IT & GDPR Policy

1 Roles and Responsibilities

1.1 Governors

Governors are responsible for the approval of the IT & GDPR Safety Policy (including Staff Acceptable Use Agreement), ensuring that it is implemented and reviewing its effectiveness. One Governor will be designated as Data Protection Governor and will advise and support the Nursery in Data Protection and GDPR responsibilities.

1.2 Headteacher

The Headteacher is responsible for ensuring the safety of members of the nursery community. The day to day responsibility for online safety may be delegated to another appropriate member of staff. The Headteacher retains responsibility for overseeing the nursery website.

1.3 Admin Leader

The Admin Leader has day to day responsibility for online safety issues and takes a leading role in establishing and reviewing the nursery IT Policy and associated documents. The Admin & Finance Leader will also:

- Liaise with the nursery's IT Consultant to ensure IT provision
  - is maintained securely and protected from misuse or malicious attack
  - is backed up offsite daily
  - is appropriate, and secure hardware and software are used
  - users are supported as required
  - meets full GDPR requirements
- Ensure that online safety incidents are reported and logged and used to inform future online safety developments.
- Monitor IT security and ensure all staff, especially IT users, are aware of the importance of data security, using passwords and encrypted secure emails when required
- Carry out display screen workplace assessments with IT users
- Ensure all staff are trained in GDPR and data security
- Report to the SLT and governors as required.

1.4 Teaching and Support Staff

Teaching and support staff are responsible for ensuring that:

- They have undertaken GDPR and Data Protection training
- They have read and understood the nursery's Staff Acceptable Use Policy (AUP) and signed to indicate agreement.
- They report any suspected misuse or problem to the Admin & Finance Leader for investigation and action.

- Digital communications with parents are on a professional level and only carried out using approved nursery systems.
- Online safety issues are embedded in all aspects of the curriculum and other nursery activities.
- They are aware of online safety issues related to the use of mobile phones, cameras and handheld devices and that they monitor their use and implement nursery policies with regard to these devices.

1.5 Designated Safeguarding Lead (DSL)

All DSLs should be understand the importance of security of IT and data protection and be aware of child protection matters that may arise from any of the following:

- Sharing or loss of personal data
- Access to illegal/inappropriate materials
- Inappropriate online contact with adults/strangers
- Potential or actual incidents of grooming
- Online bullying

1.6 Data Protection Officer (DPO)

The DPO is responsible for maintaining registration with the Information Commissioner's Office, keeping abreast of regulatory requirements and recommendations as outlined on their website at www.ico.gov.uk. SLT should be informed where nursery policies may require updating. The Data Protection Officer should take the lead in all matters relating to GDPR to ensure the Nursery fully meets these requirements.

The DPO is only responsible for data related to Ambleside nurseries. GDPR relating to the Children's Centre and Neighbourhood teams comes under the responsibility of the DPO for Wokingham Borough Council.

The DPO must ensure that the Nursery has appropriate security to prevent the personal data held (e.g. for staff, pupils and parents) being accidentally or deliberately compromised.

The implications of this for the nursery will be the need to:

- Design and organise security to fit the nature of the personal data held and the harm that may result from a security breach.
- Be clear about who is responsible for ensuring information security.
- Ensure that the nursery has the right physical and technical security, backed up by robust policies and procedures and reliable, well-trained staff.
- Respond to any breach of security swiftly and effectively.

2 GDPR

The nursery will comply with General Data Protection Regulations in all respects; this includes:

- Ensuring there is a legitimate reason for collecting all data from parents and staff
- Gaining the explicit consent of parents for use of all data, including the use of photos/videos
- Issuing Privacy Notices to parents on admission to Meadows and Pastures, and to staff on their initial employment.
- Ensuring all data is held securely whilst at the Nursery

- Reporting any data breaches in a timely manner to ICO
- Disposing of data in line with IMRS Retention Schedule
- Ensuring all staff have had training in data protection and GDPR

3 Communications & Communication Technologies

3.1 Mobile phones and personal handheld devices

- Teacher/parent contact should normally be by the main nursery telephone and not via a mobile device except where off-site activities dictate the use of a mobile phone.
- Parent helpers in nursery and staff must ensure that they do not send personal messages, either audio or text, during contact time with pupils. If an exceptional emergency arises they should arrange temporary cover whilst they make a call.
- Mobile phones and tablets must not be used by any parents or staff in the nursery areas or corridors.

