

The Lotus Academy Trust



Supporting children to find opportunities in every difficulty

The Damara School



Specialist SEMH Independent School

Cyber Security Policy

Approved by: Trust Board

Initial Ratification: October 2023

Review: October 2024

Next review due by: October 2025

1. Introduction

1.1 Cyber security has been identified as a risk for the Trust and every employee needs to contribute to ensure data security.

1.2 The Trust has invested in technical cyber security measures, but we also need our employees to be vigilant and act to protect the Trust IT systems.

1.3 The Headteacher is responsible for cyber security within the Trust.

1.4 If you are an employee, you may be liable to disciplinary action if you breach this policy.

1.5 This policy supplements other data management and security policies.

2. Purpose and scope

2.1 The purpose of this document is to establish systems and controls to protect the Trust from cyber criminals and associated cyber security risks, as well as set out an action plan should the Trust fall victim to cyber-crime.

2.2 This policy is relevant to all staff.

3. What is cyber-crime?

3.1 Cyber-crime is simply a crime that has some kind of computer or cyber aspect to it. It takes shape in a variety of different forms, e.g. hacking, phishing, malware, viruses or ransom attacks.

3.2 The following are all potential consequences of cyber-crime which could affect individuals and/or individuals: -

- cost;
- confidentiality and data protection;
- potential for regulatory breach;
- reputational damage;
- business interruption; and
- structural and financial instability.
- 3.3 It is important, given the serious consequences above, to be careful not to be the victim of cyber-crime and to follow the guidance within this policy.

4. Cyber-crime prevention

4.1. This cyber-crime policy sets out the systems we have in place to mitigate the risk of cyber-crime. The Headteacher can provide further details of other aspects of the Trust/Trust risk assessment process upon request.

4.2. The Trust have put in place a number of systems and controls to mitigate the risk of falling victim to cyber-crime. These include technology solutions as well as controls and guidance to staff.

4.3 Technology solutions

(a) The Trust have a variety of technical measures in place for protection against cyber-crime. They include:

- I. firewalls;
- II. anti-virus software;
- III. anti-spam software;
- IV. auto or real-time updates on our systems and applications;
- V. URL filtering;
- VI. secure data backup;
- VII. encryption;
- VIII. deleting or disabling unused/unnecessary user accounts;
- IX. deleting or disabling unused/unnecessary software;

- X. using strong passwords; and
- XI. disabling auto-run features.

4.4. Controls and guidance for staff

(a) all staff must follow the policies related to cyber-crime and cyber security as listed in the introduction to this policy, see section 1.

(b) all staff will be provided with training at induction and refresher training as appropriate; when there is a change to the law, regulation or policy; where significant new threats are identified and in the event of an incident affecting the Trust or any third parties with whom we share data.

(c) all staff must:

- (i) choose strong passwords;
 - (ii) keep passwords secret;
 - (iii) never reuse a password;
 - (iv) never allow any other person to access the Trust's systems using your login details;
 - (v) not turn off or attempt to circumvent any security measures (antivirus software, firewalls, web filtering, encryption, automatic updates etc.) that the IT team have installed on their computer, phone or network or the Trust IT systems;
 - (vi) report any security breach, suspicious activity, or mistake made that may cause a cyber security breach, to the Head of School / CEO as soon as practicable from the time of the discovery or occurrence. If your concern relates to a data protection breach you must follow our data breach policy;
 - (vii) only access work systems using computers or phones that the Trust owns.
 - (viii) do not install software onto your Trust computer or phone. All software requests should be made to the SNS; and
 - (ix) avoid clicking on links to unknown websites, downloading large files, or accessing inappropriate content using Trust equipment or networks.
- (d) all staff must not misuse IT systems. The Trust considers the following actions to be a misuse of its IT systems or resources:
- (i) any malicious or illegal action carried out against the Trust or using the Trust's systems;
 - (ii) accessing inappropriate, adult or illegal content within Trust premises or using Trust equipment;
 - (iii) excessive personal use of Trust's IT systems during working hours;
 - (iv) removing data or equipment from Trust premises or systems without permission, or in circumstances prohibited by this policy;
 - (v) using Trust equipment in a way prohibited by this policy;
 - (vi) circumventing technical cyber security measures implemented by the Trust's IT team; and
 - (vii) failing to report a mistake or cyber security breach.

5. Cyber-crime incident management plan

5.1. The incident management plan consists of four main stages:

- (i) Containment and recovery to include investigating the breach and utilising appropriate staff to mitigate damage and recover any data lost where possible.
- (ii) Assessment of the ongoing risk to include confirming what data has been affected, what happened, whether relevant data was protected and how sensitive it is and identifying any other consequences of the breach/attack.
- (iii) Notification to consider if the cyber-attack needs to be reported to regulators (for example the ICO) and/or colleagues/parents as appropriate.
- (iv) Evaluation and response to consider any improvements to data security and evaluate future threats to security.

5.2 Where it is apparent that a cyber security incident involves a personal data breach, the Trust will invoke their Data Breach Policy rather than follow out the process in this section 5.

Monitoring arrangements

This policy will be updated in line with any new developments in the trust and/or any new government guidance.