Brighter Futures
Educational Trust

CYBER SECURITY POLICY

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Review Committee: ELT
Type of Policy**:** Non - Statutory
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VERSION CONTROL

V1.1	September 2025	New Policy

CONTENTS

1. PURPOSE

The purpose of this policy is to establish guidelines for securing Brighter Futures Educational Trust and its schools. The policy covers the IT systems, both on-premises and in the cloud, data, and the protection, privacy and safety of students, staff, and all other stakeholders. This policy aims to provide practical systems and processes that will mitigate the risks associated with the latest cyber threats, such as data breaches, malware, and unauthorised access. The policy is based around a formalised cyber security framework that aligns itself with the guidelines provided by the government, DfE and other internationally accepted standards.

2. SCOPE

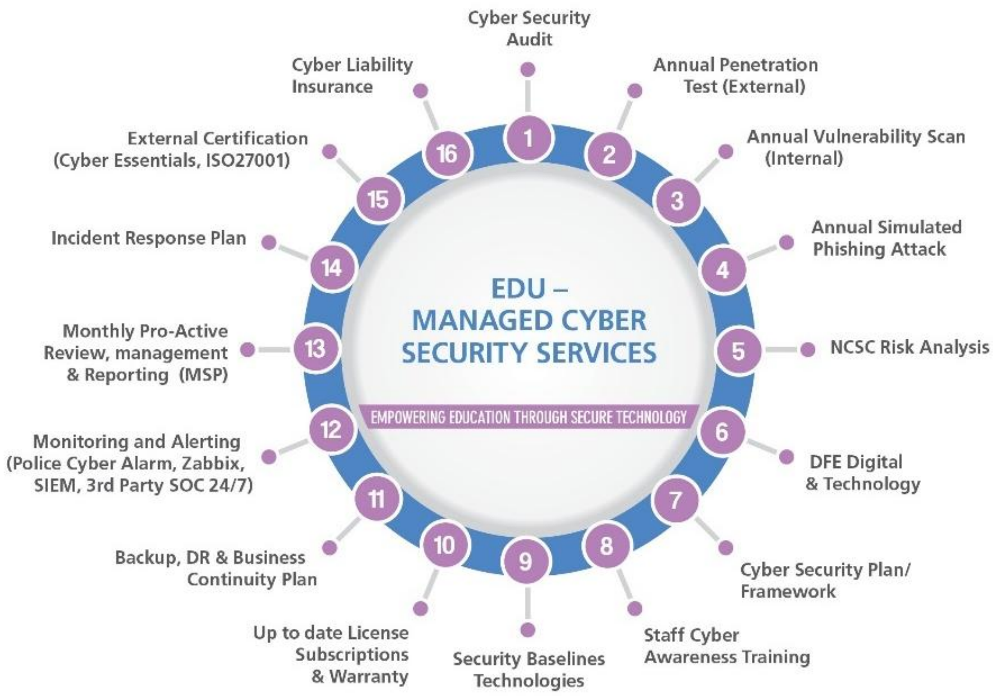
This policy applies to all students, parents/carers, trustees, members staff, administrators, contractors, and third-party service providers who have access to the trusts systems and data including but not limited to:

- Trust-owned computers and devices
- Personal devices used to access school systems and data (BYOD – Bring Your Own Device)
- On premises systems and infrastructure
- Online platforms and cloud services
- The Microsoft 365 Tenant
- User directories and security permissions systems such as Active Directory and Entra ID
- The Management Information System
- Financial and payment systems
- The backup and disaster recovery systems

3. CYBER SECURITY FRAMEWORK

Cyber security systems, processes and reporting are based on the following framework which is in turn based on the guidelines from the DfE, NCSC, RPA and CIS. The framework ensures a structured and comprehensive approach to cyber security.

16 Step Cyber Security Framework


EDU –
MANAGED CYBER
SECURITY SERVICES
EMPOWERING EDUCATION THROUGH SECURE TECHNOLOGY
1 Cyber Security Audit
2 Annual Penetration Test (External)
3 Annual Vulnerability Scan (Internal)
4 Annual Simulated Phishing Attack
5 NCSC Risk Analysis
6 DFE Digital & Technology
7 Cyber Security Plan/ Framework
8 Staff Cyber Awareness Training
9 Security Baselines Technologies
10 Up to date License Subscriptions & Warranty
11 Backup, DR & Business Continuity Plan
12 Monitoring and Alerting (Police Cyber Alarm, Zabbix, SIEM, 3rd Party SOC 24/7)
13 Monthly Pro-Active Review, management & Reporting (MSP)
14 Incident Response Plan
15 External Certification (Cyber Essentials, ISO27001)
16 Cyber Liability Insurance

4. SOURCES OF BEST PRACTICE AND GUIDELINES

DfE – The Department for Education has released the updated Digital and Technology Standards which clearly describe the cyber security requirements for schools and colleges.

