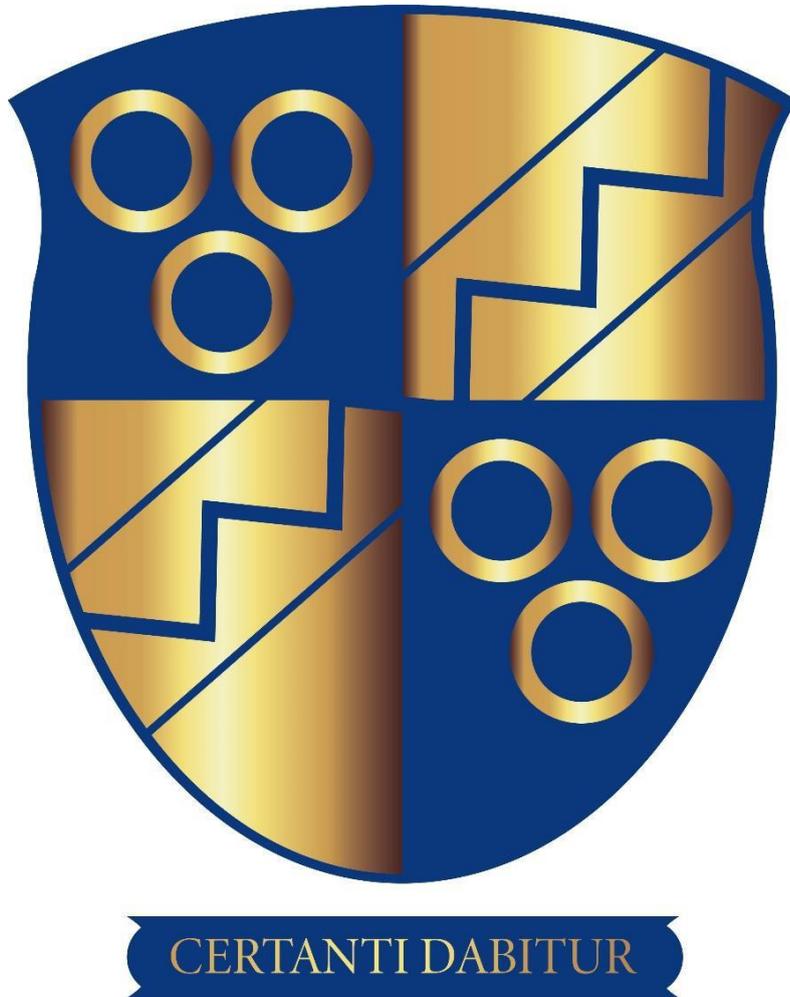


# Information Security Policy

The Oldershaw School



Approved by: Trust Board

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Policy owner: Network Manager

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## 1. Introduction

The General Data Protection Regulation (GDPR) aims to protect the rights of individuals about whom data is obtained, stored, processed, or supplied and requires that organisations take appropriate security measures against unauthorised access, alteration, disclosure, or destruction of personal data.

The School is dedicated to ensuring the security of all information that it holds and implements the highest standards of information security in order to achieve this. This document sets out the measures taken by the school to achieve this, including to: -

- Protect against potential breaches of confidentiality
- Ensure that all information assets and IT facilities are protected against damage, loss, or misuse
- Support our Data Protection Policy in ensuring all staff are aware of and comply with UK law and our own procedures applying to the processing of data
- Increase awareness and understanding at the School of the requirements of information security and the responsibility to staff to protect the confidentiality and integrity of the information that they themselves handle

Information Security can be defined as the protection of information and information systems from unauthorized access, use, disclosure, disruption, modification, or destruction.

Staff are referred to the School's Data Protection Policy, Data Breach Policy and Electronic Information and Communication Systems Policy for further information. These policies are also designed to protect personal data and can be found in the shared area.

For the avoidance of doubt, the term 'mobile devices' used in this policy refers to any removable media or mobile device that can store data. This includes, but is not limited to, laptops, tablets, digital cameras, flash drives, portable hard disks, and smartphones.

## 2. Scope

The information covered by this policy includes all written, spoken, and electronic information held, used, or transmitted by or on behalf of the School, in whatever media. This includes information held on computer systems, paper records, hand-held devices, and information transmitted orally.

This policy applies to all members of staff, including temporary workers, other contractors, volunteers, interns, governors and any and all third parties authorised to use the IT systems.

All members of staff are required to familiarise themselves with its content and comply with the provisions contained in it. Breach of this policy will be treated as a disciplinary offence which may result in disciplinary action under the School's Disciplinary Policy and Procedure up to and including summary dismissal depending on the seriousness of the breach.

