

ISMS04 - Information Security Policy

Overview

SMS Environmental Ltd has an ethical, legal and professional duty to ensure that the information it holds conforms to the principles of confidentiality, integrity and availability. The Company is responsible for safeguarding information where necessary against unauthorised disclosure. The information must be accurate, timely and accessible on a need to know basis.

This information security policy defines SMS Environmental's approach to information security management. It outlines the guidelines and responsibilities necessary to safeguard the security of the information systems. Supporting policies and procedures provide further details.

SMS Environmental is committed to preserving the confidentiality, integrity and availability of data supplied by, generated by and held on behalf of third parties for the purpose of carrying out work agreed by contract in accordance with the requirements of information security standard ISO 27001 and legislative regulations. HR73 Privacy Policy details how SMS Environmental deals with personal data.

Scope

This policy is applicable to, and is communicated to all employees, suppliers, contractors and other relevant interested parties. This includes, but it is not limited to, any systems, networks or data outsourced by the company and any systems or data managed by the SMS Environmental internally, use of mobile devices. The scope of the SMS Environmental's information security system for the provision of Water Treatment and Hygiene Services protecting company and client information in accordance with the current version of the ISMS09 Statement of Applicability and applies to physical and electronic information assets.

Purpose

The main purpose of this policy is to:

- ensure the protection of all information systems and mitigate the risks associated with unauthorised access to confidential data, loss, misuse, damage or abuse of these systems
- ensure appropriate awareness of relevant legislations
- ensure the general awareness of information security responsibilities for confidentiality and integrity of the data
- control and monitor the processes to ensure continuous improvement

Responsibilities overview

Directors

- IT & Information Security Management
- Ensuring that information security objectives are established and are compatible with the strategic direction of the company
- The implications of Risks to Strategy Objectives
- Use of IT/ Information Security Risk Assessment to reduce risk in strategic moves
- Management of IT/ Information Security Management System Framework & Governance

IT Department

- Coordinate the development and implementation of information management practices including policies, standards, guidelines and procedures
- Monitor and report on any information intrusion incidents and activate strategies to prevent further incidents.
- Work with the Compliance Manager to ensure that information assets have been assigned appropriate security classifications.
- Defining and implementing appropriate safeguards to ensure the confidentiality, integrity, and availability of the information asset
- Assessing and monitoring safeguards to ensure their compliance and report situations of non-compliance
- Authorising access to those who have a business need for the information
- Ensuring access is removed from those who no longer have a business need for the information.
- Contribute to the strategic direction of information management within the organisation
- Information Security Risk Assessment – management Information Security Risks to the business

Compliance Manager

- Business Continuity Plan Controller
- Support management and maintenance of Information Security Management System
- Identifying the classification level of information asset
- Information Security Risk Assessment – identification Information Security Risks to the business
- Develop policies, procedures and standards to ensure the security, confidentiality and privacy of information that is consistent with organisational Information security policy

Operations management

- Safeguarding processes in accordance with ISO27001 and company procedures
- Reporting issues, potential problems, concerns and security breaches
- Managing and controlling operational risks related to Information Security

HR Department/Compliance Manager

- Training and Communication

IT Operations/ Support

- Day to day operational activities, support and governance responsibilities
- Compliance with the company procedures
- Reporting and logging issues/ implementing corrective actions
- Managing and maintenance of Information Security operational equipment
- Maintenance and upkeep of the asset as defined by the IT Department
- System Restart and recovery
- Implementing any changes as per the change management procedure
- Backup of the information
- Updating of information asset inventory register;

Data Operators / End Users

- Using safeguards established by IT department
- Following policies and procedures
- Not sharing password and secret authentication information

Organisational Context

Key activities on which SMS Environmental is dependent on, are presented in the figure below.