Meeting digital and technology standards in schools and colleges - Guidance - GOV.UK

NCSC – National Cyber Security Centre is a government organisation that plays a key role in safeguarding the United Kingdom's critical infrastructure, public sector organisations, and private businesses against cyber threats. It is part of GCHQ (Government Communications Headquarters)**,** the UK's intelligence and security agency, and serves as the primary authority on cybersecurity, advising government departments, the DfE, schools and businesses.

RPA - The Risk Protection Arrangement (RPA) for schools in the UK, offered by the Department for Education (DfE)**,** provides a government-backed alternative to commercial insurance for academy trusts, free schools, and other eligible educational institutions. It is designed to offer cost-effective, flexible insurance and risk management coverage, while ensuring that schools

5. SUPPLIERS, CONTRACTORS AND THIRD-PARTY PROVIDERS

Management of suppliers, contractors and third-party providers is critical, as external relationships can introduce security risks or lead to data breaches if not properly managed. The Trust will not simply assume that the cyber security of suppliers or providers is in place and fit for purpose.

- Connecting to systems
- CAMS
- HfL

Our approach will be to:

Assess the cyber security risk of critical and / or relevant suppliers. Perform a risk assessment to understand the cyber risks introduced by each third party and evaluate their ability to meet the Trust cyber security requirements.

Where possible, third-party contracts will contain cyber security clauses within that clearly define the roles and responsibilities of both parties in maintaining the confidentiality, integrity, and availability of data.

All suppliers must have a cyber security framework in place and clear guidelines on backup and disaster recovery processes and systems. The Trust will request that suppliers share this information, review it and retain the information.

Ideally, all suppliers that have access to systems or data will have some kind of formalised cyber security framework or process in place such as:

- Cyber Essentials (a UK government-backed certification that sets out basic security controls)
- ISO 27001 (Information Security Management Systems)
- NIST Cybersecurity Framework (National Institute of Standards and Technology)
- GDPR (General Data Protection Regulation) compliance.

Access to data and sensitive information will be managed on a least privilege basis and restricted to only what is needed in order to fulfil the supplier service or contract.

The incident response plan addresses supply chain risks and the Trust approach to a supplier experiencing an attack or breach.

We must ensure that there is a clear exit and transition plan for any supplier or provider.

6. STRATEGY AND APPROACH TO CYBER SECURITY

Our Managed Service Provider (MSP) uses the following approach for cyber security:

6.1. Cyber Review

Starts by assessing current setup and defining end goal. Many schools, small to medium business and ever larger public sector organisations don't have the basic building blocks in place. Having the system reviewed by independent industry experts, against industry leading best practice, coupled with the latest government guidelines will create the perfect starting point.

6.2. Cyber Defence

Ensuring there is the minimum base line of technologies in place to protect the data and the staff. Creating the minimum layers of defence needed.

6.3. Cyber Readiness

Systems alone are simply not enough. Systems need to be maintained, regularly tested, up to date and fit for purpose. Ultimately the organisation's leaders are responsible for the cyber security. There needs to be a top approach incorporating a cyber security framework.

6.4. Cyber Recovery

Ensure that there is a disaster backup plan addressing cyber risk. Deploying the plan is an IT task, incorporating the latest government requirements for offsite/offline backups not kept on the main network.

