

## C1 School Technical Security Policy Template (including filtering, monitoring and passwords) – with significant updates – September 2023

### Introduction

Effective technical security depends not only on technical measures, but also on appropriate policies and procedures and on good user education and training. This is informed by the Department for Education (DfE) guidance, [Keeping Children Safe in Education](#), and the [Digital and Technology Standards](#) and therefore applicable for schools and colleges in England. For schools and colleges outside England, this would be considered good practice, the school should also ensure that they remain compliant with national, local authority or MAT guidance, as relevant. The school is responsible for ensuring that the *school infrastructure/network* is as safe and secure as is reasonably possible and that:

- users can only access data to which they have right of access
- access to personal data is securely controlled in line with the school's personal data policy
- system logs are maintained and reviewed to monitor user activity
- there is effective guidance and training for users
- there are regular reviews and audits of the safety and security of school computer systems, including filtering and monitoring provision

This template is not designed to reproduce the entirety of the DfE's standards, but is designed to support governors and senior leaders in the production of a technical security policy. Governors and senior leaders remain responsible for the school's technical security.

### Responsibilities

Education settings are directly responsible for ensuring they have the appropriate level of security protection procedures in place in order to safeguard their systems, staff and learners and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies. The management of technical security is the responsibility of Governors and Senior Leaders, supported in this by the Designated Safeguarding Lead, Online Safety Lead and IT Service Provider.

### Policy statements

The school is responsible for ensuring that their infrastructure/network is as safe and secure as is reasonably possible and that policies and procedures approved within this policy are implemented. It will also need to ensure that the relevant people receive guidance and training and will be effective in carrying out their responsibilities:

- school technical systems will be managed in ways that ensure that the school meets recommended technical requirements (if not managed by the Local Authority/MAT, these may be outlined in Local Authority/other relevant body technical guidance)
- cyber security is included in the school risk register.
- there will be regular reviews and audits of the safety and security of school technical systems.
- servers, wireless systems, and cabling must be securely located and physical access restricted.
- there are rigorous and verified back-up routines, including the keeping of network-separated (air-gapped) copies off-site or in the cloud,

- appropriate security measures (including updates) are in place to protect the servers, firewalls, switches, routers, wireless systems, workstations, mobile devices etc from accidental or malicious attempts which might threaten the security of the school systems and data, including operating systems.
- the school's infrastructure and individual workstations are protected by up-to-date software to protect against malicious threats from viruses, worms, trojans etc.
- responsibilities for the management of technical security are clearly assigned to appropriate and well-trained staff
- all users will have clearly defined access rights to school technical systems and accounts are deleted when the user leaves. *Details of the access rights available to groups of users will be recorded by the network manager/technical staff/other person and will be reviewed, at least annually, by the online safety group.*
- users will be made responsible for the security of their username and password, must not allow other users to access the systems using their log on details and must immediately report any suspicion or evidence that there has been a breach of security
- The IT Service Provider, in partnership with Governors/SLT/DSL, regularly monitors and records the activity of users on the school technical systems and users are made aware of this in the acceptable use agreement. *\* we have no monitoring system in place but are currently looking at options with Virtue.\**
- mobile device security and management procedures are in
- an appropriate system is in place for users to report any actual/potential technical incident to the SLT/DSL/Online Safety Lead (OSL)/ (or other relevant person, as agreed)- [All incidents are to be reported to Head or Deputy Head teacher and Bursar. Incidents are then reported to Virtue and a case is created.](#)
- [The Bursar](#) is responsible for ensuring that software licence logs are accurate and up to date and that regular checks are made to reconcile the number of licences purchased against the number of software installations.
- [guest users are provided with appropriate access to school systems based on an identified risk profile.- Assembly login details](#)
- *by default, users do not have administrator access to any school-owned device.*
- *an agreed policy is in place regarding the extent of personal use that users (staff/learners/community users) and their family members are allowed on school devices that may be used out of school. \*User policy*
- an agreed policy is in place regarding the use of removable media by users on school devices [\\*Personal data policy](#)
- personal data cannot be sent over the internet or taken off the school site unless secured. [school personal data policy](#)

## Password Security

A safe and secure username/password system is essential if the above is to be established and will apply to all school technical systems, including networks, devices, email and learning platform).

