


Data Security Policy

	Name of school	West Hill Primary School
	Policy review date	May 2018
	Date of next review	May 2019
	Who reviewed this policy?	Julie Dobson

Strategic and operational practices

At this school:

- The Head Teacher is the Senior Information Risk Officer (SIRO).
- Gary Hipple is the Data Protection Officer (DPO) with responsibility for data protection compliance.
- Staff are clear who the key contact(s) for key school information are (the Information Asset Owners). We have listed the information and information asset owners in an LGFL spreadsheet called the Data Audit Log.
- We ensure staff know to immediately report, and who to report to, any incidents where data protection may have been compromised, such as when passwords for sensitive systems or devices are lost or stolen, so that relevant action(s) can be taken. We must report a notifiable breach to the ICO without undue delay, but not later than 72 hours after becoming aware of it.
- All staff are DBS checked and records are held in one central record in SIMS.

We ensure ALL the following school stakeholders sign an Acceptable Use Agreement. We have a system so we know who has signed.

- staff
- pupils

This makes clear all responsibilities and expectations with regard to data security.

- We have approved educational web filtering across our wired and wireless networks. We also have an additional layer of monitoring software across our network system. We monitor school e-mails, online platforms, etc. to ensure compliance with the Acceptable Use Agreement. As well as monitoring usage, we may also monitor content of e-mails etc.
- We follow Wandsworth Council guidelines for the transfer of any data, such as MIS data or reports of children, to professionals working in the Local Authority or their partners in Children's Services / Family Services, Health, Welfare and Social Services.
- All staff have their own unique username and private passwords to access school systems. Staff are responsible for keeping their passwords private.
- We require staff to use STRONG passwords for access into our MIS system.

- We require staff to change their passwords into the MIS, USO admin site, and other systems every 90 days.
- We require that any personal/sensitive material must be encrypted if the material is to be removed from the school, and limit such data removal.
- School staff who set up usernames and passwords for e-mail, network access and other online services work within the approved system and follow the security processes required by those systems.
- We ask staff to undertake house-keeping checks at least annually to review, remove and destroy any digital materials and documents which need no longer be stored.

Technical or manual solutions

- Staff have secure area(s) on the network to store sensitive documents or photographs.
 - We require staff to log-out of systems when leaving their computer, but also enforce lock-out after 10 mins. idle time.
 - We use RAV3 / VPN solution with its 2-factor authentication for remote access into our systems.
 - We use the DfE S2S site to securely transfer CTF pupil data files to DfE / other schools.
 - We use the Pan-London Admissions system to transfer admissions data.
 - We use LGfL AutoUpdate for creation of online user accounts for access to services and online resources.
 - All staff use LGfL staffmail for all school related email.
 - We use LGfL's USO-FX2 to transfer documents to schools in London, such as references, reports of children.
 - We store any sensitive/special category written material in lockable storage cabinets in a lockable storage area
 - All servers are in lockable locations and managed by DBS-checked staff.
 - Back-ups are encrypted.
 - We use LGfL's Cloud remote secure back-up / NAS boxes on site for disaster recovery on our network / admin, curriculum servers.
 - We comply with the WEEE directive on equipment disposal, by using an approved disposal company for disposal of IT equipment. For systems, where any protected or restricted data has been held, (such as servers, photocopiers), we get a certificate of secure deletion.
 - Portable equipment loaned by the school (for use by staff at home), where used for any protected data, is disposed of through the same procedure.
 - Paper based sensitive information is shredded, using a cross-cut shredder.
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- Appendix 1 - Data Breach response plan

- Appendix 2 – Data Protection breach record
- Appendix 3 – Roles & responsibilities of the Data Protection Officer