RIVERSDALE PRIMARY SCHOOL

Data Security and Disposal Appendix

INTRODUCTION

This appendix is to be used in conjunction with the school's Data Protection Policy.

At Riversdale Primary School all employees should do everything within their power to ensure the safety and security of any material of a personal or sensitive nature.

It is the responsibility of all members of the school community to take care when handling, using or transferring personal data that it cannot be accessed by anyone who does not:

- have permission to access that data, and/or
- need to have access to that data.

Data breaches can have serious effects on individuals and / or institutions concerned, can bring the school into disrepute and may well result in disciplinary action, criminal prosecution and fines imposed by the Information Commissioners Office for the school and the individuals involved. Particularly, all transfer of data is subject to risk of loss or contamination.

Anyone who has access to personal data must know, understand and adhere to the Data Protection Policy and this appendix, which brings together the legal requirements contained in relevant data protection legislation and relevant regulations and guidance.

RESPONSIBILITIES

The school's Data Protection Officer (DPO) is Gary Hipple. He can be contacted via Wandsworth Borough Council.

The school's Senior Information Risk Officer (SIRO) is Bernadette Bush (SAO). She will keep up to date with current legislation and guidance and will:

- determine and take responsibility for the school's information risk policy and risk assessment.

The senior leadership team will be Information Asset Owners (IAOs) *for the various types of* data being held (e.g. pupil / student information / staff information / assessment data etc.). The IAOs will manage and address risks to the information and will understand:

- what information is held, for how long and for what purpose,
- how information has been amended or added to over time, and
- who has access to protected data and why.

Everyone in the school has the responsibility of handling protected or sensitive data in a safe and secure manner.

Governors are required to comply fully with this policy in the event that they have access to personal data, when engaged in their role as a Governor.

TRAINING & AWARENESS

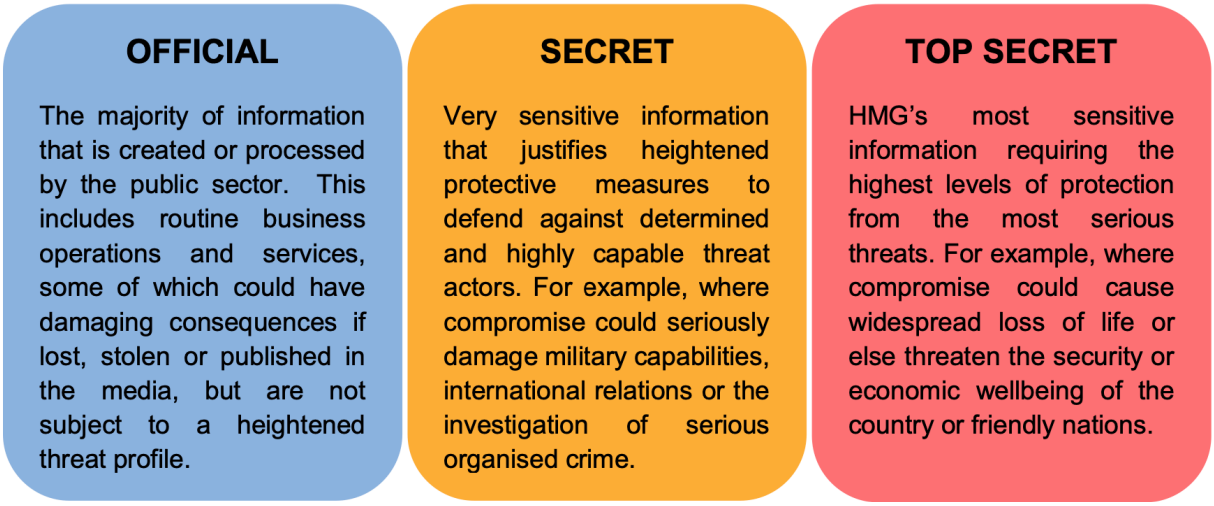
All staff will receive data handling awareness / data protection training and will be made aware of their responsibilities, as described in this policy through:

- Induction training for new staff
- Staff meetings / briefings / Inset
- Day to day support and guidance from SLT
- Risk Assessments

IMPACT LEVELS AND PROTECTIVE MARKING:

The Government classification scheme changed in April 2014 from a protective marking scheme using five categories (PROTECT, RESTRICTED, CONFIDENTIAL, SECRET and TOP SECRET) to the present scheme which has three categories (OFFICIAL, SECRET and TOP SECRET).

The new categories are defined as follows:



Information processed within the school environment will fall into the OFFICIAL category which includes the kinds of data that were previously UNCLASSIFIED, RESTRICTED, or CONFIDENTIAL. For OFFICIAL data, the information security outcomes should:

- protect against deliberate compromise by automated or opportunistic attack; and
- aim to detect actual or attempted compromise and respond

Full details are available in the associated Cabinet Office documentation[1].

The school will ensure that all school staff, independent contractors working for it, and delivery partners, comply with restrictions applying to the access to, handling and storage of data. There is currently no requirement to mark every document as "OFFICIAL" as it is understood that this is the default for government documents and those related to school environments. Where documents contain pupil personal data, electronic files should be password protected. For printed documents, release and destruction markings should be shown in the footer e.g. "Securely delete or shred this information when you have finished using it".

SECURE STORAGE OF AND ACCESS TO DATA

The school will ensure that systems are set up so that the existence of protected files is hidden from unauthorised users and that users will be assigned a clearance that will determine which files are accessible to them. Access to protected data will be controlled according to the role of the user. Members of staff will not, as a matter of course, be granted access to the whole management information system.

