

Information Governance Support

Essex County Council



Approved by	LGB
Date Approved	Autumn 2019
Version	1
Review Date	Autumn 2020

SECURITY MEASURES

An outline of the Organizational and Technical Security Measures deemed appropriate by the Data Controller for the nature of the personal data processed by the Controller and any Data Processors acting on its behalf

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

1. Organisational

a. Policies & Documented Procedures

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

b. Roles

The organisation has a named Data Protection Officer who is Lauri Almond from the IGS. This Officer executes the role by reporting the outcome of statutory process to F Bates, Head of School, who acts as the organisation's Senior Information Risk Owner. The school also has a number of Information Champions and a local Information Governance Board.

c. Training

The organisation regularly reviews our employee roles to ensure that training and awareness messages are appropriate to the nature and sensitivity of the data processing undertaken. Induction processes ensure new employees receive appropriate training before accessing personal data, and all other employees receive refresher training annually. All training received is documented for evidence purposes. All policies relating to information governance are deployed to staff for signing using an online system called EVERY.

d. Risk Management & Privacy by Design

The organisation identifies information compliance risks on its risk register. Risks are assigned clear ownership, rated against a consistent schema, appropriate mitigations are identified and are annually reviewed.

e. Contractual Controls

All Data Processors handling personal data on behalf of the organisations have given assurances about the compliance of their processes; either through procurement assurances/ evidence, contractual agreement controls, risk assessments or supplementary statements.

f. Physical Security

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

g. Security Incident Management

The school maintains a security incident process which, with the support of appropriate training, defines what constitutes a breach of these security measures to facilitate reporting of incidents. In this school, minor security incidents are logged using an online system called Every. The process covers investigation of incidents, risk rating and decisions on whether to notify an incident to the Information Commissioner's Office (ICO) within the statutory timescale. Incidents are reported to senior leaders and reviewed.

2. Technical

a. Data at Rest

i. Use of Hosting Services

Some personal data is processed externally to the organisation's managed environment by third parties in data centres under agreed terms and conditions which evidence appropriate security measures. Examples are the LA, CPOMS, and RM Unify.

ii. Firewalls

Access to the Organisation's managed environment is protected by maintained firewalls. These firewalls are managed and configured by the school's ISP. External access to the school's internal network is limited but accessible through a system called RM CC4 Access.

iii. Administrator Rights

Enhanced privileges associated with administrator accounts are strictly managed. Users are only provided with the privileges required to execute their roles in all managed systems. Administrator activities are logged on some platforms and are auditable to ensure activity can be effectively monitored.

iv. Access Controls

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

v. Password Management

The organisation requires a mandatory password complexity combination of minimum length and characters, plus a required change of password every 6 months.

vi. Anti-Malware & Patching

The organisation has a mixture of managed and unmanaged change control processes which facilitates the prompt implementation of any security updates provided by the suppliers of active software products. Servers receive regular approved MS updates and are applied as required. Critical software is updated promptly when new updates are available or appropriate. End user clients automatically receive approved updates for installation depending on OS. AV updates are installed automatically.

vii. Disaster Recovery & Business Continuity

As part of the organisation's business continuity plan, there is provision to ensure effective processes are in place to both safeguard personal data during a service outage incident and to re-establish secure access to the data to support data subject rights in ongoing service provision. A full DR plan is in place.

b. Data in Transit

i. Secure email

The organisation has access to secure email software for communicating with some third parties where licensing agreements permit this (AVCO). Sensitive data will be sent using such tools where available. Where software is not available a system of password protecting sensitive data in email attachments is employed.

ii. Secure Websites

The organisation has access to third party websites which allow for secure upload of personal data. The organisation uses these facilities to fulfil statutory obligations to report personal data to other public authorities.

iii. Encrypted Hardware

Devices which store or provide access to personal data are secured by password access. Removable media such as memory sticks are blocked on all organisational devices. Removable media such as memory sticks used under extenuating circumstances are encrypted and allowed by using AV policies.

iv. Hard-Copy Data

The removal of personal data in hard-copy form is controlled by organisational policy which requires employees to take steps to conceal the data and appropriately secure the data during transport.

These security measures are reviewed annually and approved as accurate and appropriate by the organisation's governance process.