



BERKHAMPSTEAD SCHOOL

PITTVILLE CIRCUS ROAD, CHELTENHAM, GLOUCESTERSHIRE GL52 2QA
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Payment Card Information Security Policy June 2016 *(to be reviewed June 2017)*

This Payment Card Information Security Policy outlines Berkhampstead School's standards and procedures for storing and processing payment card data to ensure the protection of cardholder data and to ensure Berkhampstead School's compliance with the Payment Card Industry Data Security Standard (PCI DSS) and the Data Protection Act 1998.

This policy applies to all school staff members, temporary staff and third party contractors who handle payment card information on behalf of Berkhampstead School.

The Governors have delegated responsibility to the Bursar for ensuring compliance with the PCI DSS and the School's own guidelines for the management of card payment data.

A secure network for cardholder data

Berkhampstead School has a secure network for processing cardholder data.

It has installed an effective firewall configuration to protect data and on-going maintenance of this is carried out and considered to be of high priority.

Protecting cardholder data

The school will not store any payment card data in electronic format including on PCs within excel spreadsheets or word documents or within any information management systems. The school will not record phone calls where cardholder data is provided.

Cardholder data that is no longer required for use by the school is always destroyed securely and irrecoverably.

Berkhampstead School does not store any of the following:

- Full magnetic stripe - track 2
- Card Security Code (CSC) otherwise known as Card Verification Code (CVC or CVC2), Card Verification Value (CVV2) or Card Identification Number (CID)
- PIN/PIN block
- Sensitive authentication data (even if it is encrypted)

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- All digits of the credit card account number (only the last four numbers will be visible to selected school staff in any form - when the full number needs to be displayed the remaining numbers are always concealed or disguised using other characters (such as '*'))

Berkhampstead School does not transfer cardholder data over the internet or via any online medium.

If the school is required, in a specific (and likely to be rare) circumstance, to transport cardholder data from one location to another, this will always be authorised by the Bursar and transported via a secure courier service. All data will have been subject to an inventory check before it leaves the school premises.

Vulnerability management programme

Berkhampstead School uses and regularly updates all its anti-virus software as part of its ongoing commitment to maintaining secure IT systems within the school.

Strong access control measures

The school restricts the use of card payment facilities to authorised staff members only. Authorised staff members are given access to restricted areas containing information systems or stored payment card data because they have a justified and approved school business need. The IT security expectations of staff are defined within their individual job descriptions. Non-authorised staff members are not permitted to access cardholder data.

The school's card payment facilities and any other data storage points are protected to limit access and for wider operational security.

Regular monitoring and testing of networks

Berkhampstead School takes its responsibility for processing cardholder data seriously and regularly monitors all access to its networks and data storage facilities.

Security incident management plan

All information security incidents are reported to the Bursar the first instance who has delegated responsibility from the Board of Governors for minimising any impact from the incident. Any security breaches or loss of data will be immediately investigated to identify the reasons for the incident and the action needed to resolve any security issues. The school's senior management team will be alerted to any security breaches and a process will be put in place to inform any other parties (where relevant) of the security issue.

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In the unlikely event that the school experiences a security breach it will:

1. Immediately shut down the system or process which to prevent any further security breaches.
2. Inform all affected parties (as above) and the school's merchant bank provider World Pay who will immediately initiate their own controls, and the Police.

Maintaining an information security policy

Berkhampstead School regularly reviews this payment card information security policy to ensure Berkhampstead School is in compliance with the PCI DSS. This policy is next due to be reviewed June 2017.

This policy is distributed to all school staff members, temporary staff and third party contractors who handle payment card information on behalf of Berkhampstead School to read.

Berkhampstead School incorporates Berkhampstead Day Nursery, which is also covered under this policy.

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