



**Focus 1st Academy**

**Computer, Internet, Email and Social Media Policy**

**Focus 1st Academy is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment!**

Working in Partnership with North London Schools & Local Authorities since 2000

Accredited Independent School Status 2014 (Registration N0. 308/6003)

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Focus Inception

*Focus 1st Academy was set up in the year 2000 using European Social Fund to provide education and training and to-date has defied all the odds and was awarded the Independent School status in August 2014. This enables us to work in partnership with schools and local authorities to provide an alternative method of education for 14 to 16 year olds. Our student referrals are some of the most vulnerable young people and it is our duty to ensure that they are equipped with the appropriate skills and qualifications to ensure full participation within the modern workplace. Our team of professionals consisting of tutors, tutor assistance, pastoral support staff and mentors to nurture the students ensuring our work-based-learning approach alongside a variety of techniques are utilised and compatible to ensure the prevention of social and economic exclusion prior to adulthood which is underpinned through the subjects delivered whilst in classroom environment as well as on an individual basis.*

Focus Ethos

*Our programme fulfils the need of students who are disengaged from academic studies and may be exhibiting behavioural problems as a result. Our hands-on approach to learning creates an inspirational motivation for students wishing to pursue a career via the vocational route. The students are taught methods on how to improve their social skills in preparation for work/apprenticeship schemes and/or further education by learning in real-life situations and participating in sports, art and drama to express emotions. We believe that all individuals have a certain quality, which is sometimes concealed due to lack of confidence, mixed sentiments or disabilities. As such, recognising and coming to terms with barriers is a small part of the conflict, we are certain that all individuals are aware of their own weaknesses; the most vital part is engaging with professionals and adhere to individual training plans set which in turn prepares our students for economic and social integration into adulthood.*

Computer, Internet, Email and Social Media Policy

* + 1. Use of School Computer Equipment
  1. In order to control the use of Focus 1st Academy’s computer equipment and reduce the risk of contamination, the following will apply:

We abide by the new Data Protections Act 2018: Not all sections apply to education however; it is one of our mission statement to never devolve information to a third party other than the following,

* Immediate family
* Internal colleagues
* External colleagues

For further information please refer to part 1 section 9 of our policy.

* + 1. The introduction of new software must first be checked and authorised by the Headteacher Androulla Savva Head of ICT before general use will be permitted.
    2. Only authorised staff should have access to Focus 1st Academy’s computer equipment.
    3. Only authorised software may be used on any of Focus 1st Academy’s computer equipment.

* + 1. No software may be brought on to or taken from Focus 1st Academy’ premises without prior authorisation.
    2. Unauthorised access to the computer facility will result in disciplinary action. Unauthorised copying and/or removal will result in disciplinary action. Such actions could lead to dismissal.

1.2 Focus 1st Academy reserves the right to carry out regular monitoring of Employee’s use of all computer equipment including the e-mail system, particularly in cases where it is suspected that some form of system or equipment abuse may be happening or where other unacceptable practices are taking place.

* + 1. Internet

2.1 The Internet is an important communication facility providing contact with professional and academic sources throughout the world. Where appropriate and duly authorised, staff are encouraged to make use of the Internet as part of their official professional activities. Attention must be paid to ensuring that published information has relevance to normal professional activities before material is released in our Academy’s name. Where personal views are expressed, a disclaimer stating that this is the case should be clearly added to all correspondence.

2.2 Intellectual Property Rights and Copyright must not be compromised or infringed when publishing on the Internet.

2.3 The availability and variety of information on the Internet has meant that it can be used to obtain material reasonably considered to be offensive. The use of the Internet to access and/or distribute any kind of offensive material or non-related employment issues will leave you liable to disciplinary action which could lead to dismissal.

* + 1. E-mail Policy

The use of the e-mail system is encouraged, as its appropriate use improves efficiency. Used correctly, it is a facility that is of great assistance to employees. Its inappropriate use, however, causes many problems, including distractions, time wasting and legal claims. This policy sets out our Academy’s position on the correct use of the e-mail system, both on computers and voicemail on telephones.

