



Information Security Policy



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MEADOWS FIRST SCHOOL

Information Security Policy

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1. Scope

This Policy applies to:

- All members of staff and governors; “Staff” includes all employees, locum staff, volunteers, work experience and any other individuals working for Meadows First School on a contractual basis.

The Importance of this Policy:

- This information Security Policy lets you know what your Information Security responsibilities are at Meadows First School. Everyone has a role to play and it is vital that you understand yours.

The Objective of this Policy is to:

- Inform staff and governors and protect Meadows First School from security issues that might have an adverse impact on our organisation. Achieving this objective will rely on all staff and governors of Meadows First School complying with this policy.

2. Key Principles

Meadows First School has adopted the following six principles to underpin its Information Security Policy, All Personal data shall be:

- (1) processed lawfully, fairly and in a transparent manner ('lawfulness, fairness and transparency');
- (2) used for specified, explicit and legitimate purposes ('purpose limitation');
- (3) used in a way that is adequate, relevant and limited to what is necessary ('data minimisation');
- (4) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, are erased or rectified without delay ('accuracy');
- (5) kept no longer than is necessary ('storage limitation');
- (6) processed in a manner that ensures it is safe and secure, ensuring that measures against unauthorised or unlawful processing and against accidental loss, destruction or damage are in place ('integrity and confidentiality')

3. Creating, storing and managing information

Meadows First School has adopted both a Clear Desk and Clear Screen Policy to reduce the risk of unauthorised access, loss of, and damage to information during and outside normal working hours or when work areas and computers are unattended.

The purpose of this section is to establish Meadows First School’s requirements to ensure that information is not disclosed by being made available in any form to unauthorised individuals.

3.1 Paper information

- Keep clear desks as this is an obvious way of preventing any confidentiality problems arising from having pupils or other staff members at desks, or disclosure when desks are left unattended. A clear desk will help to protect against the disclosure of information.
- Confidential documents must not be left on display or unsupervised.
- Store confidential information in locked cabinets, returning them to these cabinets when not required.
- Take measures to prevent accidental damage to important documents, for example, through the spillage of liquids.
- Do not leave paper by printers or photocopiers where other people may take it or read it accidentally.
- Spoiled photocopies and prints may still be confidential. Do not put them straight into the waste paper bin, dispose of them as confidential waste. Always check that originals have been removed from the device as well as copies.
- Dispose of confidential paper by shredding or put in a confidential waste bag and follow confidential waste disposal procedure. Do not dispose of confidential waste in a waste paper bin or anywhere else.
- Destroying information earlier than necessary may be a breach of the law so it is important that retention periods are checked before destroying any records.

3.2 Electronic information

- All confidential information must be stored on Meadows First School approved electronic devices or systems with access controlled/restricted, e.g. Meadows First School Shared network, one drive with appropriate restricted access, Meadows First School approved systems.
- Confidential information must not be stored on local unencrypted hard drives.
- If confidential information has to be transferred to other portable media, such as USB stick or memory cards, it must be encrypted with appropriate security software approved by Meadows First School
- PC screens/laptops/tablets must be sited away from public areas so that pupils and visitors cannot read the screens, e.g. through windows or while waiting in public areas.
- Notebook PCs, handhelds or any other portable ICT device must not be left unattended in any public area (see Mobile Computing below).
- Individual user id/passwords must not be shared with anyone, including other staff members and governors, and do not use anyone else's password. You as an individual are responsible for all transactions undertaken on the Meadows First School network using your network id.
- Passwords must not be written down and left with any equipment or accessible by anyone else.
- Make passwords hard for anyone else to guess by incorporating numbers and mixed case into it. Some systems will force this already.
- Lock screens whenever leaving any ICT equipment unattended. This will prevent anyone accessing any restricted information on the equipment while it is unattended.
- If you find you have access to confidential information that you believe should be restricted, you should notify Data Champion, Mrs R Rowley or Mrs H Dodman immediately.

