to clarify everyone's responsibilities and security measures to be undertaken in accordance with regulatory, legislative and local requirements to ensure that information remains confidential, is protected from unauthorised access or disclosure; is accessible and available and that data integrity is not compromised.

3. SCOPE

3.1 This Policy is intended for Trust owned ICT equipment and systems when held internally or outside a school/central operations of the Trust. It is intended for anyone who has access to the Trust's administrative and/or curriculum ICT systems or data.

3.2 Privately owned ICT equipment should not be used on a school's network.

3.3 For this Policy definitions are as follows:

- Information covers any method of information creation or collection, including electronic capture and storage, video and audio recordings and any images.
- ICT or ICT system means computing and communications facilities that support teaching, learning and a range of activities in education.
- ICT is the knowledge, skills and understanding needed to employ information and communication technology appropriately.
- ICT equipment means computers, laptops, ipads, tablets, cameras and mobile phones.
- Where the term Headteacher is used this incorporates Executive Headteacher roles where these exist and the Chief Executive Officer of the Active Learning Trust when the statement refers to the central operations of the Trust.

3.4 The Policy incorporates the best practice from within the National Cyber Security Centre's guidance – 10 Steps to Cyber Security in the safe and secure storage of electronic files and data. Such 10 steps are shown in Appendix I.

4. RESPONSIBILITY

4.1 The Trust Board has ultimate responsibility for setting this Policy.

4.2 A Headteacher is responsible for ensuring that the requirements relating to this Policy are adopted and adhered to, has overall responsibility for the implementation of the ICT security arrangements in their school, must ensure it is implemented consistently and effectively and is free from discrimination.

4.3 A school's ICT service is responsible for ensuring that security measures are installed on ICT systems and such are monitored for security compliance; advising of any suspected or actual ICT security breaches and ensuring an effective and tested ICT Disaster Recovery Plan is in place.

4.4 Everyone who has access to a school's ICT systems and data must comply with this Policy, the Trust's Email Acceptable Use Policy and its Internet, Social Media and E-Safety Acceptable Use Policy. Anyone outlined in 3.1 above are required to read, accept and agree to abide with all these policies.

4.5 The Trust has produced IT Standards which cover its expected cyber security mechanisms and checks that schools must comply with in order to protect personal data as outlined by the General Data Protection Regulation and the DPA 2018

4.6 An Information Governance Working Group reports to the Trust's Senior Leadership Team and considers Trust wide cyber security and information management matters.

4.7 The Trust's DPO will monitor the effectiveness of this Policy and relevant procedures as part of a Data Protection Annual Monitoring Programme. The Trust's DPO is responsible for submitting any reportable security breaches to the Information Commissioner's Office.

5. ICT ASSET ACCOUNTABILITY AND CONTROL

5.1 Procurement

5.1.1 Procurement of ICT equipment and software must be undertaken/co-ordinated by the Trust's ICT Strategic service. An ICT asset register (however financed) must be maintained by a school's ICT service under whose responsibility the ICT equipment is placed. All items must be accounted for at least annually. In addition a software register must be maintained.

5.1.2 No software which will be used to process special category personal data should be purchased/trialled before a satisfactory Data Protection Impact Assessment has been undertaken by the school/ DPO which confirms UK GDPR compliance.

5.2 Repairs and Relocation

5.2.1 Users are required to contact a school's ICT service to report any faults or problems that they experience, whether hardware or software related. All faults and problem resolutions must be logged.

5.2.2 Connection, disconnection or relocation of any ICT equipment must be undertaken by or in consultation with a school's ICT service.

5.2.3 Damaged or faulty portable and mobile devices and removeable media must not be used and should be returned to a school's ICT service.

5.3 Disposal/Loss of ICT Equipment

5.3.1 ICT equipment identified for disposal or reuse must be held in secure storage until redeployed or disposed of. A record of the ICT equipment's secure disposal must be recorded on the school's ICT asset register.

