

# **Westmoor Primary School**



## **Data and Cyber-security Breach Prevention and Management Plan**

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## **Statement of intent**

**Westmoor Primary School** is committed to maintaining the confidentiality of its information and ensuring that the details of the finances, operations and individuals within the school are only accessible by the appropriate individuals. It is, therefore, important to uphold high standards of security, take suitable precautions, and to have systems and procedures in place that support this.

The school recognises, however, that breaches in security can occur, particularly as most information is stored online or on electronic devices which are increasingly vulnerable to cyber-attacks. This being the case, it is necessary to have a contingency plan containing a procedure to minimise the potential negative impacts of any security breach, to alert the relevant authorities, and to take steps to help prevent a repeat occurrence.

## 1. Legal framework

This policy has due regard to legislation and guidance including, but not limited to, the following:

- Computer Misuse Act 1990
- The UK General Data Protection Regulation (GDPR)
- Data Protection Act 2018
- National Cyber Security Centre (2018) 'Cyber Security: Small Business Guide'
- ICO (2021) 'Guide to the UK General Data Protection Regulation (UK GDPR)'
- **[New]** (DfE) 'Meeting digital and technology standards in schools and colleges'

This policy has due regard to the school's policies and procedures including, but not limited to, the following:

- Online Safety Policy
- Data Protection Policy
- Acceptable Use Policy
- Cloud Computing Policy
- Social Media Policy

## 2. Types of security breach and causes

**Unauthorised use without damage to data** – involves unauthorised persons accessing data on the school system, e.g. 'hackers', who may read the data or copy it, but who do not actually damage the data in terms of altering or deleting it.

**Unauthorised removal of data** – involves an authorised person accessing data, who removes the data to pass it on to another person who is not authorised to view it, e.g. a staff member with authorised access who passes the data on to a friend without authorised access – this is also known as data theft. The data may be forwarded or deleted altogether.

**Damage to physical systems** – involves damage to the hardware in the school's Computing system, which may result in data being inaccessible to the school and/or becoming accessible to unauthorised persons.

**Unauthorised damage to data** – involves an unauthorised person causing damage to data, either by altering or deleting it. Data may also be damaged by a virus attack, rather than a specific individual.

Breaches in security may be caused as a result of actions by individuals, which may be accidental, malicious or the result of negligence – these can include:

- Accidental breaches, e.g. as a result of insufficient training for staff, so they are unaware of the procedures to follow.
- Malicious breaches, e.g. as a result of a hacker wishing to cause damage to the school through accessing and altering, sharing or removing data.

- Negligence, e.g. as a result of an employee that is aware of school policies and procedures, but disregards these.

Breaches in security may also be caused as a result of system issues, which could involve incorrect installation, configuration problems or an operational error – these can include:

- Incorrect installation of anti-virus software and/or use of software which is not the most up-to-date version, meaning the school software is more vulnerable to a virus.
- Incorrect firewall settings are applied, e.g. access to the school network, meaning individuals other than those required could access the system.
- Confusion between back-up copies of data, meaning the most recent data could be overwritten.

### 3. Roles and responsibilities

**[Updated]** The governing board will be responsible for:

- Ensuring the school has appropriate cyber-security measures in place.
- Ensuring the school has an appropriate approach to managing data breaches in place.
- Supporting the Head Teacher and other relevant staff in the delivery of this policy.
- **[New]** Ensuring the school meets the relevant cyber-security standards.

The Head Teacher will be responsible for:

- Ensuring all staff members and pupils are aware of their responsibilities in relation to this policy.
- Ensuring appropriate user access procedures are in place.
- Responding to alerts for access to inappropriate content in line with the Online Safety Policy.
- Organising training for staff members in conjunction with the online safety officer and DPO.
- Ensuring a log of cyber-security incidents is maintained.
- Appointing a cyber-recovery team who is responsible for implementing the school's procedures in the event of a cyber-security incident.