### Policy Statements:

- The password policy and procedures reflect NCSC and DfE advice/guidance.
- The use of passwords is reduced wherever possible, for example, using Multi-Factor Authentication (MFA) or (Single Sign On) SSO.
- Security measures are in place to reduce brute-force attacks and common passwords are blocked.
- School networks and system will be protected by secure passwords.
- Passwords are encrypted by the system to prevent theft.

- Passwords do not expire and the use of password managers is encouraged. *\*every 90 days managed change*
- Complexity requirements (e.g. capital letter, lower case, number, special character) are not used.
- Users are able to reset their password themselves.
- *All passwords are at least 12 characters long and users are encouraged to use 3 random words.*
- Passwords are immediately changed in the event of a suspected or confirmed compromise.
- *No default passwords are in use. All passwords provided "out of the box" are changed to a unique password by the IT Service Provider.*
- All accounts with access to sensitive or personal data are protected by [Multi-Factor Authentication methods](#).
- A copy of administrator passwords is kept in a secure location.
- All users (adults and learners) have responsibility for the security of their username and password, must not allow other users to access the systems using their log on details and must immediately report any suspicion or evidence that there has been a breach of security.
- Passwords must not be shared with anyone.

## Learner passwords:

### Policy Statements

- *For younger children and those with special educational needs, learner usernames and passwords can be kept in an electronic or paper-based form, but they must be securely kept when not required by the user. Password complexity for these users is reduced. Where external systems have different password requirements the use of random words or sentences is encouraged.*
- Learners will be taught the importance of password security, this should include how passwords are compromised, and why these password rules are important.

## Filtering and Monitoring

### *Introduction to Filtering*

The filtering of internet content provides an important means of preventing users from accessing material that is illegal or is inappropriate in an educational context. The filtering system cannot, however, provide a 100% guarantee that it will do so, as online content changes dynamically and new technologies are constantly being developed. It is important, therefore, to understand that filtering is only one element in a larger strategy for online safety and acceptable use. It is important that the school has a filtering policy to manage the associated risks and to provide preventative measures which are relevant to the situation in this school.

School tests our filtering for protection against illegal materials at: [SWGfL Test Filtering](#)

Your filtering system should be operational, up to date and applied to all:

- users, including guest accounts.
- school owned devices
- devices using the school broadband connection.

Your filtering system should:

- filter all internet feeds, including any backup connections.
- be age and ability appropriate for the users and be suitable for educational settings.
- handle multilingual web content, images, common misspellings and abbreviations.
- identify technologies and techniques that allow users to get around the filtering such as VPNs and proxy services and block them.
- provide alerts when any web content has been blocked.

Mobile and app content is often presented in a different way to web browser content. If your users access content in this way, you should get confirmation from your provider as to whether they can provide filtering on mobile or app technologies. A technical monitoring system should be applied to devices using mobile or app content to reduce the risk of harm.

### Introduction to Monitoring

- at present due to costs and IT infrastructure we have no monitoring software but we are looking into a Monitoring system in partnership with our It providers – Virtue – Meeting 28/09/2023.
- Discuss NETSUPPORT product £4.50 per device

Monitoring user activity on school and college devices is an important part of providing a safe environment for children and staff. Unlike filtering, it does not stop users from accessing material through internet searches or software. Monitoring allows you to review user activity on school and college devices. For monitoring to be effective it must pick up incidents urgently, usually through alerts or observations, allowing you to take prompt action and record the outcome.

Your monitoring strategy should be informed by the filtering and monitoring review. A variety of monitoring strategies may be required to minimise safeguarding risks on internet connected devices and may include:

- physically monitoring by staff watching screens of users
- live supervision by staff on a console with device management software

At Present time an analysis by DHT and Virtue deemed this to be suitable

- network monitoring using log files of internet traffic and web access
- individual device monitoring through software or third-party services - Not yet an option

[DfE Keeping Children Safe in Education](#) requires schools to have “appropriate monitoring”. DfE published [Filtering and monitoring standards for schools and colleges](#) in March 2023. Schools are recommended to use the [UK Safer Internet Centre Definitions](#) to help them determine if their monitoring system is appropriate

## Filtering and Monitoring Responsibilities

DfE Filtering Standards require that schools and colleges identify and assign roles and responsibilities to manage your filtering and monitoring systems, and include