5.3.2 ICT equipment can either be completely wiped clean of data on a school's premises by a school's ICT service or externally by a Waste Electrical and Electronic Equipment (WEEE) accredited compliant recycling partner, which must provide certificates as evidence of the secure destruction/deletion of data.

5.3.3 Any loss of a portable and mobile device and removeable media must be notified immediately to a school's ICT service who will arrange instant disablement of the device (where possible).

5.4 Staff Departure

5.4.1 All staff who leave the employment of the Trust must return Trust owned ICT equipment as part of a school's leavers process. They are also required to confirm that they have deleted any school related emails on their personal mobile devices.

6. PHYSICAL AND ENVIRONMENTAL SECURITY

6.1 All server, network and communication equipment including associated cabling must be located in secure ICT machine rooms which where possible will be climate controlled. Access to ICT machine rooms must be restricted to authorised persons by keycode locks or swipe card access or similar security devices. Computer rooms must be protected by fire alarms and where possible automated fire extinguishing systems. Eating, drinking and smoking is not permitted in the ICT machine rooms.

7. EQUIPMENT SECURITY

7.1 Equipment siting and protection

7.1.1 Computer screens, keyboards, printers or other similar devices must be positioned so that information stored or being processed can't be viewed by persons not authorised to such information. ICT equipment must be positioned so it isn't damaged by dust and heat.

7.1.2 With the exception of portable and mobile devices provided specifically for home-working, employees are not permitted to remove ICT equipment from school/Trust premises. Devices must be held securely on and off a school's premises.

7.1.3 All desktop, portable and mobile devices should have a basic input output system (BIOS) passwords and time appropriate automatic screen locking enabled of keyboard or mouse inactivity appropriate for different users in according with the Trust's IT Standards. A user's password will be required to unlock the screen.

7.1.4 Staff must ensure that all desktop, portable and mobile devices are locked prior to leaving them unattended.

7.1.5 Staff who set-up scripts and icons for convenient log ons must not pre-code them with user names or passwords. Generic passwords issued by manufacturers must be changed immediately.

7.2 Power Supplies

7.2.1 Critical hardware such as servers and communications equipment should be protected from power supply failure by the use of uninterruptible power supplies (UPS) which offer battery-based backup power.

7.3 Clock Synchronisation

7.3.1 In order to ensure the accuracy of any logging or monitoring information, the time clocks on the Trust's servers and ICT devices should be synchronised to a Network Time Protocol (NTP) source.

8. ANTI VIRUS SOFTWARE

8.1 Anti-virus software is installed onto servers and each networked device. Client devices are configured to automatically check and install updates at regular intervals.

8.2 Any Trust owned portable and mobile ICT devices connected to the Internet must be allowed to install automated virus definition and windows security patch updates.

8.3 Non networked ICT equipment e.g. laptops are installed with a standalone copy of anti-virus software which automatically displays a warning message once the virus definition is out of date. Users are required to contact a school's ICT service to arrange regular updates of anti-virus software. Laptops must be connected to the school network at least once every 90 days. If users' data is cloud based, anti-virus updates are automatic.

8.4 Any information taken from the Internet will be scanned for viruses by anti-virus software before it is received on a school's local area network.

8.5 Network devices or software designed to capture and/or analyse network traffic must not be installed on school networks without appropriate authorisation from a school's ICT service.

8.6 USB sticks/flash drives must be scanned for viruses before information is uploaded to a school's network.

8.7 External email messages entering a school network must be automatically checked for malware (computer viruses, trojan horses and worms). Messages containing malware will be retained for up to a month for administrative reasons. The sender of such messages will be informed of the viral content of their email.

8.8 Where a virus is detected this must be reported immediately to a school's ICT service which will attempt to "clean" and rebuild the affected ICT device and update the anti-virus software. The virus scanning software will automatically notify the User of any virus detected.

8.9 Users who install, store or use illegal, unapproved or copied software will be subject to appropriate disciplinary action.