4. Receiving, sending and sharing information

4.1 Post – receiving and sending

- Post should be opened and dealt with away from public areas and securely, if dealing with confidential information. Do not leave unsealed confidential documents in open post trays and 'pigeon holes'.
- Staff must ensure that any mail to an individual marked: Private, Confidential or Personal, or any combination, is only passed to the named recipient unless a prior delegation arrangement has been made.
- If outgoing post contains confidential information to an individual, the envelope should be marked as 'Private and confidential' and 'to be opened by addressee only'. A return address must be shown on the envelope and you should consider double bagging the package.
- Print each letter separately making use of any printing security and use window envelopes. Check the address is the current, correct one – don't copy previous letters. Double check that the letter and papers are for the correct recipient and address.
- When using a mailshot or multiple mailings, have a procedure in place to check you haven't included anyone else's personal information in the wrong envelope. Another person or supervisor should check mailings against address lists and sign-off before dispatch.
- Consider using signed for/tracked post, if it contains sensitive or confidential documents and/or the volume justifies secure delivery.
- Post containing very high risk/Confidential-Restricted information should only be sent to a named person and use of tracked and signed for mail or a courier to deliver to the name person with signature of receipt.
- If post goes astray or is issued to the incorrect address, notify your line manager immediately and if the information contains personal or confidential information report using the security incident procedure.

4.2 Email and Other Electronic Communications (e.g. text messages) – receiving and sending

- Meadows First School does not have total control over emails received, so staff must be aware of the dangers of opening messages from unknown or untrusted sources. Do not click on links in emails unless you know they are from a trusted source and never provide passwords in response to email requests.
- If you are not the intended recipient, the sender should be informed that the message has not reached its intended destination and has been deleted.

- Check the email address is the correct one – there are staff with similar names and your email contacts will also have external email contacts. Double check that the email is for the correct recipient before sending.
- If sending to a list/group of parents or others, send using ‘blind copy’ (bcc) so the recipients are not copied in to a large list. This especially applies to mailshots.
- Confidential and Confidential-Restricted information must not be emailed externally using normal email unless;
 - a) you are using an encrypted email service provided by Meadows First School or
 - b) the information is encrypted / password protected in an attachment, or
 - c) you are sending to an approved Meadows First School email address e.g @meadows.worcs.sch.uk
- Records of personal data sent by email or other electronic communications (internal or external) are accessible to the data subject if they request access under the GDPR. If a permanent record is required they should be saved to the appropriate file and the email removed from the email inbox. Do not use personal email as a permanent filing system for pupil, parent or staff records. When a member of staff leaves or moves to another job, the admin team must go through the Leavers Checklist including reporting to Chestnut IT regarding saving and securing any emails needed to be kept as Meadows First School records.
- Meadows First School Confidential email must not be forwarded to your own personal email account for private use.

4.3 Telephone calls

- Ensure that you are talking to who you think you are speaking with by verifying their details. It may be appropriate to call them back to verify their credentials.
- If it becomes necessary to leave the phone for any reason, put the caller on hold so that they cannot hear other potentially confidential conversations that may be going on in the office.
- If the call received or being made is of a confidential or sensitive nature, consider who else may be listening to the conversation.
- If a message needs to be taken and left on someone’s desk, ensure that these messages do not themselves contain confidential information.
- Do not leave confidential messages on an answer machine as these can be reviewed by people other than the intended person.

4.4 Conversations

Staff should remember that even though they may be on Meadows First School premises there may be pupils and visitors around.

- When having a meeting or interview with someone where confidential information will be discussed, ensure that there is sufficient privacy. Check that the room is suitable.
- Confidential information should only be discussed with colleagues who need to know the information in order to carry out their job.
- Always consider your surroundings and the proximity of others who may be able to hear in public places.

4.5 Information sharing/processing

When confidential or personal data is shared with other agencies, for example with local authorities or external providers, then arrangements must be made for that information sharing to be done in a controlled way that meets ethical and legal obligations in one of two ways:

1. If a service is commissioned with an external provider that needs confidential information to operate then the contract must contain clauses that list the commissioned organisation’s responsibilities for confidential and personal data, including data protection and security. This must include whether the organisation is processing personal data on behalf of Meadows First School or has sole or joint responsibilities for the personal data with Meadows First School. All staff involved in such data

commissioning/sharing must be aware of the details of any existing information sharing agreements/contractual agreements and the obligations that it places on them.

2. If information has to be shared with another organisation on a regular basis for legal reasons then this should be done under an information sharing agreement that sets out how the sharing will operate and the standards of management that all parties to the agreement must comply with. Such an agreement will define exactly what information will be shared and how, including the method, transmission or communication between agencies or any shared access security arrangements. The aim is to ensure that appropriate arrangements operate in the participant agencies and ensure the continued confidentiality of shared information. If staff are unclear on what basis information is being shared with another agency, whether an information agreement exists and what obligations that might place on them, it should be clarified with their manager.