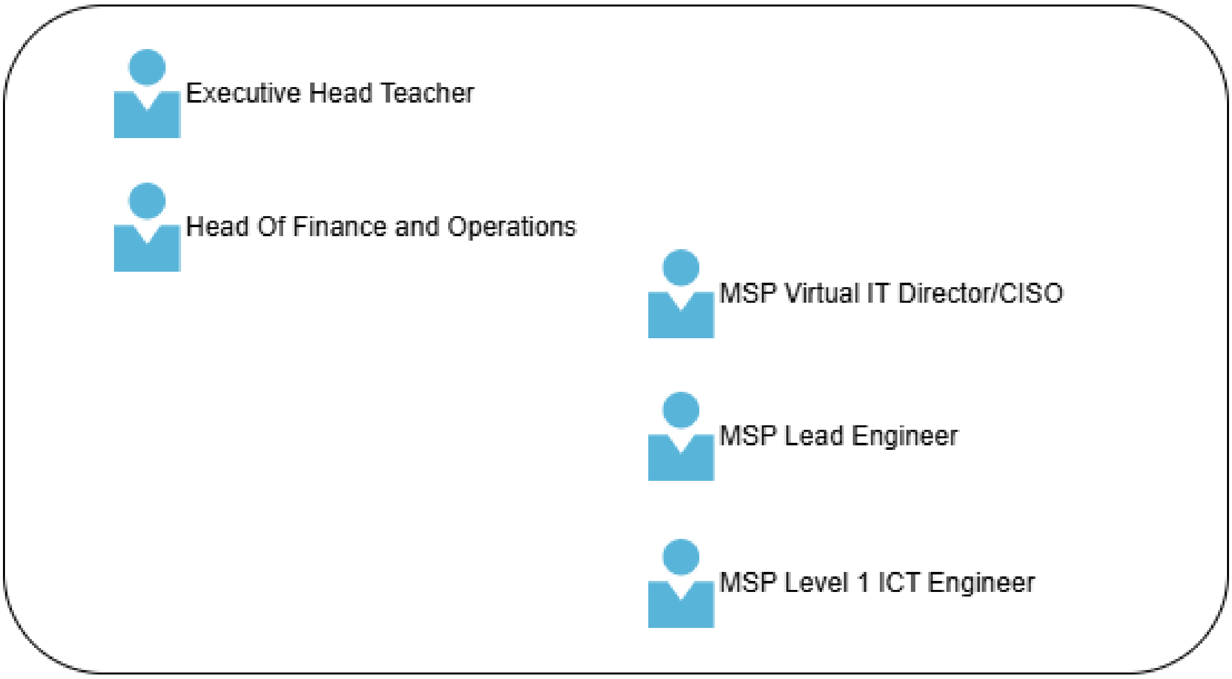
6.5. Cyber Certification

This is a government recommended certification, providing the trust, schools, staff and other stakeholders with peace of mind that systems and processes have been externally vetted. Everything within reason to ensure the business is safe has been done.

7. ROLES AND RESPONSIBILITIES

7.1. Cyber Security Management Team

The first key step to a cyber security framework is to assign key roles and responsibilities. The team includes the Extended Leadership Team (ELT) members responsible for IT, the MSP Virtual IT director, MSP lead engineer and MSP junior technician.



7.2. ELT – Executive Leadership Team

The leadership team must fully inform the trustees of the cyber security posture and they must treat cyber security as a critical topic. It is responsible for setting the tone and ensuring that there is management buy in. Importance must be placed on implementation and maintenance of the cyber security framework, policies and procedures which are in place, and fostering a culture of cyber security awareness across the Trust.

The Head of Operations has oversight of the cyber security framework, how it's managed and the team's responsibilities.

The ELT approves core plans, polices and processes such as:

- The Cyber Security Framework
- Cyber Security Policy
- Incident Response Plan
- Backup, Business Continuity and Disaster Recovery Plan.
- New systems and processes, with consultation from the Virtual IT Director/CISO.

The Head of Operations performs the critical higher-level function of ensuring support and adoption of the cyber security framework, policies and processes across the Trust.

7.3. IT and Cyber Security MSP

Virtual IT Director / CISO (Cyber Security Consultant)

- Creates the cyber security methodology based on best practice
- Determines the best practice bodies used for guidance.
- Staying up to date on the latest best practice and Digital and Technology Standards.
- Audit and reviews of IT and cyber security systems and processes.
- Creates of controls and reporting for the cyber security function.
- Provides advice and support for the ELT.
- Is responsible for managing the change control process.
- In partnership with the Head of Operations, creates policies and processes that feed the cyber security framework.

MSP Lead Technical Engineer

- The Lead MSP Engineer takes responsibility for carrying out the monthly controls checklist (Cyber Security Framework Report) and submitting the results to the cyber security management team.
- Reviews logs and system alerts.
- Is responsible for the configuration, installation and updates for IT and cyber security systems.
- Provides escalation support as an expert engineer, who is trained by the security vendors.
- Responds to and mitigates security incidents.
- Regularly scans and reviews the systems for vulnerabilities and updates and patches systems to address known vulnerabilities.
- Implements and manages firewalls, end point security, Office 365 security and other cyber security systems.