8.10 Firewall protection must be utilised to prevent illegal intrusion via the Internet.

8.11 Operating systems and application updates should be applied automatically. Ideally a school will utilise WSUS *(Windows Server Update Services)* as WSUS fully manages the distribution of updates that are released through Microsoft Update to computers on a school's network.

8.12 Schools should move to security updates being set automatically on school owned standalone devices.

9. INFORMATION BACK-UP

9.1 Data essential for the day to day running and management of a school should be stored on a school's network server. Back-up copies of data will be taken at regular intervals as determined by the Trust's IT Standards and should be taken before any patch is applied.

9.2 Data should be backed up, where possible to a cloud-based storage system.

9.3 Back-ups should be clearly marked as to what they are and when they were taken. They should be stored away from the system to which they relate in a restricted access fire proof location, preferably off site.

9.4 Instructions for re-installing data or files from back-up should be fully documented and tested at least each half-term to ensure that they enable the systems/relevant file to be re-loaded in cases of system failure.

9.5 Data should not be stored on unencrypted portable and mobile devices as these are not included in the automatic nightly back-up of the network servers.

9.6 Back-ups must only be connected to known clean devices before starting recovery.

9.7 Back-ups must be scanned for malware before files are restored as ransomware may have infiltrated a school's network over a period of time, and replicated to backups before being discovered.

9.8 Software used for backup should be regularly patched so any known vulnerabilities they might contain can't be exploited.

9.9 Backup accounts and solutions should be protected using Privileged Access Workstations (PAW) and hardware firewalls to enforce IP allow listing. Multi-factor Authentication (MFA) should be enabled on Trust owned devices, and the MFA method should not be installed on the same device that is used for the administration of backups. Privileged Access Management (PAM) solutions remove the need for administrators to directly access high-value backup systems.

9.10 Copies of data stored on back-ups are securely deleted in accordance with the Trust's Records Retention Policy.

10. AUTHORISATION

10.1 Only persons authorised by the Trust's Chief Executive Officer/ Executive Headteacher/ Headteacher are allowed to use a school's ICT systems. The school will ensure a User is fully aware of the extent to which they may make use of an ICT system.

11. USER PRIVILEGE MANAGEMENT

11.1 Each system should permit access to a User only on entry of a legitimate unique name (User ID) and password. Users must only use their own unique user name (User ID) and password to access a school network. A standard user profile can be produced for particular grades/staff types. User profiles should be agreed with the Headteacher.

11.2 Only a school's ICT service has administrative privileges on desktop and server systems. ICT Technical staff should have two logins, one Standard User Account and one with Domain Admin privileges which must only be used when necessary.

11.3 A school's ICT service restricts user access e.g. to different parts of systems or to view only, view and update or view, update and delete. It also adds or disables user accounts and sets up/amends user profiles.

11.4 Users must only be supplied with the level of access/least privilege required to perform their work duties and in which they have been trained, throughout a school's network. Users must not attempt to gain access beyond their given access privileges.

11.5 Third parties are provided with accounts that solely provide access to the systems and / or data they are contracted to handle, in accordance with least privilege and need to know principles. The accounts will be removed at the end of the contract or when no longer required. Unless operationally necessary (and explicitly recorded in the system documentation as such) third party accounts will be disabled when not in use.

11.6 After entering their unique name (User ID) and password to enter a school ICT system, Users will be reminded of their security responsibilities which they must agree to before being able to enter a school network.

11.7 A school's ICT service should hold a log which records all persons who have been allocated a User account. The log should contain the user name, designation, department, contact details and the user profile. The user profile should provide details of authorised access levels given/ removed and reviews undertaken, together with relevant dates.

11.8 A school's ICT service should undertake a systematic review of User profiles on a regular basis, at least annually, to ensure that current access levels are still appropriate.

11.9 Failed log in attempts will be monitored.

11.10 Personal User IDs must not be shared between people.

11.11 Access to 'Confidential' and 'Restricted' information will be limited to authorised persons whose role require it, as determined by law, contractual agreement or the Trust's ICT Security Policy.

