

# *Winchelsea*



*All Individuals Matter*

**WINCHELSEA PRIMARY SCHOOL**  
**RUSKINGTON**

**COMMUNICATION POLICY**

## **Part 1: Introduction**

- 1.1** Winchelsea Primary School communications facilities are provided by Winchelsea and made available to users for the purposes of school business. A certain amount of limited and responsible personal use by users is also permitted. All use of our communications facilities are governed by the terms of this policy, and if our rules and procedures are not adhered to, then use of our facilities may be curtailed or withdrawn and disciplinary action may thereafter follow. Any breach of this policy may lead to disciplinary action being taken and serious breaches may lead to summary dismissal.
- 1.2** At Winchelsea, communication plays an essential role in the conduct of our business. How you communicate with people not only reflects on you as an individual but also on us as an organisation. The school values the ability of staff to communicate with colleagues and outside agencies required in the business of the school, and as such invest substantially in information technology and communications systems which enable staff to work more efficiently. Staff are trusted to use them responsibly.
- 1.3** This policy applies to all individuals working for the school who use its communications facilities, whether, full-time, part-time or fixed-term employees, trainees, contract staff, temporary staff, agency, home workers, governors or volunteers working within the school.
- 1.4** Although the detailed discussion is limited to use of email and internet facilities, the general principles underlying all parts of this policy also apply to telephone communications, copiers and scanners. Note that some elements of personal use of Winchelsea communications facilities are specifically addressed at items 3.3, 4.3 to 4.5, 9.4 and 9.5, and 10.5. Please read this policy carefully.

## **Part 2: General Principles**

- 2.1** Staff must use Winchelsea information technology and communications facilities sensibly, professionally, lawfully and consistently with their duties, with respect for their colleagues and for Winchelsea and in accordance with this policy and other Winchelsea rules and procedures.
- 2.2** All information relating to our pupils/staff and business of school operations is confidential. Staff must treat our paper-based and electronic information with utmost care.
- 2.3** Many aspects of communication are protected by intellectual property rights which are infringed by copying, downloading, uploading, posting, possessing, processing and distributing material from the internet may be an infringement of copyright or of other intellectual property rights.

- 2.4** Particular care must be taken when using email or internal message boards as a means of communication because all expressions of fact, intention and opinion in an email/message board may bind you and/or Winchelsea and can be produced in court in the same way as other kinds of written statements.
- 2.5** The advantage of the internet and email is that they are extremely easy and informal ways of accessing and disseminating information, but this means that it is also easy to send out ill-considered statements. All messages sent on email systems or via the internet should demonstrate the same professionalism as that which would be taken when writing a letter. Staff must not use these media to do or say anything which would be subject to disciplinary or legal action in any other context such as sending any discriminatory (on the grounds of a person's sex, race, disability, age, sexual orientation, religion or belief), defamatory, or other unlawful material (for example, any material that is designed to be, or could be construed as, bullying or harassment by the recipient). If a member of staff is in doubt about a course of action, advice must be taken from the Head teacher or Deputy Head teacher.

### **Part 3: Use of Electronic Mail**

#### **3.1 Generally**

- 3.1.1** Always use the email template which contains the appropriate disclaimer notice from Winchelsea and do not amend this notice in any way.
- 3.1.2** Do not amend any messages received and, except where specifically authorised by the other person, do not access any other person's in-box or other email folders nor send any email purporting to come from another person.
- 3.1.3** It is good practice to re-read and check an email before sending.
- 3.1.4** If an email is copied to others, it may breach the Data Protection Act if it reveals all the recipients' email addresses to each recipient (e.g. in the case of marketing and mailing lists). It can also breach duties of confidentiality (e.g. in the case of internal emails to members of a staff benefit scheme). Accordingly, it may be appropriate to use the 'Bcc' (blind carbon copy) field instead of the 'Cc' (carbon copy) field when addressing an email to more than one recipient. If in doubt, staff must seek advice from a line manager.

#### **3.2 School use**

- 3.2.1** If the email message or attachment contains information which is time-critical, bear in mind that an email is not necessarily an instant communication and consider whether it is the most appropriate means of communication.
- 3.2.2** If an important document has been sent, staff are advised to add a read receipt or telephone to confirm that the email has been received and read.

**3.2.3** In some instances, staff may decide to file a hard copy of any email (including any attachments) sent to or received before filing or deleting the electronic copy. The same applies to all internal email transmissions concerning school matters.

