



Rosehill Infant and Nursery School

Cyber-security Policy

Date policy last reviewed: _____

Signed by:

_____	Headteacher	Date: _____
_____	Chair of governors	Date: _____

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Statement of intent

Rosehill Infant and Nursery School is committed to maintaining the confidentiality, integrity and availability of its information and ensuring that the details of the finances, operations and individuals within the school are only accessible to the appropriate individuals. It is, therefore, important to implement appropriate levels of access, uphold high standards of security, take suitable precautions, and have systems and procedures in place that support this.

The school recognises, however, that breaches in security can occur, with most breaches caused by human error. The school will ensure all staff are aware of how to minimise this risk. In addition, because most information is stored online or on electronic devices that can be vulnerable to cyber-attacks, the school will ensure there are procedures in place to prevent attacks occurring. To minimise both risks, 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 all relevant legislation and guidance including, but not limited to, the following:

- Computer Misuse Act 1990
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- National Cyber Security Centre (2018) 'Small Business Guide: Cyber Security'
- ICO 'Guide to the UK General Data Protection Regulation (UK GDPR)'
- National Cyber Security Centre (N.D.) 'Cyber Essentials'
- DfE (2025) 'Meeting digital and technology standards in schools and colleges'

This policy operates in conjunction with the following school policies:

- Online Safety Policy
- Data Protection Policy
- Disciplinary Policy and Procedure
- Behaviour Policy
- Social Media Policy
- Cyber Response and Recovery Plan

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. This includes unauthorised people within the school, e.g. schools where pupils access systems that staff have left open and/or logged in, or where staff access data beyond their authorisation, as can occur in schools where all staff are given admin-level access for ease.

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 ICT 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 by the actions of individuals, and may be accidental, malicious or the result of negligence:

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

Breaches caused by negligence can occur as a result of a staff member knowingly disregarding school policies and procedures or allowing pupils to access data without authorisation and/or supervision

Breaches in security may also be caused by system issues, which could involve incorrect installation, configuration problems or operational errors:

- The incorrect installation of antivirus software and/or use of outdated software can make the school software more vulnerable to a virus
- Incorrect firewall settings being applied, e.g. unrestricted access to the school network, can allow unauthorised individuals to access the school system
- Operational errors, such as confusion between back-up copies of data, can cause the most recent data to be overwritten

3. Roles and responsibilities

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 headteacher and other relevant staff in the delivery of this policy.
- Ensuring the school meets the relevant cyber-security standards.
- Ensuring at least one member of the board completes basic cyber-security training.

The headteacher 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.

- Monitoring and reviewing the effectiveness of this policy, alongside the SBM, and communicating any changes to staff members.
- Lead on the strategic oversight of cyber security controls and improvements

The DPO will be responsible for:

- The overall monitoring and management of data security.
- Leading on the school's response to incidents of data security breaches, including leading the cyber recovery team.
- Advice on 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 ICT technician, online safety officer and headteacher after a data security breach to determine where weaknesses lie and improve security measures.

The ICT Team Mercury AVS will be responsible for:

- Together with the school maintain an inventory of all ICT hardware and software currently in use at the school.
- To meet annually with the Head Teacher and SBM to complete a cyber security review and remove agreed out-of-date software.
- 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 headteacher.
- Once instructed by the Head Teacher/SBM remove inactive users from the school system.
- Performing a back-up of all electronic data held by the school, ensuring detailed records of findings are kept, excluding MIS systems such as Cia and Integris/Arbor.
- Ensuring all school-owned devices have secure malware protection and are regularly updated.
- Recording any alerts for access to inappropriate content and notifying the headteacher.

