Four Cs
Multi-Academy
Trust

Curiosity Confidence Courage Constancy

CYBER SECURITY POLICY 2026/27
(Centre-wide and Exams)

Presented to Full Trustees Committee

1 October 2026

Date approved:	1 October 2026
Date of review:	October 2027

Footnote:

- Headteacher also means Head of College and Principal
- School also means College, Academy or Academies
- MAT refers to Multi-Academy Trust

1.0 Purpose of the policy

1.1 At the Four Cs MAT, the confidentiality, integrity, and availability of our information assets, IT systems, and the personal data of students, staff, and stakeholders are of paramount importance.

1.2 This policy establishes our comprehensive cyber security framework, delineates the duties and accountabilities of all relevant parties, and ensures strict adherence to JCQ regulations, the Data Protection Act 2018, the UK General Data Protection Regulation, and the statutory guidance detailed in *Keeping Children Safe in Education*.

1.3 This Cyber Security Policy details the measures taken by the Trust to mitigate the risk of cyber threats under the following sections:

1. Roles and responsibilities
2. Complying with JCQ regulations
3. Cyber security best practice
4. Account management best practice
5. Training

1.4 The Trust and school Senior Leadership Teams recognise the need for staff involved in the management, administration and conducting of examinations to play a critical role in maintaining and improving cyber security within the Trust. This includes ensuring that all members of centre staff who access awarding bodies' online systems undertake annual cyber security training.

1.5 In addition to adhering to industry best practices, the following areas are addressed in this policy to ensure that members of the exams team protect their individual digital assets:

- Cyber Security Awareness and Training
- Device Security and Asset Register
- Creating strong, unique passwords
- Keeping all account details secret
- Enabling additional security settings wherever possible
- Updating any passwords that may have been exposed
- Setting up secure account recovery options
- Reviewing and managing connected applications
- Staying alert for all types of social engineering/phishing attempts
- Monitoring accounts and reviewing account access regularly

2.0 Scope

This policy applies to all staff who have access to the Trust's IT systems and data, with particular focus placed upon those members of staff who are involved in the management, administration and conducting of examinations and assessments.

3.0 Roles and responsibilities

3.1 <u>Trustees and Governors</u>

- Trustees to review this policy annually at the start of each academic year in line with cyber security arrangements and policy compliance, incorporating updates as required to remain abreast of new technologies, threat developments, and industry best practices.
- Local Governing Committees to monitor compliance at school level.

3.2 Head of Centre / Senior Leadership Team

- To provide overall responsibility for policy implementation and cyber security strategy
- To ensure that an up-to-date device security and asset register is maintained which details all computers, devices, and user accounts used for examinations and assessment administration. This ensures that all technology used is regularly reviewed, patched, and secured, thus reducing the risk of overlooked vulnerabilities being exploited
- To ensure that all devices are secured with up-to-date anti-malware and software updates
- To ensure that members of the exams team, supported/led by the IT team, adhere to best practice(s) in relation to:
    - The management of individual/personal data/accounts
    - Centre wide cyber security including:
        - Establishing a robust password policy
        - Enabling multi-factor authentication (MFA)
        - Keeping software and systems up to date
        - Implementing network security measures
        - Conducting regular data backups
        - Educating employees on security awareness
        - Developing and testing an incident response plan
        - Regularly assessing and auditing security controls
        - Managing and reporting a cyber-attack which impacts any learner data, assessment records or learner work

3.3 IT Manager/Team

- To implement technical controls, monitor systems, respond to incidents, manage access and updates

3.4 Data Protection Officer

- To ensure compliance with data protection law, advise on data handling, and oversee data breaches

3.5 All staff

- To follow this policy, complete annual training, report incidents or concerns promptly within the Centre

3.6 Exams Manager/ Officer/Exams Assistant

- To ensure that they follow best practice in relation to the management of individual/personal data/accounts
- To provide evidence of an awareness of best practice in relation to cyber security as defined by JCQ regulations/guidance, including the completion of annual, up-to-date cyber security awareness training
- To undertake training which must include:
    - The importance of creating strong, unique passwords
    - Keeping all account details strictly confidential
    - The critical role of Multi-Factor Authentication (MFA) in protecting against unauthorised access
    - How to properly set up and use MFA for both centre and awarding bodies' systems
    - An awareness of all types of social engineering/phishing attempts
    - The importance of staff quickly reporting any suspicious activity, events, incidents and encouraging a safe and supportive reporting culture

