



CROMER ROAD PRIMARY SCHOOL

Data Protection Policy

Reviewed:

Spring 2017

Frequency of Review:

3 Years

Ratification by Governors:

Summer 2017

SUMMARY

The objectives of this Policy, which is intended for all school staff, including governors, who use or support the school's ICT systems or data, are to:

- Ensure the protection of confidentiality, integrity and availability of school information and assets.
- Ensure all users are aware of and fully comply with all relevant legislation.
- Ensure all staff understand the need for information and ICT security and their own responsibilities in this respect.

Definitions

Information covers any information, including electronic capture and storage, manual paper records, video and audio recordings and any images, however created.

Personal Data - Any data which can be used to identify a living person. This includes names, birthday and anniversary dates, addresses, telephone numbers, fax numbers, email addresses and so on. It applies only to that data which is held, or intended to be held, on computers ('equipment operating automatically in response to instructions given for that purpose'), or held in a 'relevant filing system'. This includes paper filing systems.

Strong Password – Password which is 8 characters minimum length, contains upper and lower case alphabetical characters and numbers or punctuation characters. It should not contain dictionary words, the owner's date of birth or car registration number.

Encryption – Process of transforming information (referred to as plaintext) using an algorithm (called a cipher) to make it unreadable to anyone except those possessing special knowledge, usually referred to as a key.

Responsibilities:

- The School shall be registered with the Information Commissioner's Office (ICO) under the 1998 Data Protection Act.
- Users of the school's ICT systems and data must comply with the requirements of the Acceptable Use Policy (AUP) and ICT Security Policy.
- The School's Senior Team shall review this document at least annually.
- Users shall be responsible for notifying the ICT Manager and Headteacher of any suspected or actual breach of data protection.
- ***The Headteacher shall inform both the ICO and the Local Authority if there are any losses of personal data***
- Users must comply with the requirements of the Data Protection Act 1998, Computer Misuse Act 1990, Copyright, Designs and Patents Act 1988 and the Telecommunications Act 1984.
- Users must be provided with suitable training and documentation, together with adequate information on policies, procedures and facilities to help safeguard systems and data.

- Adequate procedures must be established in respect of the ICT security implications of personnel changes.
- No personal data shall be taken from the school unless it is on encrypted media. This includes, but is not exclusive to, laptop computers, netbooks, external hard disks, memory sticks and Personal Digital Assistants (PDAs) & other removable media.
- Remote access to information and personal data shall only be provided through an encrypted link and users shall require a strong password that is renewed at least termly.
- Users shall not publish spreadsheets, databases or other documents containing personal data on externally accessible web sites including the London MLE unless these documents are encrypted.

Physical Security:

- As far as practicable, only authorised persons should be admitted to rooms that contain servers or provide access to data.
- Server rooms must be kept locked when unattended.
- Appropriate arrangements must be applied for the removal of any ICT equipment from its normal location. These arrangements should take into consideration the risks associated with the removal and the impact these risks might have.
- All school owned ICT equipment and software should be recorded and an inventory maintained.
- Uninterruptible Power Supply (UPS) units are recommended for servers and network cabinets.
- Computer monitors should be positioned in such a way that information stored or being processed cannot be viewed by unauthorised persons.
- ❖ **Do not** leave sensitive or personal data on printers, computer monitors or desk whilst away from your desk or computer.
- ❖ **Do not** give out sensitive information unless the recipient is authorised to receive it.
- ❖ **Do not** send sensitive/personal information via e-mail or post without suitable security measures being applied.
- Ensure sensitive data, both paper and electronic, is disposed of properly, e.g. shred paper copies and destroy disks.

System Security:

- ❖ Users **shall not** make, distribute or use unlicensed software or data.
- ❖ Users **shall not** make or send threatening, offensive or harassing messages.
- ❖ Users **shall not** create, possess or distribute obscene material.
- Users must ensure they have authorisation for private use of the school's computer facilities.
- Passwords should be memorised. If passwords must be written down they should be kept in a secure location.
- Users who regularly access personal data shall have a unique user ID and a strong password that is renewed at least termly

- ❖ Passwords **shall not** be revealed to unauthorised persons.
- ❖ Passwords **shall not** be obvious or guessable and their complexity should reflect the value and sensitivity of the systems and data.
- Passwords shall be changed if it is affected by a suspected or actual breach of security, e.g. when a password may be known by an unauthorised person.
- Regular backups of data, in accordance with the recommended backup strategy, must be maintained.
- Security copies should be regularly tested to ensure they enable data restoration in the event of system failure.
- Security copies should be clearly marked and stored in a fireproof location and/or off site.

Virus Protection:

- The school should ensure current and up to date anti-virus software is applied to all school ICT systems.
- Laptop users shall ensure they update their virus protection at least weekly.
- Any suspected or actual virus infection must be reported immediately to the System Manager/ICT Co-ordinator and that computer shall not be reconnected to the school network until the infection is removed.

Care of Equipment:

- All school laptops must remain secure at all times
- Laptops must not be left unattended in classrooms and must be locked away when not in use
- Staff are responsible for the laptops in their use

Disposal of Equipment:

- The School shall ensure any personal data or software is obliterated from a PC if the recipient organisation is not authorised to receive the data.
- It is important to ensure that any software remaining on a PC being relinquished for reuse are legitimate. Care should be taken to avoid infringing software and data copyright and licensing restrictions by supplying unlicensed copies of software inadvertently.
- The School shall ensure the requirements of the Waste from Electronic and Electrical Equipment (WEEE) Directive are observed.

I have read and understood the rules for taking responsibility for data protection. I will use the computer system and Internet in a responsible way and obey these rules at all times. I understand that breaching these rules could result in disciplinary action.

Signed: _____ *J. Stone* _____ date: 1/3/17

Name (in capitals): _____ Jude Stone (Headteacher) _____