



Scalby Learning Trust

Trust Policy

Information Security Policy

Approver: Trustees
Review Cycle: Biennial

Revision History

Date	Version	Short Description of Changes	Approved by:
Feb 2020	1.00	Policy Adopted	Trustees
May 2021	1.1	No changes	Trustees

This Policy Applies To:

Secondary Schools
Primary Schools
Centralised Trust Employees
Agency Staff & Contractors
Trustees & Governors

Introduction

In May 2018 the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA) became enforceable across the United Kingdom. As part of Scalby Learning Trust's programme to comply with the new legislation it has written a new suite of Information Governance policies.

The Information Security Policy outlines the Trust's organisational security processes and standards. The policy is based upon the sixth principle of the GDPR which states organisations must protect the personal data, which it processes, against unauthorised loss by implementing appropriate technical and organisational measures. This policy has been written using the security framework recommended by ISO: 27000:1 (internationally recognised information Security standard).

This policy should be read in conjunction with the other policies in the Trust's Information Governance policy framework with particular focus on the Acceptable Use Policy and the Information Security Incident Reporting Policy.

Scope

All policies in the Information Governance policy framework apply to all School employees, any authorised agents working on behalf of the School, including temporary or agency employees, and third party contractors.

Individuals who are found to knowingly or recklessly infringe these policies may face disciplinary action.

The policies apply to information in all forms including, but not limited to:

- Hard copy or documents printed or written on paper,
- Information or data stored electronically, including scanned images,
- Communications sent by post/courier or using electronic means such as email, fax or electronic file transfer,
- Information or data stored on or transferred to removable media such as tape, CD, DVD, USB storage device or memory card,
- Information stored on portable computing devices including mobile phones, tablets, cameras and laptops,
- Speech, voice recordings and verbal communications, including voicemail,
- Published web content, for example intranet and internet,
- Photographs and other digital images.

Access Control

The Schools in the Trust will maintain control over access to the personal data that they process.

These controls will differ depending on the format of the data and the status of the individual accessing the data. The School will maintain an audit log detailing which individuals have access to which systems (both electronic and manual). This log will be maintained by the Central Single Record Administrator.

Manual Filing Systems

Access to manual filing systems (i.e. non-electronic systems) will be controlled by a key management system. All files, that contain personal data, will be locked away in lockable storage units, such as a filing cabinet or a document safe, when not in use.

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Keys to storage units will be locked in a key safe. The Office Manager will be responsible for giving individuals access to the key safe. Access will only be given to individuals who require it to carry out legitimate business functions. If the key safe is secured with a pin this will be changed every three months or whenever a member of staff leaves the organisation, whichever is sooner.

Electronic Systems

Access to electronic systems will be controlled through a system of user authentication. Individuals will be given access to electronic filing systems if required to carry out legitimate functions. A two tier authentication system will be implemented across all electronic systems. The two tiers will be user and unique password. When practicable two factor authentication will be required to access data.

Individuals will be required to set a passphrase of sufficient length and complexity as to provide a genuine obstacle to attempts to breach security and user names will be suspended either when an individual is on long term absence or when an individual leaves employment of the Trust.

Software and Systems Audit Logs

The Trust will ensure that all systems which provide access to personal data are subject to audit logging so that the Trust can ensure it can monitor what employees and users have accessed and what changes may have been made. Although this is not a preventative measure it does ensure that the integrity of the data can be assured and also deters individuals from accessing records without authorisation.

Data Shielding

The Trust does not allow employees to access the personal data of family members or close friends. Employees should declare, upon employment, whether they are aware of any family members or friends who are registered at a school within the Trust. Employees should make their line manager aware as the soonest opportunity that they become aware of any family members or close friends who register at an academy within the Trust.

Each School will then keep paper files in a separate filing cabinet (with access restricted to minimal employees) and any electronic files will be locked down so that the declaring employee cannot access that data.

Employees who knowingly do not declare family and friends registered at the School may face disciplinary proceedings and may be charged with an offence under Section 170 of the Data Protection Act 2018 (unauthorised access to information).

External Access

On occasions Trust and/or the schools within it will need to allow individuals, who are not employees, to have access to data systems. This could be, for example, for audit purposes, to fulfil an inspection, when agency staff have been brought in, or because of a Partnership arrangement with another Trust or School. The Trust ICT Manager is required to authorise all instances of third parties having access to systems. If the above individual is not available to authorise access then access can also be authorised by the Headteacher.