The DPO will be responsible for:

- The overall monitoring and management of data security.
- Deciding which strategies are required for managing the risks posed by internet use.
- Leading on the school's response to incidents of data security breaches, including leading the cyber recovery team.
- Assessing the risks to the school in the event of a cyber-security breach.
- Determining which organisations and individuals need to be notified following a data security breach, and ensuring they are notified.
- Working with the Computing technician, online safety officer and Head Teacher after a data security breach to determine where weaknesses lie and improve security measures.

- Organising training for staff members on data security, network security and preventing breaches.
- Monitoring and reviewing the effectiveness of this policy, alongside the Head Teacher, and communicating any changes to staff members.

The Computing technician will be responsible for:

- Maintaining an inventory of all Computing hardware and software currently in use at the school.
- Ensuring any out-of-date software is removed from the school systems.
- Implementing effective firewalls to enhance network security and ensuring that these are monitored regularly.
- Installing, monitoring and reviewing filtering systems for the school network.
- Setting up user privileges in line with recommendations from the Head Teacher.
- Maintaining an up-to-date and secure inventory of all usernames and passwords.
- Removing any inactive users from the school system and ensuring that this is always up-to-date.
- Installing appropriate security software on staff members' personal devices where the Head Teacher has permitted for them to be used for work purposes.
- Performing a back-up of all electronic data held by the school, ensuring detailed records of findings are kept.
- Ensuring all school-owned devices have secure malware protection and are regularly updated.
- Recording any alerts for access to inappropriate content and notifying the Head Teacher.

The online safety officer (Computing Lead) will be responsible for:

- Organising training and resources for staff on online safeguarding risks and preventative measures.
- Taking responsibility for online safety within the school and promoting online safety measures to parents.
- Ensuring the relevant policies and procedures are in place to protect pupils from harm, including the Online Safety Policy.
- Monitoring online safety incidents which could result in data breaches and reporting these to the DPO.
- Acting as the named point of contact within the school on all online safety issues.
- Liaising with relevant members of staff on online safety matters, e.g. the DPO and Computing technician.

The DSL will be responsible for:

- Assessing whether there is a safeguarding aspect to any cyber-security incident and considering whether any referrals need to be made.

All staff members will be responsible for:

- Understanding their responsibilities in regard to this policy.
- Undertaking the appropriate training.
- Ensuring they are aware of when new updates become available and how to safely install them.

#### 4. Secure configuration

An inventory will be kept of all Computing hardware and software currently in use at the school, including mobile phones and other personal devices provided by the school. This will be stored in the **Computing subject coordinator folder on the server** and will be audited on a **termly** basis to ensure it is up-to-date.

Any changes to the Computing hardware or software will be documented using the inventory and will be authorised by the Computing technician before use.

All systems will be audited on a **termly** basis by the Computing technician to ensure the software is up-to-date. Any new versions of software or new security patches will be added to systems, ensuring that they do not affect network security, and will be recorded in the inventory.

Any software that is out-of-date or reaches its 'end of life' will be removed from systems, e.g. when suppliers end their support for outdated products meaning the product is not able to fulfil its purpose anymore.

All hardware, software and operating systems will require passwords from individual users. Passwords will be changed on an **annual** basis to prevent access to facilities which could compromise network security.

The school believes that locking down hardware, such as through the use of strong passwords, is an effective way to prevent access to facilities by unauthorised users.

Passwords will need to adhere to a specific character length, use special characters, and not be obvious or easy to guess, in line with the school's policy on passwords.

**[New]** The Computing technician will:

- Protect every device with a correctly configured boundary, or software firewall, or a device that performs the same function.
- Change the default administrator password, or disable remote access on each firewall.
- Protect access to the firewall's administrative interface with multi-factor authentication (MFA), or a small, specified IP-allow list combined with a managed password, or prevent access from the internet entirely.
- Keep firewall firmware up to date.
- Check monitoring logs as they can be useful in detecting suspicious activity.
- Block inbound unauthenticated connections by default.

- Document reasons why particular inbound traffic has been permitted through the firewall.
- Review reasons why particular inbound traffic has been permitted through the firewall often, change the rules when access is no longer needed.
- Enable a software firewall for devices used on untrusted networks, like public wi-fi.