11.12 Users who have resigned or terminated their contracts or ceased duties must be assessed as to their ongoing need for access to the information systems or facilities. ICT equipment must be returned.

11.13 Users who have been dismissed or subject to disciplinary action or criminal charges which may compromise the security of information systems must not have access to a school's ICT environment, systems or facilities except with the express permission of the Headteacher.

12. PASSWORDS

12.1 Passwords should be strong and be at least 8 characters long, contain letters, numbers and special characters, include upper and lower-case letters, wholly different from previous passwords used, user rather than system generated and different to the User ID.

12.2 Users should not be forced to change their passwords, but should be given the ability to change them themselves should they feel their password may have been compromised.

12.3 Users should keep passwords secure and not store them on an ICT device. The "save my password" feature must not be used unless saved via Google or Edge – save profile function

12.4 Users should not disclose passwords to anyone. System administrator passwords are however to be recorded in hard copy by a school's ICT service and kept securely in a safe. These should immediately be changed when a member of a school's ICT service leaves a school.

12.6 Mobile phones must be accessible only by passwords or a combination of password and facial/finger print recognition.

13. CRYPTOGRPAHIC CONTROLS

13.1 All staff laptops must have fully encrypted hard drives and personal storage devices e.g. USB memory sticks, where permitted, must be fully encrypted; encryption software must be stored on desktops.

13.3 Emails with attachments sent outside the school network (with the exception of the Local Authority/DfE/EPM where data is transferred through a secure portal), must be password protected. The password must not be sent via the same medium as the data and must be provided via phone or text. Information can also be sent via Egress.

13.4 Encryption is applied to wireless networks, encryption keys should be kept secure and remain the property of the system manger and must not be shared without written permission.

14. OPERATING SYSTEM PATCHING

14.1 Network security vulnerabilities, missing patches and updates will be monitored by a school's ICT service. When it is known that a vulnerability is being actively exploited a patch must be applied immediately.

14.2 Operating systems must be patched up to date with patch releases that are issued from an appropriate manufacturer/supplier within 10 working days.

14.3 If a patch is not available or deployed within the timescale in point 14.2 above, then alternative mitigating action must be taken such as disabling or reducing access to the vulnerable service.

14.4 Where legacy applications are in use that run on unpatchable software, an upgrade plan for these applications must be established.

15. FILTERING OF THE INTERNET

15.1 Access to the Internet should be filtered using an approved system. The effectiveness of such must be monitored by a school's ICT service. Breaches must be reported to a Headteacher and the Trust's Data Protection Officer.

16. EMAIL SECURITY

16.1 The Trust's requirements for use of Emails are covered in its Email Acceptable Use Policy.

17. INTERNET, SOCIAL MEDIA, E- SAFETY SECURITY

17.1 The Trust's requirements for use of the Internet, Social Media and E-Safety are covered in its Internet, Social Media and E-Safety Acceptable Use Policy.

18. DOWNLOADING APPLICATIONS

18.1 Apps should only be downloaded for mobile phones and tablets from manufacturer-approved stores (like Google Play or Apple App Store). These apps are checked to provide a certain level of protection from malware that might cause harm. Schools should prevent staff from downloading third party apps from unknown vendors/sources, as these will not have been checked.

19. REMOTE WORKING/ACCESS

19.1 School data must **NOT** be stored on any portable or mobile ICT device not belonging to a school (including USB memory sticks, cards and hard disks).

19.2 Home working is permitted where authorised by a Headteacher through the use of school owned portable and mobile devices. Users may add their school email accounts to their personal devices such as a mobile phone or home device (such as an iPad or laptop). However these devices must be password protected and lock automatically when not in use. When a user leaves employment of the School/Trust, they must demonstrate that they have removed these accounts from their personal devices.

