Brompton-on-Swale CE Primary School
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Information Security Policy (November 2025)

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Introduction and Scope

The Information Security Policy outlines Brompton-on-Swale CE Primary School's organisational security processes and standards. It is based on the sixth principle of the UK GDPR, which states that organisations must protect personal data 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, including its appendices, applies to our entire workforce. This includes employees, governors or trustees, contractors, agents and representatives, volunteers and temporary staff working for or on our behalf. Individuals found to knowingly or recklessly infringe this policy may face disciplinary action.

The Information Security Policy applies to all personal data, whether paper or electronic. It should be read alongside the other policies within our information governance policy framework.

Roles and Responsibilities

Overall responsibility for ensuring that we meet the statutory requirements of any legislation lies with the Board of Governors or Trustees. The following roles will have day-to-day responsibility for information security management and providing the necessary assurance to the Board.

Senior Information Risk Owner (SIRO)
The SIRO is responsible for overseeing the implementation of this policy and ensuring that effective information security practices are in place across the organisation. The SIRO is also responsible for risk management and will ensure that staff are appropriately trained in information security, supported by the SPOC and IAOs. In our organisation, this role lies with the **Executive Headteacher.**

Single Point of Contact (SPOC)
The SPOC will support the SIRO in day-to-day operational management. This includes providing guidance on information security practices and promoting compliance with this policy to protect personal data in line with the CIA triad. In our organisation, this role lies with the **School Administrator.**

Information Asset Owner (IAO)
IAOs will be responsible for the security and maintenance of their assigned information assets and for ensuring that other staff members use the information safely and responsibly.

All staff
All staff, including governors or trustees, contractors, agents and representatives, volunteers, and temporary staff working for or on our behalf, will be responsible for information security in accordance with this policy.

Access Control

We will maintain control over access to the personal data that we process. These controls will differ depending on the format of the data and the role of the individual accessing the information. We will maintain a record detailing which individuals have routine access to which information systems in our IAR.

Manual filing systems
Access to manual filing systems (i.e., non-electronic systems) will be controlled by a key or PIN management system. When not in use, all files containing personal data will be locked away in lockable storage units, such as a filing cabinet or a document safe.

Keys to storage units will be held securely and managed by the SPOC. Access will only be given to staff members who require it to carry out legitimate business functions. Where in use, PINs will be changed annually or whenever a staff member with access leaves the organisation, whichever is sooner.

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 perform legitimate functions. Wherever possible, multi-factor authentication will be implemented across all critical electronic systems.

Individuals will be required to comply with our password standards. Accounts will be suspended when a staff member is on long-term absence and deleted when the staff member leaves our employment.

Individuals will use different passwords for different systems to ensure that if one system is compromised, it does not lead to access to other systems. Users should never leave a live session unattended while logged in.

Password managers
Where possible, password management software will be used to store passwords securely. This practice helps to prevent insecure workarounds such as adopting insecure passwords that are easier to remember, re-using passwords, or making minor variations to previous passwords.

Software and systems audit logs
We will ensure that all critical software and systems have built-in audit logs wherever possible so that they can monitor what users have accessed and what changes have been made. Although this is not a preventative measure, it supports the integrity of the data and acts as a deterrent for individuals seeking to access records without authorisation.

Data shielding
We will not allow our workforce to access the personal data of family members or close friends wherever possible. Users should declare whether they know any family members or friends registered with us upon employment. When such an interest is raised, we will review access controls for relevant paper and electronic files to ensure that only appropriate access is granted.

Users who knowingly fail to declare family and friends registered with us may face disciplinary proceedings and be charged with an offence under Section 170 of the Data Protection Act 2018 (unauthorised access to information).

External access
Occasionally, we may need to allow individuals outside our workforce access to our systems. This could be for audit purposes, to fulfil an inspection, when using agency staff, or because of a partnership arrangement with another educational establishment. The SIRO or SPOC, or if unavailable, an appropriately senior staff member, will authorise instances of third parties having access to systems.

We will maintain a record on our IAR detailing what access has been given to whom and the authorising individual.

Physical Security

We will maintain high physical security standards to prevent unauthorised access to personal data. We will maintain the following controls:

Clear desk policy
Staff members will not leave personal data unattended on desks or workspaces. Lockable storage units will be used to secure personal data when not in use.

Portable storage devices
We will not permit the use of portable storage devices such as USB memory sticks and external hard drives to store or transfer pupil, staff, or business-related information.

Building access
External doors to the premises will be locked when the building is not occupied. Only authorised individuals will be key holders for the building. The SPOC will be responsible for authorising key distribution and will maintain a log of key holders.