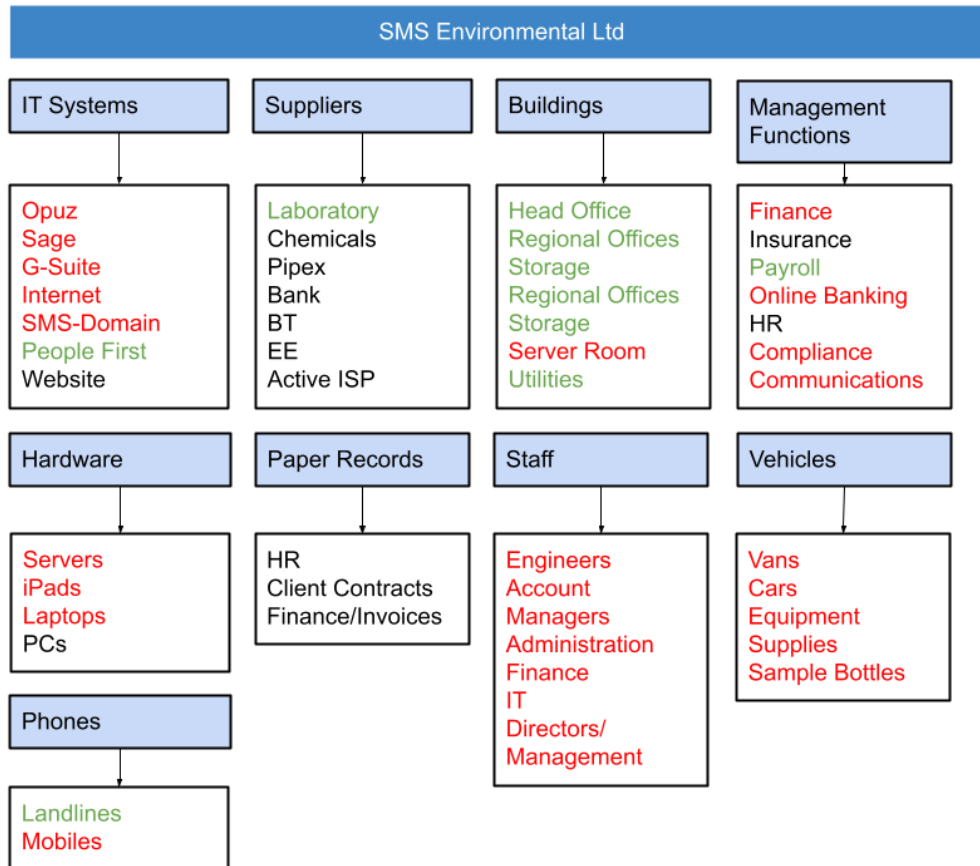


Figure 1 SMS Environmental Ltd Business Dependency Map

Key stakeholders affecting, and being affected by SMS Environmental activities are presented in the figure below.