The Head Teacher/SBM 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 ICT technician.
- Identifying and evaluating the school's most significant cyber risks.
- Recording historical incidents to inform future mitigation strategies.
- Monitoring user behaviour to highlight risks that may compromise cyber security.
- Working in conjunction with ICT support to:
 - Establish a clear reporting and escalation process for cyber risks.
 - Integrate cyber risks and have a cyber response and recovery plan.
 - Maintain all cyber security documentation in multiple secure formats (e.g. cloud storage, printed copies).
 - Develop and maintain a Cyber Response Plan that meets requirements of the Risk Protection Arrangement (RPA) cover or any other relevant insurance scheme.
 - Notify governors of material risks as part of routine strategic reporting.
- Working in conjunction with the DPO to:
 - Complete and maintain a Record of Processing Activities (ROPA) for all systems processing personal or sensitive data.
 - Ensure email security is configured to mitigate risks from spoofed or imitation emails.

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

The school will ensure that all devices, systems and software are securely configured to reduce vulnerabilities and minimise the risk of unauthorised access or cyber-attack.

An inventory will be kept of all ICT hardware and software currently in use at the school, including mobile phones and other personal devices provided by the school. The inventory will be stored in the leadership office and will be audited on an annual basis to ensure it is up-to-date. Any changes to the ICT hardware or software will be documented using the inventory and will be authorised by the Head Teacher before use.

All systems are audited on a daily basis our IT providers remote management system this audit occurs every 90 minutes. Any software or security patches are automatically applied to the device at the earliest opportunity.

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, if applicable.

All hardware, software and operating systems will require passwords from individual users. Passwords will be changed termly 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.

The school will refer to the five security controls outlined in the National Cyber Security Centre's (NCSC's) 'Cyber Essentials'. These are:

- **Firewalls** – Firewalls function as a barrier between internal networks and the internet. They will be installed on any device that can access the internet, particularly where staff are using public or otherwise insecure Wi-Fi.
- **Secure configuration** – The default configurations on devices and software are often as open as possible to ensure ease of use, but they also provide more access points for unauthorised users. The school will disable or remove any unnecessary functions and change default passwords to reduce the risk of a security breach.
- **Access control** – The more people have access to data, the larger the chance of a security breach. The school will ensure that access is given on a 'need-to-know' basis to help protect data. All accounts will be protected with strong passwords, and where necessary, two-factor authorisation.
- **Malware protection** – The school will protect itself from malware by installing antivirus and anti-malware software
- **Patch management** – The school will install software updates as soon as they are available to minimise the time frame in which vulnerabilities can be exploited. If the manufacturer stops offering support for the software, the school will replace it with a more up-to-date alternative.

The ICT team (Mercury AVS) will:

- Protect all devices on every network with a correctly configured boundary, or software firewall, or a device that performs the same function.

- Change the default administrator password is changed and remotely managed by Mercury.
- Protect access to the firewall's administrative interface with multi-factor authentication (MFA), or a small, specified IP address combined with a managed password, or prevent access from the internet entirely.
- Keep firewall firmware up to date.
- Check monitoring logs to help detect 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.

5. Network security

Mercury AVS employ firewalls in order to prevent unauthorised access to the systems.

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.

The school's firewall is managed centrally, only pre-approved mercury staff manage the firewall

The firewall is constantly checked 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 constantly checked 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 School. The ICT team will react appropriately to security threats to find new ways of managing the firewall.

The school will be aware that security standards may change over time with changing cyber threats, and that the security of every device on its network is reviewed regularly.

The school will agree with the IT provider a system for recording and reviewing decisions made about network security features.

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.

Unlicensed hardware or software will never be used by the school.

All unpatched or unsupported hardware or software will be replaced by the ICT 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 Mercury Avs will ensure that all school devices have secure malware protection and undergo regular malware scans in line with specific requirements. Mercury Avs will update malware protection constantly 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.

Staff will follow procedures for filtering and monitoring to keep pupils safe as set out in the Online Safety Policy. The school's filtering provider will be:

- A member of [Internet Watch Foundation](#) (IWF)
- Signed up to Counter-Terrorism Internet Referral Unit list (CTIRU)
- Effective at blocking access to illegal content

The filtering system will be able to identify technologies and techniques that allow users to get around the filtering such as VPNs and proxy services and block them, and provide alerts when any web content has been blocked

Filtering of websites will ensure that access to websites with known malware are blocked immediately and reported to Mercury Avs Ltd.

