

CARMEL EDUCATION TRUST INFORMATION SECURITY POLICY

**THIS POLICY APPLIES TO ALL TRUST SCHOOLS, THE CARMEL TEACHER
TRAINING PARTNERSHIP AND CARMEL TEACHING SCHOOL ALLIANCE**

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Information Security Policy

1. Introduction

- 1.1 This policy provides a Policy Statement on Information Security and an accompanying set of guidelines for all Trust staff. It is part of a suite of policies and should be read in conjunction with the Data Protection Policy and the Acceptable Use Policy.

2. Policy Statement

- 2.1 The Carmel Education Trust is committed to the protection of information and administrative resources, including paper and electronic resources and the media in which they are stored or transmitted.
- 2.2 The Trust will hold the minimum personal information necessary to enable it to perform its function and information will be erased once the need to hold it has passed.
- 2.3 The Trust will make every effort to ensure that information is accurate, up to date and that inaccuracies are corrected without unnecessary delay.
- 2.4 The Trust will ensure all personal data is obtained fairly in accordance with the "Privacy Notice" and lawfully processed – See Data Protection Policy.
- 2.5 To ensure confidentiality, information will be protected against unauthorised access and only authorised personnel will modify it.
- 2.6 Security measures such as encryption and password protection for electronic media, and secure storage for hard copy material should be provided to protect against theft or loss.
- 2.7 Staff will receive training and guidance to enable them to understand, and appropriately apply, security measures for the protection of all information.
- 2.8 Regulatory and legislative requirements as included within the Data Protection Act 1998, the Freedom of Information Act 2000, and the Education (Pupil Information) (England) Regulations 2005 will be met. This may include sharing personal data where it is fair and lawful to do so.
- 2.9 The Head of School is the Senior Information Risk Owner for their respective schools and have day to day responsibility for managing information security within their school. The Chief Executive Officer is the overall Information Risk Owner and has responsibility for the implementation of this policy and the management of information security across the Trust. The Trust Business Manager has overall responsibility for maintaining this policy and accompanying guidance and providing advice and guidance on implementation. The Trust Governance Manager and School Business Managers will conduct Information Asset audits to identify the full range of information assets and Information Asset Owners (see **Appendix 1**).
- 2.10 Staff are responsible for implementing the policy in their areas of responsibility.
- 2.11 It is the responsibility of every employee to adhere to this policy.
- 2.12 This policy and the accompanying guidance will be reviewed, and if necessary updated, every three years.

Information Security - Operational Guidance for Schools

3 Security and care of equipment

- 3.1 All items of equipment are the property of the Trust and as such must be kept well-maintained and secure at all times.
- 3.2 If a member of staff wishes to borrow a piece of equipment, (a laptop, for example) full details will be recorded by the ICT Team or Administrative Staff.
- 3.4 If the equipment is lost or stolen then the Head of School and the Police must be notified. If the equipment was being used for processing personal data then the procedures given below (Security of data) should have been followed to ensure the data was kept safe from disclosure.
- 3.5 All equipment should be proprietorially marked using an approved security marker to aid identification if recovered, following theft or loss. An asset register which lists all equipment should be kept by the School Business Manager – this should include a list of identifying information such as equipment ID's.

4 Security of data

- 4.1 The Trust has a statutory duty under the Data Protection Act 1998 to ensure appropriate technical and organisational measures are taken to protect personal data against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
- 4.2 All staff should ensure that any electronic or paper documents which contain personal data or, are otherwise confidential, are protected against unauthorised access. This includes ensuring that paper records are securely locked away, not just at the end of the day but when staff are out of the office, and that when staff are away from a computer it is switched off, or locked against access and password protected.
- 4.3 Where computers hold personal or confidential data they should be password protected. Any memory sticks or removable devices used to store personal data, or used by staff away from the school, should be password protected and if possible encrypted. Staff should not use their own personal memory sticks or removable devices for work purposes and **MUST NOT** use private equipment to store personal data.
- 4.4 The primary copy of school information should never be stored at home, so school records should be updated as soon as possible with copies of any work that staff do at home, and the home copy deleted.
- 4.5 Staff must also take reasonable security measures to protect the information they take home from unauthorised loss, access or amendment. Whenever possible, staff should ensure that copies of school information are not stored on their private PC, including in temporary directories.
- 4.6 When taking paperwork home, staff should ensure that it is stored securely when not in use and is not vulnerable to theft, or accidental access by family members.
- 4.7 Information in transit should be protected by being locked in a briefcase or car boot. Memory sticks and similar are easily lost or mislaid and should be carried securely (not in a pocket or on a lanyard). Staff should avoid transferring information or equipment from a car interior to a car boot in a car park where the car will subsequently be left, or leaving information or equipment in a car or car boot at any time when the car is unattended.