MSP Level 1 ICT Engineer

- Looks after the daily ICT operations and daily cyber security tasks.
- Assists the lead technical engineer in carrying out investigations and remedial tasks.
- Assists with educating and advising staff regarding security best practice.

7.4. Staff, Students and other Stakeholders

All stakeholders are responsible for:

- Adhering to this policy.
- Following best practices for secure use of technology, including strong passwords and Multi-Factor Authentication (MFA).
- Adhering to the Trust Acceptable Use policy.
- Reporting any suspicious activity or potential security incidents to the IT department immediately.
- Ensuring that all sensitive data is securely stored, processed and transmitted.
- Staying aware of threats and using the systems in a responsible and secure way.
- Never sharing any confidential information, usernames or passwords.

7.5. Controls, Reporting and Review

Cyber security is not a one-time check; it's an ongoing process. Continuous monitoring and regular auditing will be implemented to ensure systems remain secure and compliant throughout the contract duration.

Examples of the reporting in place:

- Quarterly IT Management Report
- Monthly Cyber Security Framework Controls Report
- Police Cyber Alarm Report (threat analysis and response)

The systems and framework components are checked monthly by the MSP lead engineer, and the documented in the cyber security framework controls report.

The report is shared with the Trust and MSP management team.

This policy will be clearly communicated with all staff and form a key component of the cyber security process during new starter induction.

8. DATA PROTECTION AND PRIVACY

8.1. Data Encryption

All Windows based machines are encrypted and the information is saved on the MS365 Tenant.

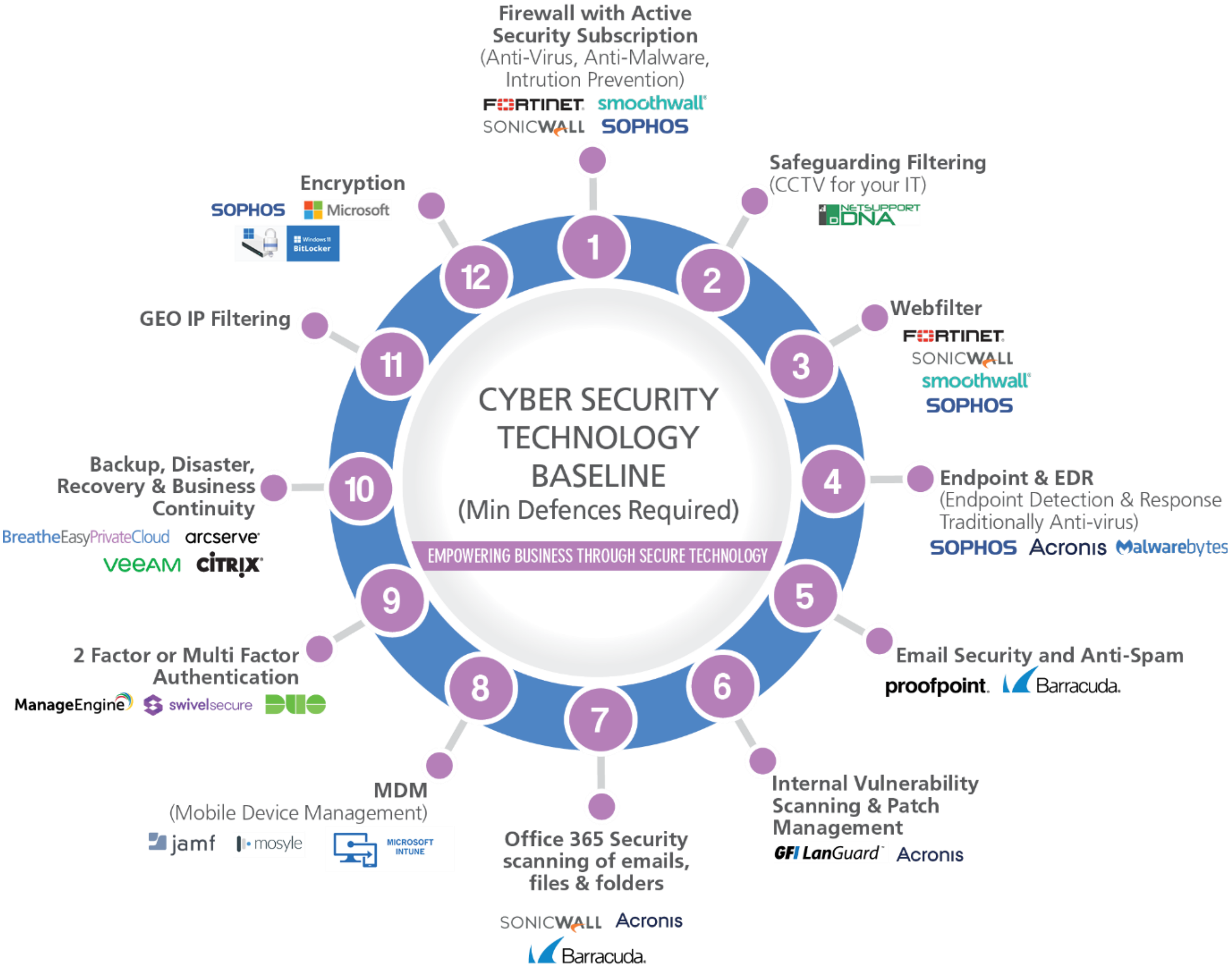
Backup data that is sent to the offsite/ offline backup is encrypted in transit and at rest.

