



**St Chad's**  
Academies Trust

# Information Security Policy

**Children first; in the footsteps of St. Chad**

**As we follow Christ in the footsteps of St. Chad, we seek to be servant leaders who have a desire to see all those, within our Trust family, truly flourish both spiritually and academically.**

## Document information

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| Document title                                                                                                                                                                                                                                                                                                      | Information Security Policy                                                                                                                                                                                                                                                    |                 |                          |
| Owner                                                                                                                                                                                                                                                                                                               | Data Protection Officer DPO                                                                                                                                                                                                                                                    |                 |                          |
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| Approved on                                                                                                                                                                                                                                                                                                         | 21 August 2026                                                                                                                                                                                                                                                                 | Effective from  | 01 September 2026        |
| Review date                                                                                                                                                                                                                                                                                                         | 01 September 2028                                                                                                                                                                                                                                                              |                 |                          |
| Purpose                                                                                                                                                                                                                                                                                                             | This policy outlines the technical and organisational measures required across the Trust to protect personal data from unauthorised access, loss, or disclosure, and to ensure colleagues understand their responsibilities for maintaining data security in their daily work. |                 |                          |
| The policy has been implemented following consultation, in line with statutory practice, with the Trust DPO and Chief of Operations, and the Trust Finance, Risk and Audit Committee ('the Committee'), and may be amended from time to time, following further consultation with the Committee and/or Trust Board. |                                                                                                                                                                                                                                                                                |                 |                          |
| This policy links to:                                                                                                                                                                                                                                                                                               | St Chad's GDPR Policy                                                                                                                                                                                                                                                          |                 |                          |

If you would like this information in another language or format, please speak to the Trust.

Telephone: 01543 622 433

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### Appendix 1 - Information Security Top Tips

Table of substantive changes from previous versions

This table explains where we have made substantive changes, or your ease of reference and assurance.

| Date       | Section Amended                                     |
|------------|-----------------------------------------------------|
| 11.08.2026 | Amendment to formatting in line with Trust policies |
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## 1.0 Introduction

- 1.1 St Chad's Academies Trust ('the Trust') is committed to ensuring that it provides a strong infrastructure to enable our academies to flourish and improve. The Trust recognises that its leaders and colleagues are central to this success and greatly values their commitment and contribution.
- 1.2 The core values of the Trust form the basis of all discussions with colleagues. We expect all colleagues of St. Chad's Academies Trust to respect and model these values.



- 1.3 Information security is about what you and the Trust need to do to keep **Personal Data** secure. This is the most important area of data protection to get right. Most data protection fines have come about because of information security breaches.
- 1.4 This policy must be read alongside the Trust's Data Protection Policy: Practical Guidance for colleagues which gives an overview of your, and the Trust's, obligations around data protection. In addition, you must also read the following which are relevant to data protection:
- 1.4.1 Acceptable use policy for colleagues.
  - 1.4.2 Use of Photos and Videos Policy
  - 1.4.3 Information and Records Retention Policy (if relevant to your role).
- 1.5 This policy is aimed at all colleagues working in the Trust (whether directly or indirectly), whether paid or unpaid, whatever their position, role, or responsibilities, which includes employees, trustees, contractors, agency colleagues, peripatetic colleagues, work experience / gap year / placement] students and volunteers.
- 1.6 Data protection is the responsibility of everyone in the Trust, and it is important that you read and understand the relevant policies so that you know what you must do day-to-day, but also what to do when something goes wrong.

- 1.7 Any questions or concerns about your obligations under this policy must be referred to the Data Protection Officer. Questions and concerns about technical support, or for assistance with using the Trust IT systems, must be referred to the Academy Principal.