**[New]** All devices will be set up in a way that meets the standards described in the technical requirements.

**[New]** The Computing technician will devise a system for monitoring logs and documenting decisions made on inbound traffic.

## 5. Network security

In line with the UK GDPR, the school will appropriately test, assess, and evaluate any security measures put in place on a **termly** basis to ensure these measures remain effective.

The school will employ firewalls in order to prevent unauthorised access to the systems.

### **[Centralised deployments only] Centralised firewall deployment**

The school's firewall will be deployed as a centralised deployment, which means the broadband service connects to a firewall that is located within a data centre or other major network location.

As the school's firewall is managed locally by a third party, the firewall management service will be thoroughly investigated by the Computing technician to ensure that:

- Any changes and updates that are logged by authorised users within the school are undertaken efficiently by the provider to maintain operational effectiveness.
- Patches and fixes are applied quickly to ensure that the network security is not compromised.

The school will consider installing additional firewalls on the servers in addition to the third-party service as a means of extra network protection. This decision will be made by the DPO, taking into account the level of security currently provided and any incidents that have occurred.

### **[Localised deployments only] Localised firewall deployment**

The school's firewall will be deployed as a localised deployment, which means the broadband service connects to a firewall that is located on an appliance or system on the school premises, as either discrete technology or a component of another system.

As the school's firewall is managed on the premises, it is the responsibility of the Computing technician to effectively manage the firewall. The Computing technician will ensure that:

- The firewall is checked **weekly** for any changes and/or updates, and that these are recorded using the inventory.



- Any changes and/or updates that are added to servers, including access to new services and applications, are checked to ensure that they do not compromise the overall network security.
- The firewall is also checked **weekly** to ensure that a high level of security is maintained, and there is effective protection from external threats.
- Any compromise of security through the firewall is recorded using an incident log and is reported to the DPO. The Computing technician will react appropriately to security threats to find new ways of managing the firewall.

**[New]** The school will be aware that security standards may change over time with changing cyber threats.

**[New]** The school will ensure that the security of every device on its network is reviewed regularly.

**[New]** The school will agree with the Computing technician a system for recording and reviewing decisions made about network security features.

**[New]** To ensure that the network is as secure as possible, the school will:

- Keep a register, list, or diagram of all the network devices.
- Avoid leaving network devices in unlocked or unattended locations.
- Remove or disable unused user accounts, including guest and unused administrator accounts.
- Change default device passwords.
- Require authentication for users to access sensitive school data or network data.
- Remove or disable all unnecessary software according to your organisational need.
- Disable any auto-run features that allow file execution.
- Set up filtering and monitoring services to work with the network's security features enabled.
- Immediately change passwords which have been compromised or suspected of compromise.
- Protect against a brute-force attack on all passwords by allowing no more than 10 guesses in five minutes, or locking devices after no more than 10 unsuccessful attempts.

**[New]** Unlicensed hardware or software will never be used by the school.

**[New]** All unpatched or unsupported hardware or software will be replaced by the Computing technician. Where it is not possible to replace these devices, they will have their access to the internet removed so that scanning tools cannot find weaknesses.

## 6. Malware prevention

The school understands that malware can be damaging for network security and may enter the network through a variety of means, such as email attachments, social media, malicious websites or removable media controls.

The Computing technician will ensure that all school devices have secure malware protection and undergo regular malware scans in line with specific requirements. The Computing technician will update malware protection on a **termly** basis to ensure it is up-to-date and can react to changing threats. Malware protection will also be updated in the event of any attacks to the school's hardware and software.

Filtering of websites, as detailed in section 7 of this policy, will ensure that access to websites with known malware are blocked immediately and reported to the Computing technician.

The school will use mail security technology, which will detect and block any malware that is transmitted by email. This will also detect any spam or other messages which are designed to exploit users. The Computing technician will review the mail security technology on a **termly** basis to ensure it is kept up-to-date and effective.

Staff members are only permitted to download apps on any school-owned device from manufacturer-approved stores and with prior approval from the online safety officer. Where apps are installed, the Computing technician will keep up-to-date with any updates, ensuring staff are informed of when updates are ready and how to install them.

