



Information and Communication Technology Policy

Policy Number	New or Reviewed	Date of next Review	Responsibility
HCP025	February 2020	February 2022	Principal

Empowering learners to shape their future

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INFORMATION AND COMMUNICATION TECHNOLOGY POLICY

1. Introduction

- 1.1 The Information and Communication Technology (ICT) Policy contains the following information:
 - a. ICT Policy outline.
 - b. ICT Disposal.
 - c. ICT and Data Protection.
 - d. Risk Assessment
 - e. ICT Resources and Auditing.
- 1.2 This ICT Policy sets out in detail how Horizons College intends to meet its duties and follow best practice. It summarises Horizons College approach to ICT across the whole College community.
- 1.3 This policy is in line with Swindon Borough Council (SBC) Safeguarding advice included in the document 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings'.

2. ICT Policy Outline

- 2.1 Purpose – Aims and Values:
 - a. Horizons College is committed to ensuring equality of education and opportunity for all members of Horizons College community – learners, staff, governors, parents, carers and community members. Horizons College aims to develop a culture where everyone feels valued and is offered maximum access to enable them to participate fully in College life.
- 2.2 ICT in the Curriculum:
 - a. ICT forms part of the Functional Skills Curriculum Area. It is also expected that the use of ICT is embedded across the whole College curriculum. The curriculum builds on learners' starting points and needs and is differentiated appropriately, with teaching and curriculum development monitoring to ensure high expectations of all learners.
- 2.3 Leadership, Management and Governance:
 - a. The Trustees in conjunction with Horizons College Local Governing Committee (LGC) will endeavor to ensure that all relevant policies reflect Horizons College's commitment to the provision of, use of and access to ICT and that this commitment is reflected clearly in all its work. Horizons College ensures the involvement of staff, Trustees and Governors and, where appropriate, takes steps to enable the contribution of learners and their parents / carers and other relevant parties. New staff are introduced to this

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document as part of their induction programme. Staff handbooks and regular professional development activities are available for all staff members to support their practice in relation to this policy. Staff receive appropriate training to enable them to model the appropriate use of ICT.

2.4 Learning and Teaching:

- a. All learners have access to the curriculum in accordance with DfE guidelines. Classroom staff ensure that the classroom is an inclusive environment in which learners have appropriate access to ICT. Learners grouping in the classroom is planned and varied. Classroom staff encourage learners to become independent and to take appropriate responsibility for their own learning.

2.5 Attainment, Progress and Assessment:

- a. Staff have high expectations of all learners and they continually challenge them to reach higher standards. Horizons College recognises and values all forms of achievement. The monitoring and analysing of learner performance in ICT enables the identification of groups of learners where there are patterns of underachievement. Horizons College ensures that action is taken to counteract this.

2.6 Partnership with Parents and the Community:

- a. Horizons College endeavors to provide information material for parents in accessible, user-friendly language and formats and Horizons College will endeavor to provide information in community languages, and alternative formats when requested. All parents are encouraged to participate at all levels in the full life of Horizons College. Information and meetings for parents are made accessible for all. Horizons College is committed to keeping abreast of developments in ICT and to deploying in an effective manner that maximises access, enhances learning, raises learner attainment and makes learning fun and age appropriate.

2.7 Effective and Efficient Deployment of ICT Resources:

- a. ICT equipment is deployed in a variety of ways. Firstly, to support cross curricular learning and teaching in the classroom each class is equipped with an ICT study room with a networked PC and printer, a rear projection interactive whiteboard with laptop or a plasma screen and iPads. All classes may have a digital camera and a microwave cooker. Where required, additional specialist ICT such as Jelly Bean Switches, BigMacks and Switch boxes are available in classrooms to support and assist the use of ICT.

2.8 Software:

- a. All class PCs have access to a range of ICT including the usual Microsoft suite and specialist resources such as Communicate in Print and Clicker. A consistent interface is provided on all machines to enable familiarity and continuity with generic 'toolkit' of software licensed and available on all curriculum computers in Horizons College.