- 4.8 Servers and back-up systems should be kept securely in locked cabinets or a locked area to which only staff have access. Similarly hardware such as laptops which are kept at the school should be locked away at the end of the day, not left on desks or visible through windows.
- 4.9 Use of emails, scanners or fax systems to transfer data should be limited according to the sensitivity of the data being transferred. Staff must always check that information is being sent to the appropriate recipient. It is strongly suggested that to send sensitive personal data staff use recorded delivery mail which can be tracked or delivered by hand if encryption facilities are not available.
- 4.10 Staff should not share or give out passwords and should not permit anyone without clearance to access secure information.
- 4.11 The Computer Misuse Act makes it an offence to access any computer system for which access authorisation has not been given. Thus any attempt to interfere with or try to bypass the security controls on a computing system is an offence. Similarly trying to obtain information, such as users' passwords or accessing or modifying files belonging to other people who have not given access authorisation is also an offence.

5. Secure Disposal

- 5.1 All confidential waste paper should be shredded and / or disposed of through a confidential waste service. This includes personal data due for destruction, duplicates of personal data and other confidential information.
- 5.2 Computer systems must be fully cleansed of any information before they are disposed of or re-sold. Approval and support for this must be obtained from the ICT Manager. Discs, memory sticks and other removable devices should be destroyed if they are intended for disposal.

6. Security of buildings

- 6.1 All staff must wear ID badges. Staff should be prepared to challenge any member of the public within the school to ensure that they have a right to be there.
- 6.2 Any contractor should carry identification and show this on request. All contractors will need to sign in and sign out at the office.
- 6.3 Staff should ensure that windows and external doors are locked when a classroom or office is empty, and at the end of school, and that offices, filing cabinets and cupboards are also kept locked if required.
- 6.4 Any security concerns including break-ins and loss of computer equipment must be reported to the Head of School and the Police.

7. Email Security

- 7.1 Staff must bear in mind that email is a formal record of correspondence and can be subject to request under Data Protection and Freedom of Information legislation – emails are also retained as records on staff, pupil and school files.
- 7.2 Staff must not send anything which would be unlawful or discriminatory, or whose content is defamatory or libellous. Work emails should not be used for forwarding chain letters or similar 'spam'. The Telecommunications Act 1994 makes it an offence to transmit

messages or other matter via a public telecommunications system that is indecent, obscene or menacing. This includes causing annoyance, inconvenience or needless anxiety to another by a message that the sender knows to be false

- 7.3 If members of staff receive an email which breaches the Trust's policies or breaks the law they are advised to speak to a senior staff member of staff or the ICT Manager before responding. This includes 'spam' emails, particularly those purporting to be from banks, or any email asking the recipient for money.
- 7.4 Staff should re-read any message before sending, checking for clarity and content (including grammar), and ensure that the message is being sent to the appropriate recipient.
- 7.5 Do not use email if the information being sent is personal or confidential, unless you are certain the information will be secure for example through password protection.
- 7.6 Do not use email to anyone who is known not to check emails regularly, or where a phone call or meeting would be a more appropriate way to get the message across.
- 7.7 Do not use email where there may be a contractual or legal need to provide a written and signed document or prove the identity of the sender.

8 Internet security

- 8.1 Access to the Internet must be used responsibly and legally. Staff must not take *any* action which could bring the Trust into disrepute, cause offence, interfere with the organisation's work or jeopardize the security of data, networks, equipment or software.
- 8.2 Under no circumstance should staff make use of the school internet to access chat lines or similar services.
- 8.3 With the advent of e-commerce, staff should beware of committing the school to purchase or acquire goods or services without proper authorisation. Purchase order must be raised for all goods and services.
- 8.4 Staff must not attempt to download or install unauthorised software from the internet.
- 8.5 Staff should be aware that, as with paper sources, not all information on the internet is accurate, complete or reliable. Users should ensure its validity, as they would printed publications, before using it.
- 8.6 At any time and without prior notice, the Trust reserves the right to examine e-mail, personal file directories, and other information stored on the Trust network and equipment. Permission to examine such information will only be granted by the Chief Executive Officer.