3.1 Procedure

***Authorised Use***

The e-mail system is available for communication on matters directly concerned with the legitimate business of our Academy. If you use the e-mail system you should pay particular attention to the following points:

* All e-mails must comply with Partnership communication standards.
* E-mail messages and copies should only be sent to those for whom they are particularly relevant.   
  + - E-mail should not be used as a substitute for face-to-face communication. E-mails, which are rude or abusive, must not be sent. Hasty messages, sent without proper consideration, can upset and cause concern or misunderstandings.
    - If an e-mail is confidential, you must ensure that the necessary steps are taken to protect confidentiality of all parties as Focus 1st Academy will be liable for infringing copyright or any defamatory information circulated either within our Academy or to external users of the system.
    - Where communications contain student information, such correspondence will be considered to be “sensitive personal data”. All such communication should refer to the student via initials only and not by name or in such a way as to readily identify the student.
    - Offers or contracts transmitted via e-mail are as legally binding on Focus 1st Academy as those sent on paper.
  + Any failure to observe these guidelines could result in disciplinary action, including summary dismissal.

Unauthorised Use

* + Focus 1st Academy will not tolerate the use of the e-mail system for unofficial or inappropriate purposes, including:
* A message that could constitute bullying, harassment or other detriment.
* Personal use, e.g. social invitations, personal messages, jokes, cartoons, chain letters or other private matters.
* On-line gambling.
* Accessing or transmitting pornography.
* Transmitting copyright information and/or any software available to the user.
* Posting confidential information about other employees, Focus 1st Academy or its students.   
  + Any unauthorised or inappropriate use of e-mail may result in disciplinary action being taken against you, which could include summary dismissal.

Implementation of the Policy

* + Regular monitoring of e-mail messages will be carried out on a random basis. Hard copies of e-mail messages will be used as evidence in disciplinary proceedings.
  + Unknown files or messages should never be introduced into the system without first being checked for viruses.
  + Training in the use of e-mail will be run on an in-house basis on request. Headteacher, Marina Savva is required to ensure that all new employees are instructed in the use of the e-mail system.
  + E-mail users may be issued with a confidential password which will be changed at irregular intervals. Access to the e-mail system using another employee’s password without prior authorisation is likely to result in disciplinary action.
  + Critical information must not be stored solely within the e-mail system. Hard copies must be retained and it is the responsibility of the individual issuing the e-mail to ensure the hard copy is filed. If necessary, documents must be password protected.
  + Users are reminded that the mere deletion of a message or file may not fully eliminate it from the system.
  + Users are required to be familiar with the requirements of the **Data Protection Act 2018** and to ensure that they operate in accordance with the requirements of the Act. Please ask Headteacher, Marina Savva or Androulla Savva for details.
  + Users should be aware that Focus 1st Academy reserves the right to access individual employee’s e-mail accounts in cases where, in the Academy’s view, there is a legitimate business need to do so.
  + If you have cause for complaint as a result of e-mail communications you should raise the matter, in writing, initially with the Headteacher, Marina Savva. If appropriate, the complaint can then be progressed through Focus 1st Academy’s Grievance Procedure.
    1. Social Media Policy

4.1 The School recognises that social media and networking sites have become a regular part of everyday life for many people. However, care must be taken not to breach our confidentiality policy, disseminate any information about yourself, your colleagues, any of The School’s supplier’s, partners or clients / customers, or even a member of the public.

4.2 Social media is a rapidly developing area. For the purposes of this policy social media will be deemed to include any data that can be transmitted, uploaded, downloaded or received and exchanged through any means. This data is not limited to print, text, email, photo, video, any electronic file format.

4.3 This policy aims to provide guidelines as to what The School expects from you as an employee. This includes your actions whilst at work or at any other time, using The School’s equipment, or other equipment you may use.

Personal use

* + If you have a personal profile on a social media site you should ensure that others may not access content, media or any other data that a) you would not be happy to disclose or b) which would or could reasonably undermine your position as a professional and trusted employee of Focus 1st Academy .
  + It is imperative that you ensure that the normal boundaries kept between yourself and your students during school time are maintained outside working hours and that you protect your privacy. To this end, it is not permitted for students to be added to personal contacts on any social networking sites. If you currently have a student in any “friends” group, you will need to delete them off your list with immediate effect.