**3.2.4** In light of the security risks inherent in some web-based email accounts, staff should only email school business documents to their personal web-based account.

### **3.3 Personal Use**

**3.3.1** Although Winchelsea email facilities are provided for the purposes of our business, it accepts that staff may occasionally want to use them for their own personal purposes. This is permitted on the condition that all the procedures and rules set out in this policy are complied with. Staff should be aware, however, that if they choose to make use of school's facilities for personal correspondence, very little privacy can be expected because Winchelsea may need to monitor communications for the reasons given in item 9.1.

**3.3.2** Under no circumstances may Winchelsea facilities be used in connection with the operation or management of any business other than that of Winchelsea.

**3.3.3** All emails contained in the inbox and the sent items box are deemed to be school business communications for the purposes of monitoring (see item 9.4).

Staff must ensure that personal email use:

**3.3.3.1** does not interfere with the performance of work duties;

**3.3.3.2** does not take priority over work responsibilities;

**3.3.3.3** is minimal and limited to taking place substantially outside of normal working hours (i.e. during any breaks which staff are entitled to or before or after normal hours of work);

**3.3.3.4** does not cause unwarranted expense or liability to be incurred by Winchelsea;

**3.3.3.5** does not have a negative impact on Winchelsea in any way; and

**3.3.3.6** is lawful and complies with this policy.

**3.3.4** As with any correspondence made using Winchelsea electronic facilities, staff can delete personal email from the live system, but they will have been copied (perhaps many times) onto the backup tapes and in that form will be retained indefinitely. It would be a very difficult, costly and time-

consuming exercise to sift all those tapes in order to delete an individual's personal email, and if the school were to agree to attempt this, it would be at its convenience, and only on the basis that all the very considerable costs involved were paid in advance by the person making the request.

**3.3.5** By making personal use of our facilities for sending and receiving email staff signify their agreement to abide by the conditions imposed for their use, and signify their consent to Winchelsea monitoring your personal email in accordance with item 9 of this policy.

#### **Part 4: Use of the Internet and Intranet**

- 4.1** We trust staff to use the internet sensibly. Bear in mind at all times that, when visiting a website, information identifying PCs may be logged. Therefore any activity staff engage in via the internet may affect Winchelsea.
- 4.2** This recognises the need for individuals to have to carry out some personal tasks during working hours, e.g. for internet banking, and this is permitted subject to the same rules as are set out for personal email use in item 3.3.4 of this policy. If these activities require additional software to be installed onto a PC then staff should submit a request to IT Support who may be able to arrange this for them. Whenever staff need to download software to enable them to access an online service they must obtain the express written permission of the Head teacher or School Business Manager who will consider the request in line with Winchelsea policy.
- 4.3** You are strongly discouraged from providing your Winchelsea email address when using public websites for non-school business purposes, such as online shopping. This must be kept to a minimum and done only where necessary, as it results in staff and Winchelsea receiving substantial amounts of unwanted email.
- 4.4** Access to certain websites is blocked during normal working hours. If you have a particular business need to access such sites, you should contact the Business Manager.
- 4.5** Staff must not:
  - 4.5.1** introduce packet-sniffing or password-detecting software;
  - 4.5.2** seek to gain access to restricted areas of the Winchelsea network;
  - 4.5.3** access or try to access data which you know or ought to know is confidential;
  - 4.5.4** intentionally or recklessly introduce any form of spyware, computer virus or other potentially malicious software; nor
  - 4.5.5** carry out any hacking activities.

**4.5.6** use Winchelsea systems to participate in any internet chat room or post messages on any external website, including any message board or blog, unless expressly permitted in writing to do so by Winchelsea.

**4.5.7** for staff information, breach of items 4.4.1 to 4.4.6 (inclusive) above, would not only contravene the terms of this policy but could in some circumstances also amount to the commission of an offence under the Computer Misuse Act 1990, which creates the following offences:

**4.5.8** unauthorised access to computer material i.e. hacking;

**4.5.9** unauthorised modification of computer material; and

**4.5.10** unauthorised access with intent to commit or facilitate the commission of further offences.

### **Part 5: Misuse of Winchelsea Facilities and Systems**

**5.1** Misuse of Winchelsea facilities and systems, including its telephone, email and internet systems, in breach of this policy will be treated seriously and dealt with in accordance with Winchelsea disciplinary procedure. In particular, viewing, accessing, transmitting, posting, downloading or uploading any of the following materials in the following ways, or using any of Winchelsea facilities, will amount to gross misconduct capable of resulting in summary dismissal (this list is not exhaustive) :