3. If staff wish to acquire services from any external third parties which involves sharing personal data i.e. setting up new applications/ software or engaging with extra-curricular clubs, they should contact **Rowley/ Hazel Dodman** to ensure that the relevant agreements and assurances are in place, before beginning to share any data with the third party in question.

5. Working Away from School

The purpose of this section is to ensure that information assets and information processing facilities, used to access personal and confidential information, are adequately protected with logical, physical and environmental controls.

This includes working away from the school, at home and use of own devices to access personal and confidential information.

Work-related information must not be kept permanently at home. Wherever staff are working on, or in possession of, work-related information they are responsible for it, e.g. in school, on the phone, at home, en route to or from school or home, at meetings, conferences, etc. If confidential information is handed out in conferences or meetings, the same person is responsible for collecting it back in at the end, or ensuring it is only in the hands of those authorised to keep it.

- Take only the confidential papers/files with you that you need and keep out of sight in a bag, do not carry around loose or in clear folder.
- Store confidential paper files/records securely in an envelope or bag. Try to use electronic files on an encrypted device or access via secure connection to the network or approved storage location instead.
- Keeping information in cars: lock away paper files and equipment (laptop/notebook) in the boot, do not leave overnight. Take only the equipment/papers/files with you that you need, leave rest locked away.
- Travelling by public transport: make sure you take all information and equipment when leaving. Be aware of conversations on mobile phone about personal and confidential information.
- Use of Laptops: Only school issued devices may be used. Do not write down passwords/pin numbers. You must not use the 'remember me' option to save user and password details on your device when accessing Meadows First School system. Make sure these are unticked and sign out/logout after using a system. Do not save login or passwords if asked. Remember any confidential files opened may be downloaded before closing down your device, so delete them from 'downloads'. If files are not accessed directly (e.g. Google drive format files), then all confidential files must be stored and accessed locally via a Meadows First School approved encrypted media.
- Working at home: Store paper and equipment securely after use, as you would your own personal valuables. Don't leave open confidential files on a table. Lock screen on laptop/tablet and close

down after use. All confidential information must be safeguarded from access, no matter how unintentional, by anyone who has no need to know such as family and friends. This would be an unauthorised disclosure. Don't leave any Meadows First School equipment or information in a car overnight at home, bring into the house and secure. Don't bin confidential information at home, bring back into an office for confidential waste disposal. Use strong security on a home WiFi connection.

6. Premises security

- All staff must wear their ID badge on school premises and report losses or thefts immediately to their line manager.
- Make sure that all visitors sign in and out at all times and disclose who they are coming to see. Visitors should be supervised at all times and display a visitor/contractor ID badge.
- Staff should be encouraged to challenge anyone in the school if they do not know who they are, e.g. if they are not accompanied by a member of staff or they are not wearing an ID badge.
- Staff should be aware of anyone they do not know attempting to follow them through a security door and if appropriate be prepared to escort them back to reception if necessary.
- Managers should ensure that all paper based records and any records held on computers are adequately protected. Risk assessments should identify any potential threats and an appropriate risk management strategy should be produced
- Parents and others who do not want to discuss their private matters with a receptionist in a public area and should be offered the opportunity to be seen elsewhere.

7. Portable Media Devices

The purpose of this section is to establish control requirements for the use of removable media devices within and across Meadows First School. Portable media devices include, but are not limited to USB sticks or memory cards.

- Connection of non Meadows First School -supplied removable media devices to the Meadows First School computing infrastructure is only permitted for the purpose of reading files from the device; Meadows First School files must not be written to a non Meadows First School -supplied device.
- Staff must not alter or disable any controls applied to any computing device by Meadows First School IT Service as part of the deployment of a removable media device.
- Removable media devices must not be used for the primary long-term storage of Meadows First School information.
- All information classified as 'Meadows First School Confidential' or 'personal' that is stored on a removable media device must be encrypted.
- Passwords applied to encrypted devices must conform to the minimum standard required stated in section 3.2 Electronic Information of this Policy.

8. Anti-Malware

The purpose of this section is to establish requirements, which must be met by all devices within Meadows First School's computing infrastructure, to protect the confidentiality, integrity and availability of Meadows First School software and information assets from the effects of malware.

- Unless undertaken by or following instruction from IT support staff, staff must not disable anti-malware software running on, or prevent updates being applied to devices.
- The intentional introduction of viruses to Meadows First School's computing infrastructure will be regarded as a serious disciplinary matter.
- Only software that has been authorised by Meadows First School can be installed upon Meadows First School systems.
- Each member of staff is responsible for immediately reporting any abnormal behaviour of Meadows First School computing systems to the School office, Chestnut IT or Schools Data Champion Mrs R Rowley/ Mrs H Dodman.