Employees must not:

* + - Publicly identify themselves as working for Focus 1st Academy, make a reference to our Academy or provide information from which others can ascertain the name or other identity in relation to this School.
    - Act in any way, by their actions or failure to prevent the actions of others that may be detrimental to Focus 1st Academy or our reputation or brings our Academy into disrepute.
    - Use a Partnership email in registering or setting up any personal social media site.
    - Allow any use or interaction on social media sites or via blogging, tweets or other means, damage working relationships between current or past employees, suppliers, partners, clients or students.
    - Make any derogatory, offensive, discriminatory or defamatory comments about current or past employees or students.
    - Make any comments about Focus’ past or present employees that could constitute unlawful discrimination, harassment or bullying. Further details regarding unacceptable behaviour is contained within Focus 1st Academy ‘Equal Opportunities and Behaviour Policy’.
    - Disclose any trade secrets of confidential information in relation to Focus’ activities.
    - Disclose any personal information of any past or present employees or students. Any disclosure would be a direct breach of the Data Protection Legislation.
  + Any official account set up on Focus’ behalf must have prior authorisation by Headteacher, Marina Savva and may only be used by authorised staff to post information online. As well as the above general conditions being applicable, all information posted must comply with our Academy’s policies on confidentiality and intellectual property, copyright laws and not identify third parties without their express consent.
  + Employees who contravene these rules will be subject to Focus’ disciplinary rules and procedures and be liable to disciplinary action up to and including dismissal.
    1. Disclosure of Information

5.1 You must not directly or indirectly disclose to any unauthorised person any knowledge or information relating to our students or Focus 1st Academy as a company without first obtaining permission in writing from Focus 1st Academy.

5.2 You must not use for your own purposes or profit or for any purposes other than those of Focus 1st Academy, any information which you may acquire in relation to our Academy and/or its students.

5.3 The rules concerning disclosure of information apply both during and after your employment with Focus 1st Academy

5.4 Unauthorised access to Partnership information, whether computerised or manual, may lead to disciplinary action being taken against you. In the case of computerised information “hacking” will be considered a dismissible offence.

5.5 At the time of leaving The School, for whatever reason, you are required to return all products; documentation or any other information related to The School and, if requested, confirm compliance of the same in writing.

5.6 In addition, The School reserves the right to request such information to be returned during any period of notice should it deem it possible that there could be a risk, intentional or otherwise, of Partnership or commercially sensitive information being made available to other parties.

Data Protection Principles

We abided by the rules and regulations of the Data protection Act 2018.

Part 1

1. Personal data shall be processed fairly and lawfully and, in particular, shall not be processed / forwarded to a second party without consent of authorized personnel.
2. Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. Personal data shall be accurate and kept up to date where applicable.
5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary and destroyed in the appropriate manner.
6. Personal data shall be processed in accordance with the rights of data subjects under the Act 2018.
7. Appropriate technical and organizational measures shall be taken against unauthorized or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
8. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

Educational records

13 In this Part of this Schedule “educational record” means a record to which paragraph 14, 15 or 16 applies.

14(1) This paragraph applies to a record of information which—

(a) is processed by or on behalf of the proprietor of, or a teacher at, a school in England and Wales specified in sub-paragraph (3),

(b) relates to an individual who is or has been a pupil at the school, and

(c) originated from, or was supplied by or on behalf of, any of the persons specified in sub-paragraph (4).

(2) But this paragraph does not apply to information which is processed by a teacher solely for the teacher’s own use.

(3) The schools referred to in sub-paragraph (1)(a) are—

(a) a school maintained by a local authority;

(b) an Academy school;

(c) an alternative provision Academy;

(d) an independent school that is not an Academy school or an alternative provision Academy;

(e) a non-maintained special school.

(4) The persons referred to in sub-paragraph (1)(c) are—

(a) an employee of the local authority which maintains the school;

(b) in the case of—

(i) a voluntary aided, foundation or foundation special school (within the meaning of the School Standards and Framework Act 1998),

(ii) an Academy school,

(iii) an alternative provision Academy,

(iv) an independent school that is not an Academy school or an alternative provision Academy, or

(v) a non-maintained special school,

a teacher or other employee at the school (including an educational psychologist engaged by the proprietor under a contract for services);

(c) the pupil to whom the record relates;

(d) a parent, as defined by section 576(1) of the Education Act 1996, of that pupil.

(5) In this paragraph—

* ***“independent school” has the meaning given by section 463 of the Education Act 1996;***
* “local authority” has the same meaning as in that Act (see sections 579(1) and 581 of that Act);
* “non-maintained special school” has the meaning given by section 337A of that Act;
* “proprietor” has the meaning given by section 579(1) of that Act.