**[New]** The school will use anti-malware software that:

- Is set up to scan files upon access, when downloaded, opened, or accessed from a network folder.
- Scans web pages as they are accessed.
- Prevents access to potentially malicious websites, unless risk-assessed, authorised and documented against a specific business requirement.

## 7. User privileges

The school understands that controlling what users have access to is important for promoting network security. User privileges will be differentiated, e.g. pupils will have different access to data and the network than members of staff.

The Headteacher will clearly define what users have access to and will communicate this to the Computing technician, ensuring that a written record is kept.

The Computing technician will ensure that user accounts are set up to allow users access to the facilities required, in line with the Head Teacher's instructions, whilst minimising the potential for deliberate or accidental attacks on the network.

The Computing technician will ensure that websites are filtered on a **weekly** basis for inappropriate and malicious content. Any member of staff or pupil that accesses inappropriate or malicious content will be recorded in accordance with the monitoring process in section 14 of this policy.

All users will be required to change their passwords on an **annual** basis and/or if they become known to other individuals, in line with section 4 of this policy. Pupils are responsible for remembering their passwords; however, the Computing technician will have an up-to-date record of all usernames and passwords and will be able to reset them if necessary. The record of all usernames and passwords is encrypted. Only the Computing technician and Computing Lead has access to this inventory.

Pupils in KS1 will not have individual logins, and class logins will be used instead. If it is appropriate for a pupil to have an individual login, the Computing technician will set up their individual user account, ensuring appropriate access and that their username and password is recorded.

The 'master user' password used by the Computing technician will be made available to the Headteacher, DPO and Computing Lead, and will be kept in the **school office**.

The master user account accessed by the Computing technician, DPO and Headteacher is subject to a two-factor authentication for logins. This account requires two different methods to provide identity before logging in: a password and a verification code sent to another school-owned device which must be entered following the password.

The master user account is used as the 'administrator' which allows designated users to make changes that will affect other users' accounts in the school, such as changing security settings, monitoring use, and installing software and hardware.

A multi-user account will be created for visitors to the school, such as volunteers, and access will be filtered as per the Head Teacher's instructions. Usernames and passwords for this account will be changed on a **termly** basis and will be provided as required.

Automated user provisioning systems will be employed in order to automatically delete inactive users or users who have left the school. The Computing technician will manage this provision to ensure that all users that should be deleted are, and that they do not have access to the system.

**[New]** Password strength will be enforced at a system level – the school will use a deny list for automatic blocking of common passwords and passwords must contain a minimum of eight characters.

**[New]** The school will implement a user account creation, approval and removal process which is part of the school joining and leaving protocols.

**[New]** User accounts and access privileges will be appropriately controlled, and only authorised individuals will have an account which enables them to access, alter, disclose or delete personal data.

**[New]** Users will have a separate account for routine business if their main account:

- Is an administrative account.
- Enables the execution of software that makes significant system or security changes.
- Can make changes to the operating system.
- Can create new accounts.
- Can change the privileges of existing accounts.

**[New]** The school will consider using multi-factor authentication, particularly for accounts that have access to sensitive or personal data.

The Computing technician will review the system on a **termly** basis to ensure the password system is working at the required level.

## 8. Monitoring usage

Monitoring user activity is important for the early detection of attacks and incidents, as well as inappropriate usage by pupils or staff.

The school will inform all pupils and staff that their usage will be monitored, in accordance with the school's Acceptable Use Policy and Online Safety Policy.

If a user accesses inappropriate content or a threat is detected, an alert will be sent to the Computing technician. Alerts will also be sent for unauthorised and accidental usage. Alerts will identify the user, the activity that prompted the alert, and the information or service the user was attempting to access.

The Computing technician will record any alerts using an incident log and will report this to the DPO. The DPO will then inform the Headteacher and online safety officer as appropriate. All incidents will be responded to in accordance with section 14 of this policy, and as outlined in the Online Safety Policy.