3.2 E-mail and messaging

- Staff will be informed that the use of nursery e-mail or messaging accounts will be monitored.
- Staff should not access personal web based e-mail accounts on nursery computers or devices.
- Under no circumstances should users use e-mail to communicate material (either internally or externally), which is defamatory or obscene.

3.3 Social networking

For the purpose of this policy social networking is considered to be any digital media or medium that facilitates interaction, e.g. Facebook, Twitter, blogs, online gaming, YouTube, Skype, WhatsApp, Snapchat, Instagram, Musicly etc.

- Staff have a right to use social networking sites in their private life. In doing so they should ensure that public comments made on social networking sites are compatible with their role as a member of staff and that they show the highest standards of professional integrity.

3.4 Conduct

Staff will always conduct themselves with the highest standards of professional integrity and be aware that how they as individuals are perceived in the virtual world may reflect on how the nursery is perceived. Staff should give careful consideration when posting personal information as to how this might be viewed by parents even when the postings are within a 'private' online space.

3.5 Posting of images and/or video clips

Photos/videos of children may be printed to Learning Records, but otherwise will only be used with the direct agreement of parents. Once printed these pictures will be deleted unless it is deemed that the photograph could be required for marketing/website use, in which case it will be stored in a secure folder and parental permission confirmed. Photos and videos of children in their Learning Journal will be saved securely on the system. These will be printed and given to parents. Once archived these are not accessible via our system.

3.6 Internet usage

Pupils and staff will be informed that internet access can be monitored by staff and governors at any time via RM Safetynet.

The nursery will take all reasonable precautions to ensure that users access only appropriate material. However, due to the international scale and linked nature of internet content, it is not possible to guarantee that unsuitable material will never appear on a nursery computer. The nursery cannot accept liability for the material accessed, or any consequences of internet access.

- Users must not create, download, upload, display or access knowingly, sites that contain pornography or other unsuitable material that might be deemed illegal, obscene or offensive.
- Unauthorised users must not attempt to disable or reconfigure any filtering, virus protection or similar.

4 Images of Children and Young People Policy Statement

Nurseries need and welcome publicity. Children's photographs add colour, life and interest to articles promoting nursery activities and initiatives. Making use of photographs for publicity materials and to promote the nursery in the press can increase pupil motivation and staff morale, and help parents and the local community identify and celebrate the nursery's achievements.

However, photographs must be used in a responsible way. Nurseries need to respect children's and parents' rights of privacy and be aware of potential child protection issues. Every reasonable effort will be made to minimise risk by following the guidelines detailed in this document and by securing parental consent for the use of photographs.

This policy applies to the use of photographs in nursery publicity materials, on its website and in the press.

Parents or Members of the Public

- The nursery will not allow images of pupils to be used on nursery websites publicity, or press releases, including social networking sites, without express permission from the parent, and if we do obtain such permission, we will not identify individual children by name.
- The nursery will not be held accountable for the use of photographs or video footage taken by parents or members of the public at nursery functions.

This policy reflects the consensus of opinion of the staff and governing body of The Ambleside Centre. Its implementation is the responsibility of all staff. Parents and visitors will be made aware of this policy.

5 Infrastructure and Security

5.1 Security

The nursery will be responsible for ensuring that the nursery infrastructure/network is as safe and secure as is reasonably possible and that procedures outlined within this policy are implemented by those responsible.

- Servers, and communications cabinets should be securely located and physical access restricted.
- Wireless systems should be secured to at least WPA level (Wi-fi protected access).
- All users will have clearly defined access rights to nursery computing systems. Details of the access rights available to groups of users will be recorded by the Admin & Finance Leader.
- The 'Administrator' passwords for the nursery Computing system, used by the Admin & Finance Leader, are also available to the IT Consultant (Waterman Solutions) and must be stored securely in nursery.

5.2 Storage and deletion

- All images of pupils will be securely stored in one central location.
- Where memory cards, USB drives, CDs or cloud storage are used during the process of capture or transfer, this must only be for temporary storage until images can be uploaded to the secure central location. The images should then be deleted from the temporary storage location and care taken to ensure they are not still available, e.g. in a recycle bin.
- Images of pupils should normally be deleted once a pupil has left the nursery unless being kept as part of archived records. Such retention, and the period involved, should be specified in the Retention policy.

