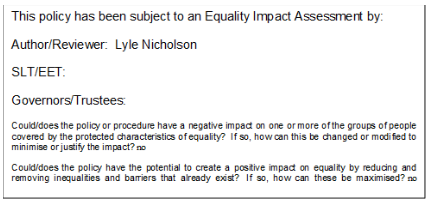
Tees Valley Collaborative Trust

Information Security Policy



This policy has been subject to an Equality Impact Assessment by:

Author/Reviewer: Lyle Nicholson

SLT/EET:

Governors/Trustees:

Could/does the policy or procedure have a negative impact on one or more of the groups of people covered by the protected characteristics of equality? If so, how can this be changed or modified to minimise or justify the impact? no

Could/does the policy have the potential to create a positive impact on equality by reducing and removing inequalities and barriers that already exist? If so, how can these be maximised? no

Introduction

In May 2018 the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA) became enforceable across the United Kingdom. As part of Tees Valley Collaborative Trust's (the Trust) programme to comply with the new legislation it has written a new suite of Information Governance policies.

The Information Security Policy outlines the Trust's organisational security processes and standards. The policy is based upon the sixth principle of the GDPR which states organisations must protect the personal data, which it processes, against unauthorised loss by implementing appropriate technical and organisational measures. This policy has been written using the security framework recommended by ISO: 270001 (internationally recognised Information Security Standard).

This policy should be read in conjunction with the other policies in the Trust's Information Governance policy framework with particular focus on the Acceptable Use Policy and the Information Security Incident Reporting Policy.

Scope

All policies in the Information Governance policy framework apply to all Tees Valley Collaborative Trust employees, any authorised agents working on behalf of the Tees Valley Collaborative Trust, including temporary or agency employees, and third party contractors.

Individuals who are found to knowingly or recklessly infringe these policies may face disciplinary action.

The policies apply to information in all forms including, but not limited to:

- Hard copy or documents printed or written on paper,
- Information or data stored electronically, including scanned images,
- Communications sent by post/courier or using electronic means such as email, fax or electronic file transfer,
- Information or data stored on or transferred to removable media such as tape, CD, DVD, USB storage device or memory card,
- Information stored on portable computing devices including mobile phones, tablets, cameras and laptops,
- Speech, voice recordings and verbal communications, including voicemail,
- Published web content, for example intranet and internet,
- Photographs and other digital images.

Access Control

The Trust will maintain control over access to the personal data that it processes.

These controls will differ depending on the format of the data and the status of the individual accessing the data. The Trust will maintain an audit log detailing which individuals have access to which systems (both electronic and manual). This log will be maintained by theTrust

Manual Filing Systems

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

Keys to storage units will be stored securely. Managers will be responsible for giving individuals access to the safe place. Access will only be given to individuals who require it to carry out legitimate business functions. Where a PIN is used, the password will be changed every year or whenever a member of staff leaves the organisation.

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 carry out legitimate functions. A two tier authentication system will be implemented across all electronic systems. The two tiers will be username and unique password. For high level administrative tasks, a third layer of authentication is also required (MFA).

Staff will be required to change their complex password every 180 days, and user accounts will be suspended either when the individual is on long term absence or when the individual leaves employment of the Trust**.**

Students will not be required to change their default complex password, though it is recommended during induction. User accounts will be suspended when the individual leaves the Trust.

Students under the age of 10 cannot change their default non-complex password. User accounts will be suspended when the individual leaves the Trust.

Software and Systems Audit Logs

The Trust will ensure that all major software and systems have inbuilt audit logs so that the Trust can ensure it can monitor what employees and users have accessed and what changes may have been made. Although this is not a preventative measure it does ensure that the integrity of the data can be assured and also deters individuals from accessing records without authorisation.

Physical Security

The Trust will maintain high standards of Physical Security to prevent unauthorised access to personal data. The following controls will be maintained by the Trust:

Clear Desk Policy

Individuals will not leave personal data on desks, or any other working areas, unattended and will use the lockable storage units provided to secure personal data when not in use.

Alarm System

The Trust will maintain a security alarm system at its premises so that, when the premises are not occupied, an adequate level of security is still in operation.

Building Access

External doors to the premises will be locked when the premises are not occupied. Only authorised employees will be key holders for the building premises. The Trust will be responsible for authorising key distribution and will maintain a log of key holders.

Internal Access

Internal areas that are off limits to students and parents will be kept locked and only accessed through PIN or keys. PINs will be changed every year or whenever a member of staff leaves the organisation. Keys will be kept in a secure location and a log of any keys issued to staff maintained.

Visitor Control

Visitors to the Trust will be required to sign in a visitor's book and state their name, organisation, car registration (if applicable) and nature of business. This may be either in paper or electronic format. Visitors will be escorted throughout the Trust and will not be allowed to access restricted areas without employee supervision.

Visitor books will be locked away at the end of the working day and kept for current financial year + six years.

Environmental Security

As well as maintaining high standards of physical security, to protect against unauthorised access to personal data, the Trust must also protect data against environmental and natural hazards such as power loss, fire, and floods.

