



Document Control

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| Contributors | Information & Communication Technology Team |
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| 1.0 | Information & Communication Technology Manager | Review | SMT |



1.0 POLICY:

Information is one of Sunbeam House Services (SHS)'s most important assets and each individual staff member has a responsibility to ensure the security of this information. Accurate, timely, relevant and properly protected information is essential to the successful operation of SHS in the provision of services to clients.

The purpose of this policy is to affirm SHS's commitment to ensuring all access to, use of, and processing of information is performed securely, and in accordance with relevant regulatory and legislative requirements.

SHS has an obligation to abide by all Irish legislation and relevant European legislation. The relevant acts, which apply in Irish law to Information Systems, include but are not limited to:

- Child Trafficking and Pornography Act (1998)
- Copyright and Related Rights Act (2000)
- Criminal Damages Act (1991)
- Criminal Justice (Theft & Fraud Offences) Act (2001)
- Data Protection Act (1988/2003)
- Data Protection EU Directive 95/46/EC
- Ecommerce Directive (200/31/EC)
- Electronic Commerce Act (2000)
- EPrivacy Directive (2002/58/EC, 2006/24/EC, 2009/136/EC)
- European Communities (Data Protection and Privacy in Telecommunications) Regulations (2002)
- European Communities Data Protection Regulations (2001)
- Intellectual Property Miscellaneous Provisions Act (1998)

2.0 SCOPE:

This policy represents SHS's position and takes precedence over all other relevant policies which are developed at a local level. The policy applies to:

- All SHS ICT resources which include equipment, systems and applications including cloud based applications.
- All users, and uses of SHS ICT resources;
- All connections to (locally or remotely) SHS network (Local Area Network (LAN)/Wide area network (WAN))

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3.0 ROLES & RESPONSIBILITIES:

3.1 *Users*

Each user of SHS's ICT resources is responsible for:-

- 3.1.1 Complying with the terms of this policy and all other relevant SHS policies, procedures, regulations and applicable legislation.
- 3.1.2 Respecting and protecting the privacy and confidentiality of the information they process at all times.
- 3.1.3 Complying with instructions issued by the ICT Manager on behalf of SHS.
- 3.1.4 Reporting all misuse and breaches of this policy to their Senior Manager.

3.2 *Senior Managers*

In addition to each user's responsibilities, Senior Managers are directly responsible for:-

- 3.2.1 The implementation of this policy and all other relevant SHS policies within the business areas for which they are responsible.
- 3.2.2 Ensuring that all SHS employees who report to them are made aware of and are instructed to comply with this policy and all other relevant SHS policies.
- 3.2.3 Consulting with the ICT Manager in relation to the appropriate procedures to follow when a breach of this policy has occurred.

3.3 *ICT System Administrators & Developers*

Each SHS System Administrator & Developer is responsible for:-

- 3.3.1 Complying with the terms of this policy and all other relevant SHS policies, procedures, regulations and applicable legislation.
- 3.3.2 Ensuring adequate procedures are in place to ensure compliance with this policy and all other relevant policies.
- 3.3.3 Complying with instructions issued by the ICT Manager on behalf of SHS.

3.4 *ICT Manager*

In addition to the above responsibilities the ICT Manager is responsible for:

- 3.4.1 The identification, implementation and management of appropriate security controls necessary to safeguard SHS's network (LAN/WAN) and supporting infrastructure.
- 3.4.2 The implementation of system-level security controls as defined by the Managing Director.

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- 3.4.3 The provision of facilities for information backups on network file servers and other centralised information stores but excluding backups of the hard-disks on individual computers.
- 3.4.4 The provision of services which enable authorised users' access to appropriate electronic communications system and data.

4.0 GUIDELINES:

It is the policy of SHS to:-

- Implement human, organisational and technological security controls to preserve the confidentiality, availability and integrity of its information
- Comply with all laws and regulations governing information security
- Establish information security education and awareness initiatives within SHS
- Develop and maintain appropriate policies, procedures and guidelines to effect a high standard of information security, reflecting industry best practice.
- Comprehensively assess and manage risks to SHS information
- Continuously review and improve SHS information security controls, and rapidly determine the cause of any breach of security and minimise damage to information system should any such incident occur.

5.0 ENFORCEMENT

- 5.1 SHS reserves the right to take such action as it deems appropriate against users who breach the guidelines of the policy
- 5.2 Breaches of this policy by a third party, may lead to the withdrawal of SHS information technology resources to that third party and/or the cancellation of any contract(s) between SHS and the third party.
- 5.3 SHS will refer any user of its ICT resources for illegal activities to the appropriate law enforcement agencies.

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