2.9 Teaching Resources:

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- a. To improve communication and access to learning and teaching resources, Senior Tutors / Tutors have access to shared areas on the network system, namely a 'T' drive. The former holds information which needs to be shared such as ILPs and learner reports, the latter, a range of specialist teaching resources, many of which have been developed by College staff. Teaching staff also have access to software to record learners' progress and attainment, these are updated at least three times a year.

2.10 Staff Support:

- a. Teaching and administration staff have access to support through the network manager.

3. ICT Disposal

- 3.1 Horizons College will comply with the requirements for the safe destruction of personal data when it is no longer required, following guidance from Swindon Borough Council (SBC) and South West Grid for Learning (SWGfL).
- 3.2 The disposal of protected data, in either paper or electronic form, must be conducted in a way that makes reconstruction highly unlikely. Electronic files must be securely overwritten, in accordance with government guidance refer to section SP4, Information, Security and Assurance, reference Secure Disposal, Mandatory requirement 45 at <http://www.cabinetoffice.gov.uk/spf>; and other media must be shredded, incinerated or otherwise disintegrated for data.
- 3.3 Obsolete equipment may be written off from Horizons College inventory with the permission of the Governors. It will be disposed of in line with the latest local authority environmental disposal policy linked to the national Waste Electrical and Electronic Equipment (WEEE) Directive covering a wide range of electrical and electronic products, to be found at:
 - a. <http://www.gov.uk/topic/environmental/managment/waste>
- 3.4 Horizons College would request that a certificate is obtained to ensure Horizons College is compliant with the WEEE directive and additionally Horizons College destroys any data.
- 3.5 Suggested Disposal Companies include:
 - a. Stone Computers.
 - b. Wiltshire Waste Recycling Limited, based in Devizes tel: 01380 730411.
 - c. Computer Salvage Specialists based in Newbury Tel: 01635 552666.

4. ICT and Data Protection

- 4.1 The LGC of Horizons College has overall responsibility for ensuring that records are

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maintained, including security and access arrangements, in accordance with Education Regulations and all other regulatory provisions. The Principal and LGC of Horizons College intend to comply fully with the requirements and principles of the Data Protection Act 2018 and GDPR 2018. All staff involved with the collection, processing and disclosure of personal data are aware of their duties and responsibilities within these guidelines.

- 4.2 The Senior Information Risk Owner (SIRO) is the Principal of Horizons College who is familiar with information risks and Horizon College's response. The SIRO will have the following responsibilities:
- a. They own the information risk policy and risk assessment.
 - b. They appoint the Information Asset Owners (IAOs).
 - c. They act as an advocate for information risk management.
- 4.3 The Office of Public Sector Information has produced *Managing Information Risk* [<http://www.nationalarchives.gov.uk/services/publications/information-risk.pdf>] to support SIROs in their role.
- 4.4 Information Asset Owners (IAO) role is to understand the following:
- a. What information is held, and for what purposes.
 - b. How information will be amended or added to over time.
 - c. Who has access to the data and why.
 - d. How information is retained and disposed of.
- 4.5 The IAO at Horizons College is the Office Manager whose responsibility includes:
- a. Personal data of staff and learners.
 - b. Assessment records.
 - c. Medical information.
 - d. Special educational needs data; non-personal data that could be sensitive if lost or corrupted, such as financial data, commercial data, organisational and operational data, and correspondence.
 - e. Horizons College Information Management System including taking responsibility for the security of passwords.
- 4.6 Enquiries:
- a. Information about Horizons College Data Protection Policy is available from the Principal. General information about the Data Protection Act can be obtained from the

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Data Protection Commissioner at www.dataprotection.gov.uk.