An access log, detailing who has been given access to what systems and who authorised the access, will be maintained by the Trust ICT Manager and by each school.

Physical Security

The School will maintain high standards of Physical Security to prevent unauthorised access to personal data. The following controls will be maintained by the School:

Clear Desk Policy

Individuals will not leave personal data on desks, or any other working areas, unattended and will use the lockable storage units provided to secure personal data when not in use.

Alarm System

The schools within the Trust will maintain a security alarm system at its premises so that, when the premises are not occupied, an adequate level of security is still in operation.

Building Access

External doors to the premises will be locked when the premises are not occupied. Only authorised employees will be key holders for the building premises. An individual specified by the Headteacher of each school will be responsible for authorising key distribution and will maintain a log of key holders.

Internal Access

Internal areas, which are off limits to pupils and parents, will be kept locked and only accessed through pin numbers or keys. Pin numbers will be changed whenever a member of staff leaves the organisation or when there is a change in access needs. Pin numbers will only be shared on a strict needs basis. Keys will be kept in a key safe.

Visitor Control

Visitors to the schools will be required to sign in a visitor's book, or electronic equivalent, subject to all other relevant considerations outlined in this document, and state their name, organisation, car registration (if applicable) and nature of business. Some visitors will be escorted throughout the school and will not be allowed to access restricted areas without employee supervision.

Visitor books will be locked away at the end of the working day and kept for the current academic year plus six years.

Environmental Security

As well as maintaining high standards of physical security, to protect against unauthorised access to personal data, schools must also protect data against environmental and natural hazards such as power loss, fire, and floods.

It is accepted that these hazards may be beyond the control of School but the School will implement the following mitigating controls:

Back Ups

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The schools within the Trust will back up their electronic data and systems on a schedule appropriate to the level of change that data undergoes, ranging from daily to monthly to incidentally. These backups will be kept off site, either at another Trust school or by an external provider. Where an external provider is used this will be governed by a data processing agreement. Should the school's electronic systems be compromised by an environmental or natural hazard then the school will be able to reinstate the data from the backup with minimal destruction.

Fire Proof Cabinets

Each School will aim to only purchase lockable data storage cabinets that can withstand exposure to fires for a short period of time. This will protect paper records, held in the cabinets, from any minor fires that break out on the building premises.

Fire Doors

Areas of the premises which contain paper records or core electronic equipment, such as server boxes, will be fitted with fire doors so that data contained within those areas will be protected, for a period of time, against any fires that break out on the premises. Fire doors must not be propped open unless automatic door releases are installed.

Fire Alarm System

Each School will maintain a fire alarm system at its premises to alert individuals of potential fires and so the necessary fire protocols can be followed.

Systems Security

As well as physical security the Trust also protects against hazards to its IT network and electronic systems. It is recognised that the loss of, or damage to, IT systems could affect the Trust's ability to operate and could potentially endanger the lives of its Pupils.

The Trust will implement the following systems security controls in order to mitigate risks to electronic systems:

Software Download Restrictions

Employees must request authorisation from the Trust IT Manager for any software to be installed on any school system. There is no provision for anyone outside the IT department to install software. The Trust IT Manager will vet software to confirm its security certificate and ensure the software is not malicious. The Trust IT Manager will retain a list of trusted software so that this can be downloaded on to individual desktops without disruption.

Phishing Emails

In order to avoid the Trust's computer systems from being compromised through phishing emails - employees are encouraged not to click on links that have been sent to them in emails when the source of that email is unverified. Employees will also take care when clicking on links from trusted sources in case those email accounts have been compromised. Employees will check with the Trust IT Manager if they are unsure about the validity of an email.

Firewalls and Anti-Virus Software

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The Trust will ensure that the firewalls and anti-virus software is installed on electronic devices and routers. The Trust will update the firewalls and anti-virus software when updates are made available and when advised to do so by the Trust IT Manager. The Trust will review its firewalls and anti-virus software on an annual basis and decide if they are still fit for purpose.

Cloud Computing

The Trust provides Office 365 and Google Apps cloud computing. Both are provisioned on the terms that the data is physically stored in the EU. No other cloud platforms are approved for use on the Trusts network or with the Trusts data.

Both platforms are available to staff and student members of the trust, with appropriate and differentiating permissions for all groups of users and levels of access, set by the IT department according to policy set by the Trust, school and IT management.

