Ryton Infant and Junior School Federation

Information Security Policy

Last Reviewed: May 2025

Introduction and Scope

The Information Security Policy outlines the School's organisational security processes and standards. The policy is based upon the sixth principle of the GDPR which states organisations must protect the personal data, which it processes, against unauthorised loss by implementing appropriate technical and organisational measures.

To ensure we meet our legal obligations, personal data should be protected by the security model known as the 'CIA' triad. These are three key elements of information security:

- **Confidentiality** – only authorised people should have access to information.
- **Integrity** – information should be accurate and trustworthy.
- **Availability** – authorised people should have access to the information and systems they need to carry out their job.

This policy and its appendices apply to our entire workforce. This includes employees, governors or trustees, contractors, agents and representatives, volunteers and temporary staff working for, or on behalf of, the school. Individuals who are found to knowingly or recklessly infringe this policy may face disciplinary action.

The Information Security policy applies to all personal data, regardless of whether it is in paper or electronic format. It should be read alongside the other policies within our information governance policy framework, including data protection, records management, and acceptable use of systems.

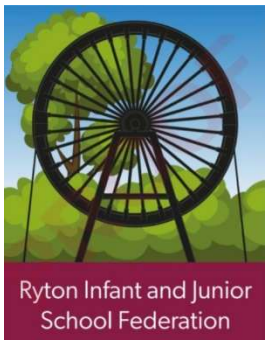
Access Control

The school 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 school 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 Business Manager

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 when not in use.

Keys to storage units will be stored securely. School Business manager will be responsible for giving individuals who require it to carry out legitimate business functions.



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. Two factor authentication will be implemented across all critical electronic systems.

Individuals will be required to keep their Password confidential and amend if they feel it has been compromised and usernames will be suspended either when an individual is on long term absence or when an individual leaves employment of the school.

Individuals should ensure they use different passwords for different systems to ensure if one system is compromised, that does not lead to other systems being accessed.

Software and Systems Audit Logs

The school will ensure that all major software and systems have inbuilt audit logs so that the school 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 School does not allow employees to access the personal data of family members or close friends unless permission is given by the Executive Head Teacher. An example of this would where a teacher is also the parent of a pupil in their class. Employees should declare, upon employment, whether they are aware of any family members or friends who are registered at the School.

The School 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 School 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 School will need to allow individuals who are not employees of the School 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. The Executive Head Teacher is required to authorise all instances of third parties having access to systems. If the above individual is not available to authorise access, then it can also be authorised by The School Business Manager.

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

Physical Security

The School will maintain high standards of Physical Security to prevent unauthorised access to personal data. The following controls will be maintained by the School

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 School 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.

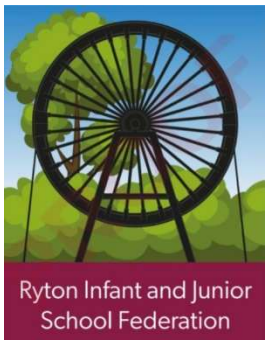
Building Access

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 School Business Manager will be responsible for authorising key distribution and will maintain a log of key holders.

Visitor Control

Visitors to the School will be required to sign in a visitor's book and state their name, organisation, car registration (if applicable) and nature of business. They may also be asked to provide information to help provide support in the event of an emergency. This may be either in paper or electronic format. Visitors will not be allowed to access to restricted areas without employee supervision.

Secure Disposal
We will ensure that all personal data is securely disposed of in line with our Records Management Policy and retention schedule. Hard copy information will be securely destroyed by shredder or a confidential waste provider.
Electronically held information



will be deleted automatically with retention periods built into the system wherever possible. Otherwise, manual review and deletion will take place at least annually.

Redundant computer equipment will be disposed of in accordance with the Waste Electrical and Electronic Equipment (WEEE) Regulations and through secure and auditable means.

Environmental Security

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

Back Ups

The School will back up their electronic data and systems every day. These backups will be kept off site by an external provider. This arrangement will be governed by a data processing agreement. Should the Schools electronic systems be compromised by an environmental or natural hazard then the School will be able to reinstate the data from the backup with minimal destruction.

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 School 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 and Cyber Security

As well as physical security the School 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 School ability to operate and could potentially endanger the lives of its Pupils and workforce.

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

Software Download Restrictions

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

Firewalls and Anti-Virus Software

The School will ensure that the firewalls and anti-virus software is installed on electronic devices and routers. The School will update the firewalls and anti-virus software when updates are made available and when advised to do so by **OMNICOM.** The School will review its firewalls and anti-virus software on an annual basis and decide if they are still fit for purpose. We will ensure that updates and patches are applied when they are available to ensure any security weaknesses are addressed as soon as they are known.

Shared Drives

The School 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. The School Business Manager 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 School and pupils alike. However, data transmission is extremely susceptible to unauthorised and/or malicious loss or corruption.