**5.1.1** material which is sexist, racist, homophobic, xenophobic, pornographic, paedophilic or similarly discriminatory and/or offensive;

**5.1.2** offensive, obscene, derogatory or criminal material or material which is liable to cause embarrassment to Winchelsea and any of its staff, governors or pupils or bring the reputation of Winchelsea and any of its staff, governors or pupils into disrepute;

**5.1.3** any defamatory material about any person or organisation or material which includes statements which are untrue or of a deceptive nature;

**5.1.4** any material which, by intent or otherwise, harasses the recipient;

**5.1.5** any other statement which is designed to cause annoyance, inconvenience or anxiety to anyone;

**5.1.6** any material which violates the privacy of others or unfairly criticises or misrepresents others;

**5.1.7** confidential information about Winchelsea and any of its staff, governors or pupils;

**5.1.8** any other statement which is likely to create any liability (whether criminal or civil, and whether for staff or Winchelsea);

**5.1.9** material in breach of copyright and/or other intellectual property rights;

**5.1.10** online gambling; or

**5.1.11** unsolicited commercial or advertising material, chain letters or other junk mail of any kind.

If Winchelsea has evidence of the examples of misuse set out above it reserves the right to undertake a more detailed investigation in accordance with its disciplinary procedures.

### **Part 6: System Security**

- 6.1** Security of the school's IT systems is of paramount importance. The school owes a duty to all of our pupils to ensure that all of our school business transactions are kept confidential. If at any time the school needs to rely in court on any information which has been stored or processed using its IT systems it is essential that the school is able to demonstrate the integrity of those systems. Every time staff use the system they should take responsibility for the security implications of what they are doing.
- 6.2** The Winchelsea system or equipment must not be used in any way which may cause damage or overloading or which may affect its performance or that of the internal or external network.
- 6.3** Staff must keep all confidential information secure, use it only for the purposes intended and do not disclose it to any unauthorised third party.
- 6.4** Staff must keep their system passwords safe and must not disclose them to anyone. Those who have a legitimate reason to access other users' inboxes must be given permission from that other user. IT Support will provide guidance on how to do this. If staff have disclosed their password to anyone else (e.g. in response to a request from the IT staff) they must ensure that they change their password once the IT staff no longer need it. Contact IT Support for guidance on how to do this.

- 6.5** If a document is highly confidential or pupil/staff sensitive, staff must mark it as "private and confidential" and password-protect/ encrypt the document itself. Bear in mind that documents which are NOT encrypted can be accessed by all users of the network.
- 6.6** Copies of confidential information should be printed out only as necessary, retrieved from the printer immediately, and stored or destroyed in an appropriate manner.
- 6.7** Staff should not download or install software from external sources without having first received the necessary authorisation from the Headteacher.
- 6.8** No external device or equipment, including other data storage devices, should be run on or connected to Winchelsea systems without the prior notification to and written approval of the Headteacher.
- 6.9** Staff should always exercise caution when opening emails from unknown external sources or where, for any reason, an email appears suspicious. The IT department should be informed immediately in such circumstances.

### **Part 7: Working Remotely**

This part of the policy and the procedures in it apply to staff use of school systems, to staff use of our laptops, and also staff use of their own computer equipment or other computer equipment whenever they are working on Winchelsea school business away from Winchelsea premises (working remotely).

#### **7.1 When you are working remotely staff must:**

**7.1.1** password protect any work which relates to Winchelsea school business so that no other person can access the work;

**7.1.2** position themselves so that their work cannot be seen by any other person;

**7.1.3** take reasonable precautions to safeguard the security of school equipment, and keep their passwords secret;

**7.1.4** inform the police and the IT department (as appropriate) as soon as possible if either a Winchelsea laptop in their possession or any computer equipment on which staff do Winchelsea work, even if this is personal IT equipment, has been lost or stolen; and

**7.1.5** ensure that any work which staff do remotely is saved on the Winchelsea system or is transferred to the school system as soon as reasonably practicable.



- 7.2** Pocket computers, mobile phones and similar hand-held devices are easily lost or stolen so staff must password-protect access to any such devices used by themselves on which is stored any personal data of which Winchelsea is a data controller, or any information relating to our school business, our pupils/staff or their business.