Regular use of USB memory sticks is discouraged, but in the event these are used for a specific purpose, then data must be encrypted.

When sending any confidential information via email, staff should use the built-in encryption functionality in Microsoft Outlook. Please refer to our Data Protection Policy for further information.

9. INFRASTRUCURE SECURITY

9.1. Cyber Security Baselines Technologies


CYBER SECURITY TECHNOLOGY BASELINE
(Min Defences Required)
EMPOWERING BUSINESS THROUGH SECURE TECHNOLOGY
1
Firewall with Active Security Subscription
(Anti-Virus, Anti-Malware, Intrution Prevention)
FORTINET
smoothwall
SONICWALL
SOPHOS
2
Safeguarding Filtering
(CCTV for your IT)
NETSUPPORT DNA
3
Webfilter
FORTINET
SONICWALL
smoothwall
SOPHOS
4
Endpoint & EDR
(Endpoint Detection & Response Traditionally Anti-virus)
SOPHOS
Acronis
Malwarebytes
5
Email Security and Anti-Spam
proofpoint.
Barracuda.
6
Internal Vulnerability Scanning & Patch Management
GFI LanGuard
Acronis
7
Office 365 Security scanning of emails, files & folders
SONICWALL
Acronis
Barracuda.
8
MDM
(Mobile Device Management)
jamf
mosyle
MICROSOFT INTUNE
9
2 Factor or Multi Factor Authentication
ManageEngine
swivelsecure
DUO
10
Backup, Disaster, Recovery & Business Continuity
BreatheEasyPrivateCloud
arcserve
veeam
citrix
11
GEO IP Filtering
12
Encryption
SOPHOS
Microsoft
Windows 11 BitLocker

The cyber security baseline technologies is a set of technology categories that are defined in the cyber security framework as the minimum layer of defences that the Trust requires. This list is by no means exhaustive and is likely to expand as new threats arise.

All cyber security technologies used by the Trust must have an active subscription for updates and security definitions. Vendor support and warranty is essential.

The following technology categories are in place:

Firewalls and Intrusion Detection

All schools within the Trust have network perimeter protection in place via firewalls with an active security subscription that includes:

- Real-Time Malware and Virus Protection
- Intrusion Detection and Prevention (IPS/IDS)
- Access to a regularly updated malware and virus global database
- Secure inspection of SSL encrypted traffic

Safeguarding Filtering

A safeguarding filtering system is implemented at all schools across the Trust. This system can monitor user activity and identify safeguarding risks across applications used on trust-managed devices. For example, the system can detect concerning phrases typed into emails or Microsoft Teams chats.

Web Filtering

Web content filtering is in place at the network perimeter of each school and on all student devices. The solution includes reporting and alerting capabilities. The MSP support team collaborates closely with each school's safeguarding lead.

Filtering systems must be:

- Approved by 360 Degree Safe and the Internet Watch Foundation
- Compliant with the most recent Keeping Children Safe in Education (KCSIE) guidelines

End Point Protection

All trust-owned servers and workstations are protected by an endpoint protection solution with an active subscription, which features in the Gartner Magic Quadrant. This ensures consistent protection from malware, viruses, and other endpoint threats.