4.7 Fair Obtaining and Processing:

- a. Horizons College undertakes to obtain and process data fairly and lawfully by informing all data subjects of the reasons for data collection, the purposes for which the data are held, the likely recipients of the data and the data subjects' right of access. Information about the use of personal data is printed on the appropriate collection form. If details are given verbally, the person collecting will explain the issues before obtaining the information.
- b. "Processing" means obtaining, recording or holding the information or data or carrying out any or set of operations on the information or data.
- c. Note the following definitions:
 - "*Data subject*" means an individual who is the subject of personal data or the person to whom the information relates;
 - "*Personal data*" means data, which relates to a living individual who can be identified. Addresses and telephone numbers are particularly vulnerable to abuse, but so can names and photographs be, if published in the press, Internet or media;
 - "*Parent*" has the meaning given in the Education Act 1996, and includes any person having parental responsibility or care of a child / young person / vulnerable adult.

4.8 Registered Purposes:

- a. The Data Protection Registration entries for Horizons College are available for inspection, by appointment, at Horizons College office. Explanation of any codes and categories entered is available from the Office Manager who is the person nominated to deal with Data protection issues in Horizons College. Registered purposes covering the data held at Horizons College are listed on Colleges registration and data collection documents. Information held for these stated purposes will not be used for any other purpose without the data subject's consent.

4.9 Data Integrity:

- a. Horizons College undertakes to ensure data integrity by the following methods:
 - Data Accuracy:
 - ❖ data held will be as accurate and up to date as is reasonably possible. If a data subject informs Horizons College of a change of circumstances their computer record will be updated as soon as is practicable. Where a data subject challenges the accuracy of their data, Horizons College will immediately mark the record as potentially inaccurate, or 'challenged'. In the case of any dispute, Horizons College shall try to resolve the issue informally, but if this proves impossible, disputes will be referred to the LGC for their judgement. If the problem cannot be resolved at this stage

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- ❖ either side may seek independent arbitration. Until resolved the 'challenged' marker will remain and all disclosures of the affected information will contain both versions of the information.
- Data Adequacy and Relevance:
 - ❖ data held about people will be adequate, relevant and not excessive in relation to the purpose for which the data is being held. To ensure compliance with this principle, Horizons College will check records regularly for missing, irrelevant or seemingly excessive information and may contact data subjects to verify certain items of data. Administration staff, under the direction of the Principal, checks records annually and data updated to ensure accuracy (updating addresses, contract details, car details, personal circumstances, health notes) and irrelevant data deleted.
- Length of Time:
 - ❖ data held about individuals will not be kept for longer than necessary for the purposes registered. It is the duty of the Central services to ensure that obsolete data are properly erased.

4.10 Subject Access:

- a. The Data Protection Acts extend to all data subjects a right of access to their own personal data. To ensure that people receive only information about themselves it is essential that a formal system of requests is in place. Where a request for subject access is received from a learner, Horizons College policy is that:
 - Requests from learners will be processed as any subject access request as outlined below and the copy will be given directly to the learner, unless the learner does not understand the nature of the request;
 - Requests from learners who do not appear to understand the nature of the request will be referred to their parents or carers;
 - Requests from parents in respect of their own child / young person / vulnerable adult will be processed as requests made on behalf of the data subject (the learner) and the copy will be sent in a sealed envelope to the requesting parent / carer.

4.11 Processing Subject Access Requests:

- a. Requests for access must be made in writing.
- b. Learners, parents or staff may ask for a Data Subject Access form, available from Horizons College Admin Office.
- c. Completed forms should be submitted to the Principal.
- d. If there is sufficient information to process the request, an entry will be made in the Subject Access log book, showing the date of receipt, the data subject's name, the

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name and address of requester (if different), the type of data required (eg Learner Record, Personnel Record), and the planned date of supplying the information (normally not more than 40 days from the request date).

- e. Should more information be required to establish either the identity of the data subject (or agent) or the type of data requested, the date of entry in the log will be date on which sufficient information has been provided.
- f. Note: In the case of any written request from a parent regarding their own child's / young person's / vulnerable adult's record, access to the record will be provided within 15 Horizons College days in accordance with the current Education (Learner Information) Regulations (See Appendix 1).

