

SDS Information Security Policy for NTP Providers

Background and Purpose

The purpose of this document is to outline the required behaviour of providers and their staff and agents when using the Skills Development Scotland (SDS) IT systems and handling SDS's personal data. The rules are defined to protect the interests of SDS, the organisations contracted to deliver National Training Programmes on behalf of SDS and the participants. The intention is not to impose intrusive constraints that are contrary to SDS's established culture of openness, trust and integrity, which SDS recognise as essential contributors to the success of SDS. Information Security is committed to protecting the operation and reputation of SDS in fulfilling its role as the catalyst for real and positive change in Scotland's skills performance. This document applies to all National Training Programme information processed by and on behalf of SDS.

Responsibility

All organisations contracted to deliver National Training Programmes are responsible for implementing, enforcing and adhering to the provisions of this policy.

All contract signatories are responsible for ensuring this policy is adhered to.

All company employees are responsible for ensuring visitors are also aware of this policy and are supervised appropriately.

Policy

Any provider in breach of this policy will be in breach of the EF Contract with SDS and may have their contract terminated.

Policy Statements

1 SDS IT System Access

- 1.1 The SDS IT systems are accessed using the provider's own individual SDS login id and password. Do not leave clues or evidence of passwords near to the computer on which the information is being processed. Passwords should be minimum of 8 characters and include at least 3 of the following:
 - Capital letter
 - Small letter
 - Number character
 - Special characters (?\$%&*)
- 1.2 Using another person's login id is not permitted under any circumstances.
- 1.3 Some SDS IT systems require the use of multi factor authentication. This relies on additional security of a separate device / system such as a mobile phone or email account. In the event that the separate system is compromised or the device lost, providers must notify SDS.
- 1.4 Passwords must not be saved on any login screen, e.g. do not tick 'Save Password' or 'Remember Me' options if these appear.
- 1.5 Never leave a logged-in computer unattended when using SDS IT systems. Use the Windows (or operating system equivalent) 'Lock Workstation' facility (Windows key + L) or logout.
- 1.6 Protect against accidental compromise of SDS and participant information; ensure information cannot be observed by unauthorised people.
- 1.7 Deliberate, unauthorised entry to SDS IT systems, entry of false data and unauthorised changes to information are strictly forbidden.

- 1.8 Providers must report all security incidents. In the first instance, providers must contact their SDS assigned Skills Investment Advisor who will ensure the correct handling of the incident.
- 1.9 Data extracted or originating from SDS IT systems must be encrypted or transferred in a secure manner when forwarding to SDS.
- 1.10 Providers must promptly inform SDS if they no longer need access to SDS systems.
- 1.11 Providers are required to comply with the terms of the User Permission arrangements in place between them and SDS.

2 Electronic Data Transfer – Mandatory Data Encryption

- 2.1 Data Encryption is a mandatory requirement of SDS where personal data is being transferred from and to third party organisations including providers. All data transfers between SDS and third parties must use 256 bit AES encryption to encrypt files. Each data transfer will be to an individual's email address by means of an encrypted Zip file using a shared encryption password which must be changed on an annual basis. The password must not be transmitted by the same means as the encrypted data file. For example, if the encrypted data file is sent by email the password should be sent by instant message, text or by telephone call. Data transferred back to SDS must also be encrypted and follow the same process as set out above. If encrypted files are not available, hard-copy documents must be posted by using double envelopes.
- 2.2 Each provider must ensure that any portable devices, such as Laptops and Tablets, which are used to store participant's personal information are encrypted.
- 2.3 It is the responsibility of each provider to provide their own copy of the necessary encryption software.
- 2.4 If a provider in their own specific circumstances cannot access a file with the level of encryption specified in 2.1, they should make their SIA aware so that an alternative means of secure transfer can be arranged. Any exceptional arrangement should only be used upon SDS' prior approval in writing.

3 Handling Hardcopy Documents and Electronic Media containing Personal Information

- 3.1 Providers are required to collect and store both personal information and special category personal information as defined by the Data Protection Act. This information must be securely protected to avoid the risk of data loss and unauthorised exposure.

4 Collecting

- 4.1 Personal information particularly 'special category' information must only be gathered from participants in an environment that respects their privacy and limits the opportunity for the participants to be overlooked.

5 Processing

- 5.1 When a provider processes a participant's personal data it should be done in a way to limit the opportunity for unauthorised access to the information.
- 5.2 Providers should consider protecting participant's information from unauthorised viewing by:
 - observing a clear desk policy;
 - handling hardcopy in non transparent folder;
 - Ensuring that documents are not left at printers and copiers and
 - Ensuring only authorised staff have access to the information

6 Storage

- 6.1 When not in use hardcopy files with personal information must be stored in lockable filing cabinets or drawers.
- 6.2 At the end of the working day the filing cabinets and drawers containing the participant's personal information must be locked.
- 6.3 Any files containing personal information held electronically must be held securely and in compliance with Data Protection Legislation.
- 6.4 Providers must ensure that, for both hard copy and electronically stored personal information, only colleagues who have a legitimate business purpose to access the personal information of apprentices can do so.

7 Sending

- 7.1 The preferred option for transferring personal information between parties is to use encrypted electronic communications as defined above in the section *Electronic Data Transfer – Mandatory Data Encryption*. If this is not available hardcopy documents can be exchanged either by post using double envelopes or hand delivered.

8 Disposal

- 8.1 Prior to disposal of information, providers should check the retention and archiving requirements.
- 8.2 Hardcopy documents that are no longer required should be shredded or disposed of via a confidential waste contractor.
- 8.3 For electronic storage media these should be destroyed or overwritten sufficiently such that the data cannot be retrieved.
 - CD/DVD's shredded
 - Memory sticks – must be destroyed or formatted in a way that data cannot be recovered.

9 Data Loss or Compromise

- 9.1 Any incident of data being loss or compromise must be reported promptly by the provider to the SDS Compliance Team.