SECURITY MEASURES

An outline of the Organisational and Technical Security measures deemed appropriate by the Data Controller for the nature of the personal data processed by the Controller and any Data Processor acting on its behalf

Description of Security Measures employed to safeguard the processing of Personal Data

1. Organisational

    a. Policies & Documented Procedures

    Policies relating to information governance issues are drafted by employees with detailed knowledge of legal requirements and the Organisation's processes. All policies have documented review dates and ownership is assigned. Reviews are held ahead of the expiry date or sooner where there is an identified issue. All policies follow a governance route for approval. Key policies are published to the organisation's website for transparency.

    b. Roles

    The organisation has a named Data Protection Officer who is Alison Dellow. This Officer executes the role by reporting the outcome of statutory process to Emilie Poulteney who acts as the organisation's Senior Information Risk Owner.

    The school has a Data Protection Lead Jemma Roche who ensures the school complies with all data protection policies and procedures and manages the administration of data protection matters, reporting to the SIRO.

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c. Training

The organisation regularly reviews our employee roles to ensure that training and awareness messages are appropriate to the nature and sensitivity of the data processing undertaken. Induction processes ensure new employees receive appropriate training before accessing personal data, and all other employees receive refresher training annually. All staff receive mandatory cyber security training annually. All training received is documented for evidence purposes.

d. Risk Management & Privacy by Design

The organisation identifies information compliance risks on its risk register. Risks are assigned clear ownership, rated against a consistent schema, appropriate mitigations are identified and are annually reviewed. Data Protection Impact Assessments are completed for any sensitive processing or any new technologies

e. Contractual Controls

All Data Processors handling personal data on behalf of the school are subject to contractual obligations or other legally binding agreements.

f. Physical Security

All employees or contractors who have access to our premises where personal data is processed are provided with Identity Cards which validate their entitlement to access. The organisation operates processes which ensure only those individuals who have an entitlement to access premises are able to. Access to physical storage holding sensitive personal data is further restricted either through lockable equipment with key or code control procedures or through auditable access to specific rooms/ areas of buildings.

g. Data Breach Management

The organisation maintains a data breach process which, with the support of appropriate training, defines what constitutes a breach of these security measures to facilitate reporting of incidents. The process covers investigation of incidents, risk rating and decisions over whether to notify a breach to the Information Commissioner's Office (ICO) within the statutory timescale and the National Cyber Security Centre (NCSC) for cyber

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security incidents. Breaches are reported to senior leaders and actions are consistently taken and lessons learned implemented.

2. Technical

    a. Data at Rest

        i. Use of Hosting Services

        Some personal data is processed externally to the organisation's managed environment by third parties in data centres under agreed terms and conditions which evidence appropriate security measures and compliance with the law.

        ii. Firewalls

        Access to the Organisation's managed environment is protected by maintained firewalls. Business needs to provide access through the firewall go through a strictly documented change control process which include risk assessment and approval.

        iii. Administrator Rights

        Enhanced privileges associated with administrator accounts are strictly managed. Administrator activities are logged and auditable to ensure activity can be effectively monitored.

        iv. Access Controls

        Access permissions to personal data held on IT systems is managed through role-based permissions. Managers of appropriate seniority inform IT professionals of additions, amendments and discontinuation of individual accounts within permission groups. Managers are periodically required to confirm that current permissions for which they are the authoriser and employees associated with these permissions are accurate.

        v. Password Management

        The organisation requires a mandatory password complexity combination of minimum length and characters.

        vi. Anti-Malware & Security Updates

        Anti-malware programs scan our computer system to prevent, detect and remove malware. The organisation has a documented

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change control process which facilitates the prompt implementation of any security updates provided by the suppliers of active software products.

vii. Disaster Recovery & Business Continuity

As part of the organisation's business continuity plan, there is provision to ensure effective processes are in place to both safeguard personal data during a service outage incident and to re-establish secure access to the data to support data subject rights in ongoing service provision.

viii. Penetration Testing / Vulnerability Scanning

An annual penetration test is carried out to identify any weaknesses and potential areas of exploitation to maximise the security of the data we hold.

Our broadband connections have vulnerability scanning in place to detect and protect our network.

ix. Multi-Factor Authentication (MFA)

MFA is enabled on all employee accounts and across all applicable systems/cloud-based systems.

x. Network Backups

The school maintains three copies of critical data comprising the live production environment, a cloud-based backup, and a backup stored on encrypted removable hard drives. The removable hard drives are rotated regularly and stored offsite when not in use, providing both an offline and offsite backup in accordance with the 3-2-1 backup principle. Access to backup systems and media is restricted to authorised personnel only. Backup integrity and data restoration processes are tested periodically to ensure that information can be successfully recovered in the event of data loss, system failure, or a cyber security incident.

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b. Data in Transit

i. Secure Digital Communications

The organisation has access to software which supports secure digital communication. Sensitive data will be sent using such tools where available. Where software is not available a system of password protecting sensitive data in email attachments is employed.

ii. Secure Websites

The organisation has access to third party websites which allow for secure upload of personal data. The organisation uses these facilities to fulfil statutory obligations to report personal data to other public authorities.

iii. Encrypted Hardware

Devices which store or provide access to personal data are secured by password access. Removable media such as memory sticks are encrypted.

iv. Hard-Copy Data

The removal of personal data in hard-copy form is controlled by organisational policy which requires employees to take steps to conceal the data and appropriately secure the data during transport.

These security measures are reviewed annually and approved as accurate and appropriate by the organisation’s governance process.

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