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. Mercury Avs Ltd 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 apps on any school-owned device after receiving authorisation from the Head Teacher/SBM who will check the GDPR compliance and seek advice from Mercury Avs Ltd.

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 and passwords

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

The headteacher will clearly define what users have access to and will communicate this to Mercury Avs Ltd, ensuring that a written record is kept. Mercury Avs Ltd will ensure that user accounts are set up to allow users access to the facilities required, in line with the headteacher's instructions, whilst minimising the potential for deliberate or accidental attacks on the network.

All users will be required to change their passwords on a [termly](#) basis and/or if they become known to other individuals, in line with the 'Secure configuration' section of this policy. Pupil logins are generic by class and protected by the most stringent security protocol.

The 'master user' password used by the ICT technician will be made available to the SBM and is kept in the [school safe](#).

High level accounts are protected 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 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 usage, and installing software and hardware.

A multi-user account will be created for visitors to the school, such as volunteers or supply staff, this is for short term visitors only. If access is required for more than a day individual logins and access will be provided and filtered as per the headteacher's instructions. Usernames and passwords for this account will be changed on a [termly](#) basis and will be provided as required.

The SBM is to inform the IT team to delete inactive users or users who have left the school.

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.

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

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.

The school is using multi-factor authentication for Mis systems such as I-Trent

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, as well as how it is being monitored and why, in accordance with the school's Online Safety Policy.

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

Mercury Avs Ltd will inform the Head Teacher/Chair of Governors of any alerts. All incidents will be responded to in accordance with the 'Data security breach incidents' section of this policy, and as outlined in the Online Safety Policy.

Mercury Avs Ltd will ensure that websites are filtered 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 the 'Data security breach incidents' section of this policy.

All data gathered by monitoring usage will be kept 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.

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 ICT 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.

The school does not permit use of USB sticks that are not encrypted and provided by the school.

Before distributing any school-owned devices, the ICT 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.

When using laptops, tablets and other portable devices, the headteacher will determine the limitations for access to the network, as described in the 'Network security' section 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 are not permitted to connect to unknown Wi-Fi hotspots, such as in coffee shops, when using any school-owned laptops, tablets or other devices, or when accessing school networks.

The online safety officer will use encryption to filter the use of websites on school-owned 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 agreed prior to usage. A separate Wi-Fi network will be established for visitors at the school to limit their access to school networks and any other applications which it is not necessary for them to access.

9. 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 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. This may also result in a data breach that the school would need to record and potentially report to the ICO.

Staff who require access to personal data to enable them to work from home will first seek approval from the headteacher/SBM, and it will be ensured that the appropriate security measures are in place by Mercury Avs Ltd 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 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 never be transferred to a home device.

Staff working from home will be encouraged and enabled 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. The school's procedures for taking data off the school premises will apply to both paper-based and electronic data.

When taking physical copies of data, e.g. paper documents and school-owned devices, off the school premises, staff will sign out the documents at the school office. The physical data will be signed back in when staff return it.

The age range of our pupils are 2 – 7 years of age. Any lessons that involve IT are supervised and log ins are required. Pupils cannot download any software without permissions granted from Mercury and Mercury will seek approval from the Head Teacher/SBM

Any devices that are used by staff and pupils for remote working and learning will be assessed by the ICT 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

The ICT technician will provide staff with details and instructions for accessing the school network that they will be using throughout the duration of the remote working and learning period.

In the event that a staff member decides to leave the school permanently, all data in any form will be returned on or before their last day.

10.Backing up data

Every 2 hours data kept for two months and data is encrypted 3-2-1

Mercury Avs Ltd perform a back-up of data held by the school on a daily basis. In the event the back up does not run the system will automatically send a notification to the helpdesk. Should the back up then run it will self-remedy the ticket

Each back-up is retained for twelve months before being automatically deleted.

