St Benedict's Catholic College

Date reviewed	August 2024
Version	2024
Date of next review	August 2025

SECURITY MEASURES

An outline of the Organisational 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 College'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 for transparency.

    b. Roles

    St Benedict's Catholic College has a named Data Protection Officer who is Lauri Almond (Essex Information Governance Support) This Officer executes the role by reporting the outcome of statutory process to Chris Brown, Business Manager who acts as the organisation's Senior Information Risk Owner.

    The college has a Data Protection Lead [Chris Brown] who ensures the college complies with all data protection policies and procedures and manages the administration of data protection matters.

    c. Training

    St Benedict's Catholic College 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.

    d. Risk Management & Privacy by Design

    St Benedict's Catholic College 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 college are subject to contractual obligations or other legally binding agreements.

f. Physical Security

All employees or contractors who have access to our premises where personal data is processed are provided with Identity Cards which validate their entitlement to access. St Benedict's Catholic College 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 or through auditable access to specific rooms/ areas of buildings.

g. Data Breach Management

St Benedict's Catholic College maintains an incident process which, with the support of appropriate training, defines what constitutes a breach of these security measures to facilitate reporting of incidents. The process covers investigation of incidents, risk rating and decisions over whether to notify an incident to the Information Commissioner's Office (ICO) within the statutory timescale. Incidents are reported to senior leaders and actions are consistently taken and lessons learned implemented.

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 and compliance with the law.

ii. Firewalls

Access to the St Benedict's Catholic College network is protected by maintained firewalls.

iii. Administrator Rights

Enhanced privileges associated with administrator accounts are strictly managed. Administrator activities are logged and auditable to ensure activity can be effectively monitored.

iv. Access Controls

Access permissions to personal data held on IT systems is managed through role-based permissions. 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

St Benedict's Catholic College requires a change of password after 120 days, with a minimum length of 7 characters, including at least 1 capital letter and 1 special character. The previous 2 passwords cannot be reused.

vi. Anti-Malware & Patching

St Benedict's Catholic College has a documented process to ensure the prompt implementation of any security updates provided by the suppliers of active software products.

vii. Disaster Recovery & Business Continuity

As part of the St Benedict's Catholic College 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.

viii. Penetration Testing / Vulnerability Scanning

An annual penetration test is carried out to identify any weaknesses and potential areas of exploitation to maximise the security of the data we hold.

Our broadband connections have vulnerability scanning in place to detect and protect our network

b. Data in Transit

i. Secure Digital Communications

St Benedict's Catholic College has access to secure email software for communicating with some third parties where licensing agreements permit this. 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

St Benedict's Catholic College 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 encrypted.

iv. Hard-Copy Data

The removal of personal data in hard-copy form is controlled by our 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.