### **Part 8: Personal Blogs and Websites**

This part of the policy and procedures in it apply to content that staff publish on the internet (e.g. your contributions to blogs, message boards and social networking or content-sharing sites) even if created, updated, modified or contributed to outside of working hours or when using personal IT systems.

- 8.1** Winchelsea recognises that in staff's own private time they may wish to publish content on the internet. For the avoidance of doubt, such activities are expressly prohibited during work time or using Winchelsea systems.
- 8.2** If staff post any content to the internet, written, vocal or visual, which identifies, or could identify them as a member of Winchelsea staff and/or you discuss your work or anything related to Winchelsea or its school business, pupils or Winchelsea staff or governors, the school expects staff, at all times, to conduct themselves appropriately and in a manner which is consistent with their contract of employment and Winchelsea policies and procedures. It should be noted that simply revealing one's name or a visual image of one's self could be sufficient to identify a member of staff as an individual who works for Winchelsea.
- 8.3** If staff already have a personal blog, social networking site or website which indicates in any way that you work for Winchelsea this should be reported to the Headteacher.
- 8.4** If a member of staff intends to create a personal blog or social networking site or website that will say that they work for Winchelsea, or in any way could identify them as someone who works for Winchelsea, then they should report this to the Headteacher.
- 8.5** If a blog or social networking site clearly identifies that a member of staff works for Winchelsea and he/she expresses any idea or opinion then he/she should add a disclaimer such as "these are my own personal views and not those of Winchelsea".
- 8.6** The following matters will be treated as gross misconduct capable of resulting in summary dismissal (this list is not exhaustive):-
- 8.6.1** revealing confidential information about Winchelsea in a personal online posting. This might include revealing information relating to Winchelsea pupils, staff or governors, school business plans, policies, financial information or internal discussions. Staff should consult the Headteacher if they are unclear about what might be confidential.

**8.6.2** criticising or embarrassing Winchelsea, its pupils or its staff or governors in a public forum (including any website). Staff should respect the reputation of Winchelsea and the privacy and feelings of others at all times. If they have a genuine complaint to make about a colleague or workplace matter the correct procedure is to raise a grievance using Winchelsea grievance procedures.

**8.6.3** accessing or updating a personal blog or social networking posting or website from Winchelsea computers or during work time.

**8.7** If a member of staff thinks that something on a blog or social networking site or a website could give rise to a conflict of interest and in particular concerns issues of impartiality or confidentiality required by their role then this must be discussed with the Headteacher.

**8.8** If someone from the media or press contacts any staff about online publications that relate to Winchelsea they should talk to the Headteacher before responding.

**8.9** Online publications which do not identify the author as a member of Winchelsea staff and do not mention Winchelsea and are purely concerned with personal matters will normally fall outside the scope of Winchelsea communications policy.

**8.10** Staff are strongly advised against allowing pupils past or present, whilst they are still in full-time education, to access their personal blogs or social networking information. Information on blogs or social networking sites must be restricted to those you give express permission to access by password protection or whatever the site requires to restrict access and not be publically accessible. Allowing access to inappropriate material could result in disciplinary action up to and including dismissal.

**8.11** Anything posted on blogs or social networking sites that brings Winchelsea into disrepute could result in disciplinary action up to and including dismissal.

### **Part 9: Monitoring of Communications by Winchelsea Primary School**

**9.1** Winchelsea is ultimately responsible for all school business communications but subject to that will, so far as possible and appropriate, respect your privacy and autonomy while working. Winchelsea may monitor your school business communications for reasons which include:-