Internal access
Internal areas off limits to pupils and visitors will be appropriately secured and only accessible by access card, fob, PIN, or key. Access equipment will be collected and deactivated when a staff member leaves or is away from work for over three months. PINs, where in use, will be changed every six months or whenever a staff member leaves the organisation. Keys will be kept in a secure location, and the SPOC will maintain a log of any keys issued to staff.

Visitor control
Visitors must sign in and state their name, organisation, car registration (if applicable), who they are visiting, and the nature of business. They may also be asked to provide information to help us provide support in an emergency event. Visitor access will be documented via paper or an electronic visitor management system. Visitors will be escorted throughout the site and will not access restricted areas without appropriate supervision.

Secure disposal
We will ensure that all personal data is securely disposed of per our Records Management Policy and retention schedule. Hard copy information will be securely destroyed by a cross-shredder or a confidential waste provider. Electronically held information will be deleted automatically, with retention periods built into systems, wherever possible. Otherwise, manual review and deletion will take place annually at a minimum.

Redundant computer equipment will be securely wiped and disposed of following the Waste Electrical and Electronic Equipment (WEEE) Regulations. Where personal devices are being disposed of, the user must ensure that they have complied with this policy. School-related data should be removed and stored appropriately within the appropriate systems before disposal.

Environmental Security

We must maintain high standards of physical security to protect personal data against unauthorised access and environmental and natural hazards such as power loss, fire, and floods. It is accepted that these hazards may be beyond our control, but we will implement the following mitigating controls:

Back-ups
We will regularly back up our electronic data and systems and conduct tests to ensure they can be restored correctly. These backups will be held in a different location from the main server room, off-site by an external provider, or using appropriate cloud storage. A data processing agreement will govern this arrangement. Should an environmental or natural hazard compromise our electronic systems, we will be able to reinstate the data from the backup with minimal disruption or data loss.

Fire-proof cabinets
We will provide lockable data storage cabinets that can withstand short fire exposure. This will protect any business-critical paper records held in cabinets from minor fires on the building premises.

Security alarm systems
We will ensure that appropriate security systems are in place to alert individuals in the event of a fire or intruder. Extra measures, such as fire doors, will be implemented in areas where paper records or critical electronic equipment are held to provide extra security in an emergency event.

Emergency contact details will be in place and shared with the necessary services to ensure we can be contacted out of hours in the event of alarm system triggers.

Systems and Cyber Security

We will protect against hazards to our IT network and electronic systems. It is recognised that the loss of, or damage to, IT systems could affect our ability to operate and could potentially endanger the safety of our pupils and workforce.

We will implement security controls to mitigate risks to our digital devices and online locations, such as the cloud. All use of personal devices to access our network or systems must be authorised. We will ensure that, at minimum, the device has up-to-date security systems and encrypted storage, and that all software patches are installed as soon as they are released. The user will ensure these criteria are met for their personal devices, seeking specialist advice if required.

Software download restrictions
We will restrict users from downloading third-party apps and software onto our devices. Users must request authorisation from our IT provider, who will vet the software to confirm that it does not pose a security risk. A list of trusted software will be retained.

Firewalls and anti-virus software
We will ensure that firewall infrastructure is deployed and anti-virus software is installed on electronic devices and routers. We will also update security releases as soon as possible to address any weaknesses. We will review our firewall setup and anti-virus software annually to assess if they remain fit for purpose.

Shared storage
We will maintain shared storage on our servers with restricted areas only authorised users can access. The SPOC will be responsible for providing users with access. Information held within shared storage will remain subject to our retention schedule.

Cloud storage
We will liaise with our IT provider before utilising cloud storage. We will only use providers who can meet our security needs and demonstrate assurance with the National Cyber Security Centre (NCSC) Cloud Security Principles.

Malicious software and fraud
To avoid our systems being compromised fraudulently by email, users will consider the source of emails before clicking on any links or opening attachments. Users will check with our IT provider if they are unsure about the validity of an email, and must immediately inform our IT provider if they have clicked on a suspicious link.

We will ensure staff receive adequate training to identify phishing, spear phishing, whaling emails, and other malicious threats. Staff identified as at higher risk of being targets for this type of fraud will receive regular training to combat the risk of social engineering and other types of fraud.

Communications Security

The transmission of personal data is a key business need and, when operated securely, benefits us and pupils alike. However, data transmission is susceptible to unauthorised or malicious loss or corruption. We will implement the following transmission security controls to mitigate these risks:

Sending personal data by post
We will use Royal Mail's standard postal service when sending personal data, excluding special category data, by post. Individuals will double-check addresses before sending and ensure that the sending envelope does not contain data not intended for the data subject.