It is accepted that these hazards may be beyond the control of the Trust but the Trust will implement the following mitigating controls:

Backups

The Trust will back up their electronic data and systems every 24 hours (essential data servers backup every 12 hours), these backups will be kept at the Guisborough campus in multiple disparate buildings. Data servers at the Guisborough campus also backup to the Stockton campus overnight. This arrangement will be governed by a data processing agreement. Should the Trust's electronic systems be compromised by an environmental or natural hazard then the Trust will be able to reinstate the data from the backup with minimal destruction.

Fire Doors
Areas of the premises which contain paper records or core electronic equipment, such as server boxes, will be fitted with fire doors so that data contained within those areas will be protected, for a period of time, against any fires that break out on the premises. Fire doors must not be propped open unless automatic door releases are installed.

Fire Alarm System
The Trust will maintain a fire alarm system at its premises to alert individuals of potential fires and so the necessary fire protocols can be followed.

Systems Security

As well as physical security the Trust also protects against hazards to its IT network and electronic systems. It is recognised that the loss of, or damage to, IT systems could affect the Trust's ability to operate.

The Trust will implement the following systems security controls in order to mitigate risks to electronic systems:

Software Download Restrictions
Employees must request authorisation from **IT Support Team** before downloading software on to the Trust's IT systems. **The IT Support Team** will vet software to confirm its security certificate and ensure the software is not malicious. **The IT Support Team** will retain a list of trusted software so that this can be downloaded on to individual desktops without disruption.

Phishing Emails
In order to avoid the Trust's computer systems from being compromised through phishing emails, employees are encouraged not to click on links that have been sent to them in emails when the source of that email is unverified. Employees will also take care when clicking on links from trusted sources in case those email accounts have been compromised. Employees will check with **The IT Support Team** if they are unsure about the validity of an email.

Firewalls and Anti-Virus Software

The Trust will ensure that the firewalls and anti-virus software is installed on electronic devices and routers. The Trust will update the firewalls and anti-virus software when updates are made available**.** The Trust will review its firewalls and anti-virus software on an regular basis and decide if they are still fit for purpose frequently.

Communications Security

The transmission of personal data is a key business need and, when operated securely is a benefit to the Trust and students alike. However, data transmission is extremely susceptible to unauthorised and/or malicious loss or corruption. The Trust has implemented the following transmission security controls to mitigate these risks:

Sending Personal Data by post

When sending personal data, excluding special category data, by post, the Trust will use Royal Mail’s standard postal service. Employees will double check addresses before sending and will ensure that the sending envelope does not contain any data which is not intended for the data subject.

Sending Special Category Data by post

When sending special category data by post the Trust will use Royal Mail’s 1st Class Recorded postal service. Employees will double check addresses before sending and will ensure that the sending envelope does not contain any data which is not intended for the data subject. If the envelope contains information that is thought to be particularly sensitive then employees are advised to have the envelope double checked by a colleague.

Sending Personal Data and Special Category Data by email

The Trust will only send personal data and special category data by email if using a secure email transmission portal.

Employees will always double check the recipient’s email address to ensure that the email is being sent to the intended individual(s). Use of autocomplete should be strongly discouraged.

Exceptional Circumstances

In exceptional circumstance the Trust may hand deliver, or use a direct courier, to ensure 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 big for usual transmission methods.

Using the BCC function

When sending emails to a large number of recipients, such as a mail shot, or when it would not be appropriate for recipients to know each other's email addresses then Trust employees will utilise the Blind Copy (BCC) function.

Surveillance Security

The Trust operates CCTV at its premises.

Due to the sensitivity of information that could collected as a result of this operation, the Trust has a separate policy which governs the use of CCTV. This policy has been written in accordance with the ICO's Surveillance Code of Practice.

Remote Working

It is understood that on some occasion employees of the Trust will need to work at home or away from the Trust premises. If this is the case then the employees will adhere to the following controls:

Lockable Storage

If employees are working at home they will ensure that they have lockable storage to keep personal data and Trust equipment safe from loss or theft.

Employees must not keep personal data or Trust equipment unsupervised at home for extended periods of time (for example when the employee goes on holiday).

Employees must not keep personal data or Trust equipment in cars if unsupervised.

Private Working Area

Employees must not work with personal data in areas where other individuals could potentially view or even copy the personal data (for example on public transport).

Employees should also take care to ensure that other household members do not have access to personal data.

Trusted Wi-Fi Connections

Employees will only connect their devices to trusted Wi-Fi connections and will not use 'free public Wi-Fi' or 'Guest Wi-Fi'. This is because such connections are susceptible to malicious intrusion.

When using home Wi-Fi networks employees should ensure that they have appropriate anti-virus software and firewalls installed to safeguard against malicious intrusion. If in doubt employees should seek assistance from The IT Support Team**.**

Email Accounts

Employees will not use Personal email accounts to access or transmit personal data. Employees must only use Trust issued, or Trust authorised, email accounts.

Data Removal and Return

Employees will only take personal data away from the Trust premises if this is required for a genuine business need. Employees will take care to limit the amount of data taken away from the premises.

Employees will ensure that all data is returned to the Trust premises either for re-filing or for safe destruction. Employees will not destroy data away from the premises as safe destruction cannot be guaranteed.

Date of Last Approval/Revision	
Review interval (years)	3 yearly
Responsible Officer	Director of Resources
Approval/review body	Executive Team
Date of next review	September 2024
Public File location	Tees Valley Collaborative Trust Sharepoint/ Websites/Staff Handbook