19.3 All remote access connections must pass through a school's security infrastructure system. Connections which bypass a school's security infrastructure systems (e.g. direct connections to internal modems) are prohibited.

19.4 Access to a school's network and school ICT equipment should not be accessed outside the UK unless appropriate security measures are implemented.

19.5 Staff shouldn't connect to the Internet using unknown hotspots, and instead use their mobile 3G or 4G mobile network, which will have built-in security whilst they are working on whilst connected. This will prevent unauthorised access to private login details that many apps and web services maintain whilst a user is logged on and also prevent access to what an employee is working on.

19.6 Any documents which are stored on portable and mobile devices must be reviewed regularly by the User and deleted when no longer needed in accordance with the Trust's Records Retention Policy.

20. CREDIT CARD SECURITY

20.1 **Employees should ensure that the following isn't recorded:**

- The contents of the payment card magnetic stripe (track data) on any media whatsoever;
- The CVV/CVC (the 3 or 4 digit number on the signature panel on the reverse of the payment card) on any media whatsoever;
- The PIN or the encrypted PIN Block under any circumstance.

20.2 All Access to sensitive cardholder information should be controlled and authorised. Any Job functions that require access to cardholder data should be clearly defined.

- Any display of the card holder should be restricted at a minimum of the first 6 and the last 4 digits of the cardholder data.
- User ID's should be restricted to least privileges necessary to perform job responsibilities
- Access to sensitive cardholder information such as Permanent Account Numbers, personal information and business data is restricted to employees that have a legitimate need to view such information.
- No other employees should have access to this confidential data unless they have a genuine business need.

20.3 Access to sensitive information in both hard and soft media format must be physically restricted to prevent unauthorised individuals from obtaining sensitive data:

- A list of devices that accept payment card data should be maintained and include make, model and location of the device, serial number or a unique identifier of the device,
- The list should be updated when devices are added, removed or relocated
- POS devices surfaces should be periodically inspected to detect tampering or substitution.
- Personnel using the devices should be trained and aware of handling the POS devices and how to report suspicious behaviour and indications of tampering of the devices to the appropriate personnel.
- Personnel using the devices should verify the identity of any third party personnel claiming to repair or run maintenance tasks on the devices, install new devices or replace devices.

21. ICT SECURITY INCIDENTS

21.1 The Trust must have an ICT Disaster Recovery Policy.

21.2 The Trust and its schools should plan and rehearse ransomware scenarios in the event that defences are breached as recommended by the National Cyber Security Centre (NCSC) Link following recent incidents affecting the education

sector which led to the loss of student coursework, school financial records, as well as data relating to COVID-19 testing.

21.3 Each school must have mechanisms in place to properly react and deal with ICT security incidents and violations, both intentional and unintentional and have an effective and tested ICT Disaster Recovery Plan.

21.4 All ICT security weaknesses and incidents, whether suspected or actual, must be reported as outlined in the Trust's Data Protection Policy. Users must not attempt to prove or exploit a suspected ICT security weakness. ICT security incidents include (but are not limited to) for example virus attacks, hardware and software faults, theft or suspected theft of any ICT resources, equipment or information, breach of security resulting in internal fraud or suspected fraud, non-compliance with statutory requirements regarding privacy of information.

22. ICT SECURITY AWARENESS /TRAINING

22.1 ICT security awareness mechanisms must be in place to ensure anyone who has access to a school's ICT equipment and data are aware of the importance of ICT security, and to properly react and deal with ICT security incidents and weaknesses. User awareness will be supported by regular updates.

23. MONITORING

23.1 Users should have no expectation of privacy in any message, files, data, document, facsimile, telephone conversation, social media post, conversation or message, or any other kind of information or communications transmitted to, received or printed from, or stored or recorded on Trust owned electronic information and communications systems.