Email Security

Emails are hosted via Microsoft 365, which is considered a significant threat vector. Therefore, the trust email systems are protected with a security solution that can provide the following:

- **Threat Protection:** Emails are scanned for SPAM, phishing, social engineering, malware, and other forms of attack.
- **Email Authentication**: To protect against email spoofing and to ensure email authenticity, the Trust has implemented DMARC, DKIM and account takeover protection.

Office 365 Security

The growing use of Microsoft 365 applications (SharePoint, OneDrive, Teams) increases the risk of unauthorised data access via the internet. To mitigate this cloud security scanning has been implemented on the trust Microsoft tenant to scan all data for malware and suspicious code, as well as monitor account activity for potential account takeover incidents. Additionally conditional access policies have been implemented to restrict tenant access to the UK only.

Vulnerability Scanning and Patch Management

- Patch management is done through cloud management tools where trust devices are enrolled.
- Trust and school systems must be checked for known vulnerabilities and have identified vulnerabilities remediated; where a vulnerability cannot be reasonably remediated, it should be added to the trust risk register.

Mobile Device Management

MDM is used to manage, secure, and monitor mobile devices such as laptops and desktops.

Multi-Factor Authentication (MFA)

MFA adds a critical layer of protection for accessing accounts, and sensitive services. MFA must be implemented wherever feasible, especially for systems storing sensitive information (e.g., M365, MIS, financial systems, student data).

Systems not owned by the trust but holding trust data must also support MFA.

Backup, Business Continuity and Disaster Recovery

The Trust has a comprehensive strategy in place that meets the DfE standards.

Additional Considerations:

Wireless Network Security

Wireless networks are encrypted using WPA3 or a similarly secure standard. Access to the wireless network is restricted to authorised users only, and guests can access the internet using a segregated guest Wi-Fi.

Remote Access

Remote access to school systems is restricted to the IT MSP support team and is done via the provided remote management tool.

Web Application Firewall (WAF)

The trust websites are managed by an external web development agency which takes responsibility for the websites and their security. A WAF is essential as websites are a constant target, being publicly accessible on the internet. The trust responsibility is to ensure that the supplier management complies with this policy.

10. AUTHENTICATION AND ACCESS CONTROL

10.1. Password Management

All accounts must be protected with strong passwords that meet the following criteria:

- 6 previous passwords are remembered and can't be re-used
- Complexity requirements:
  - Not contain the user's account name or parts of the user's full name that exceed two consecutive characters
  - Be at least twelve characters in length
  - Contain characters from three of the following four categories:
  - English uppercase characters (A through Z)
  - English lowercase characters (a through z)
  - Base 10 digits (0 through 9)
  - Non-alphabetic characters (for example, !, $, #, %)
- Complexity requirements are enforced when passwords are changed or created.
- Passwords must be changed under the following conditions:
- After a known/suspected security breach
- If the password has been written down
- If it is known/suspected that the password has been shared with an unauthorised individual

10.2. Role-Based Access Control and Conditional access

The Trust makes use of Role-Based Access Control (RBAC), which is a security strategy that applies tailored access controls to users based on their roles and responsibilities within the organisation. It leverages conditional access policies to enforce different authentication and access requirements depending on a user's job function, ensuring both security and usability.

11. MONITORING AND ALERTING

By implementing comprehensive monitoring and alerting, the Trust can significantly reduce cyber security risks, detect issues early, and maintain a safe IT environment.

The following monitoring and alerting measures have been setup for the Trust and MSP to receive and, if required, immediately respond to:

- Endpoint Security Monitoring
- User Activity Monitoring
- Email Security Monitoring
- Cloud and Application Security Monitoring
- Cyber Threat Intelligence
- Safeguarding Monitoring

Monthly, the MSP lead engineer checks all systems to ensure that monitoring and alerting is functioning correctly and analyses system reports and logs. This standardised process is captured in the Trust Cyber Security Framework Controls document and the report is then provided to the ELT and the MSP Team.

12. CYBERSECURITY TRAINING AND AWARENESS

12.1. Training

All faculty and staff, trustees, governors and members must complete cyber security training upon commencement of employment and annually thereafter. The training will cover topics such as:

- Identifying phishing attempts.
- Best practices for password management.
- Safe use of school devices and networks.
- Reporting security incidents.

As part of this training, staff must complete the NCSC training for schools.