Role	Responsibility	Name / Position
Responsible Governor	Strategic responsibility for filtering and monitoring and need assurance that the standards are being met.	Bruce Parker/ Virtue – IT security
Senior Leadership	<p>Team Member Responsible for ensuring these standards are met and:</p> <ul style="list-style-type: none"> <li>• procuring filtering and monitoring systems</li> <li>• documenting decisions on what is blocked or allowed and why</li> <li>• reviewing the effectiveness of your provision</li> <li>• overseeing reports</li> </ul> <p>Ensure that all staff:</p> <ul style="list-style-type: none"> <li>• understand their role</li> <li>• are appropriately trained</li> <li>• follow policies, processes and procedures</li> <li>• act on reports and concerns</li> </ul>	Roy Turner / HT
Designated Safeguarding Lead	<p>Lead responsibility for safeguarding and online safety, which could include overseeing and acting on:</p> <ul style="list-style-type: none"> <li>• filtering and monitoring reports</li> <li>• safeguarding concerns</li> <li>• checks to filtering and monitoring systems</li> </ul>	<p>Roy Turner / HT</p> <p>Meghan Clayton DHT</p>
IT Service Provider	<p>Technical responsibility for:</p> <ul style="list-style-type: none"> <li>• maintaining filtering and monitoring systems</li> <li>• providing filtering and monitoring reports</li> <li>• completing actions following concerns or checks to systems</li> </ul>	Virtue
All staff	<ul style="list-style-type: none"> <li>• they witness or suspect unsuitable material has been accessed</li> <li>• they can access unsuitable material</li> <li>• they are teaching topics which could create unusual activity on the filtering logs</li> <li>• there is failure in the software or abuse of the system</li> </ul>	
need to be aware of reporting mechanisms for safeguarding and technical concerns. They should report if:		

	<ul style="list-style-type: none"> <li>• there are perceived unreasonable restrictions that affect teaching and learning or administrative tasks</li> <li>• they notice abbreviations or misspellings that allow access to restricted material</li> </ul>	
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## Policy Statements

Internet access is filtered for all users. Differentiated internet access is available for staff and customised filtering changes are managed by the school. Illegal content is filtered by the broadband or filtering provider by actively employing the Internet Watch Foundation URL list and other illegal content lists. Filter content lists are regularly updated and internet use is logged and frequently monitored. The monitoring process alerts the school to breaches of the filtering policy, which are then acted upon. There is a clear route for reporting and managing changes to the filtering system. Where personal mobile devices are allowed internet access through the school network, filtering will be applied that is consistent with school practice.

- There is a filtering and monitoring system in place that safeguards staff and learners by blocking harmful, illegal and inappropriate content.
- There is a monitoring system that enables the prompt investigation of a potential safeguarding incident and outcomes are logged.
- Roles and responsibilities for the management of filtering and monitoring systems have been defined and allocated.
- The filtering and monitoring provision is reviewed at least annually and checked regularly.
- There is a defined and agreed process for making changes to the filtering or monitoring system that involves a senior leader in the agreement of the change.
- Mobile devices that access the school's internet connection (whether school or personal devices) will be subject to the same filtering standards as other devices on the school systems.
- *The school has provided enhanced/differentiated user-level filtering through the use of the SOPHOS filtering system. (allowing different filtering levels for different ages/stages and different groups of users – staff/learners etc.)*

## Changes to Filtering and Monitoring Systems

There should be a clear process for requests to change the filtering and monitoring systems and who makes the decision to alter the filtering system.

In this section the school should provide a detailed explanation of:

- how, and to whom, users may request changes to the filtering and monitoring systems
- the grounds on which changes may be permitted or denied
- how a second responsible person will agree to the change before it is made
- any audit/reporting system



## Filtering and Monitoring Review and Checks

To understand and evaluate the changing needs and potential risks of the school, the filtering and monitoring provision will be reviewed at least annually. The review will be conducted by members of the senior leadership team, the designated safeguarding lead (DSL), and the IT service provider. Additional checks to filtering and monitoring will be informed by the review process so that governors have assurance that systems are working effectively and meeting safeguarding obligations.

### Reviewing the filtering and monitoring provision

A review of filtering and monitoring will be carried out to identify the current provision, any gaps, and the specific needs of learners and staff.

