

EALING INDEPENDENT COLLEGE

INFORMATION SECURITY POLICY

BELLEVUE | EDUCATION

Date of Policy: April 2018
Reviewed: July 2020

1 Introduction

- 1.1 Information security is about what you and the School should be doing to make sure that **Personal Data** is kept safe. This is the most important area of data protection to get right. Most of the data protection fines have come about because of information security breaches.
- 1.2 This policy should be read alongside the School's data protection policy which gives an overview of your and the School's obligations around data protection. The School's data protection policy can be found here on the Ealing Independent College website. In addition to the data protection policy, you should also read the following which are relevant to data protection:
 - 1.2.1 the School's privacy notices for staff, pupils and parents; and
 - 1.2.2 IT acceptable use policy for staff.
- 1.3 This policy applies to all staff (which includes the central Leadership Team and senior staff at the school, agency staff, contractors, work experience students and volunteers) when handling Personal Data. For more information on what Personal Data is, please see the School's data protection policy.
- 1.4 Any questions or concerns about your obligations under this policy should be referred to Carol Milstead. Questions and concerns about technical support or for assistance with using the School IT systems should be referred to Paul Carter.

2 Be aware

- 2.1 Information security breaches can happen in a number of different ways. Examples of breaches which have been reported in the news include:
 - 2.1.1 an unencrypted laptop stolen after being left on a train;
 - 2.1.2 Personal Data taken after website was hacked;
 - 2.1.3 sending a confidential email to the wrong recipient; and
 - 2.1.4 leaving confidential documents containing Personal Data on a doorstep.
- 2.2 These should give you a good idea of the sorts of things which can go wrong, but please have a think about what problems might arise in your team or department and what you can do to manage the risks. Speak to your manager and the Principal if you have any ideas or suggestions about improving practices in your team. One option is to have team specific checklists to help ensure data protection compliance.
- 2.3 You should immediately report all security incidents, breaches and weaknesses to Carol Milstead. This includes anything which you become aware of even if you are not directly involved (for example, if you know that document storage rooms are sometimes left unlocked at weekends).
- 2.4 You must immediately tell the Principal and Carol Milstead if you become aware of anything which might mean that there has been a security breach. You must provide your the Principal or Carol Milstead with all of the information you have. If you cannot get hold of your Carol Milstead or the Principal or it is outside of school hours then please use this

emergency contact number 07912 874467. All of the following are examples of a security breach:

- 2.4.1 you accidentally send an email to the wrong recipient;
 - 2.4.2 you cannot find some papers which contain Personal Data; or
 - 2.4.3 any device (such as a laptop or a smartphone) used to access or store Personal Data has been lost or stolen or you suspect that the security of a device has been compromised.
- 2.5 In certain situations the School must report an information security breach to the Information Commissioner's Office (the data protection regulator) and let those whose information has been compromised know within strict timescales. This is another reason why it is vital that you report breaches immediately.

3 Thinking about privacy on a day to day basis

- 3.1 We should be thinking about data protection and privacy whenever we are handling Personal Data. If you have any suggestions for how the School could protect individual's privacy more robustly please speak to Carol Milstead
- 3.2 From May 2018, the School is required to carry out an assessment of the privacy implications of using Personal Data in certain ways. For example, when we introduce new technology, where the processing results in a risk to individual's privacy or where Personal Data is used on a large scale, such as CCTV.
- 3.3 These assessments should help the School to identify the measures needed to prevent information security breaches from taking place. If you think that such an assessment is required please let Carol Milstead know.

4 Critical School Personal Data

- 4.1 Data protection is about protecting information about individuals. Even something as simple as a person's name or their hobbies count as their Personal Data. However, some Personal Data is so sensitive that we need to be extra careful. This is called **Critical School Personal Data** in this policy and in the data protection policy. Critical School Personal Data is:
 - 4.1.1 information concerning child protection matters;
 - 4.1.2 information about serious or confidential medical conditions and information about special educational needs;
 - 4.1.3 information concerning serious allegations made against an individual (whether or not the allegation amounts to a criminal offence and whether or not the allegation has been proved);
 - 4.1.4 financial information (for example about parents and staff);
 - 4.1.5 information about an individual's racial or ethnic origin; and
 - 4.1.6 political opinions;
 - 4.1.7 religious beliefs or other beliefs of a similar nature;
 - 4.1.8 trade union membership;

- 4.1.9 physical or mental health or condition;
 - 4.1.10 genetic information;
 - 4.1.11 sexual life;
 - 4.1.12 information relating to actual or alleged criminal activity; and
 - 4.1.13 biometric information (e.g. a pupil's fingerprints following a criminal investigation).
- 4.2 Staff need to be extra careful when handling Critical School Personal Data.

