


Information Security Policy (SS-10-3)

(part of the Data Protection suite of policies)

Ratified by:	Bob Crozier, Chair of Finance & Staffing Committee
Signature:	
Date:	08.02.2022

Committee Responsible:	Finance & Staffing
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Version	Date	Comments	Author
01	Jan 2022	Part of new Data Protection Suite of policies (Veritau templates)	Veritau/AMO
02			

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INTRODUCTION

As part of Cockermouth School's programme to comply with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA), it has a new suite of Information Governance policies.

The Information Security Policy outlines the School's organisational security processes and standards. The policy is based upon the sixth principle of the UK 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: 270001 (internationally recognised Information Security Standard).

This policy should be read in conjunction with the other policies in the School'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 Cockermouth 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 School will maintain control over access to the personal data that it processes.

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 IT Systems Manager and the Data Manager.

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.

Keys to storage units will be stored securely by relevant staff. The Business Manager will be responsible for approving access to storage units. Access will only be given to individuals who require it to carry out legitimate business functions. The Premises Manager will keep copies of keys for storage units where possible.

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 username and unique password.

Individuals will be required to change their password every term and usernames will be suspended either when an individual is on long term absence or when an individual leaves employment of the School.

Software and Systems Audit Logs

Where possible, the School will ensure that major software and systems have inbuilt audit logs so that the School 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.

External Access

On occasions the School will need to allow individuals who are not employees of the School 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 School. The Headteacher is required to authorise all instances of third parties having access to systems. If the Headteacher is not available to authorise access then access can also be authorised by the Deputy Headteacher.

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 School 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 (Headteacher, Business Manager, Premises Manager and Assistant Site Managers. The Business Manager will be responsible for authorising key distribution by the Premises Manager.

Internal Access

Internal areas that are off limits to students and parents will be kept locked and only accessed through PIN or keys. PINs will be changed every six months or whenever a member of staff leaves the organisation. Keys will be kept in a secure location and a log of any keys issued to staff maintained.

Visitor Control

Visitors to the School will be required to sign an electronic visitor's book (InVentry) and state their name, organisation, car registration (if applicable) and nature of business. Visitors will be escorted throughout the School and will not be allowed to access restricted areas without employee supervision.

Electronic visitor information will be held securely and kept for the current year + three years in line with the School's Data Retention Policy.

ENVIRONMENTAL SECURITY

As well as maintaining high standards of physical security, to protect against unauthorised access to personal data, the School 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

The School will back up their electronic data and systems fully every week, with new/revised data backed up daily. These backups will be kept both on-site through the backup server and off-site via removable drives. This arrangement 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

The 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

The 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 School 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 School's ability to operate and could potentially endanger the lives of its students.

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

Software Download Restrictions

Employees must request authorisation from IT Support before downloading software on to the School's IT systems. IT Support will vet software to confirm its security certificate and ensure the software is not malicious. IT Support 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 School'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 IT Support if they are unsure about the validity of an email.

Firewalls and Anti-Virus Software

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

Cloud Computing

Data stored in the Cloud – i.e. using OneDrive or Google Drive – must not be shared with persons outside the school. Data should only be shared with personnel through their cockermouthschool.org accounts and never through private email accounts.

Shared Drives

The School 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 an HR folder in the shared drive will only be accessible to employees responsible for HR matters. IT Support 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 School and students alike. However, data transmission is extremely susceptible to unauthorised and/or malicious loss or corruption. The School 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, Cockermouth School 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 that 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 that 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 colleague.

Sending Personal Data and Special Category Data by email

The School will only send personal data and special category data by email if using a secure email transmission portal such as Egress or by encrypted (password-protected) attachments. The School is planning to move to Exchange Online in 2022.

Employees will always double-check the recipient's email address to ensure that the email is being sent to the intended individual(s). Use of autocomplete is strongly discouraged.

Exceptional Circumstances

In exceptional circumstance the School 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 that the 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 the School employees will utilise the Blind Copy (BCC) function.

Surveillance Security

The School operates CCTV at its premises. Due to the sensitivity of information that could be collected as a result of this operation, the School has a separate policy which governs the use of CCTV (CCTV Procedures). This policy has been written in accordance with the ICO's Surveillance Code of Practice.

REMOTE WORKING

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

School Equipment

When using school equipment (iPads, laptops etc) whilst away from school (at home for example), employees must ensure that it is kept in a safe place and accessible only with a secure passcode or password. All devices must be locked (with passcode or password) or turned off when unsupervised.

If school equipment is kept in a vehicle unsupervised (when getting petrol for example), both the equipment and the vehicle must be locked. School equipment should not be left in a vehicle overnight.

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 school equipment for their own personal use.

Trusted Wi-Fi Connections

Employees will only connect their devices to trusted 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 IT Support.

Encrypted Devices and Email Accounts

Employees will only use school-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 school-issued device.

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

Data Removal and Return

Employees will only take personal data away from the School 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 School premises either for re-filing or for safe destruction. Employees will not destroy data away from the premises as safe destruction cannot be guaranteed.

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Mr R J King BSc

Chair of Governors:
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