



**Blessed is the one who trusts in the Lord, whose confidence is in him.
They will be like a tree planted by the water that sends out its roots by the stream.
It does not fear when heat comes; its leaves are always green.
It has no worries in a year of drought and never fails to bear fruit.**

Jeremiah 17: 7 - 8

INFORMATION POLICY

Date of policy creation	January 2022
Date of Review	January 2023
Responsibility	Governing Body

Introduction

As part of The Federation of Middleham & Spennithorne CE Primary Schools' programme to comply with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA), it has a 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 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 Federation 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 Federation will maintain an audit log detailing which individuals have access to which systems (both electronic and manual). This log will be maintained by the School Administrators and monitored by the Headteacher.

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. School Administrators or the Headteacher will be responsible for giving individuals access to the safe place. Access will only be given to individuals who require it to carry out legitimate business functions. Where a PIN is used, the password 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.

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

Software and Systems Audit Logs

The Federation will ensure that all major software and systems have inbuilt audit logs so that the Federation 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 Federation 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 the Federation.

The Federation will then keep paper files in a separate filing cabinet (with access restricted to minimal employees) and where possible 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 Federation 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 the Federation will need to allow individuals who are not employees of the Federation 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 or organisation. The Headteacher is required to authorise all instances of third parties having access to systems.

An access log, detailing who has been given access to what systems and who authorised the access, will be maintained by the School Administrators, monitored by the Headteacher and FGB.

Physical Security

The Federation will maintain high standards of Physical Security to prevent unauthorised access to personal data.

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 Federation 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. The Headteacher will be responsible for authorising key distribution and will maintain a log of key holders.

Internal Access

Internal areas that are off limits to pupils 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 will be required to sign in a visitor's book and state their name, organisation, car registration (if applicable) and nature of business. This may be either in paper or electronic format. 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 current financial year + six years.

Environmental Security

As well as maintaining high standards of physical security, to protect against unauthorised access to personal data, the Federation 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 the Federation but measures will implement the following mitigating controls.

Back Ups

Schools ICT manage the Federation Backup system. These backups will be kept off site by an external provider. This arrangement will be governed by a data processing agreement. Should the Federation's electronic systems be

compromised by an environmental or natural hazard then School's ICT will be able to reinstate the data from the backup with minimal destruction.

Fire Proof Cabinets

The Federation 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 Federation 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 Federation 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 Federation's ability to operate and could potentially endanger the lives of its Pupils.

Software Download Restrictions

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

Firewalls and Anti-Virus Software

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

Cloud Computing

Cloud Computing will be securely set up by Schools ICT for staff to access and the necessary training on use and how to keep information safe given.

Shared Drives

The Federation of Middleham (VA) & Spennithorne (VC) CE Primary Schools 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. Schools ICT, monitored by the Headteacher 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 Federation and pupils alike. However, data transmission is extremely susceptible to unauthorised and/or malicious loss or corruption.

Sending Personal Data by post

When sending personal data, excluding special category data, by post, The Federation of Middleham (VA) & Spennithorne (VC) CE Primary Schools 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 Federation of Middleham (VA) & Spennithorne (VC) CE Primary Schools 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 colleague.

Sending Personal Data and Special Category Data by email

The Federation of Middleham (VA) & Spennithorne (VC) CE Primary Schools will only send personal data and special category data by email if 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). Use of autocomplete should be strongly discouraged.

Exceptional Circumstances

In exceptional circumstance The Federation of Middleham (VA) & Spennithorne (VC) CE Primary Schools 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 Federation of Middleham (VA) & Spennithorne (VC) CE Primary Schools employees will utilise the Blind Copy (BCC) function.

Remote Working

It is understood that on some occasion employees of The Federation of Middleham (VA) & Spennithorne (VC) CE Primary Schools will need to work at home or away from the school premises. If this is the case then the employees will adhere to schools Remote Learning Policy, Acceptable Use Policy or the Online Safety Policy.

Employees must not keep personal data 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 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 Schools ICT.

Encrypted Devices and Email Accounts

Employees will only use Federation 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.

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

Data Removal and Return

Employees will only take personal data away from The Federation of Middleham (VA) & Spennithorne (VC) CE Primary Schools 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.