All data gathered by monitoring usage will be kept **on a secured shared drive** for easy access when required. This data may be used as a method of evidence for supporting a not yet discovered breach of network security. In addition, the data may be used to ensure the school is protected and all software is up-to-date.

## 9. Removable media controls

The school understands that pupils and staff may need to access the school network from outside the school premises. Effective security management will be established to prevent access to, or leakage of, data, as well as any possible risk of malware.

The Computing technician will encrypt all school-owned devices for personal use, such as laptops, USB sticks, mobile phones and tablets, to ensure that they are password protected. If any portable devices are lost, this will prevent unauthorised access to personal data.

Before distributing any school-owned devices, the Computing technician will ensure that manufacturers' default passwords have been changed. A set password will be chosen, and the staff member will be prompted to change the password once using the device. The Computing technician will check school-owned devices on a **termly** basis to detect any unchanged default passwords.

Pupils and staff are not permitted to use their personal devices where the school provides alternatives, such as work laptops, tablets and USB sticks, unless instructed otherwise by the Headteacher. If pupils and staff are instructed that they are able to use their personal devices, they will ensure that they have an appropriate level of security and firewall to

prevent any compromise of the school's network security. This will be checked by the Computing technician.

When using laptops, tablets and other portable devices, the Headteacher will determine the limitations for access to the network, as described in section 5 of this policy.

Staff who use school-owned laptops, tablets and other portable devices will use them for work purposes only, whether on or off the school premises.

Staff members will avoid connecting to unknown Wi-Fi hotspots, such as in coffee shops, when using any school-owned laptops, tablets or other devices. The online safety officer will use encryption to filter the use of websites on these devices, in order to prevent inappropriate use and external threats which may compromise network security when bringing the device back onto the premises. The school uses tracking technology where possible to ensure that lost or stolen school-owned devices can be retrieved.

All data will be held on systems centrally in order to reduce the need for the creation of multiple copies, and/or the need to transfer data using removable media controls.

The Wi-Fi network at the school will be password protected and will only be given out as required. Staff and pupils are not permitted to use the Wi-Fi for their personal devices, such as mobile phones or tablets, unless instructed otherwise by the Headteacher.

## **10. Home working and remote learning**

Staff and pupils will adhere to data protection legislation and the school's related policies when working remotely.

Staff will receive **annual** training regarding what to do if a data protection issue arises from any home working or remote learning.

Wherever possible, personal data will not be taken home by staff members for the purposes of home working, due to the risk of data being lost or the occurrence of a data breach.

Staff and pupils may be required to use their own devices for the duration of the remote working or learning period. Any user on a personal device will need to access the school system through a proxy, e.g. VPN. Using a shared personal or household device for school purposes should be avoided where possible; however, the school understands that this may not always be possible.

Staff and pupils are not permitted to let their family members or friends use any school equipment, in order to protect the confidentiality of any personal data held on the device. Any staff member found to have shared personal data without authorisation will be disciplined in line with the Disciplinary Policy and Procedure.

Staff members who require access to personal data to enable them to work from home will first seek approval from the Headteacher, and it will be ensured that the appropriate security measures are in place by the Computing technician and the DPO, e.g. secure passwords and anti-virus software.

Staff will be informed that caution should be exercised while accessing personal data if an unauthorised person is in the same room. If a member of staff needs to leave their device unattended, the device should be locked.

School devices will automatically lock after **one minute** of inactivity to avoid an unauthorised person gaining access to the device. Where staff are using a personal device, they will be advised that a similar function should be implemented.

Personal data should only be transferred to a home device if this is necessary for the member of staff to carry out their role. When sending confidential information, staff must never save confidential information to a personal or household device.

Data that is transferred from a work to a home device will be encrypted so that if any data is lost, stolen or subject to unauthorised access, it will remain safe until it can be recovered.

To ensure reasonable precautions are taken when managing data, staff will avoid doing the following:

- Keeping personal data on unencrypted hard drives
- Sending work emails to and from personal email addresses
- Leaving logged-in devices and files unattended
- Using shared home devices where other house members can access personal data
- Using an unsecured Wi-Fi network

Staff working from home will be encouraged to go paperless, where possible, as paper files cannot be protected digitally and may be misplaced. If sensitive data is taken off the school premises to allow staff to work from home, it will be transported in a lockable bag or container. This will apply to data that is both paper-based and electronic.