8 Security of records

- 8.1 Access to data, and particularly personal data, should be limited to staff who have a genuine 'need to know'. Staff should be aware that all computer systems permit audit trails to be checked to see who has altered or updated data.
- 8.2 Changes to data, and particularly personal data, should be carried out promptly and recorded appropriately so the reason for the change and its originator is known.
- 8.3 Records should be properly managed to enable staff to find or identify information quickly and accurately. Best practice dictates that student and staff records are kept in one location – multiple locations will lead to duplication or discrepancies between files.

9 Reporting & responding to security breaches

- 9.1 Any security breaches or loss of personal data must be immediately reported to the Senior Information Risk Owner who in turn will inform the Trust Business Manager. The form at **Appendix 2** must be completed.
- 9.2 A security breach would be caused when [and this not an exhaustive list]:
- A laptop containing personal data is lost or stolen
 - A USB [memory stick] containing personal data is lost or stolen
 - A vehicle containing a laptop or paper files is stolen
 - A laptop or paper files are stolen from a private property
 - An email is sent [either internally or externally] with files attached containing personal data and the email is sent to the wrong email address
 - An email is sent [either internally or externally] with files attached that contain personal data which is far in excess of that necessary in order for the business function to be carried out
 - An email is sent [either internally or externally] which should be sent “bcc” to a large number of people, is instead, sent “to” and so the recipient is aware who else has received the email and their personal email address or other personal details
 - Personal data is shared outside of the school for a legitimate business reason, but it is lost by the recipient, or it is stolen from the recipient, or it is used by the recipient in a manner for which they have no authority for
 - Personal data is transferred electronically outside the school and is not encrypted when it should be
 - Paper files of personal data are left unattended and are taken or copied and then used for an unauthorised purpose
 - A member of staff uses personal data for a personal rather than a school or Trust business reason
- 9.3 Any theft from the school should be notified to the police.
- 9.4 Any loss of or damage to technical equipment should be notified to the ICT service.
- 9.5 The Trust Business Manager with support from the Governance Manager and where necessary the ICT Manager for cases involving breaches of IT security will investigate the security breach / loss of data through the process detailed at **Appendix 3**. The investigation will determine whether to notify the Information Commissioner. The following guidance will be followed when considering a referral to the Information Commissioner [Notification of data security breaches to the ICO](#)

INFORMATION ASSET AUDIT FORM

1. What is an information asset audit?

An information asset audit is a form of records survey encompassing:

- **Paper documents and records**
- **Electronic documents and records**
- **Databases (proprietary or developed in-house)**
- **Microfilm/microfiche**
- **Sound recordings**
- **Video/photographic records (including those records taken on traditional magnetic tape and photographic paper but increasingly digital sound, video and photo files)**
- **Hybrid files**
- **Knowledge**

The information audit is designed to help organisations complete an information asset register and to identify vital information. The terminology grows out of the concept of “knowledge management” which involves the capture of knowledge in whatever form it is held, including encouraging people to document the information they would previously have held in their heads. It is now generally accepted that information is an organisation’s greatest asset and that it should be managed in the same way as the organisation’s more tangible assets such as staff, buildings and money.

Effective Information Management is about getting the right information to the right people at the right time and an information audit is key to achieving this.

2. What are the benefits of the information asset audit?

The information audit is designed to allow organisations to discover the information they are creating, holding, receiving and using and therefore to manage that information in order to get the most effective business use from it. For a school the concept is much more concerned with accessibility of information. The information audit allows the school to identify the personal information it creates and stores to allow correct management under the Data Protection Act (DPA) 1998.

In other words an information audit collects the information necessary to formulate and implement an efficient records management programme and to ensure compliance with legislation.

