

SECURITY MEASURES

An outline of the Organisational and Technical Security measures deemed appropriate by the Data Controller for the nature of the personal data processed by the Controller and any Data Processor acting on its behalf

Description of Security Measures employed to safeguard the processing of Personal Data

1. Organisational

a. Policies & Documented Procedures

Policies relating to information governance issues are drafted by employees with detailed knowledge of legal requirements and the Organisation's processes. All policies have documented review dates and ownership is assigned. Reviews are held ahead of the expiry date or sooner where there is an identified issue. All policies follow a governance route for approval. Key policies are published to the organisation's website for transparency.

b. Roles

The organisation has a named Data Protection Officer who is Lauri Almond. This Officer executes the role by reporting the outcome of statutory process to Marie Maduro-Henson who acts as the organisation's Senior Information Risk Owner.

The school has a Data Protection Lead Lisa Gibbs who ensures the school complies with all data protection policies and procedures and manages the administration of data protection matters, reporting to the SIRO.

c. Training

All staff are required to undertake GDPR for Education refresher training annually. The organisation regularly reviews our employee roles to ensure that training and awareness messages are appropriate to the nature and sensitivity of the data processing undertaken. Induction processes ensure new employees receive appropriate training before accessing personal data, and all other employees receive refresher training annually. All staff

receive mandatory cyber security training annually. All training received is documented for evidence purposes.

d. Risk Management & Privacy by Design

The organisation identifies information compliance risks on its risk register. Risks are assigned clear ownership, rated against a consistent schema, appropriate mitigations are identified and are annually reviewed. Data Protection Impact Assessments are completed for any sensitive processing or any new technologies

e. Contractual Controls

All Data Processors handling personal data on behalf of the school are subject to contractual obligations or other legally binding agreements.

f. Physical Security

All employees or contractors who have access to our premises where personal data is processed are provided with Identity Cards which validate their entitlement to access. The organisation operates processes which ensure only those individuals who have an entitlement to access premises are able to. Access to physical storage holding sensitive personal data is further restricted either through lockable equipment with key or code control procedures or through auditable access to specific rooms/ areas of buildings.

g. Data Breach Management

The organisation maintains a data breach process which, with the support of appropriate training, defines what constitutes a breach of these security measures to facilitate reporting of incidents. The process covers investigation of incidents, risk rating and decisions over whether to notify a breach to the Information Commissioner's Office (ICO) within the statutory timescale and the National Cyber Security Centre (NCSC) for cyber security incidents. Breaches are reported to senior leaders and actions are consistently taken and lessons learned implemented.

2. Technical

a. Data at Rest

i. Use of Hosting Services

Some personal data is processed externally to the organisation's managed environment by third parties in data centres under agreed terms and conditions which evidence appropriate security measures and compliance with the law.

ii. Firewalls

Access to the Organisation's managed environment is protected by maintained firewalls. Business needs to provide access through the firewall go through a strictly documented change control process which include risk assessment and approval.

iii. Administrator Rights

Enhanced privileges associated with administrator accounts are strictly managed. Administrator activities are logged and auditable to ensure activity can be effectively monitored.

iv. Access Controls

Access permissions to personal data held on IT systems is managed through role-based permissions. Managers of appropriate seniority inform IT professionals of additions, amendments and discontinuation of individual accounts within permission groups. Managers are periodically required to confirm that current permissions for which they are the authoriser and employees associated with these permissions are accurate.

v. Password Management

The organisation requires a mandatory password complexity combination of minimum length and characters, plus a required change of password after 90 days.

vi. Anti-Malware & Security Updates

Anti-malware programs scan our computer system to prevent, detect and remove malware. The organisation has a documented change control process which facilitates the prompt implementation of any security updates provided by the suppliers of active software products.

vii. Disaster Recovery & Business Continuity

As part of the organisation's business continuity plan, there is provision to ensure effective processes are in place to both

safeguard personal data during a service outage incident and to re-establish secure access to the data to support data subject rights in ongoing service provision.

viii. Penetration Testing / Vulnerability

We manage penetration testing and vulnerabilities through regular testing, continuous monitoring, timely remediation, and verification of security improvements.