Note - Appendix to follow

5 Minimising the amount of Personal Data that we hold

- 5.1 Restricting the amount of Personal Data we hold to that which is needed helps keep personal data safe. If you would like guidance on when to delete certain types of information please speak to Carol Milstead

6 Using computers and IT

- 6.1 A lot of data protection breaches happen as a result of basic mistakes being made when using the School's IT system. Here are some tips on how to avoid common problems:
- 6.2 **Lock computer screens:** Your computer screen should be locked when it is not in use, even if you are only away from the computer for a short period of time. To lock your chromebook screen press the "" key followed by the "L" key. To lock your PC Screen press the "Ctrl", the "alt" and the "del" keys at the same time, then click on 'Lock' If you are not sure how to do this then speak to Carol Milstead The School's computers are configured to automatically lock if not used for five minutes.
- 6.3 **Be familiar with the School's IT:** You should also make sure that you familiarise yourself with any software or hardware that you use. In particular, please make sure that you understand what the software is supposed to be used for and any risks. For example:
- 6.3.1 if you use a "virtual classroom" which allows you to upload lesson plans and mock exam papers for pupils then you need to be careful that you do not accidentally upload anything more confidential;
 - 6.3.2 make sure that you know how to properly use any security features contained in School software. For example, some software will allow you to redact documents (i.e. "black out" text so that it cannot be read by the recipient). Make sure that you can use this software correctly so that the recipient of the document cannot "undo" the redactions; and
 - 6.3.3 you need to be extra careful where you store information containing Critical School Personal Data. For example, safeguarding information should not ordinarily be saved using alumni database software. If in doubt, speak to Carol Milstead
- 6.4 Specific guidance on the information security requirements of the different programmes that the School uses can be found in the Bellevue Hub.
- 6.5 **Hardware and software not provided by the School:** Staff must not use, download or install any software, app, programme, or service without permission from the Principal / Vice

Principal Staff must not connect (whether physically or by using another method such as Wi-Fi or Bluetooth) any device or hardware to the School IT systems without permission.

- 6.6 **Private cloud storage:** You must not use private cloud storage or file sharing accounts to store or share School documents.
- 6.7 **Portable media devices:** The use of portable media devices (such as USB drives, portable hard drives, DVDs) is not allowed unless those devices have been given to you by the School and you have received training on how to use those devices securely. Paul Carter will protect any portable media device given to you with encryption.
- 6.8 **Disposal of School IT equipment:** School IT equipment (this includes laptops, printers, phones, and DVDs) must always be returned to the IT Department even if you think that it is broken and will no longer work.
- 6.9 Data can be protected by ensuring that it is stored within secure school systems. This is why the school uses ISAMS as its main information system, Pupil Asset/Classroom Monitor to store pupil progress data, GL online for standardised testing and pupil enquiries, googledocs for emails and file storage, Dataplan for payroll and AIQ for financial data. Staff should avoid storing any personal data outside any of these password secure environments and should also avoid printing off data.

7 Passwords

- 7.1 Passwords should be long, for example, you could use a song lyric or a memorable phrase plus a number. Do not choose a password which is so complex that it's difficult to remember without writing it down. Your password should not be disclosed to anyone else.
- 7.2 Your password should be difficult to guess, for example, you could base your password on something memorable that no-one else would know. You should not use information which other people might know, or be able to find out, such as your address or your birthday.
- 7.3 You must not use a password which is used for another account. For example, you must not use your password for your private email address or online services for any school account.
- 7.4 Passwords (and any other security credential you are issued with such as a key fob or USB drive) must be kept secure and confidential and must not be shared with, or given to, anyone else. Passwords should not be written down.

8 Emails (and faxes)

- 8.1 When sending emails or faxes you must take care to make sure that the recipients are correct.
- 8.2 **Emails to multiple recipients:** When sending emails to multiple recipients i.e. parents or students you must enter the email address at 'BCC' recipients. Alternatively communications to parents or students can be sent using ISAMs in a secure manner.
- 8.3 If the email or fax contains Critical School Personal Data then you should ask another member of staff to double check that you have entered the email address / fax number correctly before pressing send. If a fax contains Critical School Personal Data then you must make sure that the intended recipient is standing by the fax machine to receive the fax.
- 8.4 **Encryption:** Remember to encrypt internal and external emails which contain Critical School Personal Data. For example, encryption should be used when sending details of a

safeguarding incident to social services. To use encryption then you need to for example, where you need to lock a document for viewing, please seek advice from Paul Carter. If you need to give someone the "password" or "key" to unlock an encrypted email or document then this should be provided via a different means. For example, after emailing the encrypted documents you may wish to call the recipient with the password.

