



ACE Schools Multi Academy Trust

Infosec Policy

Issue	Date adopted by Trustees	Policy Author/Reviewer	Comments	Signed by the DPO
V3	March 2019		Done	

CONTENTS

1	Introduction	1
2	Scope	1
3	General principles	2
4	Information management	2
5	Human resources information	2
6	Access to offices and information	3
7	Computers and IT	3
8	Communications and transfer	4
9	Home working	4
10	Transfer to third parties	5
11	Overseas transfer	5
12	Reporting breaches	5
13	Consequences of failing to comply	5

1 Introduction

- 1.1 ACE Schools MAT is committed to the highest standards of information security and treats confidentiality and data security extremely seriously.
- 1.2 This purpose of this policy is to:
 - 1.2.1.1 protect against potential breaches of confidentiality;
 - 1.2.1.2 ensure all our information assets and IT facilities are protected against damage, loss or misuse;
 - 1.2.1.3 support our Data Protection Policy in ensuring all staff are aware of and comply with UK law and our own procedures applying to the processing of data; and
 - 1.2.1.4 increase awareness and understanding in ACE Schools MAT of the requirements of information security and the responsibility of staff to protect the confidentiality and integrity of the information that they themselves handle.
- 1.2.2 The DPO is responsible for the monitoring and implementation of this policy. If you have any questions about the content of this policy or other comments you should contact the *DPO*.

2 Scope

- 2.1 The information covered by the policy includes all written, spoken and electronic information held, used or transmitted by or on behalf of ACE Schools MAT, in whatever media. This includes information held on computer systems, hand-held devices, phones, paper records, and information transmitted orally.
- 2.2 This policy applies to all staff, which for these purposes includes employees, trainees, contractors, and others.
- 2.3 All staff must be familiar with this policy and comply with its terms.
- 2.4 This policy supplements ACE Schools MAT's other policies relating to data protection.
- 2.5 This policy does not form part of any employee's contract of employment and ACE Schools MAT may supplement or amend this policy by additional policies and guidelines from time to time. Any new or modified policy will be circulated to staff before being adopted.

3 General principles

- 3.1 All ACE Schools MAT information must be treated as commercially valuable and be protected from loss, theft, misuse or inappropriate access or disclosure.
- 3.2 Staff should discuss with line managers the appropriate security arrangements which are appropriate and in place for the type of information they access in the course of their work.
- 3.3 Staff should ensure they attend any information security training they are invited to unless otherwise agreed by line managers.
- 3.4 Information is owned by ACE Schools MAT and not by any individual or team.
- 3.5 ACE Schools MAT information must only be used in connection with work being carried out for ACE Schools MAT and not for other commercial or personal purposes.

4 Information management

- 4.1 Information gathered should not be excessive and should be adequate relevant, accurate and up to date for the purposes for which it is to be used by ACE Schools MAT.
- 4.2 Information will be kept for no longer than is necessary and in accordance with ACE Schools MAT's data retention guidelines.
- 4.3 All confidential material that requires disposal must be shredded or, in the case of electronic material, securely destroyed, as soon as the need for its retention has passed.

5 Human resources information

- 5.1 Given the internal confidentiality of personnel files, access to such information is limited to the HR Department. Except as provided in individual roles, other staff are not authorised to access that information.
- 5.2 Any staff member in a management or supervisory role must keep personnel information confidential.

- 5.3 Staff may ask to see their personnel files in accordance with the relevant provisions of the General Data Protection Regulation.

6 Access to offices and information

- 6.1 Office doors must be kept secure at all times and visitors must not be given keys or access codes.
- 6.2 Documents containing confidential information and equipment displaying confidential information should be positioned in a way to avoid them being viewed by people passing by or be fitted with privacy screens.
- 6.3 Visitors should be required to sign in at reception, and never be left alone in areas where they could have access to confidential information.
- 6.4 Wherever possible, visitors should be seen in meeting rooms. If it is necessary for a member of staff to meet with visitors in an office or other room which contains ACE Schools MAT information, then steps should be taken to ensure that no confidential information is visible.
- 6.5 At the end of each day, or when desks are unoccupied, all paper documents, backup systems and devices containing confidential information must be securely locked away.