**9.1.1** providing evidence of school business transactions;

**9.1.2** ensuring that school business procedures, policies and contracts with staff are adhered to;

**9.1.3** complying with any legal obligations;

- 9.1.4** monitoring standards of service, staff performance, and for staff training;
  - 9.1.5** preventing or detecting unauthorised use of Winchelsea communications systems or criminal activities; and
  - 9.1.6** maintaining the effective operation of Winchelsea communications systems.
- 9.2** Winchelsea will monitor telephone, email and internet traffic data (i.e. sender, receiver, subject, non-business attachments to email, numbers called and duration of calls, domain names of websites visited, duration of visits, and files downloaded from the internet) at a network level (but covering both personal and business communications) for the purposes specified at item 9.1. For the purposes of your maintenance of your own personal privacy, staff need to be aware that such monitoring might reveal sensitive personal data about them, for example, if staff regularly visits websites which detail the activities of a particular political party or religious group, then those visits might indicate their political opinions or religious beliefs. By carrying out such activities using Winchelsea facilities staff consent to the school processing any sensitive personal data about them which may be revealed by such monitoring.
- 9.3** Sometimes it is necessary for Winchelsea to access a member of staff's school business communications during their absence, such as when they are away because they are ill or while they are on holiday. Unless your mailbox settings are such that the individuals who need to do this already have permission to view an inbox, access will be granted only with the permission of one of the persons authorised to grant such access.
- 9.4** In certain very limited circumstances the school may, subject to compliance with any legal requirements, access email marked PERSONAL. Examples are when there is reasonable suspicion that they may reveal evidence of unlawful activity, including instances where there may be a breach of a contract with Winchelsea.
- 9.5** All incoming email are scanned by McAfee on behalf of Winchelsea using virus-checking software. The software will also block unsolicited marketing email (spam) and email which have potentially inappropriate attachments. If there is a suspected virus in an email which has been sent to anyone, the sender will automatically be notified and that person will receive notice that the email is not going to be delivered to you because it may contain a virus.

## **Part 10: Data Protection**

- 10.1** As a member of Winchelsea who uses its communications facilities, staff will inevitably be involved in processing personal data for Winchelsea as part of their job. Data protection is about the privacy of individuals, and is governed

by the Data Protection Act 1998. This Act defines, among others, terms as follows:-

- 10.1.1** "data" generally means information which is computerised or in a structured hard copy form;
  - 10.1.2** "personal data" is data which can identify someone, such as a name, a job title, a photograph;
  - 10.1.3** "processing" is anything you do with data – just having data amounts to processing; and
  - 10.1.4** "data controller" is the person who controls the purposes and manner of processing of personal data – this will be Winchelsea in the case of personal data processed for the school.
- 10.2** Whenever and wherever staff are processing personal data for Winchelsea they must keep it secret, confidential and secure, and particular care must be taken not to disclose it to any other person (whether inside or outside) Winchelsea unless authorised to do so. Staff must not use any such personal data except as authorised by Winchelsea for the purposes of their job.
- 10.3** The Data Protection Act gives every individual the right to see all the information which any data controller holds about them. Staff must bear this in mind when recording personal opinions about someone, whether in an email or otherwise. It is another reason why personal remarks and opinions must be made or given responsibly, and they must be relevant and appropriate as well as accurate and justifiable.
- 10.4** Section 55 of the Data Protection Act states that it is a criminal offence to obtain or disclose personal data without the consent of the data controller. "Obtaining" here includes the gathering of personal data by employees at work without the authorisation of the employer. Staff may be committing this offence if, without authority of Winchelsea: staff exceed their authority in collecting personal data; staff access personal data held by Winchelsea; staff control it or it is passed to them by someone else (whether inside or outside Winchelsea).
- 10.5** While Winchelsea is a data controller of all personal data processed for the purposes of our school business, each staff member will be a data controller of all personal data processed in any personal email which is sent or received. Use for social, recreational or domestic purposes attracts a wide exemption under the Data Protection Act, but if, in breach of this policy, a staff member is using the school's communications facilities for the purpose of a business which is not Winchelsea business, then that person will take on extensive personal liability under the Data Protection Act.

- 10.6** To help staff understand and comply with Winchelsea obligations as a data controller under the Data Protection Act they may be offered, and they may also request, training. Whenever staff are unsure of what is required or they otherwise need guidance in data protection, they should consult the School Business Manager, privacy statements and information about Winchelsea's data protection policies can be found on the Winchelsea G-Drive.

### **Part 11: Compliance with this Policy**

- 11.1** Failure to comply with this policy may result in disciplinary action being taken against a member of staff under Winchelsea disciplinary procedures, which may include summary dismissal, and/or the withdrawal of permission to use the school's equipment for personal purposes. If there is anything in this policy that staff do not understand, they must discuss it with the Headteacher.
- 11.2** Please note that the procedures and policies outlined in this policy, and in any related policy, may be reviewed or changed at any time. All staff will be alerted to important changes and updates.

Signed: \_\_\_\_\_  
Chair of Governors

Dated: \_\_\_\_\_