Pupils are not permitted to use school-owned devices or software for activities that do not pertain to their online education, e.g. use of social media, gaming, streaming or viewing content that is not applicable to their curriculum. Pupils are not permitted to download any software onto school devices, unless instructed to and approved by their teacher.

Pupils will not alter the passwords or encryptions protecting school documents and systems put in place by the school. Pupils will not alter or disable any security measures that are installed on school devices, e.g. firewalls, malware prevention or anti-virus software.

Pupils will not share any confidential and/or personal information made accessible to them, e.g. VPN passwords, with anyone who is not authorised to view that information.

Pupils that do not use school devices or software in accordance with this policy will be disciplined in line with the Behavioural Policy.

Pupils must report any technical issues to their teacher as soon as possible. Parents and pupils will be encouraged to contact the online safety officer if they wish to report any concerns regarding online safety.

Any devices that are used by staff and pupils for remote working and learning will be assessed by the Computing technician prior to being taken to the home setting, using the following checks:

- System security check – the security of the network and information systems
- Data security check – the security of the data held within the systems
- Online security check – the security of any online service or system, e.g. the school website
- Device security check – the security of the personal device, including any ‘bring your own device’ systems.

The Computing technician should provide staff and pupils with details and instructions for accessing the school’s network that will be using throughout the duration of the remote working and learning period.

## 11. Backing-up data

The Computing technician performs a back-up of all electronic data held by the school on a termly basis, and the date of the back-up is recorded using a log. Each back-up is retained for three months before being deleted. The Computing technician performs an incremental back-up on a **monthly** basis of any data that has changed since the previous back-up. The Computing technician will record the date of any incremental back-up, alongside a list of the files that have been included in the back-up.

Where possible, back-ups are run overnight and are completed before the beginning of the next school day. Upon completion of back-ups, data is stored on the school’s hardware which is password protected.

Data is also replicated and stored in accordance with the school’s Cloud Computing Policy. Only authorised personnel are able to access the school’s data.

**[New]** The Computing technician will ensure that there are at least three backup copies of important data, on at least two separate devices.

**[New]** The number of devices with access to back up data will be kept to an absolute minimum.

## 12. Avoiding phishing attacks

The Computing technician will configure all staff accounts using the principle of ‘least privilege’ – staff members are only provided with as much rights as are required to perform their jobs.

Designated individuals who have access to the master user account will avoid browsing the web or checking emails whilst using this account. Two-factor authentication is used on any important accounts, such as the master user account.

organise regular training for staff members – this will cover identifying irregular methods of communication in order to help staff members spot requests that are out of the ordinary, such as receiving an invoice for a service not used, and who to contact if they notice anything unusual. Unusual communications could come in a variety of forms, e.g. emails, phone calls, text messages or social media messages.

Staff will use the following warning signs when considering whether a communication may be unusual:

- Is it from overseas?
- Is the spelling, grammar and punctuation poor?
- Is the design and quality what you would expect from a large organisation?
- Is it addressed to a 'valued customer', 'friend' or 'colleague'?
- Does it contain a veiled threat that asks the staff member to act urgently?
- Is it from a senior member of the school asking for a payment?
- Does it sound too good to be true? It is unlikely someone will want to give another individual money or access to another service for free.

The Computing technician will ensure that an appropriate email filtering system is used to identify which emails would be classed as junk or spam, applied in accordance with section 6 of this policy. The Computing technician will ensure that the filtering system is neither too strict nor too lenient, to allow the correct emails to be sent to the relevant folders.

To prevent anyone having access to personal, unnecessary information, the DPO will ensure the school's social media accounts and websites are reviewed on a **termly** basis, making sure that only necessary information is shared.

The Headteacher and DPO will ensure the school's Social Media Policy includes expectations for sharing of information – and determines what is and is not appropriate to share.

The Headteacher will ensure parents, pupils, staff and other members of the school community are aware of acceptable use of social media and the information they share about the school and themselves, in accordance with the school's Acceptable Use Policy.