- 8.5 **Private email addresses:** You must not use a private email address for School related work. You must only use your Ealing Independent College address. Please note that this rule applies to the Leadership Team as well. Please speak to Carol Milstead if you require an email account to be set up for you.

9 Paper files

- 9.1 **Keep under lock and key:** Staff must ensure that papers which contain Personal Data are kept under lock and key in a secure location and that they are never left unattended on desks (unless the room is secure). Any keys must be kept safe.
- 9.2 If the papers contain Critical School Personal Data then they must be kept in secure cabinets identified for the specified purpose as set out in the table below. Information must not be stored in any other location.

| Cabinet | Access |
|---|--|
| Child protection - located in the DSL's office (SMT Office) | There are 3 key holders to the Safeguarding Filing Cabinet: Laura Bellerby as Designated Safeguarding Lead James Garside as Deputy Designated Safeguarding Lead Carol Milstead as Deputy Designated Safeguarding Lead |
| Financial information - located in the main office and safe | There is 1 key holder to the Finance Cupboard in the Main Office: Carol Milstead The safe to the key is locked away in the Server Room for which Carol Milstead has access to |
| Staff Personnel files - Located in the Principals Office | The HR Filing Cabinet is situated in the Principals Office, which is kept secure by a coded lock - the code to the door is known to: Allan Cairns - Principal Carol Milstead - Office Manager Maria Bavington - Cleaner |
| Student Files - Located in Main office | The filing cabinet are situated in the Main office, which is kept secure by a coded lock. The filing cabinets are kept locked when the office is not manned and the keys are kept securely in the office. |

- 9.3 **Disposal:** Paper records containing Personal Data should be disposed of securely by placing them in the confidential waste bags which are located in the main office. Personal Data should never be placed in the general waste.
- 9.4 **Printing:** When printing documents, make sure that you collect everything from the printer straight away, otherwise there is a risk that confidential information might be read or picked up by someone else. If you see anything left by the printer which contains Personal Data then you must hand it in to Carol Milstead.

- 9.5 **Put papers away:** You should always keep a tidy desk and put papers away when they are no longer needed. Please see paragraph 9.2 above for details of where Critical School Personal Data should be kept.
- 9.6 **Post:** You also need to be extra careful when sending items in the post. Confidential materials should not be sent using standard post. If you need to send something in the post that is confidential, consider asking your IT team to put in on an encrypted memory stick or arrange for it to be sent by courier.
- 10 Working off site (e.g. School trips and homeworking)**
- 10.1 Staff might need to take Personal Data off the School site for various reasons, [• for example because they are working from home or supervising a School trip]. This does not breach data protection law if the appropriate safeguards are in place to protect Personal Data.
- 10.2 For school trips, the trip organiser should decide what information needs to be taken and who will be responsible for looking after it. You must make sure that Personal Data taken off site is returned to the School.
- 10.3 If you are allowed to work from home then check with the Principal what additional arrangements are in place. This might involve installing software on your home computer or smartphone, please see section 11 below.
- 10.4 Not all staff are allowed to work from home. If in doubt, speak to the Principal.
- 10.5 **Take the minimum with you:** When working away from the School you must only take the minimum amount of information with you. For example, a teacher organising a field trip might need to take with her information about pupil medical conditions (for example allergies and medication). If only eight out of a class of twenty pupils are attending the trip, then the teacher should only take the information about the eight pupils.
- 10.6 **Working on the move:** You must not work on documents containing Personal Data whilst travelling if there is a risk of unauthorised disclosure (for example, if there is a risk that someone else will be able to see what you are doing). For example, if working on a laptop on a train, you should ensure that no one else can see the laptop screen and you should not leave any device unattended where there is a risk that it might be taken.
- 10.7 **Paper records:** If you need to take hard copy (i.e. paper) records with you then you should make sure that they are kept secure. For example:
- 10.7.1 documents should be kept in a locked case. They should also be kept somewhere secure in addition to being kept in a locked case if left unattended (e.g. overnight);
- 10.7.2 if travelling by train you must keep the documents with you at all times and they should not be stored in luggage racks;
- 10.7.3 if travelling by car, you must keep the documents out of plain sight. Please be aware that possessions left on car seats are vulnerable to theft when your car is stopped e.g. at traffic lights;
- 10.7.4 if you have a choice between leaving documents in a vehicle and taking them with you (e.g. to a meeting) then you should usually take them with you and keep them on your person in a locked case. However, there may be specific circumstances when you consider that it would be safer to leave them in a locked case in the vehicle out of plain sight. The risks of this situation should be reduced by only

having the minimum amount of Personal Data with you (please see paragraph 10.5 above).