Annually, a simulated phishing attack is carried out by the MSP, using real world tools. This attack is not communicated to staff before it is performed. However, the results are communicated after. This helps to create awareness and a culture of vigilance encouraging everyone to stay alert, report concerns, and act responsibly to prevent security or data breaches.

12.2. Training for Students

Students will receive age-appropriate cybersecurity education that covers:

- The risks of sharing personal information online.
- How to recognise and avoid phishing emails and scams.
- The importance of maintaining strong, private passwords.

13. INCIDENT RESPONSE PLAN

All staff and students are required to report any security incidents, including suspicious emails, potential breaches, or system vulnerabilities, to the trust MSP Support Team immediately. All incidents are logged via the helpdesk system. Where required the DPO will inform the ICO.

13.1. Incident Response

An incident response plan is in place and should be reviewed in conjunction with this document.
The IT MSP will follow a defined incident response protocol to:

- Assess the nature and scope of the incident.
- Contain and mitigate the impact of the incident.
- Investigate the cause of the incident.
- Notify affected parties, including students, staff, and parents, as necessary.

13.2. Post-Incident Review

After a cyber security incident, a post-incident review will be conducted to evaluate the response and identify areas for improvement.

14. CHANGE IN MANAGEMENT

The IT MSP Team uses a change management process to govern all changes that meet specific criteria:

- Changes that affect multiple users

- Changes that affect the cyber security systems or processes
- Changes that have a financial impact or requirement
- Changes to the system architecture or design
- Changes that require down time or cause disruption with the IT systems

The sign off process includes the same stakeholders as the cyber security management team.

15. ACCEPTABLE USE OF TECHNOLOGY

An AUP is in place and should be viewed in conjunction with this policy.

15.1. General Use

Students, staff, trustees and members are expected to use trust and school technology responsibly and for educational or administrative purposes only. The following behaviours are prohibited:

- Accessing, downloading, or distributing inappropriate or illegal content.
- Unauthorised use or sharing of other people's accounts or data.
- Circumventing security controls or attempting unauthorised access to systems.
- Allowing remote connections onto the trust network via personal device

15.2. Personal Devices (BYOD)

Personal devices used for trust-related activities must be secured with passwords or other forms of authentication. Personal devices are subject to monitoring and may be restricted from accessing certain trust systems.

16. COMPLIANCE AND REGULATORY REQUIREMENTS

The trust will comply with all applicable cyber security laws, regulations, and industry standards, including:

Requirement	Key Actions
DfE Digital & Technology Standards	The minimum standards that schools need to achieve in IT, safeguarding and cyber security
GDPR	Data encryption, access controls, appoint a DPO, breach reporting.
Cyber Essentials	Firewalls, secure configurations, malware protection, patching.
KCSIE	Online monitoring, content filtering, safeguarding policies.
NCSC Guidelines	MFA, backups, training, endpoint protection, response planning.
Prevent Duty	Monitor extremist content, train staff to recognize risks.
Incident Response	Develop and test incident response and disaster recovery plans.

17. CYBER SECURITY INSURANCE

Each school must have cyber security insurance in place, either from their general insurance provider or via the DfE's Risk Protection Arrangement (RPA).

Cyber security insurance, like the RPA for schools, provides critical financial and operational support to schools in the event of a cyber incident.

- Covers incident costs such as data recovery and system restoration
- Legal and regulatory costs
- Ransom payments where applicable

18. POLICY AND FRAMEWORK REVIEW AND UPDATES

This policy will be reviewed annually and updated as necessary to reflect changes in technology, legal requirements, and cyber security best practices.

19. CO-OPERATION BETWEEN DEPARTMENTS

Cyber security is a trust wide responsibility that requires co-operation between departments.

This includes:

HR

- Staff employment checks and onboarding/offboarding.
- Maintaining a schedule of staff that have completed the cyber security training

Governance

- Approval of policies
- Approval changes and new systems

DPO

- GDPR related policies and processes that affect data

Facilities and Estates

- Responsible for physical security, access and alarm systems including the server room and communications rooms.

20. ENFORCEMENT AND DISCIPLINARY ACTIONS

Failure to comply with this policy may result in disciplinary actions, including revocation of access to Trust systems, suspension, or termination of employment or enrolment, depending on the severity of the violation.

21. LINKS WITH OTHER POLICIES

This cyber security policy is linked to the:

- AI Policy
- CCTV Policy
- Data Protection Policy
- ICT and Internet Acceptable Use Policy
- Online Safety Policy