This policy does not form part of any individual's terms and conditions of employment with the School and is not intended to have contractual effect. Changes to data protection legislation will be monitored and further amendments may be required to this policy in order to remain compliant with legal obligations.

## 3. General principles

All data stored on our IT systems are to be classified appropriately (including, but not limited to, personal data, sensitive personal data, and confidential information. Further details on the categories of data can be found in the School's Data Protection Policy and Record of Processing Activities). All data so classified must be handled appropriately in accordance with its classification.

Staff should discuss the appropriate security arrangements for the type of information they access in the course of their work with the School's **Network Manager**.

All data stored on our IT Systems and our paper records shall be available only to members of staff with legitimate need for access and shall be protected against unauthorised access and/or processing and against loss and/or corruption.

All IT Systems are to be installed, maintained, serviced, repaired, and upgraded by our **Network Manager** or by such third party/parties as the **Network Manager** may authorise.

The responsibility for the security and integrity of all IT Systems and the data stored thereon (including, but not limited to, the security, integrity, and confidentiality of that data) lies with the **Network Manager** unless expressly stated otherwise.

All staff have an obligation to report actual and potential data protection compliance failures to the School's **Chief Finance & Operations Officer (CFOO)** who shall investigate the breach. Any breach which is either known or suspected to involve personal data or sensitive personal data shall be reported to the Data Protection Officer (full details of the officer can be found in our Data Protection Policy).

## 4. Physical security and procedures

Paper records and documents containing personal information, sensitive personal information, and confidential information shall be positioned in a way to avoid them being viewed by people passing by as much as possible, e.g. through windows. At the end of the working day, or when you leave your desk unoccupied, all paper documents shall be securely locked away to avoid unauthorised access.

Available storage rooms, locked cabinets, and other storage systems with locks shall be used to store paper records when not in use.

Paper documents containing confidential personal information should not be left on office and classroom desks, on staffroom tables, or pinned to noticeboards where there is general access unless there is legal reason to do so and/or relevant consents have been obtained. You should take particular care if documents have to be taken out of school.

The physical security of buildings and storage systems shall be reviewed on a regular basis. If you find the security to be insufficient, you must inform the **Buildings Manager**, as soon as possible. Increased risks of vandalism and or burglary shall be taken into account when assessing the level of security required.

The School carry out regular checks of the buildings and storage systems to ensure they are maintained to a high standard.

The School close the school gates during certain hours to prevent unauthorised access to the building. An alarm system is set nightly, which is monitored by our security partner **Atlas Fire & Security Ltd**, who will attend to any out of hours call outs.

CCTV Cameras are in use at the School and monitored by our **IT Support and Site Teams**.

Visitors are required to sign in at reception using our electronic InVentry system. Printed passes must be worn at all times whilst on site. Visitors must sign out at the end of their visit / day. Visitors without an enhanced DBS should be accompanied at all times by a member of staff. Visitors should not be left alone in areas where they could have access to confidential information.

## 5. Computers and IT

### 5.1 Responsibilities of the **Network Manager**

The Network Manager, shall be responsible for the following:

- a) ensuring that all IT Systems are assessed and deemed suitable for compliance with the School's security requirements
- b) ensuring that IT Security standards within the School are effectively implemented and regularly reviewed, working in consultation with the School's management, and reporting the outcome of such reviews to the School's management
- c) ensuring that all members of staff are kept aware of this policy and of all related legislation, regulations, and other relevant rules whether now or in the future in force, including, but not limited to, the GDPR and the Computer Misuse Act 1990

Furthermore, the **Network Manager** shall be responsible for the following:

- a) assisting all members of staff in understanding and complying with this policy
- b) providing all members of staff with appropriate support and training in IT Security matters and use of IT Systems
- c) ensuring that all members of staff are granted levels of access to IT Systems that are appropriate for each member, taking into account their job role, responsibilities, and any special security requirements
- d) receiving and handling all reports relating to IT Security matters and taking appropriate action in response [including, in the event that any reports relate to personal data, informing the Data Protection Officer]
- e) taking proactive action, where possible, to establish and implement IT security procedures and raise awareness among members of staff
- f) monitoring all IT security within the School and taking all necessary action to implement this policy and any changes made to this policy in the future; and
- g) ensuring that regular backups are taken of all data stored within the IT Systems at regular intervals and that such backups are stored at a suitable location

### 5.2 Responsibilities – Members of staff

All members of staff must comply with all relevant parts of this policy at all times when using the IT Systems.

Computers and other electronic devices should be locked when not in use to minimise the accidental loss or disclosure.

You must immediately inform the **Network Manager** of any and all security concerns relating to the IT Systems which could or has led to a data breach as set out in the Breach Notification Policy.