## **2 Be aware and report concerns**

- 2.1 You must keep Trust Personal Data confidential and take steps to make sure that it is not seen by anyone unless they are entitled to see it. In this policy, Trust Personal Data means any Personal Data relating to the Trust, or its schools, such as personal data about colleagues, pupils, and parents.
- 2.2 Information security breaches can happen in a number of different ways. Examples include:
- 2.2.1 opening a suspicious attachment in an email.
  - 2.2.2 not being able to access a document because the password has been forgotten.
  - 2.2.3 an unencrypted laptop stolen after being left on a train.
  - 2.2.4 Personal Data held to ransom following a website hack.
  - 2.2.5 Inadvertently displaying information (for example a confidential email) via a screenshare or interactive whiteboard.
  - 2.2.6 Sending a confidential email to the wrong recipient; and
  - 2.2.7 Leaving documents containing Personal Data on a doorstep.
- 2.3 These should give you a good idea of the sorts of things that can go wrong, but please have a think about what problems might arise in your team or department and what you can do to manage the risks. Speak to your manager and the Data Protection Officer if you have any ideas or suggestions about improving practices. One option is to have team specific checklists to help ensure data protection compliance. Think about other teams as well, another example of something that must be reported is where you become aware that a particular department has developed a habit of leaving confidential documents in unlocked classrooms.
- 2.4 You must immediately tell the Data Protection Officer and academy data controller if you become aware of anything that might mean that there is a risk to Trust Personal Data, if you suspect a security incident or data breach or if you become aware of a practice that weakens the Trust's defences in relation to the protection of Personal Data. The sooner you tell someone the easier it is for the Trust to respond and put things right.
- 2.5 If you cannot get hold of the Data Protection Officer or it is outside of school hours, then please use this emergency contact number 07543 502182.
- 2.6 You must report even if you are not certain that something has gone wrong. For example, if you accidentally send an email to the wrong recipient, or you cannot find some papers which contain Personal Data. You must report this even if there is no evidence that they have been accessed or stolen. You must report anything which puts Personal Data at risk, for example, if Personal Data has been or is at risk of being destroyed, altered, disclosed, or accessed without authorisation, lost or stolen.
- 2.7 The Trust must report certain data breaches to the Information Commissioner's Office ICO (the data protection regulator) within 72 hours, and also let those whose information has been compromised know within strict timescales. This is another reason why it is vital that you report breaches immediately. You must report even if you are not directly involved.

- 2.8 Pupils can also pose a risk, particularly those pupils who have a good understanding of IT. Many schools have had their computer systems compromised by pupils. If you have any suspicions, please raise them as explained above.

### **3 Thinking about privacy day-to-day**

- 3.1 You should be thinking about data protection and privacy whenever you are handling Personal Data. Personal Data is virtually anything recorded about someone, even something as simple as a person's address or hobbies. Our Data Protection Policy: Practical Guidance for Colleagues includes more information on what Personal Data is.
- 3.2 If you have any suggestions for how the Trust could improve its data protection / information security practices or protect individual's privacy more robustly, please speak to the Data Protection Officer.
- 3.3 In some situations, the Trust is required to carry out an assessment of the privacy implications of using Personal Data in certain ways. These assessments are known as Data Protection Impact Assessments. For example, when we introduce new technology which represents a particular risk to privacy.
- 3.4 These assessments should help the Trust to identify the measures needed to prevent information security breaches from taking place. If you think that such an assessment is required or would be helpful, please let the Data Protection Officer know.

### **4 Critical Trust Personal Data**

- 4.1 Data protection is about protecting Personal Data. However, some Personal Data is so sensitive that we need to be extra careful. This is called **Critical Trust Personal Data** in this policy and in the Data Protection Policy: Practical Guidance for Colleagues.
- 4.2 Critical Trust Personal Data is information about:
- 4.2.1 Child protection or safeguarding matters.
  - 4.2.2 Someone's special educational needs.
  - 4.2.3 A serious allegation made against an individual (whether or not the allegations amount to a criminal offence and whether or not the allegations have been proved)
  - 4.2.4 Financial information (for example, a parent's bank details or a colleague's salary);
  - 4.2.5 An individual's racial or ethnic origin.
  - 4.2.6 An individual's political opinions.
  - 4.2.7 Someone's religious or philosophical beliefs.
  - 4.2.8 Trade union membership.
  - 4.2.9 Someone's physical or mental health or condition. This includes information about the provision of health care which reveals information about their health status.
  - 4.2.10 Sex life or sexual orientation.
  - 4.2.11 Genetic information.

- 4.2.12 Actual or alleged criminal activity or the absence of criminal convictions (e.g. Disclosure and Barring Service checks); and
- 4.2.13 Biometric information that uniquely identifies someone (e.g. fingerprints used for allowing access to buildings).

4.3 Colleagues need to be extra careful when handling Critical Trust Personal Data.

4.4 If you are sharing Critical Trust Personal Data, for example via email, then you must mark the message as SENSITIVE / HIGHLY SENSITIVE before sending.

## **5 Minimising the amount of Personal Data that we hold**

5.1 Restricting the amount of Personal Data, we hold to what is needed helps keep Personal Data safe, but you must never delete Personal Data unless you are sure you are allowed to do so.

5.2 If you would like guidance on when to delete certain types of information, please speak to the Data Protection Officer.

## **6 Using computers and IT**

6.1 A lot of data protection breaches happen because of basic mistakes being made when using the Trust's IT system. Here are some tips on how to avoid common problems.

6.2 **Lock computer screens:** your computer screen must be locked when it is not in use, even if you are only away from the computer for a short period of time.

6.3 **Close programmes and windows when not in use:** make sure you close any programmes or windows when not being used or where someone else may be able to see your screen. You must also ensure your notifications and pop-up alerts are switched off. For example, when screen sharing with pupils as part of a lesson or when using an interactive whiteboard. Emails and other programmes that contain personal data must not be accessed while screen sharing or using an interactive whiteboard.

6.4 **Be careful when looking at confidential emails and documents:** don't view confidential emails or documents whilst teaching, whilst pupils are around, or if there is a risk that the contents will be seen by someone unauthorised.

6.5 **Be familiar with the Trust's IT:** you must also make sure that you familiarise yourself with any software or hardware that you use. In particular, please make sure that you understand what the software is supposed to be used for and how to deal with any risks. For example:

6.5.1 if you use a "virtual classroom" which allows you to upload lesson plans and mock exam papers for pupils then you need to be careful that you do not accidentally upload anything more sensitive.

6.5.2 make sure that you know how to properly use any security features. For example, some software will allow you to redact documents. Make sure that you can use this software correctly so that the recipient of the document cannot "undo" the redactions; and

6.5.3 you need to be extra careful where you store information containing Critical Trust Personal Data. For example, safeguarding and child protection information must not be saved anywhere but on the agreed academy system. If in doubt, speak to the Data Protection Officer.



- 6.6 **Hardware and software not provided by the Trust:** colleagues must not use, download, or install any software, app, programme, or service without permission from the relevant IT Department Provider. Colleagues must not connect (whether physically or by using another method such as Wi-Fi or Bluetooth) any device or hardware to the Trust IT systems without permission from the IT Provider.
- 6.7 **Private cloud storage:** you must not use private cloud storage or file sharing accounts to store or share Trust documents. You must only use cloud storage provided by the Trust.
- 6.8 **Portable media devices:** the use of portable media devices (such as USB drives, portable hard drives, DVDs) is not allowed unless those devices have been given to you by the Trust and you have received training on how to use those devices securely. The IT provider will protect any portable media device given to you with encryption. You must not plug in or connect anything not provided by the Trust, to Trust computers or other equipment, even if it looks harmless. This is because something that looks innocuous such as a USB charging cable can be harmful.
- 6.9 **Trust IT equipment:** if you are given Trust IT equipment to use (this includes laptops, printers, phones, cameras, USB drives and DVDs), you must make sure that this is recorded on the Trust's IT equipment asset register. Trust IT equipment must always be returned to the IT Department even if you think that it is broken and will no longer work, and the asset register updated accordingly.
- 6.10 **Where to store electronic documents and information:** you must ensure that you only save or store electronic information and documents in the correct location on the Trust's systems.

## **7 Passwords**

- 7.1 Passwords must be as long as possible and difficult to guess. The longer a password the more difficult it is to hack.
- 7.2 Create a password using three random words with special characters and numbers (e.g. 82@GiraffeSparklingBlue).
- 7.3 Make sure that the words are unrelated to each other. The advantage of three well-chosen random words is that they can be easy to remember but not easy to guess.
- 7.4 Make sure your password is memorable but don't choose words or numbers that are linked to you like the names of your family members or words related to the Trust. Do not choose a password which is so complex that it's difficult to remember without writing it down.
- 7.5 You must not use a password which you use for another account.
- 7.5.1 For example, you must not use your password for your private email address or online shopping account for any Trust account.
- 7.5.2 This is because if your personal account is compromised this presents a risk of access to the Trust's systems as well. Neither must you use your work email address for personal things online (e.g. online shopping).
- 7.6 Passwords (and any other security credential you are issued with such as a key fob or USB drive) must be kept secure and confidential and must not be shared with, or given to, anyone else. Passwords must not be written down.
- 7.7 You can check if your email address has been compromised by using the website Have I Been Pwned: Check if your email has been compromised in a data breach. Please speak to the IT Department if you have any questions.

- 7.8 Sometimes a computer or web browser will allow you to save the password so that you do not need to type it in again next time. You must make sure this does not happen, for example, by declining any request from the browser to save the password.

## **8 Cyber-attacks and related risks**

- 8.1 Schools are frequently targeted by attackers looking to take advantage of vulnerabilities in their systems and processes. Sometimes, such attacks will look to exploit technical weaknesses, whilst on other occasions attacks will focus on the human element.
- 8.2 For example, an attacker might encourage someone to click on a link in an email by making the email appear as if it has come from a trusted source such as a colleague. This is commonly known as a phishing attack. Phishing attacks are usually done by email or text but can also be via social media. You can reduce the likelihood of a phishing attack by thinking about what information you (and others) post about you, and by reviewing your privacy settings on your social media accounts.
- 8.3 Hackers will sometimes carry out research to help make their communications appear genuine (e.g. research what job you have at the Trust). They might even have discovered one of your passwords used outside of the Trust through another cyber-attack and mention this.
- 8.4 For example, a phishing email might appear to be from the Trust's IT team and state that you must click on a link to reset your password immediately or you will lose all of your emails. If you click on the link it would take you a page that looks genuine and asks you to input your current password and create a new one. The hacker then has your password and can use this to access the Trust's systems.
- 8.5 The following are examples of the types of things to look out for in emails and text messages:
- 8.5.1 a request for information, especially financial information.
  - 8.5.2 a request to click a link or open an attachment.
  - 8.5.3 the sender telling you that it is urgent or pressuring you to act.
  - 8.5.4 the sender appears as though they have authority or power.
  - 8.5.5 poor language or spelling.
  - 8.5.6 a payment request from a supplier using an email address that is not their usual email address; or
  - 8.5.7 unusual sender details or an email address that doesn't look quite right. Often someone may try to pretend that they are emailing you from a Trust email address. For example, the email address after the @ symbol might contain the name of your academy, or the Trust, but the spelling is incorrect or the suffix at the end of the email might be different (e.g. .org rather than org.uk or vice versa).
- 8.6 Alternatively, an email or text may appear as if it's from someone who is providing technical support. For example, it might ask for your password or other credentials. Never share your password with anyone. IT will never ask for this.
- 8.7 If you find that you cannot access a particular programme, system or set of data, you must contact the IT team immediately. Whilst this could just be a technical fault, it could be evidence that someone has been able to gain access to the Trust's systems.

- 8.8 Sometimes the attacker may be someone known to the Trust, such as a parent or pupil. For example, following an acrimonious divorce a parent may set up an email address using the other parent's name in order to try to trick the Trust into sending them information concerning the other parent.
- 8.9 If you are asked to provide Personal Data over the phone, make sure that the request is genuine. For example, by calling the individual back using the number you have on the system. In most cases, this must be done even if the person says that they are in a position of authority, such as the police.
- 8.10 Sometimes hackers create fake links to advertisements which are displayed on websites. When you click on the link or advert a malicious programme is downloaded.
- 8.11 You must also be on your guard if anyone asks you to change Personal Data held by the Trust. Compromising the accuracy of Personal Data is also a breach, even if it is accidental.
- 8.12 You must be familiar with the Trust's normal policies and procedures relevant to your role (e.g. around the payment of invoices) so that you can more easily spot an unusual request.
- 8.13 Hackers will sometimes use information about people found online to increase the likelihood that their attack will succeed. For example, if they know that you have access to financial information, they might use this to target you. You must be careful about what you publish online regarding your job.
- 8.14 If you fall victim to any form of scam or attack, you **MUST** report this immediately so that the Trust can take the necessary steps to minimise the impact of the action, and report where necessary. Please see section 2 above. Every successful cyber-attack that goes unreported, with no investigation or information sharing, makes other attacks and repeat attacks more likely.
- 8.15 If you receive a suspicious message, you must inform the IT Department immediately rather than simply ignoring the message.

## **9 Email and telephone (including text messaging and messaging apps)**

- 9.1 You must take care to make sure that the recipients are correct. Getting an email address or telephone number wrong is one of the most common causes of a breach.
- 9.2 Double check email attachments before sending by opening them after you have attached them to the email.
- 9.3 **Emails to multiple recipients:** It is not always necessary to hide email addresses. For example, when sending a routine email to colleagues about a timetable change.
- 9.4 **Forwarding email chains:** always check the entire email chain before forwarding on.
- 9.5 **Encryption:** remember to encrypt internal and external emails that contain Critical Trust Personal Data. For example, encryption must be used when sending details of a safeguarding incident to social services.
- 9.6 **Non-trust email addresses:** you must not use a non-school email address for sending or receiving Trust Personal Data. You must only use a trust email address, Please note that this rule applies to trustees as well. Please speak to the data Protection officer if you require an email account to be set up for you.
- 9.7 **Messaging apps:** you must not use messaging apps (e.g. WhatsApp) for sharing Trust Personal Data unless you have been given permission by the Data Protection Officer.

## 10 Paper files

- 10.1 **Keep under lock and key:** colleagues must ensure that papers which contain Personal Data are kept under lock and key, in a secure location, and that they are never left unattended on desks (unless the room is secure). Any keys must be kept safe. If you take Personal Data with you to a meeting, make sure that you collect all of your papers when you leave.
- 10.2 If the papers contain Critical Trust Personal Data, then they must be kept in secure cabinets identified for the specified purpose as set out in the table below. Information held in paper format must not be stored in any other location.

| Cabinet                                                | Access                                                                                          |
|--------------------------------------------------------|-------------------------------------------------------------------------------------------------|
| Child protection - located in the DSL's office         | For each cabinet, access should be limited to the DSL and DDSL at the Academy Trust.            |
| Financial information - located in the Bursar's office | For each cabinet, access should be limited to the SBM and Exec/Principal.                       |
| Health information etc                                 | For each cabinet, access should be limited to the Exec/Principal, Head of School, DSL and DDSL. |

- 10.3 **Disposal:** paper records containing Personal Data must be disposed of securely by placing them in confidential waste bins. Personal Data must never be placed in the general waste.
- 10.4 **Printing:** you must collect everything from the printer straight away, otherwise there is a risk that confidential information might be read or picked up by someone else. If you see anything left by the printer which contains Personal Data then you must hand it in to the Exec/Principal.
- 10.5 **Put papers away:** you must always keep a tidy desk and put papers away when they are no longer needed.
- 10.6 **Displays:** be aware of what Personal Data is on display when the classroom is being used for lessons. For example, would it be possible for pupils to read information that is on your desk while you are teaching? Additionally, if any photographs or videos are being taken on the school premises, you must ensure that there is no Personal Data in the background (e.g. on school displays) that could be accidentally captured and made public by the photograph or video.
- 10.7 **Post:** you also need to be extra careful when sending items in the post. Confidential materials, including anything which contains Critical Trust Personal Data, must not be sent using standard post. If you need to send something in the post that is confidential, always use Tracked postage services.

## 11 Working off site (e.g. school trips and homeworking)

- 11.1 Colleagues might need to take Personal Data off site for various reasons, for example because they are working from home or supervising a school trip. This does not breach data protection law if appropriate safeguards are in place.

- 11.2 For school trips, the trip organiser] is responsible for deciding what information needs to be taken and who will look after it. You must make sure that any Personal Data taken off site is returned to the school.
- 11.3 If you are allowed to work from home, then check with the Academy Data protection controller what additional arrangements are in place in relation to paper records and accessing information electronically. This might involve installing software on your home computer or smartphone, please see section 12 below. You must never email anything containing Trust Personal Data either from or to a non-school email address.
- 11.4 Not all colleagues are allowed to work from home. If in doubt, speak to the Data Protection Officer.
- 11.5 **Take the minimum with you:** When working away from school or from Trust offices, you must only take the minimum amount of information with you. For example, a teacher organising a field trip might need to take with them information about pupil medical conditions (for example allergies and medication). If only eight out of a class of twenty pupils are attending the trip, then the teacher must only take the information about the eight pupils.
- 11.6 **Working on the move:** You must not work on documents containing Personal Data whilst travelling if there is a risk of unauthorised disclosure for example, if there is a risk that someone else will be able to see what you are doing. If working on a laptop on a train, you must ensure that no one else can see the laptop screen and you must not leave any device unattended where there is a risk that it might be taken. A privacy screen may help.
- 11.7 **Return the documents:** Make sure that documents are returned. For example, if you print off some information for a school trip, make sure the printout is returned once the trip has finished.
- 11.8 **Paper records:** If you need to take hard copy (i.e. paper) records off school site then you must make sure that they are kept secure. For example:
- 11.8.1 documents must be kept in a locked case. They must also be kept somewhere secure in addition to being kept in a locked case if left unattended (e.g. overnight);
  - 11.8.2 if travelling by train you must keep the documents with you at all times and they must not be stored in luggage racks.
  - 11.8.3 if travelling by car, you must keep the documents out of sight. Please be aware that possessions left on car seats are vulnerable to theft when your car is stopped e.g. at traffic lights; and
  - 11.8.4 if you have a choice between leaving documents in a vehicle and taking them with you (e.g. to a meeting) then you must usually take them with you and keep them on your person in a locked case. However, there may be specific circumstances when you consider that it would be safer to leave them in a locked case in the vehicle out of sight. The risks of this situation should be reduced by only having the minimum amount of Personal Data with you (please see paragraph 11.5 above).
- 11.9 **Public Wi-Fi:** You must not use public Wi-Fi to connect to the internet. For example, if you are working in a cafe then you will either need to work offline or use 4G/5G.
- 11.10 Critical Trust Personal Data must not be taken off the site in paper format save for specified situations where this is absolutely necessary. For example, where necessary for school trips (see 11.5 above). Other than school trips, you must obtain authorisation from the Data Protection Officer or Academy Data Controller.

- 11.11 **When you leave us:** When you leave the Trust (e.g. to start a new job or to retire) you must return any Personal Data (and documents containing personal data) to the Academy before the end of your last day (or earlier if requested). For example, if you have been given permission to keep papers at home you will need to make sure that these are returned. Please also see 12.13 below in relation to electronic devices used for Trust work.

## 12 Using personal devices for work

- 12.1 You may only use your personal device (such as your laptop or smartphone) for work if you have been given permission by the Data Protection Officer.
- 12.2 Even if you have been given permission to do so, then before using your own device for work you must speak to the IT providers so that they can configure your device.
- 12.3 **Using your own laptop or PC:** If you use your computer for work then you must use the remote access software provided by the Academy Trust. Personal Data is accessed through the Trust's own network which is far more secure and significantly reduces the risk of a security breach
- 12.4 **Using your own smartphone or handheld:** Before you use your own smartphone or handheld for Trust work you must speak to the Trust IT Providers who can advise on the installation of device management software which will help keep Personal Data secure and separate from private files.
- 12.4.1 The Trust reserves the right to monitor, review and erase, without further notice, all content on the device that has been created for the Trust or on the Trust's behalf or which contains Personal Data.
- 12.4.2 Although we do not intend to wipe other data that is private in nature (such as private photos or private files or emails), it may not be possible to distinguish all such information from Personal Data in all circumstances. You must therefore regularly back up any private data contained on the device.
- 12.5 You must not do anything that could prevent any software installed on your computer or device by the Trust from working properly. For example, you must not try and uninstall the software, or save Trust related documents to an area of your device not protected, without permission from the Data Protection Officer.
- 12.6 **Appropriate security measures** must always be taken. This includes making sure that the firewall on your device is enabled and using anti-virus software and malware protection. Any software or operating system on your device must be kept up to date by promptly installing updates when they become available. You must make sure that you are using an operating system which is still supported (so you must not use an old version of Windows, such as Windows 7, for example).
- 12.7 **Downloading apps and software:** You must take care when downloading apps or software onto your personal device if it is used for school work. This is the case even if you are using remote access software. Hackers can exploit vulnerabilities in your personal device to access Trust Personal Data. Please only download apps from official app stores like the Apple App Store and Google Play.
- 12.8 **Screen lock and password:** You must have a screen lock on any mobile device used to access Trust Personal Data (e.g. a passcode or fingerprint). Any computer (e.g. laptop) used for Trust work must be protected with a strong password (see section 7 above).
- 12.9 **Default passwords:** If you use a device for work which came with a default password then this password must be changed immediately. You must also change the default password on any account used for work reasons even if you are not using it to share Personal Data. Please see section 7 above for guidance on choosing a strong password.

- 12.10 **Sending or saving documents to your personal device:** Documents containing Personal Data (including photos and videos) must not be sent to or saved to personal devices, unless you have been given permission by the Data Protection Officer.
- 12.10.1 This is because anything you save to your computer, tablet or mobile phone will not be protected by the Trust's security systems.
- 12.10.2 Furthermore, it is often very difficult to delete something which has been saved to a computer. For example, if you saved a school document to your laptop because you wanted to work on it over the weekend, then the document would still be on your computer hard drive even if you deleted it and emptied the recycle bin.
- 12.11 **Friends and family:** You must not share Trust Personal Data with your friends and family or allow them to access or see Trust Personal Data. For example, you must not share the login details with others, and you must log out of your account once you have finished working and restart your device. You must also make sure that your devices are not configured in a way that would allow someone else access to Trust related documents and information – if you are unsure about this then please speak to the Academy Data Controller. Disclosing Trust Personal Data to your friends and family is a data breach, and if you do so knowingly or recklessly, you might be committing a criminal offence. The Trust is likely to consider breaches of confidentiality as a disciplinary matter.
- 12.12 **Social media:** You must never upload or publish Trust Personal Data using your personal social media account, even if your account is set to private. For example, you must not upload photos of pupils under any circumstances.
- 12.13 **When you stop using your device for Trust work:** If you stop using your device for Trust work, for example:
- 12.13.1 if you decide that you do not wish to use your device for Trust work; or
- 12.13.2 if the Trust withdraws permission for you to use your device; or
- 12.13.3 if you are about to leave the Trust.
- then you must ensure that all Trust documents (including Trust emails), and any software applications provided by us for Trust purposes, are removed from the device.
- If this cannot be achieved remotely, you must submit the device to the IT Provider for wiping and software removal. You must provide all necessary co-operation and assistance to the IT provider in relation to this process.
- 12.14 **Disposal:** if you need to dispose of IT equipment, you must make sure no personal data is left on any of the devices before you dispose of them. You must check with your IT team to ensure that this is done correctly.

### **13 Breach of this policy**

- 13.1 Any breach of this policy will be taken seriously and may result in disciplinary action.
- 13.2 A colleague who deliberately or recklessly obtains or discloses Personal Data held by the Trust (or procures its disclosure to another person) without proper authority might also be committing a criminal offence and gross misconduct. This could result in summary dismissal. Further information on this and on other offences can be found in the Trust's Data Protection Policy: Practical Guidance for Colleagues.

- 13.3 Employees only: This policy does not form part of your contract of employment and may be amended by the Trust at any time.
- 13.4 We reserve the right to change this policy at any time. Where appropriate, we will notify colleagues of those changes by mail or email.



### **Appendix 1 - Information Security Top Tips**

1. Speak to the Data Protection Officer if you have any concerns, questions or suspicions.
2. If you have any questions about the Trust's IT systems speak to the Data Protection Officer.
3. If it's an emergency (e.g. you suspect a data breach) call the data Protection officer on 07543 502182.
4. If you need to dispose of any Trust Personal Data, this must be done securely (e.g. use confidential waste bins for paper).
5. Your passwords must be strong and unique (please see section 7 of the Information Security Policy for more information).
6. School Personal Data must never be sent to a non-school email account that you use.
7. Be on your guard for suspicious emails, texts and phone calls. Never click on a link, open an attachment or provide information if you have any doubts - check with the IT Provider first. See section 8 of the Information Security Policy.
8. Be extra careful to keep Personal Data secure when working away from the Trust site. For example, only take the minimum amount of Personal Data with you. See section 11 of the Information Security Policy.
9. You must only use a personal device (e.g. phone, tablet, laptop) for school work if this has been approved by the Data Protection Officer and you understand how to access Trust Personal Data securely. See section 12 of the Information Security Policy.
10. Personal Data must be sent securely. Never send anything confidential or sensitive by normal post. Speak to the IT Provider if you need to send something electronic securely.

**These are some key points to remember. You must still read and follow the Information Security Policy, which goes into a lot more detail.**