23.2 The Trust reserves the right to monitor, intercept and review, without prior notification or authorisation from Users. Usage of the Trust's IT resources and communications systems, including but not limited to telephone, e-mail, messaging, voicemail, CCTV, internet and social media postings and activities is monitored to ensure that Trust rules are being complied with and for the following purposes:

- to monitor whether the use of the e-mail system or the internet is legitimate and in accordance with this Policy;
- to assist in the investigation of alleged wrongful acts; or
- to comply with any legal obligation

23.3 Users consent to monitoring by acknowledgement of the Trust's Code of Conduct and the use of Trust resources and systems. The Trust may store copies of data or communications for a period of time after they are created and may delete such copies from time to time without notice. If necessary, information may be handed to the Police in connection with a criminal investigation.

23.4 Security audit logging is activated on most ICT devices and servers have security audit logging switched on to automatically record events such as failed logon attempts. Critical application systems such as SIMs and PS Financials log, display information and unsuccessful logon attempts.

23.5 The performance of school servers is continually reviewed as part of a regular Server maintenance schedule at each school. This includes a review of system event logs, ICT device messages and disk space.

23.6 Where a CCTV system monitors a school 24 hours a day this data is recorded and may be used as evidence of any alleged wrong doing.

23.7 The Trust reserves the right for appropriate employees to use approved software tools to monitor school network, systems and emails in order to check compliance with this Policy.

23.9 An annual information security/data protection monitoring programme will be undertaken to evidence the effectiveness of this Policy. Evidence will be obtained in order to meet the accountability principle of the UK GDPR.

24. DISCIPLINARY ACTION

24.1 Disciplinary action may be taken against any User suspected of being in breach of this Policy, including an immediate ban from using a school's ICT facilities.

24.2 Breaches of this Policy may constitute gross misconduct and as such may lead to staff dismissal. For individuals not directly employed by the Trust, breaches of the Policy may result in withdrawal of facilities and referral made to their employer. For all other Users breach of this Policy may be a breach of the Code of Conduct and may lead to sanctions being applied up to and including their removal from the Governing Bodies.

24.3 The Police will be informed where there is a possibility that a criminal offence has been committed.

24.4 If an employee is aggrieved or wishes to register or report a complaint they must follow the Trust's Whistleblowing Policy and/or Staff Grievance Procedures.