Name of School	<input type="checkbox"/> Carmel College <input type="checkbox"/> St Michaels Catholic Academy <input type="checkbox"/> OLSB <input type="checkbox"/> St Augustine’s <input type="checkbox"/> St Bede’s <input type="checkbox"/> St Gregory’s <input type="checkbox"/> Holy Family
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Room within School / Office (if appropriate)	
Person responsible for keeping the information (name & job title)	
Where the information came from / originated (if different from above)	
Detailed description of the information	
How is the information stored?	
Purpose for keeping the information (e.g. staff admin, student admin, marketing, financial, statistical, research, etc etc.)	
Format e.g. paper, electronic, database, spreadsheet, disk, CD, video, photo (could be more than one)	<input type="checkbox"/> Paper <input type="checkbox"/> Electronic <input type="checkbox"/> Film

<p>If electronic which format?</p>	<p><input type="checkbox"/> Floppy Disk</p> <p><input type="checkbox"/> Databases (proprietary or developed in house)</p> <p><input type="checkbox"/> Microfilm/Microfiche</p> <p><input type="checkbox"/> Sound Recordings</p> <p><input type="checkbox"/> Video/Photographic Records</p> <p><input type="checkbox"/> Hybrid Files</p> <p><input type="checkbox"/> Server</p> <p><input type="checkbox"/> Hard Drive</p> <p><input type="checkbox"/> CD</p> <p><input type="checkbox"/> Tape</p> <p><input type="checkbox"/> Other: Please Specify _____</p>
<p>Location of information</p>	
<p>How often is the information accessed</p>	<p><input type="checkbox"/> Less than once a week but not every <input type="checkbox"/> month week At least once a</p> <p><input type="checkbox"/> At least once a week but not <input type="checkbox"/> every day Daily</p>
<p>How long do you need to keep this information - refer to Information & Record Management Society Retention Guidelines:</p> <p>Records Management Toolkit</p>	<p><input type="checkbox"/> Less than 1 year <input type="checkbox"/> Less than 2 years</p> <p><input type="checkbox"/> 2 to 6 years <input type="checkbox"/> 6 to 10 years</p> <p><input type="checkbox"/> 10 to 25 years <input type="checkbox"/> 25 to 50 years</p> <p><input type="checkbox"/> 50 to 100 years <input type="checkbox"/> Archived for research</p>
<p>Is the information disposed of at the end of its use? If so, how?</p>	
<p>If the information you hold is personal data, i.e. it is about, or contains information about, an individual (could be staff, student or an external person), please answer the following questions. If you have a form which is used to collect personal data, please provide a copy of that form.</p>	

<p>Who is the information about? E.g. staff, student, other: please give as much information as possible.</p>	
<p>What information is held? E.g. contact details, marks or progression, meetings about the person, biographical data, sickness, salary, etc. etc.</p>	
<p>Does any of this information fall under the category of sensitive personal data? (Please specify) i.e. Racial or ethnic origin Political opinions Religious beliefs or beliefs of a similar nature Membership of a trade union Physical or mental health or condition Sexual life An offence or alleged offence Proceedings for any offence or alleged offence, or sentence of court</p>	
<p>Does the person whose information you hold know that it is held? Have they been informed? Have they signed a consent form? (Please provide as full detail as possible.)</p>	

<p>Is the information subject to automatic decision-making? (i.e. without human intervention)</p>	
<p>Is the information disclosed outside the Trust? If so, to whom? (If it is abroad, please state which country.)</p>	
<p>Do you have any method for checking the accuracy of the information held, at regular intervals? Please give details.</p>	
<p>Please provide the following detail about the information that you hold, whether it is personal data or not.</p>	
<p>What security arrangements, if any, do you have for the location of the information? (Both hard & soft copy.)</p>	
<p>Is the information made available on our website, and if so, is it Intranet only or available to all?</p>	
<p>If not available, is there any reason why it should not be?</p>	
<p>The loss of certain information through fire or some other disaster would have very serious consequences for the schools operations</p>	<p>Does this information fall into this <input type="checkbox"/> Yes <input type="checkbox"/> No category?</p> <p>If yes explain why:</p>
<p>Any other comments</p>	

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Name:

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Contact details:

Date:

Please return this form to Julian Kenshole, Carmel Education Trust, Carmel College, The
Headlands, Darlington, DL3 8RW

<u>Audit Recommendations:</u>	<u>Actions:</u>	<u>By who:</u>	<u>By when:</u>	<u>Verified by:</u>
Move to secure unit				
Record destruction				
Archive				

INFORMATION SECURITY INCIDENT REPORT

To be completed by the person reporting incident.