- 10.8 **Using School laptops, phones, cameras and other devices:** If you need to book out a School device then you will be required to 'sign out' the equipment and then 'sign in' again upon the return of said equipment.
- 10.9 Critical School Personal Data should not be taken off the site in paper format save for specified situations where this is absolutely necessary, for example, where necessary for school trips (see 10.5 above).

11 Using personal devices for School work

- 11.1 You may only use your personal device (such as your laptop or smartphone) for School work if you have been given permission by the Principal or Vice Principal. In the instance this is permitted staff must consider all safeguarding policies.
- 11.2 Even if you have been given permission to do so, then before using your own device for School work you must speak to your IT team so that they can configure your device.
- 11.3 **Using your own PC or Laptop:** If you use your laptop or PC for School work then you must use your Ealing Independent College gmail account. Using your School Gmail account means that Personal Data is accessed through the School's own network which is far more secure and significantly reduces the risk of a security breach.
- 11.4 The School reserves the right to monitor, review and erase, without further notice, all content on the device that has been created for the School or on the School's behalf or which contains Personal Data. Although we do not intend to wipe other data that is private in nature (such as private photographs or private files or emails), it may not be possible to distinguish all such information from Personal Data in all circumstances. You should therefore regularly back up any private data contained on the device or keep private material separate via a partition that would not be remotely wiped in these circumstances.
- 11.5 You must not do anything which could prevent any software installed on your computer or device by the School from working properly. For example, you must not try and uninstall the software, or save School related documents to an area of your device that is not protected.
- 11.6 **Appropriate security measures** should always be taken. This includes the use of firewalls and anti-virus software. Any software or operating system on the device should be kept up to date.
- 11.7 **Default passwords:** If you use a personal device for school work which came with a default password then this password should be changed immediately. Please see section 7 above for guidance on choosing a strong password.
- 11.8 **Sending or saving documents to your personal devices:** Documents containing Personal Data (including photographs and videos) should not normally be sent to or saved to personal devices. This is because anything you save to your computer, tablet or mobile phone will not be protected by the School's security systems. Furthermore, it is often very difficult to delete something which has been saved to a computer. For example, if you saved a School document to your laptop because you wanted to work on it over the weekend, then the document would still be on your computer hard drive even if you deleted it and emptied the recycle bin.

11.9 **Friends and family:** You must take steps to ensure that others who use your device (for example, friends and family) cannot access anything school related on your device. For example, you should not share the login details with others and you should log out of your account once you have finished working by restarting your device. You must also make sure that your devices are not configured in a way that would allow someone else access to School related documents and information – if you are unsure about this then please speak to Paul Carter

11.10 **When you stop using your device for School work:** If you stop using your device for School work, for example:

11.10.1 if you decide that you do not wish to use your device for School work; or

11.10.2 if the School withdraws permission for you to use your device; or

11.10.3 if you are about to leave the School

then, all School documents (including School emails), and any software applications provided by us for School purposes, will be removed from the device.

If this cannot be achieved remotely, you must submit the device to Paul Carter for wiping and software removal. You must provide all necessary co-operation and assistance to Paul Carter in relation to this process.

12 Breach of this policy

12.1 Any breach of this policy will be taken seriously and may result in disciplinary action.

12.2 A member of staff who deliberately or recklessly discloses Personal Data held by the School without proper authority is also guilty of a criminal offence and gross misconduct. This could result in summary dismissal.

12.3 This policy does not form part of any employee's contract of employment.

12.4 We reserve the right to change this policy at any time. Where appropriate, we will notify staff of those changes by mail or email.

I confirm that I have read and understood the contents of this policy:

| | |
|------------------|-------------------|
| Name | |
| Signature | |
| Date | [• 00 month year] |

Appendix 1 School applications

| Application | What it can be used for | Specific security arrangements | Any other notes |
|----------------------------------|--------------------------------------|--|--|
| [• Example: 123 Alumni Database] | [• Storing alumni information only.] | [• Only the following staff have permission to access the database: [• please complete]. Different staff have different permission levels, if you need additional permissions, please speak to [the Head].] | [• Although the the alumni asso them access to permission from |
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