The School 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, the School 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 School 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 School 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.

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 we will utilise the Blind Copy (BCC) function.

Exceptional Circumstances

In exceptional circumstance the School 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.

Data Breaches

Article 33 of the UK GDPR requires data controllers to report breaches of personal data to the Information Commissioner's Officer; and sometimes the affected data subject(s), within 72 hours of discovery if the incident is likely to result in a risk to the rights and freedoms of the data subject(s).

All actual and suspected breaches of security or confidentiality are to be reported in accordance with the Data Breach Procedure set out in Appendix One of this document.

Business Continuity

We will ensure that we have a Critical Incident Plan in place to ensure a process is documented for what to do, who to call and what the priorities are in the event of a disaster.

Ryton Federation governing body will be responsible for evaluating and reviewing this policy every 2 years

The next review date is May 2027

Ryton Infant and Junior School Federation

Appendix One - Data Breach Procedure

Introduction

To enable us to report serious incidents to the ICO within 72 hours it is vital that we have a robust system in place to manage, contain, and report such incidents.

This procedure has been written to govern our management of data breaches.

Roles and Responsibilities

Single Point of Contact (SPOC) – School Business Manager
Senior Information Risk Owner (SIRO) – Executive Headteacher
Information Asset Owner (IAO) – as detailed in the Information Asset Register.
Data Protection Officer (DPO) – Veritau.

Immediate Actions (within 24 hours)

If any member of the workforce is made aware of an actual data breach, or an information security event (a 'near-miss'), they must report it to their line manager and the Single Point of Contact (SPOC) within 24 hours. If the SPOC is not at work at the time of the notification, their nominated deputy would need to start the investigation process.

If the breach has the potential to have serious or wide-reaching detriment to data subjects, then the Data Protection Officer must be contacted within this 24-hour period.

If appropriate, the individual who discovered the breach, or their line manager, will make every effort to retrieve the information and/or ensure recipient parties do not possess a copy of the information.

Assigning Investigation (within 48 hours)

Once received, the SPOC will assess the data protection risks and determine the severity rating using the Risk Matrix. An Investigation Report should also be completed.

The SPOC will notify the Senior Information Risk Owner (SIRO) and the relevant Information Asset Owner (IAO) that the breach has taken place. The SPOC will recommend immediate actions that need to take place to contain the incident.

The IAO will assign an officer to investigate any near misses, very low, low and moderate incidents. High or very high incidents will be investigated by the SPOC or SIRO, with assistance from the Data Protection Officer (DPO).

Reporting to the ICO/Data Subjects (within 72 hours)

The SIRO, in conjunction with the relevant manager, SPOC, IAO and DPO will decide whether the incident needs to be reported to the ICO, and whether any data subjects need to be informed. The relevant member of staff/IAO will be responsible for liaising with data subjects and the DPO for liaising with the ICO.

Investigating and Concluding Incidents

The SPOC will ensure that all investigations have identified all potential information risks and that remedial actions have been implemented.

When the DPO has investigated a data breach, the SIRO must sign off the investigation report and ensure recommendations are implemented.

The SIRO will ensure all investigations have been carried out thoroughly and all highlighted information security risks addressed.

All incidences should be recorded on our Data Breach Log, along with the outcome of the investigation.

DPO contact details:

Ryton Infant and Junior School Federation

Schools Data Protection Officer
Veritau
West Offices
Station Rise
York
North Yorkshire
YO1 6GA

schoolsDPO@veritau.co.uk // 01904 554025

Appendix 2 - Remote Working

Introduction

On some occasions our workforce may need to work at home or remotely. Where this is the case, the workforce will adhere to the following controls:

Lockable Storage

Individuals will ensure they have lockable storage to keep personal data and our equipment safe from loss or theft.

Individuals must not keep personal data or our equipment unsupervised at home for extended periods of time (during periods of annual leave).

Individuals must not keep personal data or our equipment in cars if unsupervised.

Private Working Area

Individuals 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).

Individuals should also take care to ensure that other household members do not have access to personal data and do not use our equipment for their own personal use.

Trusted Wi-Fi Connections

Individuals 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 individuals should ensure that they have appropriate anti-virus software and firewalls installed to safeguard against malicious intrusion. If in doubt, assistance should be sought from our IT provider.

Encrypted Devices and Email Accounts

Individuals will only use encrypted devices issued by ourselves to access school data, unless authorised by the SIRO in accordance with the acceptable use policies.

Individuals will not use personal email accounts to access or transmit school related personal data. Individuals must only use school issued, or school authorised, email accounts.

Data Removal and Return

Individuals will only take personal data away from our premises if this is required for a genuine business need. Individuals will take care to limit the amount of data taken away from the premises and will ensure that all data is returned to our premises either for re-

filing or for safe destruction. Individuals will not destroy data away from the premises as safe destruction cannot be guaranteed.