All users will use strong passwords which must be changed regularly. User passwords must never be shared.
Personal data may only be accessed on machines that are securely password protected. Any device that can be used to access data must be locked if left (even for very short periods) and set to auto lock if not used for five minutes.
All storage media must be stored in an appropriately secure and safe environment that avoids physical risk, loss or electronic degradation.
Personal data can only be stored on school equipment (this includes computers and portable storage media). Private equipment (i.e. owned by the users) must not be used for the storage of personal data.

When personal data is stored on any portable computer system, USB stick or any other removable media:

- the data must be encrypted, and password protected,
- the device must be password protected where possible
- the device must offer approved virus and malware checking software, and
- the data must be securely deleted from the device, in line with school policy (below) once it has been transferred or its use is complete.

[1] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/715778/May-2018_Government-Security-Classifications-2.pdf

The school has clear policy and procedures for the automatic backing up, accessing and restoring all data held on school systems, including off-site backups.

The school has clear policy and procedures for the use of "Cloud Based Storage Systems" (for example dropbox, Microsoft 365, google apps and google docs) and is aware that data held in remote and cloud storage is still required to be protected in line with the Data Protection Act. The school will ensure that it is satisfied with controls put in place by remote / cloud-based data services providers to protect the data.

As a Data Controller, the school is responsible for the security of any data passed to a "third party". Data Protection clauses will be included in all contracts where data is likely to be passed to a third party.

All paper based Protected and Restricted (or higher) material must be held in lockable storage, whether on or off site.

The school recognises that under Section 7 of the DPA, data subjects have a number of rights in connection with their personal data, the main one being the right of access. Procedures are in place to deal with Subject Access Requests i.e. a written request to see all or a part of the personal data held by the data controller in connection with the data subject. Data subjects have the right to know: if the data controller holds personal data about them; a description of that data; the purpose for which the data is processed; the sources of that data; to whom the data may be disclosed; and a copy of all the personal data that is held about them. Under certain circumstances the data subject can also exercise rights in connection with the rectification; blocking; erasure and destruction of data.

SECURE TRANSFER OF DATA AND ACCESS OUT OF SCHOOL

- The school recognises that personal data may be accessed by users out of school or transferred to the LA or other agencies. In these circumstances:
- Users may not remove or copy sensitive or restricted or protected personal data from the school or authorised premises without permission and unless the media is encrypted and password protected and is transported securely for storage in a secure location Users must take particular care that computers or removable devices which contain personal data must not be accessed by other users (e.g. family members) when out of school
- When restricted or protected personal data is required by an authorised user from outside the organisation's premises (for example, by a member of staff to work from their home), they should preferably have secure remote access to the management information system or learning platform;
- If secure remote access is not possible, users must only remove or copy personal or sensitive data from the organisation or authorised premises if the storage media, portable or mobile device is encrypted and is transported securely for storage in a secure location;
- Users must protect all portable and mobile devices, including media, used to store and transmit personal information using approved encryption software; and
- Particular care should be taken if data is taken or transferred to another country, particularly outside Europe, and advice should be taken from the local authority (if relevant) in this event.

DISPOSAL OF DATA

The school will comply with the requirements for the safe destruction of personal data when it is no longer required. The disposal of personal data, in either paper or electronic form, must be conducted in a way that makes reconstruction highly unlikely. Electronic files must be securely overwritten, in accordance with government guidance and other media must be shredded, incinerated or otherwise disintegrated for data.

A Destruction Log should be kept of all data that is disposed of. The log should include the document ID, classification, date of destruction, method and authorisation.

AUDIT LOGGING / REPORTING / INCIDENT HANDLING

It is good practice, as recommended in the "Data Handling Procedures in Government" document that the activities of data users, in respect of electronically held personal data, will be logged and these logs will be monitored by responsible individuals. (SLT)

The audit logs will be kept to provide evidence of accidental or deliberate data security breaches – including loss of protected data or breaches of an acceptable use policy, for example.

The school has a policy for reporting, managing and recovering from information risk incidents, which establishes:

- a "responsible person" for each incident
- a communications plan, including escalation procedures;
- and results in a plan of action for rapid resolution; and
- a plan of action of non-recurrence and further awareness raising.

All significant data protection incidents must be reported through the SIRO to the Information Commissioner's Office based upon the local incident handling policy and communication plan.

USE OF TECHNOLOGIES AND PROTECTIVE MARKING

	The information	**The technology**
School life and events	School terms, holidays, training days, the curriculum, extra-curricular activities, events, displays of pupils work, lunchtime menus, extended services, parent consultation events	To use publically accessible technology such as school websites or portal, emailed newsletters, subscription text services
Learning and achievement	Individual pupil / student academic, social and behavioural achievements, progress with learning, learning behaviour, how parents can support their child's learning, assessments, attainment, attendance, individual and personalised curriculum and educational needs.	We will make information available by parents logging on to a system that provides them with appropriately secure access, such as a Learning Platform or portal, or by communication to a personal device or email account belonging to the parent.
Messages and alerts	Attendance, behavioural, achievement, sickness, school closure, transport arrangements, and other information that it may be important to inform or contact a parent about as soon as possible. This may be particularly important when it is necessary to contact a parent concerning information that may be considered too sensitive to make available using other online means.	We use text to contact and keep parents informed. It is the parent's responsibility to keep phone numbers up to date.