Shared Drives

The Trust maintains a shared drive on its servers. Whilst employees are encouraged not to store personal data on the shared drive it is recognised that on occasion there will be a genuine business requirement to do so.

The shared drive will have restricted areas that only authorised employees can access. For example a HR folder in the shared drive will only be accessible to employees responsible for HR matters. The Trust IT Manager will be responsible for giving shared drive access rights to employees. Shared drives will still be subject to the School's retention schedule.

Communications Security

The transmission of personal data is a key business need and, when operated securely is a benefit to the Trust and pupils alike. However, data transmission is extremely susceptible to unauthorised and/or malicious loss or corruption. The Trust has implemented the following transmission security controls to mitigate these risks:

Sending Personal Data by post

When sending personal data, excluding special category data, by post the Trust will use Royal Mail's standard postal service. Employees will double check addresses before sending and will ensure that the sending envelope does not contain any data which is not intended for the data subject.

Sending Special Category Data by post

When sending special category data by post the School will use Royal Mail's 1st Class Recorded postal service. Employees will double check addresses before sending and will ensure that the sending envelope does not contain any data which is not intended for the data subject. If the envelope contains information that is thought to be particularly sensitive then employees are advised to have the envelope double checked by a suitable colleague.

Sending Personal Data and Special Category Data by email

The Trust will only send personal data and special category data by email if one or more of the following conditions are met:

- Both the sending and receiving email addresses are GCSX or GCX etc.

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- Using a secure email transmission portal such as Egress

Employees will always double check the recipient's email address to ensure that the email is being sent to the intended individual(s).

Exceptional Circumstances

In exceptional circumstances the Trust may wish to hand deliver, or use a direct courier, to ensure safe transmission of personal data. This could be because the personal data is so sensitive usual transmission methods would not be considered secure or because the volume of the data that needs to be transmitted is too big for usual transmission methods.

Using the BCC function

When sending emails to a large number of recipients, such as a mail shot, or when it would not be appropriate for recipients to know each other's email addresses then Trust employees will utilise the Blind Copy (BCC) function.

Surveillance Security

The Trust operates CCTV and Phone Recording software at some of its premises.

Due to the sensitivity of information that could be collected as a result of this operation, the Trust has a separate policy which governs the use of CCTV and Phone Recording software. This policy has been written in accordance with the ICO's Surveillance Code of Practice.

Remote Working

It is understood that on some occasion employees of the Trust will need to work at home or away from the Trust premises. If this is the case then the employees will adhere to the following controls:

Lockable Storage

If employees are working at home they will ensure that they have lockable storage to keep personal data and Trust equipment safe from loss or theft. If the Employee does not have access to lockable storage then they may apply to the School for assistance in purchasing such storage.

Employees must not keep personal data or Trust equipment unsupervised at home for extended periods of time (for example when the employee goes on holiday).

Employees must not keep personal data or Trust equipment in cars if unsupervised.

Private Working Area

Employees must not work with personal data in areas where other individuals could potentially view or even copy the personal data (for example on public transport).

Employees should also take care to ensure that other household members do not have access to personal data and do not use Trust equipment for their own personal use.

Trusted Wi-Fi Connections

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Employees will only connect their devices to trust Wi-Fi connections and will not use 'free public Wi-Fi' or 'Guest Wi-Fi'. This is because such connections are susceptible to malicious intrusion.

When using home Wi-Fi networks employees should ensure that they have appropriate anti-virus software and firewalls installed to safeguard against malicious intrusion. If in doubt employees should seek assistance from **the Trust IT Manager**.

Encrypted Devices and Email Accounts

Employees will only use Trust issued encrypted devices to work on Personal Data. Employees will not use personal devices for accessing, storing, or creating personal data. This is because personal devices do not possess the same level of security as a Trust issued device.

Employees will not use Personal email accounts to access or transmit personal data. Employees must only use Trust issued, or Trust authorised, email accounts.

Data Removal and Return

Employees will only take personal data away from the Trust premises if this is required for a genuine business need. Employees will take care to limit the amount of data taken away from the premises.

Employees will ensure that all data is returned to the Trust premises either for re-filing or for safe destruction. Employees will not destroy data away from the premises as safe destruction cannot be guaranteed.

It is the Trusts intention to ultimately prohibit the practice of emailing documents altogether, and eventually to move towards providing access to documents via the cloud as a replacement to both email and external devices as a transport medium.