- Prior to any encryption, all files must be scanned for and cleaned of viruses before being sent to any third party.

9. Access Control

- Access to information shall be restricted to users who have an authorised need to access the information.
- Users of information will have no more access privileges than necessary to be able to fulfil their role.
- All requests for access to Meadows First School] computer systems must be via a formal request to you're the School Office, Chestnut IT or School Data Champion Mrs R Rowley/Mrs H Dodman.
- Meadows First School reserves the right to revoke access to any or all of its computer systems at any time.
- Users must not circumvent the permissions granted to their accounts in order to gain unauthorised access to information resources.
- Users must not allow anyone else to use their account, or use their computers while logged in with their account.
- Computer screens should be 'locked' or the user logged out before leaving any workstation or device unattended.
- Users should not leave workstations or devices in 'sleep mode' for convenience.
- If users find that they have been granted permissions beyond what is necessary, they should inform Rebecca Rowley/ Hazel Dodman immediately.

10. Monitoring System Access and Use

The purpose of this section is to establish control requirements for the monitoring and logging of information security related events relating to the use of Meadows First School's information and information systems.

An audit trail of system access and staff data use shall be maintained and reviewed on a regular basis. Meadows First School will put in place routines to regularly audit compliance with this and other policies. In addition, it reserves the right to monitor activity where it suspects that there has been a breach of policy.

Any monitoring will be undertaken in accordance with the Human Rights Act and any other applicable law.

11. Clear Desk/ Clear Screen Policy

Paper records which are left on desks/workstations overnight or for long periods of time are at risk of theft, unauthorised disclosure and damage. By ensuring that staff securely lock away all papers at the end of the day and when they are away at meetings this risk can be reduced.

Security risks of unauthorised access to electronic records are also prevalent when PC screens are left unattended.

Clear desks and clear screens also ensure that Meadows First School projects a professional and efficient image to visitors, members of the public and colleagues

This policy sets out Meadows First School's requirements for each member of staff to protect any documents or records which are kept at their desk/workstation either temporarily or permanently and covers records in all formats including:

- Paper

- Electronic documents
- Emails
- Visual images such as work related photographs
- Audio and video tapes, CDs, DVDs and cassettes
- Memory sticks and portable hard drives
- Databases

Clean Desk Procedure

Personal confidential information must be locked away when not in use and never left unattended. Ideally, all staff should leave their desk paper free at the end of the day.

Ensure that you select an appropriately located printer where you are able to retrieve your printing immediately. Do not leave personal confidential information for others to find.

An easy way to comply with the clear desk procedure is to work with electronic documents whenever possible – “do you need to print it”?

Ensure documents are disposed of securely. Never put documents containing sensitive, personal or corporate sensitive information in the general waste bins. Use the confidential paper shredding bags or take to the office.

All Portable Computing & Data Storage Devices (PCDs) such as USB data sticks, mobile phones and laptops should be placed out of sight, preferably locked away at the end of the working day.

Clear Screen Procedure

Always lock the desktop when leaving the workstation/desk unattended. If using a shared workstation/desk log off rather than lock it. If anticipating an absence of 30 minutes or more log off or shutdown the computer. This also applies when using a laptop. Press windows key + L and your computer will lock automatically. (The windows key can usually be found in the bottom left of the keyboard and looks like a flag/window.) To unlock you will be asked to put your password in. Always be aware of the position of the screen on your workstation. Wherever possible, ensure that it cannot be seen by unauthorised people while in use.

12. Potential breaches of security or confidentiality

If staff become aware that information has not been handled according to procedures and there is a data breach or potential security incident, they must report it immediately to School Data Champion Mrs R Rowley/ Mrs H Dodman or the Head Teacher immediately.

For losses of equipment or if you believe your email or the network may be at risk, contact the School Data Champion Mrs R Rowley/Mrs H Dodman or the Head Teacher immediately.

If equipment or confidential information has been stolen report to the Police and obtain a crime reference number.

Use the Meadows First School procedure to report and record incidents. The form is available from the school office, School Data Champion Mrs R Rowley/Mrs H Dodman or the Head Teacher.

If you are aware of a potential incident or if you are not sure whether the issue is a security breach then please complete this form as fully as possible and email to: Office@meadows.worcs.sch.uk or hand the form direct to School Data Champion as soon as possible and in any event within 4 hours.