The review will take account of:

- the risk profile of learners, including their age range, pupils with special educational needs and disability (SEND), pupils with English as an additional language (EAL)
- what the filtering system currently blocks or allows and why
- any outside safeguarding influences, such as county lines
- any relevant safeguarding reports
- the digital resilience of learners
- teaching requirements, for example, the RHSE and PSHE curriculum
- the specific use of chosen technologies, including Bring Your Own Device (BYOD)
- what related safeguarding or technology policies are in place
- what checks are currently taking place and how resulting actions are handled

To make the filtering and monitoring provision effective, the review will inform:

- related safeguarding or technology policies and procedures
- roles and responsibilities
- training of staff
- curriculum and learning opportunities
- procurement decisions
- how often and what is checked
- monitoring strategies

The review will be carried out as a minimum annually, or when:

- a safeguarding risk is identified
- there is a change in working practice, e.g. remote access or BYOD
- new technology is introduced

## Checking the filtering and monitoring systems

Checks to filtering and monitoring systems are completed and recorded as part of the filtering and monitoring review process. How often the checks take place will be based on the context, the risks highlighted in the filtering and monitoring review, and any other risk assessments. Checks will be undertaken from both a safeguarding and IT perspective.

When filtering and monitoring systems are checked this should include further checks to verify that the system setup has not changed or been deactivated. Checks are performed on a range of:

- school owned devices and services, including those used off site
- geographical areas across the site
- user groups, for example, teachers, pupils and guests

Logs of checks are kept so they can be reviewed. These record:

- when the checks took place
- who did the check
- what was tested or checked
- resulting actions

The SWGfL [Filtering Standards checklist](#) may be helpful.

## Training/Awareness:

It is a statutory requirement in England that staff receive training, at least annually, about safeguarding, child protection, online safety and filtering and monitoring. Furthermore, in order to protect personal and sensitive data, governors, senior leaders, staff and learners should receive training about information security and data protection, at least annually.

*Governors, Senior Leaders and staff are made aware of the expectations of them:*

- at induction
- at whole-staff/governor training
- through the awareness of policy requirements
- through the acceptable use agreements
- in regular updates throughout the year

Those with specific responsibilities for filtering and monitoring (Responsible Governor, DSL, OSL or other relevant persons) will receive enhanced training to help them understand filtering and monitoring systems and their implementation and review.

*Learners are made aware of the expectations of them:*

- in lessons (the schools should describe how this will take place)
- through the acceptable use agreements



Parents will be informed of the school's filtering policy through the acceptable use agreement and through online safety awareness sessions/newsletter etc. (amend as relevant)

### Audit/Monitoring/Reporting/Review:

Governors/SLT/DSL/OSL will ensure that full records are kept of:

- Training provided
- User Ids and requests for password changes
- *User logons*
- *Security incidents related to this policy*
- *Annual online safety reviews including filtering and monitoring*
- *Changes to the filtering system*
- *Checks on the filtering and monitoring systems*

### Further Guidance

Schools may wish to seek further guidance. The following is recommended:

Schools in England (and Wales) are required *"to ensure children are safe from terrorist and extremist material when accessing the internet in school, including by establishing appropriate levels of filtering"*. Furthermore, the Department for Education's statutory guidance '[Keeping Children Safe in Education](#)' obliges schools and colleges in England to *"ensure appropriate filters and appropriate monitoring systems are in place and regularly review their effectiveness" and they "should be doing all that they reasonably can to limit children's exposure to the above risks from the school's or college's IT system" however, schools will need to "be careful that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding."* [Ofsted concluded as far back as 2010](#) that "Pupils in the schools that had 'managed' systems had better knowledge and understanding of how to stay safe than those in schools with 'locked down' systems. Pupils were more vulnerable overall when schools used locked down systems because they were not given enough opportunities to learn how to assess and manage risk for themselves."

To further support schools and colleges in England, the Department for Education published [Digital and Technology standards](#).

The UK Safer Internet Centre has produced guidance on "[Appropriate Filtering and Monitoring](#)"

SWGfL, on behalf of UK Safer Internet Centre and DfE, developed further [Filtering and Monitoring | SWGfL](#) information for schools and colleges, including a checklist alongside further support for Governors

SWGfL provides a site for schools to test their filtering to ensure that illegal materials cannot be accessed: [SWGfL Test Filtering](#)