7 Computers and IT

- 7.1 Use password protection and encryption where available on ACE Schools MAT systems to maintain confidentiality.
- 7.2 Computers and other electronic devices must be password protected and those passwords must be changed on a regular basis. Passwords should not be written down or given to others.
- 7.3 Computers and other electronic devices should be locked when not in use to minimise the risk of accidental loss or disclosure.
- 7.4 Confidential information must not be copied onto removable hard drive, CD or DVD or memory stick without the express permission of the IT Department and it must be encrypted. Data copied onto any of these devices should be deleted as soon as possible and stored on ACE Schools MAT's computer network in order for it to be backed up.
- 7.5 All electronic data must be securely backed up at the end of each working day.

- 7.6 Staff should ensure they do not introduce viruses or malicious code on to ACE Schools MAT systems. Software should not be installed or downloaded from the internet without it first being virus checked. Staff should contact the IT department for guidance on appropriate steps to be taken to ensure compliance.

8 Communications and transfer

- 8.1 Staff should be careful about maintaining confidentiality when speaking in public places.
- 8.2 Confidential information should be marked 'confidential' and circulated only to those who need to know the information in the course of their work for ACE Schools MAT.
- 8.3 Confidential information must not be removed from ACE Schools MAT's offices without permission from MAT Leadership except where that removal is temporary and necessary.
- 8.4 In the limited circumstances when confidential information is permitted to be removed from ACE Schools MAT's offices, all reasonable steps must be taken to ensure that the integrity of the information and confidentiality are maintained. Staff must ensure that confidential information is:
- 8.4.1 not transported in see-through or other un-secured bags or cases;
 - 8.4.2 not read in public places (eg waiting rooms, cafes, trains); and
 - 8.4.3 not left unattended or in any place where it is at risk (eg in conference rooms, car boots, cafes).
- 8.5 Postal and email addresses and numbers should be checked and verified before information is sent to them. Particular care should be taken with email addresses where auto-complete features may have inserted incorrect addresses.
- 8.6 All sensitive or particularly confidential information should be encrypted before being sent by email, or be sent by tracked or recorded delivery.
- 8.7 Sensitive or particularly confidential information should not be sent by fax.

9 Home working

- 9.1 Staff should not take confidential or other information home without the permission of the *MAT Leadership* and only do so where satisfied appropriate

technical and practical measures are in place within the home to maintain the continued security and confidentiality of that information.

- 9.2 In the limited circumstances in which staff are permitted to take ACE Schools MAT information home, staff must ensure that:
 - 9.2.1 Confidential information must be kept in a secure and locked environment where it cannot be accessed by family members or visitors; and
 - 9.2.2 All confidential material that requires disposal must be shredded or, in the case of electronic material, securely destroyed, as soon as any need for its retention has passed.
- 9.3 Staff should not store confidential information on home computers (PCs, laptops or tablets).

10 Transfer to third parties

- 10.1 Third parties should only be used to process ACE Schools MAT information in circumstances where written agreements are in place ensuring that those service providers offer appropriate confidentiality, information security and data protection undertakings.
- 10.2 Staff involved in setting up new arrangements with third parties or altering existing arrangements should consult the DPO for more information.

11 Overseas transfer

- 11.1 There are restrictions on international transfers of personal data. Staff must not transfer personal data internationally at all without first consulting the DPO.

12 Reporting breaches

- 12.1 All staff have an obligation to report actual or potential data protection compliance failures to the MAT Leadership This allows ACE Schools MAT to:
 - 12.1.1 investigate the failure and take remedial steps if necessary; and
 - 12.1.2 make any applicable notifications.

13 Consequences of failing to comply

- 13.1 ACE Schools MAT takes compliance with this policy very seriously. Failure to comply puts both staff and ACE Schools MAT at risk. The importance of this policy means that failure to comply with any requirement may lead to disciplinary action, which may result in dismissal.
- 13.2 Staff with any questions or concerns about anything in this policy should not hesitate to contact the DPO.

I have read and understood this policy and agree to abide by its terms.

Signed

Date