Sending special category data by post
We will restrict sending special category data by post wherever possible. Where necessary, we will use a signed-for postal service to track delivery. Individuals will double-check addresses before sending and ensure that the sending envelope does not contain data not intended for the data subject. If the information is particularly sensitive, a colleague will double-check the contents.

Sending personal data by email
We will only email personal and special category data using secure email transmission methods, such as end-to-end encryption and encryption protocols. Individuals will double-check the recipient's email address to ensure that the email is being sent to the intended individual(s). The use of autocomplete for recipient email addresses will be discouraged.

Secure data transfer services must be used when sending emails to a large number of recipients, such as a mailshot, or when it would not be appropriate for recipients to know each other's email addresses. The Blind Carbon Copy (BCC) function will be used where no alternative option exists.

Staff must not use personal email accounts to access or transmit pupil, staff, or business data. Only business-issued email accounts should be used.

Exceptional circumstances
In exceptional circumstances, we may wish to hand deliver or use a direct courier to ensure the 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 large for usual transmission methods.

Remote Working

Personal devices
Any electronic device not provided by us and used to access or process personal or business data will be classed as a personal device. The use of personal devices must be authorised and meet the requirements set out in this policy.

Personal devices must be limited to the individual user and not a shared resource, e.g., a family device. Users must only access the information they are entitled to in order to fulfil their role. To prevent

unauthorised access, devices must include appropriate security and access controls, such as password and/or PIN protection.

Pupil, staff, or business data must not be downloaded and saved onto personal devices. Such data must remain within the defined systems to ensure it remains secure, available to all authorised personnel, and managed within our systems for its full lifecycle, including secure destruction in line with our retention schedule. Printing of any personal data on home printers is strictly forbidden.

Security and confidentiality
Users must ensure that electronic equipment or paper documents containing personal data are kept secure and never left unsupervised. Any paper documents requiring disposal must be securely destroyed using a cross-cut shredder or returned to our premises for confidential waste disposal.

Individuals must not work in areas where others may view, hear, or copy personal data. Users must always be mindful of their surroundings and ensure measures are in place to prevent loss or unauthorised access to information.

When remote working, only trusted Wi-Fi connections will be used, with appropriate anti-virus and firewalls installed to safeguard against malicious intrusion. Unsecured network connections, including public Wi-Fi or hot spots, must not be used, and devices must be configured to prevent automatic connection to unknown networks.

Users will be mindful of any applications (apps) installed on personal devices that could be used to access pupil, staff, or business data. The user must seek reassurance that any risks associated with apps monitoring the device's use are being effectively managed.

Authorised access
Access to business systems and cloud storage on personal devices is only permitted where authorised. Access should not be attempted when a user leaves employment or the working relationship ceases. Attempts to do so will be treated as a data breach and investigated as such. Under Section 170 of the Data Protection Act 2018, knowingly accessing data you are not entitled to is a criminal offence.

Any exemptions to the above access can only be authorised by the SIRO and will only be given where there is a clear business need and following a full risk assessment.

Data Breaches

A personal data breach is defined as a breach of security leading to the accidental or unlawful destruction, loss, alteration, or unauthorised disclosure of or access to personal data. The severity of breaches can vary from minor to very severe, however all breaches will be treated seriously. Appropriate measures will be in place to ensure continuous improvement of information security practice, reducing the risk of minor breaches or near-miss incidents from turning into high-risk breaches.

Where a data breach is likely to result in a high risk to the rights and freedoms of the data subject(s), Article 33 of the UK GDPR requires data controllers to report these to the Information Commissioner's Office (ICO), and sometimes the affected data subject(s), within 72 hours of discovery.

All actual and suspected breaches of security or confidentiality, including near misses, will be recorded and investigated in accordance with the Data Breach Procedure set out in Appendix One.

Business Continuity

We will have a risk-based business continuity and/or disaster recovery plan to enable us to continue critical business in the event of an information security incident. This plan will include the process to follow, emergency contacts, and business-critical priorities. We will ensure staff are aware of these arrangements and can access the plan easily.

We will have a process for testing, assessing, and evaluating the effectiveness of our information security measures. This may include vulnerability scanning and penetration testing.

We will obtain appropriate insurance, including cybersecurity coverage, to cover the costs of a serious cyber event. We will also ensure that all staff complete cybersecurity training in accordance with the insurance policy requirements.

Appendix One – Data Breach Procedure

Immediate actions (within 24 hours)

If any member of the workforce becomes aware of an actual data breach or an information security event (a 'near-miss'), they must report it to the Single Point of Contact (SPOC) within 24 hours. If the SPOC is unavailable, the SIRO or nominated deputy must start the investigation process.