The ICT technician performs an incremental back-up on a **monthly** basis of any data that has changed since the previous back-up. The back system provides an incremental back up on a two hour basis.

Mercury will ensure that there are at least three backup copies of important data, on at least two separate devices – one of which will remain off-site, e.g. cloud backups.

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

The school will follow the NCSC's guidance on backing up data where necessary, including:

- Identifying what essential data needs to be backed up.
- Backed-up data is stored in a separate location to the original data {cloud}
- Referring to the NCSC's Cloud Security Guidance.
- Ensuring that backing up data is regularly practised.

The school will keep under review where servers can be replaced with cloud solutions and the longer term plan is to use share point for accessing files, documents and shared folders. Mercury Avs Ltd will ensure that data is portable and allows for:

- Secure encrypted transfer.
- Data export to an open standard or commonly used format.
- Data links through secure, documented application programming interfaces (APIs).
- A timely process for data transfer in an open standard or neutral format if the school ends the contract.
- Easy and secure access from a range of devices.

The school will ensure that offline or 'cold' back-ups are secured. This can be done by only digitally connecting the back-up to live systems when necessary, and never having all offline back-ups connected at the same time.

The school's back-up strategy will be tested every two hours. All testing will be recorded.

11. Avoiding phishing attacks

Mercury Avs Ltd 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.

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?
- Is it from a supplier advising of a change in bank account details for 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.
- Is it from a generic email address, such as Gmail or Hotmail?

Mercury Avs Ltd 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 the 'Malware prevention' section of this policy. Mercury Avs Ltd 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.

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.

12. User training and awareness

The headteacher/SBM will arrange training for staff to ensure they are aware of how to use the network appropriately. 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.

The Headteacher will arrange for staff to undertake the appropriate training relating to online safety issues.

The DPO provides training for staff on an annual basis on 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 SBM/DPO within [two weeks](#) following an attack, breach or significant update.

Through training, all 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.

Staff with access to the school's IT network will be required to undertake basic cyber-security training upon induction which is refreshed every year. At least one member of the governing board will also take part in this training. The training will focus on the following:

- Phishing
- Password security
- Social engineering
- The dangers of removable storage media

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.

13. Cyber-security incidents

All cyber-security incidents will be managed in line with the school's Cyber Response and Recovery Plan.

Any individual that discovers a cyber-security incident will report this immediately to the headteacher and the SBM who will then consult 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. the ICO or police

The school's DPO will take the lead in investigating the incident, with assistance from the Headteacher, 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 incident 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 incident, 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 member of staff who caused the breach, in accordance with the Disciplinary Policy and Procedure
- In the event of any external or internal breach, the SBM/DPO will record this using an incident log and respond appropriately, e.g. by updating the firewall, changing usernames and passwords, updating filtered websites or creating further back-ups of information
- The school will organise updated staff training following a breach
- 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 what 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

The school will report a personal data breach to the DPO in the first instance who will decide if the breach needs reporting to the ICO

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 Mercury Avs Ltd 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.

14. Assessment of risks

The following questions will be considered by the DPO to fully and effectively assess the risks that the cyber-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 and/or 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?

The school will ensure that a cyber security audit is conducted annually with Mercury Avs Ltd to:

- Understand how prepared the school is in response to a cyber incident or attack.
- Highlight weaknesses and put processes in place to help reduce risk.
- Secure systems to ensure resilience against cyber incidents and attacks.
- Prepare a cyber response plan to be implemented quickly in the event of a serious incident to minimise any impact to the school.
- Avoid safeguarding issues, disruption, significant data breaches, reputational damage or significant unexpected spend and lost staff time to recover systems and data.

15. 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 the 'Data security breach incidents' section of this policy, 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, such as the 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.

16.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 Mercury Avs Ltd to improve security procedures wherever required. The DPO and headteacher 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.

17. Monitoring and review

This policy will be reviewed on an [annual](#) basis. The next scheduled review date for this plan is [July 27](#)