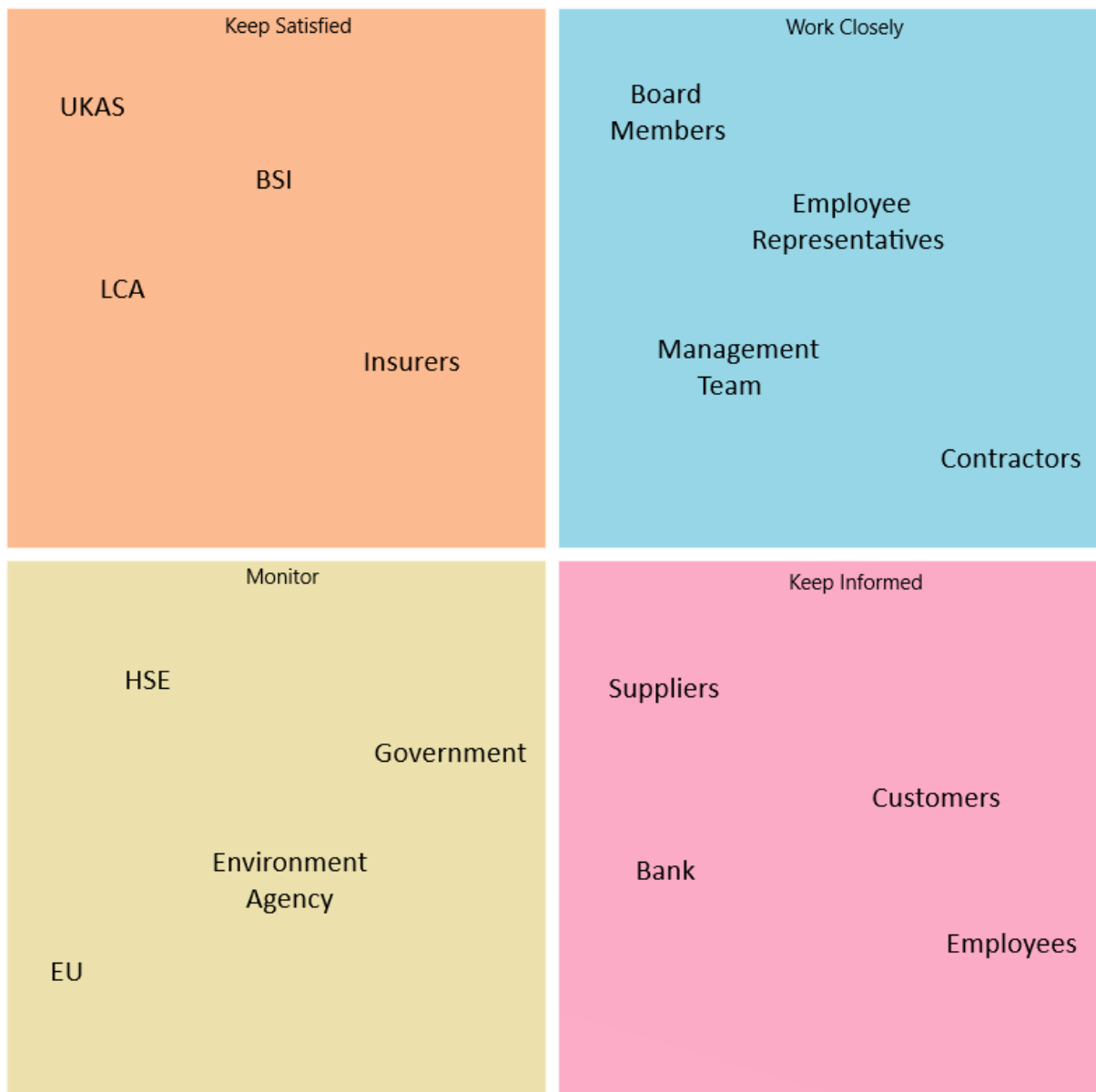


Figure 2 Identification of Stakeholders

Policy

Information Security Management takes responsibility for ensuring that information used, processed and stored by SMS Environmental is classified in accordance with appropriate levels of confidentiality, integrity and availability as well as relevant legislative, regulatory and contractual requirements.

Employees responsible for the management of information security systems must ensure appropriate classification of information. They are responsible for handling that information in accordance with its classification level and any associated procedures or systems.

All employees, regardless of their role and level of access and responsibility are obliged to handle information appropriately and in accordance with its classification level.

Information is protected against unauthorised access and processing in accordance with its classification level.

Information availability and access is established based on legitimate need for access on a need to know basis. Employees who have been granted access must not pass on information to others unless they have also been granted access through appropriate authorisation.

Security incidents and breaches of this policy must be reported immediately to the IT Department or Compliance Manager and dealt with in accordance with corrective action procedure.

Information Classification

| Label | Access Level | Scope | Lawful Basis | Availability |
|------------------------------|---|---|--|--|
| Strictly Confidential | Specified only | Sensitive - Personal Data Personally Identifying Data Bank details Passwords | Compliance with legal obligation | Restricted availability, information released only when authorised or required by Law |
| Confidential | Specified only | Personal Data (DPA) Systems | Compliance with legal obligation | Restricted availability, information released only when authorised or required by Law |
| Restricted | Employees & Clients (restricted only to client relevant data) | Internal documents, communications and correspondence Communications and correspondence with external parties Minutes | Compliance with legal and contractual obligation | Available internally or within access permission only or as required by interested parties |
| Public | Full availability as required | Annual Accounts Certificates Information Available on the website | Public Interest | Freely available through website and as required |

Confidential information relates to but is not inclusive, trade secrets, processes, operations, methods of work, sales, purchases, identification of employees and customers, inventories, income, profits, losses, expenditures or any other information of commercial or personal value. Internal access to this information must be authorised as appropriate.