4.12 Authorised Disclosures:

- a. Horizons College will, in general, only disclose data about individuals with their consent. However, there are circumstances under which Horizons College authorised officer may need to disclose data without explicit consent for that occasion. These circumstances are strictly limited to:
 - Learner data disclosed to authorised recipients related to education and administration necessary for Horizons College to perform its statutory duties and obligations;
 - Learner data disclosed to authorised recipients in respect of their child's health, safety and welfare;
 - Learner data disclosed to parents in respect of their child's progress, achievements, attendance, attitude or general demeanor within or near Horizons College;
 - Staff data disclosed to relevant authorities eg in respect of payroll and administrative matters;
 - Unavoidable disclosures, for example to an engineer during maintenance of the computer system. In such circumstances the engineer would be required to sign a form promising not to disclose the data outside Horizons College. Officers and are Information Technology (IT) personnel writing on behalf of the Local Authority (LA) IT liaison / data processing officers, for example in the LA, are contractually bound not to disclose personal data;
 - Only authorised and trained staff can make external disclosures of personal data. Data used within Horizons College by administrative staff, Learner Leads, support staff and welfare officers will only be made available where the person requesting the information is a professional legitimately working within Horizons College who **needs to know** the information to do their work;
 - Horizons College will not disclose anything on learners' records which would be likely to cause serious harm to their physical or mental health or that of anyone else – including anything where suggests that they are, or have been, either the subject of or at risk of abuse;

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- Note the following definitions:
 - ❖ a “*legal disclosure*” is the release of personal information from the computer to someone who requires the information to do his or her job within or for Horizons College, provided that the purpose of that information has been registered
 - ❖ An “*illegal disclosure*” is the release of information to someone who does not need it, or has no right to it, or one which falls outside Horizons College registered purposes.

4.13 Data and Computer Security:

- a. Horizons College undertakes to ensure security of personal data by the following general methods (precise details cannot, of course, be revealed):
 - Physical Security:
 - ❖ Appropriate building security measures are in place, such as alarms, mag locks and passwords. Only authorised persons are allowed in the hub room. Disks, tapes and printouts are locked away securely when not in use. Back up tapes from the site server are routinely taken off site by the Network manager to ensure if there was a catastrophe such as a fire Horizons College would still have a copy of all data. Visitors to Horizons College are required to sign in and out, to wear identification badges whilst in Horizons College and are, where appropriate, accompanied.
 - Logical Security:
 - ❖ Security software is installed on all computers containing personal data. Only authorised users are allowed access to the computer files and password changes are regularly undertaken. Computer files are backed up (i.e. security copies are taken) regularly and these files are kept securely by the Network Manager.
 - Procedural Security:
 - ❖ to be given authorised access to the computer, staff will have to undergo checks and will sign a confidentiality agreement.
 - ❖ new staff are issued with an email account by the Network Manager with the authority of the Principal of Horizons College; these accounts are cancelled via the same route when a member of staff leaves Horizons College’s employment.
 - ❖ all staff are trained in their Data Protection obligations and their knowledge updated as necessary. Computer printouts as well as source documents are shredded before disposal
 - ❖ overall security policy for data is determined by the Principal and LGC and is monitored and reviewed regularly, especially if a security loophole or breach becomes apparent
 - ❖ any queries or concerns about security of data in Horizons College should in the first

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instance be referred to the Principal

- ❖ Individual members of staff can be personally liable in law under the terms of the Data Protection Acts. They may also be subject to claims for damages from persons who believe that they have been harmed because of inaccuracy, unauthorised use or disclosure of their data. A deliberate breach of this Data Protection Policy will be treated as disciplinary matter, and serious breaches could lead to dismissal.

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5. Risk Assessment – Use of ICT Equipment

5.1 Using computers can pose serious health risks, all of them avoidable. The health and safety of computer users matters! Horizons College staff can use this checklist for each computer or workstation they regularly use and note down any point they feel unhappy about, or where they are not sure if things are ok. If staff don't have time to write detailed responses, just indicate the areas they are concerned about. Horizons College must meet minimum standards in all these areas.

General				
Hazard	Risk Rating	Control Measures	Risk Rating	Safe System of Work
Adequate lighting	Low	All rooms have adequate lighting	Low	All problems with lighting should be reported to the Principal
Glare from monitors	Low	All rooms have adequate lighting which should help minimise glare	Low	
Adequate ventilation	low	All rooms have adequate lighting	Low	All problems with ventilation should be reported to the Principal
Ozone levels produced by photocopiers / printers	Low Medium	Printers and photocopiers are kept in reception and classrooms	Low	Staff are not / should not be exposed to long periods of time in these rooms e.g. several hours. All rooms to have adequate ventilation, staff to be aware of how much they need to print / photocopy
Room temperature including humidity	Low Medium	Most rooms radiators which are thermostatically controlled	Low	Any problems with temperature including very cold or too hot should be reported to the Principal
Intrusive noise levels	Low	Noise is kept to a minimum	Low	They also have rooms with doors in the classroom
Room to manoeuvre	Low	Computer rooms should be clutter free	Low	Staff should always keep computer areas tidy and clutter free.

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Visual fatigue / eye strain	Low Medium	Staff should not use a computer when suffering fatigue	Low	
Dehydration	Medium Low	Staff should drink water	Low	
Trailing wires / cables / tripping hazards	Medium	Cables should be kept tidy	Low	All cables should be kept tidy
Electrocution	Low	All computers / electrical equipment have regular PAT testing	Low	All staff are aware of Fire Evacuation procedures
Electrical Fire	Low			

Personal				
Hazard	Risk Rating	Control Measures	Risk Rating	Safe System of Work
Computer desk/work station height	Medium Low	Correct height for the person working at it	Low	All classrooms have computer work stations
Work Space	Medium Low	There should also be adequate space in the room, and the desk should be positioned correctly in relation to the windows etc to reduce glare	Low	All classrooms have a computer study room
Chair Height				
Position of desk / workstation in relation to windows / lighting	Medium Low	All desks should be at the correct height for the person	Low	Most classrooms have height adjustable chairs
Static electricity	Medium Low			

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Computer / Interactive Whiteboard / Plasma Screen				
Hazard	Risk Rating	Control Measures	Risk Rating	Safe System of Work
Position and height of screen / monitor	Medium Low		Low	Most classrooms have interactive Plasma screens which are height adjustable
Dirty screen / monitor	High Medium	Screens should be kept clean, using a damp cloth	Low	Staff have access to clean cloths and water for cleaning screens
Keyboard / mouse height at work station / desk	Low	Keyboards / laptops should be positioned at the correct height	Low	
Readable keys	Low	If keys unreadable they should be replaced	Low	
Arm / wrist injury	Low	Staff should refrain from using a computer if they have any arm or wrist injury, until they are deemed fit to do so, or feeling that they are fully recovered	Low	
ICT training	Medium	All staff should have access to ICT training	Low	All staff should have access to ICT training via TD days or through twilight sessions arranged via the Learning Lead
Faulty equipment	Low	Any equipment deemed faulty should not be used	Low	Any faulty equipment should be reported immediately

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Switch Devices / Communication Aids				
Hazard	Risk Rating	Control Measures	Risk Rating	Safe System of Work
Positioning of switch arm and mounts	Medium	Switch mounts should be positioned securely and correctly	Low	There are members of in Horizons College who will provide training on positioning of switches etc
Trailing cables – switch boxes / USB interface units / wires from various switches	Medium Low	All cables MUST be put away after use, and when in use, they must be kept tidy and tucked away	Low	All cables should be kept tidy

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6. ICT Resources and Auditing