Any other technical problems (including, but not limited to, hardware failures and software errors) which may occur on the IT Systems shall be reported to the **Network Manager or Senior IT Technician** immediately.

You are not entitled to install any software of your own without the approval of the **Network Manager**. Any software belonging to you must be approved by the **Network Manager** and may only be installed where that installation poses no security risk to the IT Systems and where the installation would not breach any licence agreements to which that software may be subject. Installations, if approved, will be carried out by the IT Department, who will require copies of all licence keys, and installation media if appropriate.

Prior to any usage of physical media (e.g. USB memory sticks or disks of any kind) for transferring files, you must make sure to have the physical media is virus-scanned. Use of personal cloud services (Google Drive, Drop Box etc) is not permitted.

If you detect any virus this must be reported immediately to the **Network Manager / Senior IT Technician** (this rule shall apply even where the anti-virus software automatically fixes the problem).

## 6. Access security

All members of staff are responsible for the security of the equipment allocated to or used by them and must not allow it to be used by anyone other than in accordance with this policy.

The School has a secure firewall and anti-virus software in place. These prevent individuals from unauthorised access and to protect the School's network. The School also teach individuals about e-safety to ensure everyone is aware of how to protect the School's network and themselves.

All IT Systems (in particular mobile devices) shall be protected with a secure password or passcode, or such other form of secure log-in system as approved by the IT Department. Biometric log-in methods can only be used if approved by the IT Department.

All passwords must, where the software, computer, or device allows:

- a) be at least 9 or more characters long including at least one of each of the following: number, upper and lowercase letters, and a symbol (e.g. @#?£)
- b) not be obvious or easily guessed (e.g. birthdays or other memorable dates, memorable names, events, or places, variations of obvious common words (password/ wordpass / letmein including substituting numbers and symbols for such words.)
- c) must be unique and not used for any other site or service (e.g.: home banking, online shopping, streaming services etc.). It may be necessary to disclose your password to the senior IT Technician or Network Manager in order to setup or update your school devices. Passwords will be stored securely in our encrypted database and used only the express purpose of updating / setting up

With the exception of point ( c ) above, passwords must be kept confidential and must not be made available to anyone else unless authorised by a member of the Senior Leadership Group who will liaise with the **Network Manager** as appropriate and necessary. Any member of staff who discloses his or her password to another employee in the absence of express authorisation will be liable to disciplinary action under the School's Disciplinary Policy and Procedure. Any member of staff who logs on to a computer using another member of staff's password will be liable to disciplinary action up to and including summary dismissal for gross misconduct.

If you forget your password, you should notify the **Network Manager or ICT Technician** to have your access to the IT Systems restored. You must set up a new password immediately upon the restoration of access to the IT Systems.

You should not write down passwords if it is possible to remember them. If necessary, you may write down passwords provided that you store them securely in isolation of other relevant information (i.e. username)

Examples of secure storage include, a locked drawer, secure password database, encrypted notes file on a smartphone). Passwords must never be left on display for others to see.

Computers and other electronic devices with displays and user input devices (e.g. mouse, keyboard, touchscreen etc.) shall be protected with a screen lock that will activate after a period of inactivity. You may not change this time period or disable the lock. If leaving your device unattended before the lock activates, invoke it manually by pressing the **WINDOWS KEY** (to the right of the left control key) and the "L" key simultaneously.

All mobile devices provided by the School, shall be set to lock, sleep, or similar, after a period of inactivity, requiring a password, passcode, or other form of log-in to unlock, wake or similar. You may not alter this time period.

Staff should be aware that if they fail to log off and leave their terminals unattended, they may be held responsible for another user's activities on their terminal in breach of this policy, the School's Data Protection Policy and/or the requirement for confidentiality in respect of certain information.

**Staff must never allow students to use their devices for any reason, even if using their student login credentials. This includes staff laptops, staff workstations, staff tablets, and smartphones. Conversely staff should not use student computers or laptops. If you need to temporarily borrow a staff device, please speak to the IT Team ([Helpdesk@oldershaw.wirral.sch.uk](mailto:Helpdesk@oldershaw.wirral.sch.uk)).**

## 7. Data security

Personal data sent over the school network will be encrypted or otherwise secured.

All members of staff are prohibited from downloading, installing, or running software from external sources without obtaining prior authorisation from the **Network Manager** who will consider bona fide requests for work purposes. Please note that this includes instant messaging programs, screen savers, photos, video clips, games, music files and opening any documents or communications from unknown origins. Where consent is given all files and data should always be virus checked before they are downloaded onto the School's system.

It is not currently feasible to allow staff to connect personal devices on to the network. In exceptional circumstances we may allow this (student teachers without school owned devices for example). Please see the **Network Manager** for further advice.