### **13. User training and awareness**

The DPO and Headteacher will arrange training for pupils and staff on a **termly** basis to ensure they are aware of how to use the network appropriately in accordance with the Acceptable Use Policy. The online safety officer will arrange for staff and pupils to undertake the appropriate training relating to online safety issues./

The DPO will also arrange training for pupils and staff on a **termly** basis maintaining data security, preventing data breaches, and how to respond in the event of a data breach. Training for all staff members will be arranged by the online safety officer and DPO within **two weeks** following an attack, breach or significant update.

Through training, all pupils and staff will be aware of who they should inform first in the event that they suspect a security breach, and who they should inform if they suspect someone else is using their passwords. All staff will receive training as part of their induction programme, as well as any new pupils who join the school.

All users will be made aware of the disciplinary procedures for the misuse of the network leading to malicious attacks, in accordance with the process detailed in the Behavioural Policy and the Disciplinary Policy and Procedure.



## 14. Data security breach incidents

Any individual that discovers a data security breach will report this immediately to the Headteacher and the DPO.

When an incident is raised, the DPO will record the following information:

- Name of the individual who has raised the incident
- Description and date of the incident
- Description of any perceived impact
- Description and identification codes of any devices involved, e.g. school-owned laptop
- Location of the equipment involved
- Contact details for the individual who discovered the incident
- Whether the incident needs to be reported to the relevant authorities, e.g. ICO or the police

The school's DPO will take the lead in investigating the breach and will be allocated the appropriate time and resources to conduct this. The DPO, as quickly as reasonably possible, will ascertain the severity of the breach and determine if any personal data is involved or has been compromised. The DPO will oversee a full investigation and produce a comprehensive report.

The cause of the breach, and whether it has been contained, will be identified – ensuring that the possibility of further loss or jeopardising of data is eliminated or restricted as much as possible.

If the DPO determines that the severity of the security breach is low, the incident will be managed in accordance with the following procedures:

- In the event of an internal breach, the incident is recorded using an incident log, and by identifying the user and the website or service they were trying to access.
- The Headteacher will issue disciplinary sanctions to the pupil or member of staff, in accordance with the Behavioural Policy or Disciplinary Policy and Procedure.
- **[Centralised deployments only]** The school will work with the third-party provider to provide an appropriate response to the attack, including any in-house changes.

Any further action which could be taken to recover lost or damaged data will be identified – this includes the physical recovery of data, as well as the use of back-ups.

Where the security risk is high, the DPO will establish which steps need to be taken to prevent further data loss which will require support from various school departments and staff. This action will include:

- Informing relevant staff of their roles and responsibilities in areas of the containment process.
- Taking systems offline.
- Retrieving any lost, stolen or otherwise unaccounted for data.
- Restricting access to systems entirely or to a small group.
- Backing up all existing data and storing it in a safe location.

- Reviewing basic security, including:
  - Changing passwords and login details on electronic equipment.
  - Ensuring access to places where electronic or hard data is kept is monitored and requires authorisation.

Where appropriate, e.g. if offences have been committed under the Computer Misuse Act 1990, the DPO will inform the police of the security breach.

Schools are required to report personal data breaches to the ICO if there is a likelihood of risk to people's rights and freedoms. If the DPO decides that risk is unlikely, the breach does not need to be reported; however, the school will need to justify this decision and document the breach.

The DPO will notify the ICO within 72 hours of becoming aware of a breach where it is likely to result in a risk to the rights and freedoms of individuals.

The UK GDPR recognises that it will not always be possible to investigate a breach fully within 72 hours. The information required can be provided in phases, as long as this is done without undue further delay.

In line with the UK GDPR, the following must be provided to the ICO when reporting a personal data breach:

- A description of the nature of the breach, including, where possible:
  - The categories and approximate number of individuals concerned
  - The categories and approximate number of personal data records concerned
- The name and contact details of the DPO
- A description of the likely consequences of the breach
- A description of the measures taken, or proposed to be taken, to deal with the breach
- A description of the measures taken to mitigate any possible adverse effects, where appropriate

Schools will report a personal data breach to the ICO via their website. The school will also make use of the ICO's self-assessment tool to determine whether reporting a breach is a necessary next step.