Incident report

Date of incident:

Place of incident:

Name of person reporting incident:

Contact details: email; telephone/address:

Brief description of incident or details of the information lost:

Brief description of any action taken at the time of discovery including recovery:

INVESTIGATION

Assessing the risks and actions to be taken

The Trust Business Manager will liaise with the Governance Manager and where necessary the ICT Manager and Information Asset Owners to consider the following risk factors when assessing, managing and investigating the incident. This list is not intended to be prescriptive and other relevant factors and issues should be recorded as necessary

Incident summary

Summary of the actual or suspected security breach

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Date of incident:

School(s) / services affected:

People involved in/affected by the incident, (such as staff members, students, contractors, external clients)

Does the incident need to be reported immediately to the police?

YES/NO

Risk Factor Details and action required

Which IT systems, equipment or devices are involved in the security breach? What information has been lost or compromised?	
How much information has been lost? Is the information unique?	
If the incident involves the loss of a laptop or portable device how recently was the information it held backed up onto central IT systems?	

How important is the information or system to the School/Trust?	
Is it business-critical? Do users rely on access to this particular information asset or can they use reliable electronic copies or alternative manual processes e.g. paper files if the information asset is unavailable?	
How urgently would access need to be restored to an information asset to resume business or, if a workaround will keep business moving in the short term, to return to the required standard of service?	
Will the loss or compromise of the information have adverse operational, research, financial legal, liability or reputational consequences for the School/Trust or third parties?	
Is the information bound by any contractual security arrangements?	
<p>Is any of the information confidential? Please provide details of any types of information that fall into any of the following categories.</p> <p>personal data</p> <p>Sensitive personal information (as defined in Section 2 of the Data Protection Act 1998 relating to an identifiable individual's</p> <ol style="list-style-type: none"> 1. racial or ethnic origin; 2. political opinions; 3. religious or other beliefs; 4. membership of a trade union; 5. physical or mental health or condition; 6. sexual life; 7. proven or alleged offences, including any legal proceedings and their outcome e.g. a court sentence imposed on the individual. 	
Information that could be used to commit identity fraud such as personal bank account and other financial information and national identifiers, such as national insurance numbers and copies of passports and visas.	
Personal information relating to vulnerable adults and children.	

Detailed profiles of individuals; including information about work performance, salaries or personal life that would cause significant damage or distress to that person if disclosed.	
Spread sheets of marks or grades obtained by students, information about individual cases of student discipline.	
Sensitive negotiations which could adversely affect individuals.	
Security information that would compromise the safety of individuals if disclosed.	
Any other personal information that would cause damage or distress to individuals if disclosed without their consent Other categories of "high risk" Information.	
Information received in confidence .e.g. legal advice from solicitors, trade secrets and other proprietary information received from contractors, suppliers and partners Information that would substantially prejudice the Trust or another party's intellectual property rights, commercial interests or competitive edge if it were disclosed.	
Information that would compromise the security of buildings, equipment or assets if disclosed.	
Who else needs to be informed	
Reported to Police?	YES/NO If YES notified on Incident ref:
Major risks escalated to Audit Committee and Risk Management Register	YES/NO If YES: Date
Notification to Information Commissioner's Office	YES/NO If YES notified on [date]
Notification to data subjects	YES/NO If YES notified on [date]
Notification to other external, regulator/stakeholders	YES/NO If YES notified on

Reviewing the incident

The Responsible Officers should meet to review the incident, ensure that all appropriate actions have been taken to mitigate its impact of the incident and to identify further action needed to reduce the risk of a future breach of this kind

How and why the incident occurred
Actions taken to resolve the incident and manage its impact
Impact of the incident (Operational, financial, legal, liability, reputational)
Risks of other adverse consequences of the incident (Operational, financial, legal, liability, reputational)
Any further remedial actions required to mitigate the impact of the breach
Actions recommended to prevent a repetition of the security breach
Resource implications or adverse impacts, if any, of these actions