Any data, which is classified as sensitive personal data under the Data Protection Act 2018 and **General Data Protection Regulations 2018 will be classified as strictly confidential.**

Confidential and Strictly Confidential files and emails will be preceded with 'CONFIDENTIAL' word in the email subject or file name as described in HR16 Internal Communications Policy.

Security Objectives

The Information Security Objectives ISMS19 must be reviewed at least annually and be established at various relevant functions and levels. The security objectives must be consistent with this policy, be measurable whenever possible, take into account relevant information security requirements and the results from risk assessment and risk treatment, be communicated and updated whenever there is a significant change that would affect their development and design. When establishing the objectives, the objective action, management, resources, responsibility, evaluation and the proposed completion target must be determined.

Monitoring and Measurement – performance evaluation

Information security performance – processes and controls and the effectiveness of the information security management system is measured through monitoring, measurement, analysis and evaluation. The results from monitoring and measurement shall be analysed and evaluated during ISO27001 Management Review (SFT094 Compliance Management Review Agenda) by the following methods

| Aspect | Associated Processes and controls | Method of monitoring | Frequency | Method of analysing | Responsibility |
|---|---|--|--|---|--------------------------------|
| Legislation | Compliance evaluation, Compliance Management Review | ISMS05 Legal Compliance Register | 6 monthly PPM | Review of compliance through: http://www.lawsociety.org.uk/support-services/advice/practice-notes/information-security/ https://ico.org.uk/for-organisations/guide-to-data-protection/principle-7-security/ Compliance Management Review | Compliance Team |
| Corrective & Improvement Actions | Internal & External Audit, Management Meetings, Management Review, Annex A – operational controls | CSIP Tasks on Opuz, Hazards, | Annual Management Meeting PPM | Review of corrective/ improvement actions, follow up actions, completion status | IT Department, Compliance Team |
| Changes Management | Changes/ Issues Management Control | Control of changes – ISMS13 | Annual Management Meeting PPM, IT Meetings | IT manages changes register and agreeing follow up actions if necessary | IT Department, Compliance Team |
| Issues Management | Changes/ Issues Management Control | Reporting procedures ISMS17 Information Security Incident Management Procedure | Annual Management Meeting PPM, IT Meetings | IT issues - agreeing follow up actions if necessary, analysing trends in incident records | IT Department, Compliance Team |
| Equipment | Asset Register | Inventory of Equipment on Opuz | Ongoing | Monitoring of assets, equipment purchase, repair, allocation | IT Department |
| Access Rights | ISMS11 Access Control Policy, ISMS04 Information Security Policy ISMS07 Mobile Device and remote working Policy, HR24 Home- working Policy – Information Classification & Access Levels | Audit of systems, Opuz, Sage, Drive, Simplify user permissions Audit of homemaker access and equipment | Yearly PPM | Audit of access provisioning & privileged access rights | IT Department |

Information Handling

Disposal of information

Any type of information must be disposed of securely. Confidential papers must be disposed of through confidential waste disposal companies approved by the company.

Electronic information must be securely erased or otherwise rendered inaccessible prior to disposal of equipment.

Backups - Information owners must ensure that appropriate backup and system recovery measures are in place. Where backups are stored off site, appropriate security measures must be taken to protect against unauthorised disclosure or loss. Recovery procedures should be tested on a regular basis.

Exchange of information

Whenever significant amounts of personal data or other confidential information are exchanged with other organisations, appropriate information security measures must be established to ensure the integrity and confidentiality of the data transferred. Regular exchanges must be covered by a formal written agreement with the third party.

When exchanging information by email or any other communication, recipient addresses should be checked carefully prior to transmission. Emails, telephone calls or any other communication requesting information which is not classified as public should not be acted upon until and unless the authenticity and validity of the communication has been verified.

Compliance

Noncompliance can lead to the loss of confidentiality, integrity and availability of information security systems and may result in criminal or civil actions against SMS Environmental Ltd. The loss or breach of confidentiality of contractually assured information may result in the loss of business, financial penalties or legal actions against SMS Environmental.