4.0 Complying with JCQ regulations

4.1 The Head of Centre / Senior Leadership Team at Trust schools must ensure that there are procedures in place to maintain the security of user accounts in line with JCQ regulations (sections 3.20 of the *General Regulations for Approved Centres* document) by:

- Developing and maintaining this comprehensive cyber security policy
- Ensuring that all members of centre staff who access awarding bodies' online systems undertake annual, cyber security training
- Holding a record of completed staff cyber training on file for inspection. (This record could take the form of a certificate, a paper checklist, a spreadsheet-based checklist or a Learning Management System (LMS) report)
- Implementing and enforcing robust security measures, including:
    - Where available, MFA must be used for all accounts and systems containing exam-related information, including those that interface between awarding body and centre systems, to enhance security and protect sensitive data. (Where MFA is not available on the centre's systems, an equivalent multi-layered security approach must be in place. For example, strong log-in controls, access and monitoring controls and secure storage so that exam-related data is protected in line with cyber security best practice.)
    - Regularly reviewing and updating security settings to align with current best practices
- Updating any passwords that may have been exposed
- Setting up secure account recovery options
- Reviewing and managing connected applications
- Monitoring accounts and regularly reviewing account access, including removing access when no longer required
- Ensuring authorised members of staff securely access awarding bodies' online systems in line with awarding body regulations regarding cyber security and the JCQ document *Guidance for centres on cyber security* (www.jcq.org.uk/exams-office/general-regulations), and that where necessary, they have access to a device which complies with awarding bodies' requirements
- Reporting any actual or suspected compromise of an awarding body's online systems immediately to the relevant awarding body

5.0 Cyber security best practice

5.1 The Head of Centre / Senior Leadership Team at Trust schools must ensure that:

- Security measures are in place including:
    - Firewalls and network security controls
    - Anti-virus and anti-malware software on all devices
    - Regular software updates and patch management
    - Secure data backup and tested recovery procedures
    - Encryption for sensitive and personal data
    - Multi-factor authentication (MFA) for critical systems and remote access
    - Secure configuration and monitoring of cloud services (eg Microsoft 365, Google Workspace).
    - Prompt removal of access for leavers
- They and all staff involved in the management, administration and conducting of examinations/assessments stay informed about the latest security threats and trends in account security.

- Staff within the exams team are educated on how to identify phishing attempts, use secure devices and how to protect systems and data by undergoing annual online training.

5.2 Best practice, advice and guidance from the Trust's IT Services is observed for all IT systems, particularly those where learner information, learner work or assessment records are held.

The Exams Office training and guidance is followed at Trust schools includes:

- Good practice in creating strong and unique passwords
- Account security: Keeping account details secret (including sharing passwords, remembering passwords and monitoring account access)
- Additional security settings (including, multi-factor/two-step/two-factor authentication, the security of confidential examination materials)
- Updating expired or exposed passwords
- Account recovery (including recovery options)
- Reviewing and managing connected applications (including reviewing and removing access, using a third-party or a cloud service, granting permissions, saving passwords, saving details on local web browsers, using a shared browser)
- Social engineering/phishing attempts (including suspicious emails and phone calls, sharing information, QR codes, phishing attempts, recovery plan)
- Monitoring and reviewing access (including suspicious, unusual or unauthorised activity, departing staff, levels of access, reviewing user accounts)
- Identifying cyber security good practice via a range of exam-related scenarios.

5.3 Exam specific guidance is also provided on each of the areas listed above. By adopting industry standard cyber security best practices, the Head of Centre / Senior Leadership Team are significantly reducing the risk of cyber-attacks and protecting valuable data and assets within the centre.

5.4 If a cyber-attack which impacts any learner data, assessment records or learner work is experienced, the Senior Leadership Team / Exams Officer will contact the relevant awarding body/bodies immediately for advice and support.