## 8. Electronic storage of data

Staff should save all portable data in their Microsoft 365 One Drive account. Portable devices such as flash drives / portable hard disks, must not be used to store any form of personal data whether encrypted or otherwise. Appropriate use of portable devices would be video resources, generic images / clip art, and non-personalised documents. You are responsible for backing up these devices in case of failure, damage, or corruption. Care should be taken with portable hard disks as they are not tolerant of shocks or extreme temperatures.

Personal data should be stored on the school network, and / or in your school Microsoft 365 One Drive / Teams account. Care must be taken when saving to One Drive / Teams as you may have access to areas that can be accessed by several members of staff (e.g. Shared Resources). IF you require help with using these cloud services, please contact the IT Helpdesk ([Helpdesk@oldershaw.wirral.sch.uk](mailto:Helpdesk@oldershaw.wirral.sch.uk))

You should not store any personal data on any mobile device, whether such device belongs to the School or otherwise without prior written approval of the **Principal**. You should delete data copied onto any of these devices as soon as possible and make sure it is stored on the School's computer network in order for it to be backed up. Full backups are taken at the end of each working week, with incremental changes taken each evening. A copy of the full backups are copied on encrypted tape and transferred off site every Monday.

## 9. Home working

You should not take confidential or other information home without prior permission of the **Principal**, and only do so where satisfied appropriate technical and practical measures are in place within your home to maintain the continued security and confidentiality of that information. School owned IT equipment must not be used by family members, or any non-school employees for any purpose, including but not limited to the following: online / remote learning, online shopping, streaming, banking, or gaming.

When you have been given permission to take confidential or other information home, you must ensure that:

- a) the information is kept in a secure and in a locked environment where it cannot be accessed by family members or visitors; and
- b) all confidential material that requires disposal is shredded or, in the case of electronic material, securely destroyed as soon as any need for its retention has passed.

Use of school owned equipment on public Wi-Fi hotspots is not permitted under any circumstances.

## 10. Communications, transfer, internet, and email use

When using the School's IT Systems, you are subject to and must comply with the School's Electronic Information and Communication Systems Policy.

The School work to ensure the systems protect pupils and staff and are reviewed and improved regularly.

If staff or pupils discover sites or material which would be unsuitable, this should be reported to the **IT Support Team**.

Regular checks are made to ensure that filtering methods are appropriate, effective, and reasonable and that users access only appropriate material as far as possible. This is not always possible to guarantee, and the school cannot accept liability for the material accessed or its consequence.

All personal information, and in particular sensitive personal information and confidential information should be encrypted before being sent by email or sent by tracked DX (document exchange) or recorded delivery. You must not send such information by fax as this form of information transfer is no longer considered secure.

Postal, DX, and email addresses should be checked and verified before you send information to them. In particular you should take extra care with email addresses where auto-complete features may have inserted incorrect addresses.

You should be careful about maintaining confidentiality when speaking in public places.

You should make sure to mark confidential information 'confidential' and circulate this information only to those who need to know the information in the course of their work for the School.

Personal or confidential information should not be removed from the School without prior permission from the **Principal** except where the removal is temporary and necessary. When such permission is given, you must take all reasonable steps to ensure that the integrity of the information and the confidentiality are maintained. You must ensure that the information is:

- a) not transported in see-through or other un-secured bags or cases.
- b) not read in public places (e.g., waiting rooms, cafes, trains, etc.); and
- c) not left unattended or in any place where it is at risk (e.g., in car boots, cafes, etc.)

## 11. Reporting security breaches

All concerns, questions, suspected breaches, or known breaches shall be referred immediately to the School's **CFOO**. All members of staff have an obligation to report actual or potential data protection compliance failures.

When receiving a question or notification of a breach, the **CFOO** shall immediately assess the issue, including but not limited to, the level of risk associated with the issue, and shall take all steps necessary to respond to the issue.

Members of staff shall under no circumstances attempt to resolve an IT security breach on their own without first consulting the **Network Manager**. Any attempt to resolve an IT security breach by a member of staff must be under the instruction of, and with the express permission of, the **Network Manager**.

Missing or stolen paper records or mobile devices, computers or physical media containing personal or confidential information should be reported immediately to **CFOO**.

All IT security breaches shall be fully documented.

Full details on how to notify of data breaches are set out in the Breach Notification Policy.

## **12. Monitoring arrangements**

This policy will be reviewed by the Principal annually and approved by the Finance, Audit & Risk Committee.

## **13. Links with other policies**

- Electronic Information and Communication Systems Policy
- Data Breach policy
- Data protection Policy
- Home Working Policy