

Information Security Policy (Non Statutory)



Preamble

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

The Information Security Policy outlines NMAT'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 NMAT'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 NMAT employees, any authorised agents working on behalf of NMAT, 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. (The use of USB devices is discouraged by the Trust and their use will be phased out over the next 12 months),
- 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. NMAT employees, authorised agents and third party contractors must not use their own devices to take photographs or other digital images.

Access Control

NMAT will maintain control over access to the personal data that it processes.

This policy will be kept under regular review in light of legal developments and best practice.

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These controls will differ depending on the format of the data and the status of the individual accessing the data. NMAT will maintain an audit log detailing which individuals have access to which systems (both electronic and manual). In terms of IT, this log will be maintained by IT Network manager in each Academy. In terms of data relating to Child Protection, this log will be maintained by the Designated Safeguarding Lead in each academy. For SEND data this will be maintained by the SENDCO in each NMAT academy.

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 locked in a safe place. The IT Network Manager, Designated Safeguarding Lead and SENDCO will be responsible for giving individuals access to the relevant key. 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. 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 60 – 90 days and user names will be suspended either when an individual is on long term absence or when an individual leaves employment of NMAT.

Software and Systems Audit Logs

NMAT will ensure that all software and systems have inbuilt audit logs so that NMAT 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 NMAT will need to allow individuals who are not employees of the Trust 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 Academy. The relevant Head of School 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 Vice Principal and/or the Executive Principal.

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An access log, detailing who has been given access to what systems and who authorised the access, will be maintained by the academy's IT Network Manager.

Physical Security

NMAT will maintain high standards of physical security to prevent unauthorised access to personal data. The following controls will be maintained by each Academy in the Trust:

Clear Desk Policy

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

Alarm System

NMAT and each Academy 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. NMAT Health & Safety and site teams will be responsible for authorising key distribution and the IT Network manager (Nunthorpe Academy) will maintain a log of key holders.

Internal Access

Internal areas that are off limits to students and parents will be kept locked and only accessed through key fobs. 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 academies will be required to sign in via the electronic signing in system 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 academy and will not be allowed to access restricted areas without employee supervision.

If appropriate, visitor books (electronic and paper based) 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, NMAT 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 NMAT but NMAT will implement the following mitigating controls in line with Business Continuity Plans.

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Back Ups

NMAT academies will back up their electronic data and systems regularly and the frequency is determined by the criticalness of the systems. These backups will be kept in a different part of the building and where possible in a different building. This arrangement will be governed by a data processing agreement. Should the Academy's electronic systems be compromised by an environmental or natural hazard then the Academy will be able to reinstate the data from the backup with minimal destruction.

Fire Proof Cabinets

The Academy 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. Where practicable, data is increasingly being stored on clouds.

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 Academy 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 NMAT 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 NMAT's ability to operate and could potentially endanger the lives of its students.

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

Software Download Restrictions

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

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Firewalls and Anti-Virus Software

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 IT Team. 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

Cloud computing is used across the academy as and when required to cover back ups such as the SIMS Server and Remote Learning documents.

Shared Drives

NMAT Academies maintains a shared drive on their 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 ICT team at each Academy will be responsible for giving shared drive access rights to employees. Shared drives will still be subject to the Academy'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 students alike. However, data transmission is extremely susceptible to unauthorised and/or malicious loss or corruption. NMAT 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, each Academy 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 each NMAT Academy 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

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The **Trust** will only send personal data and special category data by email if using a secure email transmission portal such as **Insert Your School's Secure Email method**.

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 NMAT 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 NMAT employees will utilise the Blind Copy (BCC) function.

Surveillance Security

The academies in the Trust operate CCTV at its premises.

Due to the sensitivity of information that could be collected as a result of this operation, NMAT has a separate policy which governs the use of CCTV software. 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 NMAT will need to work at home or away from the Academy 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 NMAT equipment safe from loss or theft. Employees must not keep personal data or Academy equipment unsupervised at home for extended periods of time (for example when the employee goes on holiday).

Employees must not keep personal data or NMAT 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 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 the ICT team.

Password protected devices, encrypted devices and Email Accounts

Employees will only use NMAT issued password protected, where practicable 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 NMAT issued, or NMAT authorised, email accounts.

Data Removal and Return

Employees will only take personal data away from the NMAT 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 NMAT 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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