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

If appropriate, the SPOC or the individual who discovered the breach will make every effort to retrieve the information and ensure recipients do not retain a copy of the disclosed data. This may involve asking email recipients to delete from their inboxes and recycle bins or collecting paper records in person. Measures to retrieve disclosed information will be dependent on the level of risk. Written confirmation should be sought from the recipient to confirm that the information is no longer held.

Assigning an investigation (within 48 hours)

The SPOC or nominated officer will begin to complete a data breach form and assess the data protection risks using a risk matrix to determine the severity rating. If the breach is assessed to be moderate or above, the SPOC will inform the SIRO.

The DPO should be sent a copy of the data breach form and the risk matrix to ensure the breach has been assessed appropriately and to recommend further measures to mitigate or reduce the risk.

Reporting to the ICO and/or data subjects (within 72 hours)

Where the breach is assessed as high or very high risk, it should be reported to the ICO within 72 hours.

The SIRO, in liaison with the SPOC and DPO, will agree on whether the incident will be reported to the ICO and whether any data subjects should be informed. The DPO will prepare the ICO report and, once approved by the SIRO, submit it and liaise with the ICO until the matter is concluded.

The decision to notify data subjects will depend on the level of risk and any detriment or harm that could result from the disclosure. We will also consider what is in the best interests of the data subjects when making the decision. The SPOC will be responsible for liaising with data subjects where it has been deemed appropriate to inform them.

Investigating and concluding incidents

The SPOC will ensure that all investigations have been completed, all potential information risks have been identified, and remedial actions have been implemented. Where necessary, the SIRO should review the completed data breach form and action plan to ensure the breach was handled appropriately and actions completed.

All actual data breaches and near-misses must be recorded on a data breach log, along with the risk rating, actions taken, and investigation outcome. Any lessons learned should be shared and used to improve working practices.

Appendix Two – Workforce Acceptable Use

The document governs our workforce's use of the corporate network and cloud-based systems, including when authorised to use personal devices.

Email, Instant Messaging, and Internet Use

We provide the workforce with email accounts, instant messaging (IM) functionality, and Internet access to assist with performing their duties. For the benefit of doubt, Instant Messages are classed as email communications in this policy.

Personal use
Whilst email accounts, IM, and the Internet should primarily be used for business functions, incidental and occasional use in a personal capacity may be permitted so long as users understand the following:

- Use must not tarnish our reputation or infringe on business functions
- Emails sent to and from corporate accounts are our property
- We may monitor the use of accounts and systems and access any personal messages and browsing history contained within
- Emails sent to or from their email account may be disclosed under Freedom of Information and/or Data Protection Legislation
- We reserve the right to cleanse email accounts at regular intervals, which could result in personal emails being erased from the corporate network
- We reserve the right to suspend access to accounts and systems anytime.

Inappropriate use
We do not permit users to send, forward, or solicit emails, or use the Internet in any way that may be interpreted as insulting, disruptive, or offensive by any other individual or entity. Examples of prohibited material include, but are not necessarily limited to:

- Sexually explicit or pornographic messages, images, cartoons, jokes, or movie files
- Unwelcome propositions, profanity, obscenity, slander, or libel
- Any messages or content containing ethnic, religious, political, or racial slurs
- Any messages or content that could be construed as harassment or disparagement of others based on their sex, gender, racial or ethnic origin, sexual orientation, age, disability, religious or philosophical beliefs, or political beliefs.

Users are also not permitted to use the Internet in a way that could affect others' usage. This means not streaming or downloading media files and not using the Internet to play online games.

Other business use
Users are not permitted to use emails or the Internet to carry out their own business or the business of others. This includes, but is not limited to, work for political organisations, not-for-profit organisations, and private enterprises. The SIRO may lift this restriction on a case-by-case basis.

Security
Users will only use corporate accounts and systems in accordance with our Information Security Policy. In particular, users will not:

- Click on links from untrusted or unverified sources
- Use insecure email transmission methods when sending personal data
- Sign up for marketing material that could jeopardise our IT network
- Send excessively large email attachments without prior authorisation from the SIRO and/or our IT Provider
- Attempt to download any software onto corporate devices. This can present a virus risk and/or breach of software license requirements.

Group email accounts
Users may be permitted to send and receive emails from group and/or generic email accounts. These group email accounts must not be used in a personal capacity, and users must ensure that they sign each email with their name so that emails can be traced to individuals. Improper use of group email accounts could lead to the suspension of a user's email rights.

The SPOC will be responsible for allowing access to group email accounts. All email traffic to and from individual and group accounts may be monitored.