- 6.1 Horizons College is committed to keeping abreast of developments in ICT and to deploying in an effective manner that maximises access, enhances learning, raises learner attainment and makes learning fun and age appropriate.
- 6.2 Effective and Efficient Deployment of ICT Resources:
- a. ICT equipment is deployed in a variety of ways. Firstly, to support cross curricular learning and teaching in the classroom each class is equipped with ICT equipment with a networked PC digital camcorder and a plasma screen. All classes should have a digital camera, digital video recorder and a microwave cooker.
 - b. Where required, additional specialist ICT such as Jelly Bean Switches, BigMacks and Switch boxes are available in classrooms to support and assist the use of ICT.
 - c. A set of ToughBook PCs and Apple I-pads which are mobile and can be used in virtually any educational environment. The ToughBooks may be used within the classrooms and virtually anywhere where learning can be expected to take place.
- 6.3 Software:
- a. All class PCs should have access to a range of ICT including the usual Microsoft suite and specialist resources such as Boardmaker.
 - b. A consistent interface is provided on all machines to enable familiarity and continuity with generic 'toolkit' of software licensed and available on all curriculum computers in to the College.
- 6.4 Teaching Resources:
- a. To improve communication and access to learning and teaching resources, teachers have access to shared areas on the network system, namely a staff drive or Shared College documents 'G' drive.' The former holds information which needs to be shared such as ILPs and learner reports, the latter, a range of specialist teaching resources, many of which have been developed by College staff.
 - b. No confidential data or media should be held on an unencrypted pen drive or on a personal home computer.
- 6.5 Staff Support:
- a. Teaching and administration staff have access to a support network via email. Staff are issued with an email account where appropriate by the ICT Technician with the authority of the Principal of Horizons College; these should be used for all College business.
 - b. The College is supported by a Network Manager.

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6.6 ICT Audits:

- a. Hardware.
- b. Software
- c. Staff access rights
- d. These will be reviewed at least annually by the Network Manager in conjunction with the Office Manager and the Principal of Horizons College.
- e. ICT resources are security tagged and logged through SBC and Parago management system for networked hardware on line; other hardware is security tagged and recorded on the asset management laptop held securely by the Network Manager within College.

6.7 This policy should read in conjunction with the following College policy:

- a. E Safety Policy.

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Appendix 1 Freedom of Information Act 2000 GDPR 2018

Enquirer's Surname

Enquirer's Forenames

Enquirer's Address

.....
.....
.....

Enquirer's Postcode

Telephone Number

Are you the person who is the subject of the records you are enquiring about?

YES / NO

(i.e. the "Data Subject")?

If NO,

Do you have parental responsibility for a child who is the "Data Subject" of the YES / NO records you are enquiring about?

If YES,

Name of child or children about whose personal data records you are enquiring

.....

Description of Concern / Area of Concern

Description of Information or Topic(s) Requested (in your own words)

Additional information:

Please dispatch Reply to: *(if different from enquirer's details as stated on this form)*

Name

Address

Postcode

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DATA SUBJECT DECLARATION

I request that the College search its records based on the information supplied above under Section 7 (1) of the Data Protection Act 1998 and provide a description of the personal data found from the information described in the details outlined above relating to me (or my child/children) being processed by the College.

I agree that the reply period will commence when I have supplied sufficient information to enable the College to perform the search.

I consent to the reply being disclosed and sent to me at my stated address (or to the Dispatch Name and Address above who I have authorised to receive such information).

Signature of "Data Subject" (or Subject's Parent)

.....

Name of "Data Subject" (or Subject's Parent) (PRINTED)

.....

Dated

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Appendix 2

Please read the attached Policy Acceptable Use of Photographs & Videos for Uplands Learner, Please SIGN and return to Horizons College

Photograph & Video Consent Form for Horizons College Website or Horizons College publications.

Horizons College is including photos of learners, teachers, and Horizons College activities on its website. Though the names of teachers, staff, and administration will regularly be used, it is our policy that the full names of learners will not. Occasionally, it might be necessary to use the first name of a learner, but no last names, addresses, and / or telephone numbers will ever be used. (Please see attached policy).

We / I hereby give permission for Horizons College to use photos and video along with first name on Horizons College website and other electronic forms of communication.

We / I hereby give permission for Horizons College to use photos and video only *without* first name on Horizons College website and other electronic forms of communication.

We / I hereby *do not* give permission for Horizons College to use photos and video on the Horizons College website and other electronic forms of communication.

Learner's Name: _____

Parent or Guardian Signature: _____

Print Name: _____

Date: _____

Signed Principal

Signed Chair of Governors

Date

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