5.3 Passwords

Any staff with individual log ins will be given an individual password. Other staff members will have access to the shared group login

- Individuals with their own login will have their own password. In order to ensure continuity of business needs, this password may only be shared with the Admin & Finance Leader
- Once a computer has been used, users must remember to log off so that others cannot access their information.
- Users leaving a computer temporarily should lock the screen (Windows key + L).
- Passwords should be changed at regular intervals.
- In the event that a password becomes insecure then it should be changed immediately.

5.4 Maintenance of the IT system

The nursery will contract to a third party, the maintenance of the IT system including set up, virus protection, internet filtering and system backup. This third party will be Waterman Solutions for 2019/20.

Staff at Waterman Solutions will have access to the whole Nursery IT infrastructure. All their staff will have an enhanced DBS and Waterman will be required to sign an IT Support Provider Agreement.

5.5 Staff laptops/devices and flash drives

If staff take laptops/devices out of the Nursery they must sign them out with Reception. Laptops/devices are only covered by the Nursery insurance if they are transported in a locked car boot and not left in the car at any time.

Laptops/devices should not be used for purposes beyond that associated with the work of the nursery, e.g. by the family of a member of staff.

5.6 Loading/installing software

No software will be loaded on to the Nursery's computers/laptops without the express permission of the Headteacher/Admin & Finance Leader.

5.7 Backup and disaster recovery

The nursery will contract Waterman Solutions to ensure that the Nursery IT system is backed up (on site and offsite) and that items can be recovered following any critical incident.

The Ambleside Centre - Staff Acceptable Use Agreement

To ensure that members of staff are fully aware of their professional responsibilities when using information systems and when communicating with parents, they are asked to sign this code of conduct.

- I understand that it is a criminal offence to use a nursery computing system for a purpose not permitted by its owner.
- I appreciate that computing includes a wide range of systems, including mobile phones, PDAs, digital cameras, e-mail, social networking and that Computing use may also include personal Computing devices when used for nursery business.
- I understand that nursery information systems may not be used for private purposes without specific permission from the Headteacher.
- I understand that my use of nursery information systems, internet and e-mail may be monitored and recorded to ensure policy compliance.
- I will respect system security and I will not disclose any password or security information to anyone other than an authorised system manager.
- I will not install any software or hardware unless authorised, e.g. on a nursery laptop.
- I will ensure that personal data, particularly that of pupils, is stored securely through encryption and password and is used appropriately, whether in nursery, taken off the nursery premises or accessed remotely in accordance with the nursery Online Safety policy.
- I will respect copyright and intellectual property rights.
- I will ensure that electronic communications with pupils (including e-mail, instant messaging and social networking) and any comments on the web (including websites, blogs and social networking) are compatible with my professional role and that messages cannot be misunderstood or misinterpreted.
- I know what to do if offensive or inappropriate materials are found on screen or printer.

The nursery may exercise its right to monitor the use of the nursery's information systems, including internet access, the interception of e-mail and the deletion of inappropriate materials where it believes unauthorised use of the nursery's information system may be taking place, or the system may be being used for criminal purposes or for storing unauthorised or unlawful text, imagery or sounds.

Name:	
Signature:	
Date:	

The Ambleside Centre - Laptop/Devices Acceptable Use Agreement

1. Introduction

- This agreement applies to all laptops and other associated devices which are loaned to staff and therefore remain the property of the nursery.
- All recipients and users of these devices should read and sign the agreement.

2. Security of equipment and data

- The laptop and any other equipment provided should be stored and transported securely. Special care must be taken to protect the laptop and any removable media devices from loss, theft or damage. Users must be able to demonstrate that they took reasonable care to avoid damage or loss.
- Staff should understand the limitations of the nursery's insurance cover.
- Government and nursery policies regarding appropriate use, data protection, information security, computer misuse and health and safety must be adhered to. It is the user's responsibility to ensure that access to all sensitive information is controlled.

3. Software

- No additional software should be loaded onto the laptop without the express permission of the Headteacher/Admin & Finance Leader. No personal software should be loaded.
- Only software for which the nursery has an appropriate licence may be loaded onto the laptop. Illegal reproduction of software is subject to civil damages and criminal penalties.
- Users should not attempt to make changes to the software and settings that might adversely affect its use.

4. Faults

- In the event of a problem with the computer, the Admin & Finance Leader should be contacted.

5. Using the device offsite

- The laptop/device must be signed out of the building by the user from the Admin & Finance Leader
- It should be returned within the agreed period and handed to the Admin & Finance Leader

Declaration:

I have read and understood the above and agree to abide by the rules and requirements outlined.

Name:	
Signature:	
Date:	