Social Media and Private Messaging Apps

We recognise and embrace the benefits and opportunities that social media can contribute to an organisation. However, we also recognise that social media poses a data protection risk due to its open nature and capacity to broadcast to many people quickly.

Corporate accounts
We may have social media accounts across multiple platforms. Nominated users will have access to these accounts and are permitted to post general information about our business activities. Authorised users will be given the usernames and passwords to these accounts, which must not be disclosed to any other user within or external to the organisation. The SPOC will be responsible for allowing access to corporate social media accounts.

Corporate social media accounts must not be used to disseminate personal data in an open forum or by direct message. Doing so would be a contravention of our information governance policies and data protection legislation.

Corporate accounts must not be used in a way which could:

- Tarnish our reputation
- Be construed as harassment or disparagement of others based on their sex, gender, racial or ethnic origin, sexual orientation, age, disability, religious or philosophical beliefs, or political beliefs
- Be construed as sexually explicit
- Be construed as political beliefs or commentary.

Personal accounts
We understand that many users will use or have access to personal social media accounts. Users must not use these accounts:

- During working hours
- Using corporate equipment
- To conduct corporate business
- To contact or approach our clients, customers, or partners
- Make posts that relate to us or refer to information gained through your role within the organisation
- Identify your role within our organisation.

Private messaging apps
Social messaging apps such as WhatsApp, Facebook Messenger, etc. must not be used for communicating any school business. Information held in non-corporate communication channels may be subject to FOIA if it relates to official business.

Telephone and Video Conferencing Use

We provide users access to telephone and video conferencing services to assist with communication and performing their duties.

Personal use
Whilst telephone and video conferencing services should primarily be used for business functions, incidental and occasional use in a personal capacity may be permitted so long as users understand the following:

- Usage must not tarnish our reputation or infringe on business functions
- We may monitor and access call history and recordings
- We reserve the right to suspend telephone and video conferencing usage at any time
- Telephone calls, video conference recordings, or transcripts may be disclosed under the Freedom of Information and/or Data Protection Legislation.

Inappropriate use
We do not permit users to use the telephone or video conferencing services in any way which may be interpreted as insulting, disruptive, or offensive by any other individual or entity.

Other business use
Users are not permitted to use these services to carry out their own business or the business of others. This includes work for political organisations, not-for-profit organisations, and private enterprises. The SIRO may lift this restriction on a case-by-case basis.

Appendix Three - Pupil Acceptable Use - Primary

Information for Parents and Guardians

Digital technologies have become integral to children's and young people's lives, both within and outside school. These technologies are powerful tools that open up new opportunities for everyone. They can stimulate discussion, promote creativity, and raise awareness, which promotes effective learning. Young people should always be entitled to safe digital and Internet access.

This Acceptable Use Agreement is intended to ensure that:

- pupils will be responsible users and stay safe while using the Internet and other digital technologies for educational, personal and recreational use
- our digital systems are protected from accidental or deliberate misuse that could put the security of our systems and users at risk
- parents and guardians are aware of the importance of e-safety and are involved in the education and guidance of young people regarding online behaviour.

Pupil Acceptable Use Agreement

I understand that I must use digital technology responsibly by doing the following:

- I will only use computers or tablets with permission from a teacher or a suitable adult.
- I will only use applications that a teacher or a suitable adult has allowed me to use.
- I will take care of the computer, tablet, and other equipment.
- I will ask for help from a teacher or a suitable adult if I am unsure what to do or think I have done something wrong.
- I will tell a teacher or a suitable adult if I see something that upsets me on the screen.

I have read and understand the above and agree to follow these rules when:

- I use the school systems and devices (both in and out of school).
- I use my own equipment outside of school in a way related to schoolwork, e.g. communicating with other pupils or teachers, accessing school email, website, etc.

If I break the rules, I might not be allowed to use a computer or tablet for schoolwork.

Pupil name:
Class:
Pupil signature:
Date:

Parent or Guardian Permission

As the parent or guardian of the named pupil, I give permission for my child to access the Internet and digital systems at school.

I know that my child has signed this Acceptable Use Agreement and has received, or will receive, e-safety education to help them understand the importance of safe use of technology and the Internet, both in and out of school.

I understand that the school will take every reasonable precaution, including monitoring and filtering systems, to ensure that my child is safe when using the Internet and digital systems.

I understand that my child's activity on digital systems will be monitored and that the school will contact me if they have concerns about any possible breaches of the Acceptable Use Policy.

I will encourage my child to use the Internet and digital technologies safely at home and will inform the school if I have concerns about my child's e-safety.

Parent or guardian name:
Parent or guardian signature:
Date: