



Bronte Academy Trust

Data and E-Security Breach Prevention and Management Policy

Reviewed By	Approved By	Date of Approval	Version Approved	Next Review Date
Working Party	JB	5 Nov 18		5 Nov 20
DH	JB	13 Jan 20		13 Jan 22
DH	SC	27 Sep 22		27 Sep 24

Contents

Statement of Intent

1. Legal Framework
2. Types of security breach and causes
3. Roles and responsibilities
4. Secure configuration
5. Network security
6. Malware prevention
7. User privileges
8. Monitoring usage
9. Removable media controls and home working
10. Backing-up-data
11. Avoiding phishing attacks
12. User training and awareness
13. Security breach incidents
14. Assessment of risks
15. Consideration of further notification
16. Evaluation and response
17. Monitoring and review

Appendix

- a) Timeline of Incident Management

STATEMENT OF INTENT

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

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

1. LEGAL FRAMEWORK

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

- The Computer Misuse Act 1990
- The General Data Protection Regulation (GDPR)
- National Cyber Security Centre (2018) 'Cyber Security: Small Business Guide'

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

- E-safety Policy
- Data Protection Policy
- Acceptable Use Policy

2. TYPES OF SECURITY BREACH AND CAUSES

2.1 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.

2.2 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.

2.3 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 authorised persons.

2.4 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.

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

- Accidental breaches, e.g. as a result of insufficient training for staff, so they are unaware of the procedures to follow
- Malicious breaches, e.g. as a result of a hacker wishing to cause damage to the Trust through accessing and altering, sharing or removing data
- Negligence, e.g. as a result of an employee that is aware of school policies and procedures, but disregards these

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

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

3. ROLES AND RESPONSIBILITIES

The Trust shall nominate a data protection officer (DPO) and an e-safety officer.

3.1 The DPO is responsible for

- The overall monitoring and management of data security
- Deciding which strategies are required for managing the risks posed by internet usage, and for keeping the school's network services, data and users safe, in conjunction with the e-safety officer
- Leading on the school's response to incidents of data security breaches
- Assessing the risks to the school in the event of a data security breach
- Producing a comprehensive report following a full investigation of a data security breach
- Determining which organisations and individuals need to be notified following a data security breach, and ensuring they are notified
- Working with the head teacher and the e-safety officer after a data security breach to determine where weaknesses lie and improve security measures
- Organising training for staff members on data security and preventing breaches
- Monitoring the effectiveness of this policy, alongside the head teacher and the e-safety officer and communicating any changes to staff members

3.2 The e-safety officer is responsible for:

- Maintaining an inventory of all ICT hardware and software currently in use at the school
- Ensuring any software that is out-of-date is removed from the school premises
- Implementing effective firewalls to enhance network security and ensuring that these are monitored regularly

- Ensuring all Trust owned devices have secure malware protection and that devices are regularly updated
- Installing, monitoring and reviewing filtering systems for the school's network
- Setting up user privileges in line with recommendations from the head teacher
- Maintaining an up-to-date inventory of all usernames and passwords
- Removing any inactive users from the school's system, ensuring that this is always up-to-date
- Recording any alerts for access to inappropriate content and notifying the head teacher
- Installing appropriate security software on staff members' personal devices where the head teacher has permitted for them to be used for work purposes
- Performing a backup of all electronic data held by the school, ensuring detailed records of findings are kept
- Organising training for staff members on network security

3.3 The head teacher is responsible for:

- Ensuring all staff members and pupils are aware of their responsibilities in relation to this policy
- Defining users' access rights for both staff and pupils, communicating these to the e-safety officer and maintaining a written record of privileges
- Responding to alerts for access to inappropriate content in line with the E-safety Policy
- Informing the e-safety officer of staff members who are permitted to use their personal devices for work purposes so that appropriate security methods can be applied
- Issuing disciplinary sanctions to pupils or members of staff who cause a data security breach
- Organising training for staff members in conjunction with the e-safety officer and the DPO

4. SECURE CONFIGURATION

4.1 An inventory will be kept of all ICT hardware and software currently in use at the schools, including mobile phones and other personal devices provided by the schools. This will be stored in the school office and will be audited annually. Any changes to the ICT hardware or software will be documented using the inventory and will be authorised by the e-safety officer before use.

4.2 Any changes to the ICT hardware or software will be documented using the inventory.

4.3 All systems will be audited to ensure the software is up to date. Any new versions or 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.

4.4 Any software that is out of date or reaches its 'end of life' will be removed from Systems, i.e. when suppliers end their support for outdated products such that any security issues will not be rectified.

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

4.6 The Trust 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.

5. NETWORK SECURITY

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

5.2 The school's firewall will be deployed as a:

- Localised deployment: 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

5.3 As the school's firewall is managed on the premises, it is the responsibility of the e-safety

officer to effectively manage the firewall. The e-safety officer will ensure that:

- The firewall is 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 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 DPO. The e-safety officer will react to security threats to find new ways of managing the firewall

6. MALWARE PREVENTION

6.1 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.

6.2 The e-safety officer will ensure that all school devices have secure malware protection and undergo regular malware scans in line with specific requirements.

6.3 The e-safety officer will update malware protection to ensure it is up to date and can react to changing threats

- 6.4 Malware protection will also be updated in the event of any attacks to the school's hardware and software
- 6.5 Filtering of websites, as detailed in section 7 of this policy, will ensure that access to websites with known malware are blocked immediately and reported to the e-safety officer
- 6.6 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.
- 6.7 The e-safety officer will review the mail security technology to ensure it is kept up to date and effective.
- 6.8 Staff members are only permitted to download apps on any school owned device from manufacturer-approved stores.
- 6.9 Where apps are installed, the e-safety officer will keep up to date with any updates, ensuring staff are informed of when updates are ready, how to install them, and that they should do this without delay.

7 USER PRIVILEGES

- 7.1 The Trust understands that controlling what users have access to is important for promoting network security. User privileges will be differentiated, i.e. pupils will have different access to data and the network than members of staff
- 7.2 The head teacher will clearly define what users have access to and will communicate this to the e-safety officer, ensuring that a written record is kept
- 7.3 The e-safety officer will ensure that user accounts are set up to allow users access to the facilities required, in line with the head teacher's instructions, whilst minimising the potential for deliberate or accidental attacks on the network.
- 7.4 The e-safety officer will ensure that websites are filtered on a weekly basis for inappropriate and malicious content. Any member of staff or pupil that has accessed inappropriate or malicious content will be recorded in accordance with the monitoring process in section 13 of this policy.
- 7.5 All users will be required to change their passwords on an annual basis and will use upper and lowercase letters, as well as numbers, to ensure that passwords are strong.
- 7.6 Users will also be required to change their password if they become known to other individuals.
- 7.7 Pupils are responsible for remembering their passwords; however, the e-safety officer will have an up to date record of all usernames and passwords and will be able to reset them if necessary.
- 7.8 The record of all usernames and passwords is encrypted. Only the the e-safety officer has access to this inventory.
- 7.9 Pupils in KS1 will not have individual logins, and class logins will be used instead. If it is appropriate for a pupil to have an individual login, the e-safety officer will set

- up their individual user account, ensuring appropriate access and that their username and password is recorded.
- 7.10 The 'master user' password used by the e-safety officer will be made available to head teacher, DPO and any other nominated senior leader, and will be kept in the school office.
- 7.11 The master user account accessed by the e-safety officer, DPO and head teacher is subject to a two-factor authentication for logins. The account requires two different methods to provide identity before logging – these are:
- A password
 - A code sent to another school owned device, such as a tablet, which must be entered following a password
- 7.12 The master user account is used as the 'administrator' which allows designated users to make changes that will affect other users' accounts in the school, such as changing security settings, monitoring use, and installing software and hardware.
- 7.13 A multi-user account will be created for visitors to the school, such as volunteers, and access will be filtered as per the head teacher's instructions. Usernames and passwords for this account will be changed on a termly basis and will be provided as required.
- 7.14 Automated user provisioning systems will be employed in order to automatically delete inactive users or users who have left the school. The e-safety officer will manage this provision to ensure that all users that should be deleted are, and they do not have access to the system.
- 7.15 The e-safety officer will review the system on a termly basis to ensure the system is working at the required level.
- 7.16 The e-safety officer will review the system on a termly basis to ensure the system is working at the required level

8 MONITORING USAGE

- 8.1 Monitoring user activity is important for the early detection of attacks and incidents, as well as inappropriate usage by pupils or staff.
- 8.2 The school will inform all pupils and staff that their usage will be monitored.
- 8.3 If a user accesses inappropriate content or a threat is detected, an alert will be sent to the e-safety officer. Alerts will also be sent for unauthorised and accidental usage.
- 8.4 The e-safety officer will record any alerts using an incident log and will report this to the head teachers. All incidents will be responded to in accordance with section 13 of this policy.
- 8.5 All data gathered by monitoring usage will be kept in a filing cabinet in the school officer for easy access when required. This data may be used as a method of evidence for supporting a not yet discovered breach of network security. In additions, the data may be used to ensure the school is protected and all software is up to date.

9 REMOVABLE MEDIA CONTROLS AND HOME WORKING

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

- 9.2 The e-safety officer 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.
- 9.3 Before distributing any school – owned devices, the e-safety officer will ensure that manufactures’ 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.
- 9.4 Pupils and staff are not permitted to use their personal devices where the school provides alternatives, such as laptops, tablets and USB sticks.
- 9.5 If pupils and staff are instructed that they are able to use their personal devices, they will ensure that they have an appropriate level of security and firewall to prevent any compromise of the school’s network security. This will be checked by the e-safety officer.
- 9.6 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.
- 9.7 Staff members will avoid connecting to unknown Wi-Fi hotspots, such as in coffee shops, when using any laptops, tablets or other devices.
- 9.8 The Wi-Fi network at the school will be password protected and will only be given out as required. Staff and pupils are not permitted to use the Wi-Fi for their personal devices, such as mobile phones or tablets, unless instructed by the head teacher.

10 BACKING-UP DATA

- 10.1 Where possible, back-ups are run overnight and are completed before the beginning of the next school day.
- 10.2 Upon completion of back-ups, data is stored on the school’s hardware which is password protected.
- 10.3 Only authorised personnel are able to access the school’s data.

11 AVOIDING PHISHING ATTACKS

- 11.1 Designated individuals who have access to the master user account will avoid browsing the web or checking emails whilst using this account
- 11.2 Staff will use the following warning signs when considering whether an email may be unusual:
- Is the email from overseas?
 - Is the spelling, grammar and punctuation poor?
 - Is the design and quality what you would expect from a large organisation?
 - Is the email addressed to a ‘valued customer’, ‘friend’ or ‘colleague’?
 - Does the email contain a veiled threat that asks the staff member to act urgently?
 - Is the email from a senior member of the school asking for a payment?
 - Does the email sound too good to be true? It is unlikely someone will want to give another individual money or access to another service for free.
- 11.3 The e-safety officer will ensure that email filtering systems, applied in accordance with section 6 of this policy, are neither too strict or lenient; filtering

that is too strict may lead to legitimate emails becoming lost, and too lenient filters may mean that emails that are spam or junk are not sent to the relevant folder.

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

12 USER TRAINING AND AWARENESS

- 12.1 The e-safety officer and head teacher will arrange training for pupils and staff to ensure they are aware of how to use the network appropriately in accordance with the Acceptable Use Policy
- 12.2 Training for all staff members will be arranged by the e-safety officer and DPO within two weeks following an attack, breach or significant update.
- 12.3 Through training, all pupils and staff will be aware of whom they should inform first in the event that they suspect a security breach, and whom they should inform if they suspect someone else is using their passwords.
- 12.4 All users will be made aware of the disciplinary procedures for the misuse of the network leading to malicious attacks.

13 SECURITY BREACH INCIDENTS

- 13.1 Any individual that discovers a security data breach will report this immediately to the head teacher and the DPO.
- 13.2 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
- 13.3 The Trust's DPO will take the lead in investigating the breach and will be allocated the appropriate time and resources to conduct this.
- 13.4 The DPO, as quickly as reasonably possible, will ascertain the severity of the breach and determine if any personal data is involved or has been compromised.
- 13.5 The DPO will oversee a full investigation and produce a comprehensive report.
- 13.6 The cause of the breach, and whether or not it has been contained, will be identified – ensuring that the possibility of further loss/jeopardising of data is eliminated or restricted as much as possible.
- 13.7 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 head teacher will issue disciplinary sanctions to the pupil or member of staff
- A data controller will work with the third party provider to provide an appropriate response to the attack, including any in house changes

13.8 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.

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

- Informing relevant staff of their roles and responsibilities in areas of the containment process
- Taking systems offline
- Retrieving any lost, stolen or otherwise unaccounted for data
- Restricting access to systems entirely or to a small group
- Backing up all existing data and storing it in a safe location
- Reviewing basic security, including:
 - Changing passwords and login details on electronic equipment
 - Ensuring access to places where electronic or hard data is kept is monitored and requires authorisation

13.10 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

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

13.12 The e-safety officer 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

14.1 The following questions will be considered by the DPO to fully and effectively assess the risks that the security breach has brought, and to help take the next appropriate steps. All relevant questions will be clearly and fully answered in the DPO's report and records:

- What type and how much data is involved?
- How sensitive is the data? Sensitive data is defined in the GDPR; some data is sensitive because of its very personal nature (e.g. health records) while other data types are sensitive because of what might happen if it is misused (e.g. bank account details).

- Is it possible to identify what has happened to the data – has it been lost, stolen, deleted or tampered with?
- If the data has been lost or stolen, were there any protective measures in place to prevent this, such as data and device encryption?
- If the data has been compromised, have there been effective measures in place that have mitigated the impact of this, such as the creation of back-up tapes and spare copies?
- Has individuals' personal data been compromised – how many individuals are affected?
- Who are these individuals – are they pupils, staff, governors, volunteers, stakeholders, suppliers?
- Could their information be misused or manipulated in any way?
- Could harm come to individuals? This could include risks to the following
 - Physical safety
 - Emotional wellbeing
 - Reputation
 - Finances
 - Identity
 - Private affairs becoming public
- Are there further implications beyond the risks to individuals? Is there a risk of loss of public confidence / damage to the Trust'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?

14.2 In the event that the DPO, or other persons involved in assessing the risks to the school, are not confident in the risk assessment, they will seek advice from the Information Commissioners Officer (ICO)

15 CONSIDERATION OF FURTHER NOTIFICATION

- 15.1 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 security.
- 15.2 The DPO will assess whether notification could help the individual (s) affected, and whether individuals could act on the information provided to mitigate risks, e.g. by cancelling a credit card or changing a password.
- 15.3 If a large number of people are affected, or there are very serious consequences, the ICO will be informed.
- 15.4 The DPO will consider who to notify, what to tell them and how they 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 will be included

- 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
- 15.5 The ICO will be consulted for guidance on when and how to notify them about breaches.
- 15.6 The DPO will consider, as necessary, the need to notify any third parties – police, insurers, professional bodies, funders, trade unions, website/system owners, banks/credit card companies – who can assist in helping or mitigating the impact on individuals.
- 15.7 The DPO will notify the ICO within 72 hours of a breach where it is likely to result in a risk to the rights and freedoms of individuals.
- 15.8 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.
- 15.9 Where the breach compromises personal information, the notification will contain:
- The nature of the personal data breach including, where possible:
 - The type(s) , e.g. staff, pupils or governors, and approximate number of individuals concerned
 - The type (s) and approximate number of personal data records concerned
 - The name and contact details of the DPO or other person(s) responsible for handling the schools' information
 - A description of the likely consequences of the personal data breach
 - A description of the measures taken, or proposed, to deal with and contain the breach and, where appropriate, of the measures taken to mitigate any possible adverse effects

16 EVALUATION AND RESPONSE

- 16.1 The DPO will establish the root of the breach, and where any present or future risks lie.
- 16.2 The DPO will consider the data and contexts involved.
- 16.3 The DPO and the head teacher will identify any weak points in existing security measures and procedures.
- 16.4 The DPO will work with the e-safety officer to improve security procedures wherever required.
- 16.5 The DPO and head teacher will identify any weak points in levels of security awareness and training.
- 16.6 The DPO will report on findings and, with the approval of the school leadership team, implement the recommendations of the report after analysis and discussion

17 MONITORING AND REVIEW

The Trustees will review this policy on a bi-annual basis.

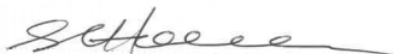
Declaration of Responsibility

This Data and E-Security Breach Prevention and Management Policy was reviewed and formally adopted by Bronte Academy Trust on

.....27 Sep 22.....Date



.....Signed Chair of Trustees



.....Signed Chief Executive Officer