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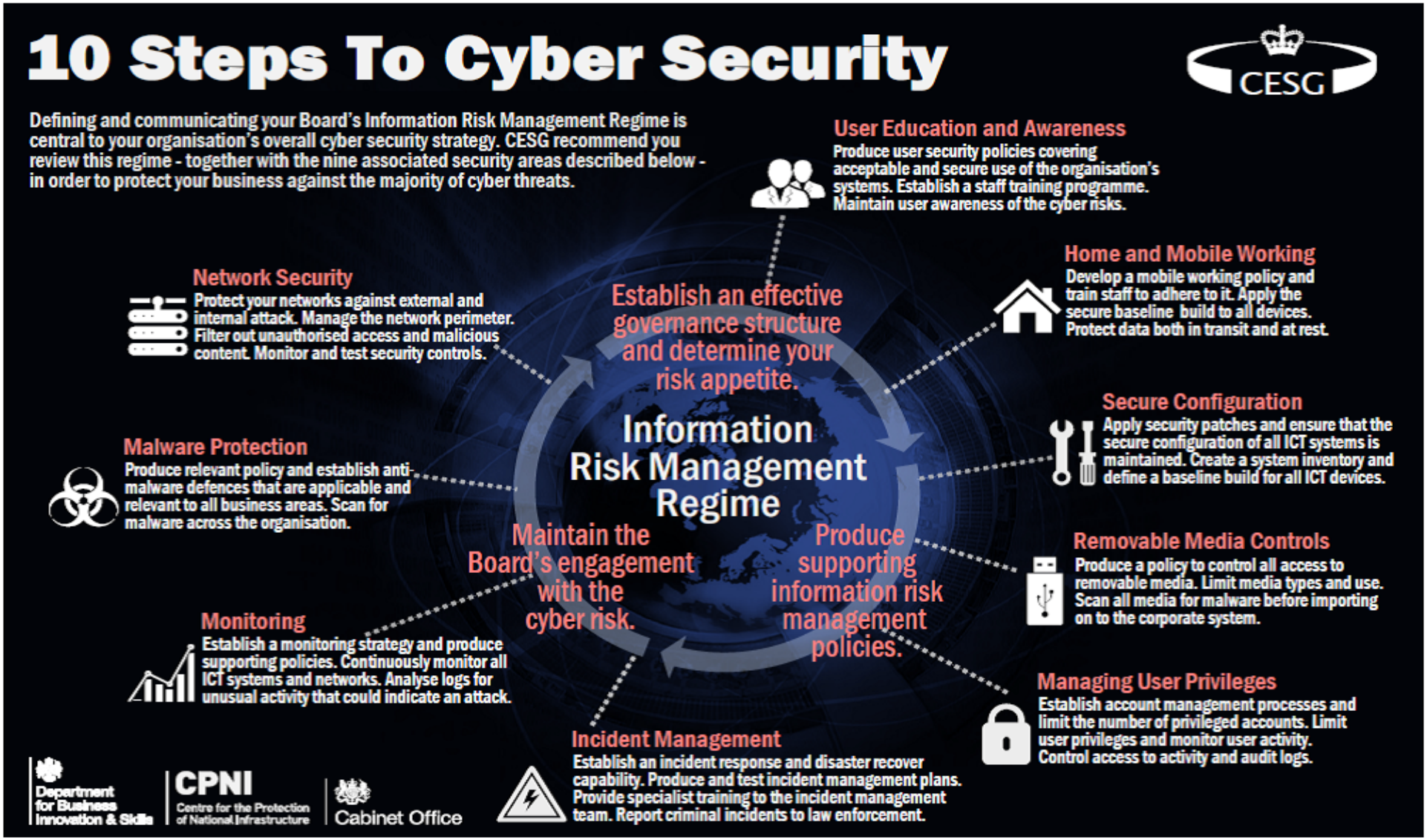
APPENDIX I


10 Steps To Cyber Security
CESG
Defining and communicating your Board's Information Risk Management Regime is central to your organisation's overall cyber security strategy. CESG recommend you review this regime - together with the nine associated security areas described below - in order to protect your business against the majority of cyber threats.
User Education and Awareness
Produce user security policies covering acceptable and secure use of the organisation's systems. Establish a staff training programme. Maintain user awareness of the cyber risks.
Home and Mobile Working
Develop a mobile working policy and train staff to adhere to it. Apply the secure baseline build to all devices. Protect data both in transit and at rest.
Network Security
Protect your networks against external and internal attack. Manage the network perimeter. Filter out unauthorised access and malicious content. Monitor and test security controls.
Establish an effective governance structure and determine your risk appetite.
Information Risk Management Regime
Secure Configuration
Apply security patches and ensure that the secure configuration of all ICT systems is maintained. Create a system inventory and define a baseline build for all ICT devices.
Malware Protection
Produce relevant policy and establish anti-malware defences that are applicable and relevant to all business areas. Scan for malware across the organisation.
Maintain the Board's engagement with the cyber risk.
Produce supporting information risk management policies.
Removable Media Controls
Produce a policy to control all access to removable media. Limit media types and use. Scan all media for malware before importing on to the corporate system.
Monitoring
Establish a monitoring strategy and produce supporting policies. Continuously monitor all ICT systems and networks. Analyse logs for unusual activity that could indicate an attack.
Managing User Privileges
Establish account management processes and limit the number of privileged accounts. Limit user privileges and monitor user activity. Control access to activity and audit logs.
Incident Management
Establish an incident response and disaster recover capability. Produce and test incident management plans. Provide specialist training to the incident management team. Report criminal incidents to law enforcement.
Department for Business Innovation & Skills
CPNI
Centre for the Protection of National Infrastructure
Cabinet Office