15(1) This paragraph applies to a record of information which is processed—

(a) by an education authority in Scotland, and

(b) for the purpose of the relevant function of the authority.

(2) But this paragraph does not apply to information which is processed by a teacher solely for the teacher’s own use.

(3) For the purposes of this paragraph, information processed by an education authority is processed for the purpose of the relevant function of the authority if the processing relates to the discharge of that function in respect of a person—

(a) who is or has been a pupil in a school provided by the authority, or

(b) who receives, or has received, further education provided by the authority.

(4) In this paragraph “the relevant function” means, in relation to each education authority, its function under section 1 of the Education (Scotland) Act 1980 and section 7(1) of the Self-Governing Schools etc. (Scotland) Act 1989.

16(1) This paragraph applies to a record of information which—

(a) is processed by or on behalf of the Board of Governors, proprietor or trustees of, or a teacher at, a school in Northern Ireland specified in sub-paragraph (3),

(b) relates to an individual who is or has been a pupil at the school, and

(c) originated from, or was supplied by or on behalf of, any of the persons specified in sub-paragraph (4).

(2) But this paragraph does not apply to information which is processed by a teacher solely for the teacher’s own use.

(3) The schools referred to in sub-paragraph (1)(a) are—

(a) a grant-aided school;

(b) an independent school.

(4) The persons referred to in sub-paragraph (1)(c) are—

(a) a teacher at the school;

(b) an employee of the Education Authority, other than a teacher at the school;

(c)an employee of the Council for Catholic Maintained Schools, other than a teacher at the school;

(d) the pupil to whom the record relates;

(e) a parent, as defined by Article 2(2) of the [Education and Libraries (Northern Ireland) Order 1986 (S.I. 1986/594 (N.I. 3))](http://www.legislation.gov.uk/id/nisi/1986/594).

(5) In this paragraph, “grant-aided school”, “independent school”, “proprietor” and “trustees” have the same meaning as in the [Education and Libraries (Northern Ireland) Order 1986 (S.I. 1986/594 (N.I. 3))](http://www.legislation.gov.uk/id/nisi/1986/594).

Other definitions

17(1) In this Part of this Schedule—

* “education authority” and “further education” have the same meaning as in the Education (Scotland) Act 1980;
* “education data” means personal data consisting of information which—

(a)

constitutes an educational record, but

(b)

is not data concerning health;

* “Principal Reporter” means the Principal Reporter appointed under the [Children’s Hearings (Scotland) Act 2011 (asp 1)](http://www.legislation.gov.uk/id/asp/2011/1), or an officer of the Scottish Children’s Reporter Administration to whom there is delegated under paragraph 10(1) of Schedule 3 to that Act any function of the Principal Reporter;
* “pupil” means—

(a)

in relation to a school in England and Wales, a registered pupil within the meaning of the Education Act 1996,

(b)

in relation to a school in Scotland, a pupil within the meaning of the Education (Scotland) Act 1980, and

(c)

in relation to a school in Northern Ireland, a registered pupil within the meaning of the [Education and Libraries (Northern Ireland) Order 1986 (S.I. 1986/594 (N.I. 3))](http://www.legislation.gov.uk/id/nisi/1986/594);

* “school”—

(a)

in relation to England and Wales, has the same meaning as in the Education Act 1996,

(b)

in relation to Scotland, has the same meaning as in the Education (Scotland) Act 1980, and

(c)

in relation to Northern Ireland, has the same meaning as in the Education and Libraries (Northern Ireland) Order 1986;

* “teacher” includes—

(a)

in Great Britain, head teacher

2, we work in-line with the rules and regulations set by Government: the “serious harm test” is met with respect to education data if the application of Article 15 of the GDPR to the data would be likely to cause serious harm to the physical or mental health of the data subject or another individual.

New data protection legislation, the General Data Protection Regulation (“GDPR”) came into effect on 25 May 2018. This is supplemented by a new UK Data Protection Act. Among the changes made by GDPR, we are processing more detailed contracts where one organisation processes personal data on behalf of another however; all our date is processed in-house. As GDPR is now in full effect, Focus 1st Academy is upgrading contracts with the people they either share data with or via contracts. GDPR has stricter requirements for these contracts and almost all existing arrangements have been updated.

Reviewed:

February 2015

February 2016

June 2016

June 2017

July 2018

June 2019

July 2020

September 2021

May 2022