



# Policy Statements and Procedures

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## **CYBER SECURITY POLICY**

(To Include JCQ regulations 2025 to 2026)

**SEPTEMBER 2025**

### **Introduction**

A cybersecurity incident can have a major impact on any organisation for extended periods of time. For a school, this can range from minor reputational damage and the cost of restoring systems from existing backups, to major incidents such as losing pupil work or access to learning platforms and safeguarding systems, which could lead to data-protection fines or even failing an inspection.

This Cyber Security Policy outlines Hewens Primary's guidelines and security provisions which are there to protect our systems, services and data in the event of a cyberattack.

### **Scope of Policy**

This policy applies to all Hewens Primary staff, contractors, volunteers and anyone else granted permanent or temporary access to our systems and hardware. It also covers the physical and technical elements that are used to deliver IT services for the School.

### **Risk Management**

Hewens Primary will include cybersecurity risks on its organisational risk register, regularly reporting on the progress and management of these risks to Governors.

### **Physical Security**

Hewens Primary will ensure there is appropriate physical security and environmental controls protecting access to its IT Systems, including but not limited to air conditioning, lockable cabinets, and secure server/communications rooms.

### **Asset Management**

To ensure that security controls to protect the data and systems are applied effectively, Hewens Primary will maintain asset registers for, files/systems that hold confidential data, and all physical devices (servers, switches, desktops, laptops etc) that make up its IT services.

## **User Accounts**

Users are responsible for the security of their own accounts. If at any time they believe their credentials may have been compromised, for example after a phishing scam, they must change their password and inform IT Support as soon as possible. Personal accounts should not be used for work purposes. Hewens Primary will implement multi-factor authentication where it is practicable to do so.

## **Devices**

To ensure the security of all Hewens Primary issued devices and data, users are required to:

- Lock devices that are left unattended
- Update devices when prompted
- Report lost or stolen equipment as soon as possible to IT Support
- Change all account passwords at once when a device is lost or stolen (and report immediately to AIT ([help@advanceditservices.co.uk](mailto:help@advanceditservices.co.uk)))
- Report a suspected threat or security weakness in Hewens Primary's systems to [Risk Register Owner]

Devices will be configured with the following security controls as a minimum:

- Password protection
- Full disk encryption
- Client firewalls
- Anti-virus / malware software
- Automatic security updates
- Removal of unrequired and unsupported software
- Autorun disabled
- Minimal administrative accounts

## **Data Security**

Hewens Primary will take appropriate measures to reduce the likelihood of the loss of availability to, or the disclosure of, confidential data.

### **Hewens Primary defines confidential data as:**

- Personally identifiable information as defined by the ICO
- Special Category personal data as defined by the ICO
- Unpublished financial information

Critical data and systems will be backed up on a regular basis following the 3-2-1 backup methodology:

- 3 versions of data
- 2 different types of media
- 1 copy offsite/offline

## **Sharing Files**

Hewens Primary recognises the security risks associated with sending and receiving confidential data. To minimise the chances of a data breach users are required to:

- Consider if an email could be a phishing email or that a colleague's account could be 'hacked'. If something does not feel right check with the sender by another method, particularly in relation to financial transactions, attachments, or links to websites
- Wherever possible, keep Hewens Primary's files on school systems
- Not send school files to personal accounts
- Verify the recipient of data prior to sending
- Use file encryption where possible, sending passwords/keys via alternative communication channels
- Alert IT Support to any breaches, malicious activity or suspected scams

## **Training**

Hewens Primary recognises that it is not possible to maintain a high level of Cybersecurity without appropriate staff training. It will integrate regular Cybersecurity training into Inset days, provide more specialist training to staff responsible for maintaining IT systems and promote a "No Blame" culture towards individuals who may fall victim to sophisticated scams.

## **System Security**

IT Support will build security principles into the design of IT services for Hewens Primary.

- Security patching – network hardware, operating systems and software
- Pro-actively plan for the replacement of network hardware, operating systems and software before vendors stop providing security support for them
- Actively manage anti-virus systems
- Actively manage and test backups
- Regularly review and update security controls that are available with existing systems
- Segregate wireless networks used for visitors' & staff personal devices from school systems
- Review the security risk of new systems or projects

## **Major Incident Response Plan**

Hewens Primary will develop, maintain, and regularly test a Cybersecurity Major Incident Response Plan. This will include identifying or carrying out:

- Key decision-makers
- Key system impact assessments and restoration priorities (i.e., which backups need to be restored first for the school to become operational again)
- Emergency plans for the school to function without access to systems or data
- Alternative methods of communication, including copies of contact details
- Emergency budgets and who can access them / how
- Key agencies for support (e.g., IT support company)

## **Maintaining Security**

Hewens Primary understands that the financial cost of recovering from a Major Cybersecurity Incident can far outweigh the ongoing investment in maintaining secure IT systems. Hewens Primary will budget appropriately to keep cyber related risk to a minimum.

## Cyber Security (JCQ Regulations 2025–26)

In accordance with the **JCQ General Regulations for Approved Centres 2025–26**, this centre is committed to maintaining the highest standards of cyber security to protect candidate data, assessment materials, and all examination systems.

### 1. Responsibilities

- The **Head of Centre** is responsible for ensuring compliance with JCQ cyber-security requirements.
- All staff with access to awarding-body systems must complete **annual cyber-security training**, covering:
  - password management and the use of **strong, unique passwords**
  - **multi-factor authentication (MFA)** procedures
  - identifying and reporting **phishing attempts** or suspicious activity
  - secure handling of candidate information and assessment data

Training completion records must be retained for audit and inspection.

### 2. System Access and Controls

- Access to online systems and confidential materials is strictly **role-based** and provided only on a **need-to-know** basis.
- Accounts must be monitored regularly, and access revoked immediately when no longer required.
- **MFA is mandatory** for all staff accounts used to access awarding body platforms.
- Connected applications and integrations must be reviewed to ensure they do not compromise security.

### 3. Data and Material Protection

- All digital and physical assessment materials must be **securely stored** and transmitted only through approved, encrypted channels.
- Candidate data must be handled in line with **JCQ requirements**, the **UK GDPR**, and the **Data Protection Act 2018**.
- Back-up and recovery systems must be in place to protect against data loss, cyber-attacks, or system failures.

### 4. Incident Management

- Any **suspected or actual cyber breach** must be reported immediately to the Head of Centre and the relevant awarding body.
- A clear record of the incident, response, and follow-up action must be maintained.
- The centre will cooperate fully with awarding bodies and regulators in investigating and addressing security incidents.

### 5. Policy Review

- This cyber-security policy will be **reviewed annually** or following any significant change in JCQ requirements, awarding body systems, or internal IT provision.

<b>Created</b>	September 2025
<b>Next Review Date</b>	September 2026