6.0 Account Management Best Practice

6.1 <u>Creating strong unique passwords</u>

- Exams office staff are informed that password length is a more valuable defence than complexity and instructed to use a password creation approach such as three random words to generate suitably secure passwords
- Exams office staff will not use easily guessable information such as birthdays, singular names or common words for a password
- For every account, users are instructed to use a strong unique password and that the same password is not used across any other account(s)

6.2 <u>Keeping all account details strictly confidential</u>

- Exams office staff are instructed never to share login/password details or additional factor/authentication codes with anyone else
- Staff who require access to a system will request their own user account and never share an account assigned for their use with anyone else. Staff are reminded that anything done with an account assigned to someone will be attributed to that person in the first instance

6.3 Enabling additional security settings wherever possible

- All staff will follow awarding body two-step verification (2SV)/two-factor verification (2FA) or multi-factor authentication (MFA) wherever available/requested. Staff are made aware of the purpose of 2SV/2FA /MFA, which includes:
  - adding a layer of account security
  - helps to protect users if the extra steps/factors are protected

6.4 Updating any passwords that may have been exposed

- If it is believed that a password may have been exposed/become known to others, staff will inform their senior leader / line manager immediately
- Any exposed passwords will be changed as soon as possible, and the new passwords should not be shared with anyone except their senior leader / line manager
- Staff are instructed to use strong unique passwords (eg three random words) when changing passwords and that old passwords should not be reused nor should cycling through a small set of passwords across multiple accounts be used

6.5 Setting up secure account recovery options

- Staff are instructed to follow centre account recovery options which consist of Microsoft 365 SSPR (self-service password reset)

6.6 Reviewing and managing connected applications

- Staff within the exams team will regularly review and remove access for third-party applications or services that no longer require access to accounts
- Staff will be informed that access should only be provided to trusted services
- Staff will be asked to be particularly cautious when interacting with content and services (eg quizzes, prize draws, surveys etc)
- Staff will only grant permissions to required applications or the necessary access to allow them to function
- Staff will only download and install applications with established reputations from trusted sources
- Staff will not save passwords to local web browsers unless a secure password manager extension is used in a browser that requires unlocking (eg with another password) before the saved account details can be retrieved, however care will be taken to ensure that this is locked/signed out of after use
- When using a shared browser, staff will clear browser history and caches after use

6.7 Staying alert for all types of social engineering/phishing attempts

- Staff must take care if unsolicited or unexpected emails, instant messages, or phone calls are received asking for account credentials or personal or confidential information. Passwords and 2FA/MFA authentication codes should not be given out to anyone
- Staff are instructed that they should have a wariness of anyone or anything that seems to want to gain their trust, rush them into doing something or that just seems off, they should hang up / not reply and not click on links or take any action and check with a trusted party via a secure channel (ie call awarding body customer services via a known support number)
- Staff will never approve or authenticate a login request that they did not initiate
- Staff will not share codes/approve logins. Requests to share codes/approve logins should be treated with a high degree of suspicion
- Staff will not click on suspicious links, download attachments or scan QR codes from unknown sources

- Staff will verify the authenticity of any communication by contacting the organisation directly through official known channels
- Staff will report any phishing attempts which reference awarding bodies/their systems to the awarding body concerned immediately

6.8 Monitoring accounts and reviewing account access

- If any suspicious, unusual or potentially unauthorised activity on awarding body systems is observed this will be immediately reported to the relevant awarding body, particularly if it is believed that user account security may have been compromised
- Access control and permissions are based on job roles and reviewed regularly
- Levels of access for all exams team staff are reviewed regularly to ensure accounts have the minimum level of access required for their current role
- Accounts are promptly disabled when users leave

7.0 Training

7.1 The Head of Centre / Senior Leadership Team to ensure that there are procedures in place to maintain the security of user accounts by ensuring that all staff who have responsibility for the administration or delivery of examinations complete annual cyber security training, with practical advice on protecting assessment systems and recognising attacks such as phishing or social engineering.

7.2 Records of completed cyber security training are retained for all staff and are available for inspection.

7.3 Annual training will be undertaken by relevant centre staff in line with JCQ regulations and requirements.

8.0 Review

The Trust Board will review this policy in line with the procedure for policy review. This will include an annual evaluation of this policy, incorporating updates as required to remain abreast of new technologies, threat developments, and industry best practices.

Date for Review
If no other reason for review (see policy review procedure) this policy will be reviewed annually at the start of each academic year.