Where a breach is likely to result in a significant risk to the rights and freedoms of individuals, the DPO will notify those concerned directly of the breach without undue delay.

Where the school has been subject to online fraud, scams or extortion the DPO will also report this using the Action Fraud website.

The DPO and Computing technician will test all systems to ensure they are functioning normally, and the incident will only be deemed 'resolved' when it has been assured that the school's systems are safe to use.

## **15. Assessment of risks**

The following questions will be considered by the DPO to fully and effectively assess the risks that the security breach has brought, and to help take the next appropriate steps. All

relevant questions will be clearly and fully answered in the DPO's report, which should record:

- What type of, and how much, data is involved?
- How sensitive is the data? Sensitive data is defined in the UK GDPR; some data is sensitive because of its very personal nature (e.g. health records) while other data types are sensitive because of what might happen if it is misused (e.g. bank account details).
- Is it possible to identify what has happened to the data – has it been lost, stolen, deleted or tampered with?
- If the data has been lost or stolen, were there any protective measures in place to prevent this, such as data and device encryption?
- If the data has been compromised, have there been effective measures in place that have mitigated the impact of this, such as the creation of back-up tapes and spare copies?
- Has individuals' personal data been compromised – how many individuals are affected?
- Who are these individuals – are they pupils, staff, governors, volunteers, stakeholders, suppliers?
- Could their information be misused or manipulated in any way?
- Could harm come to individuals? This could include risks to the following:
  - Physical safety
  - Emotional wellbeing
  - Reputation
  - Finances
  - Identity
  - Private affairs becoming public.
- Are there further implications beyond the risks to individuals? Is there a risk of loss of public confidence/damage to the school's reputation, or risk to the school's operations?
- Who could help or advise the school on the breach? Could the LA, external partners, authorities, or others provide effective support?
- Does the breach need to be reported to the ICO? If so, has it been successfully reported without undue delay?

In the event that the DPO, or other persons involved in assessing the risks to the school, are not confident in the assessment of risk, they will seek advice from the ICO.

## **16. Consideration of further notification**

The DPO will consider whether there are any legal, contractual or regulatory requirements to notify individuals or organisations that may be affected or who will have an interest in data security.

The DPO will assess whether notification could help the individual(s) affected, and whether the individual(s) could act on the information provided to mitigate risks, e.g. by cancelling a credit card or changing a password. In line with section 14, if a large number of people are affected, or there are very serious consequences, the ICO will be informed.

The DPO will consider who to notify, what to tell them and how they will communicate the message, which may include:

- A description of how and when the breach occurred and what data was involved.
- Details of what has already been done to respond to the risks posed by the breach.
- Specific and clear advice on the steps they can take to protect themselves, and what the school is willing to do to help them.
- A way in which they can contact the school for further information or to ask questions about what has occurred.

The DPO will consider, as necessary, the need to notify any third parties – police, insurers, professional bodies, funders, trade unions, website and/or system owners, banks and/or credit card companies – who can assist in helping or mitigating the impact on individuals.

## **17. Evaluation**

The DPO will document all the facts regarding the breach, its effects and the remedial action taken. This should be an evaluation of the breach, and what actions need to be taken forward.

The DPO will consider the data and contexts involved, establish the root of the breach, and where any present or future risks lie, taking into consideration whether the breach is a result of human or systematic error and see how a recurrence can be prevented.

The DPO and Headteacher will identify any weak points in existing security measures and procedures. The DPO will work with the Computing technician to improve security procedures wherever required. The DPO and Head Teacher will identify any weak points in levels of security awareness and training.

The DPO will report on findings and implement the recommendations of the report after analysis and discussion.

## **18. Monitoring and review**

This policy will be reviewed by the Head Teacher and the DPO on an **annual** basis.

The DPO is responsible for monitoring the effectiveness of this policy, amending necessary procedures and communicating any changes to staff members.