

CRAFT Training Ltd

Data Protection/Security Policy

Based on our client security policy we, CRAFT Training Ltd, can provide an assurance that we have considered the range of risks to the information and assets which are managed and delivered. We confirm that the appropriate security controls are in place to reduce risks to an acceptable level and we have in place effective governance controls to monitor compliance and respond to incidents.

CRAFT Training Ltd has been an employer since 1994. Since that time we have had a recruitment selection and vetting policy for all staff including those who have direct or indirect contact with students.

Our policies are comprehensive, descriptive and formatted in such a way that they are easy to follow to ensure we comply with current legislation. These policies include: identification confirmation, current address checks, five year address history, internet mining search, ten year employment history, personal references, professional memberships and qualifications, right to work and immigration status, CV analysis and employment gap checking, criminal records bureau or unspent criminal records, directorships, national insurance numbers, personal credit histories, media searches and sanction searches. These checks are to ensure that prior to employment the evidence provided by the staff is a true reflection of their history. Each staff member is checked using AccessNI and is not offered a Contract of Employment until we are satisfied with their compatibility and personal history.

CRAFT Training Ltd have operated as a contract holder through the Department for Employment and Learning since 2004. We have a rigorous system for the dissemination of information that is closely controlled by our Operational Manager. Since 1993 we have trained six members of staff as information processors as outlined below:

Seamus Nealis – Managing Director with overall responsibility and registered data controller

Julie Mc Gonigle – Director of Operations and External/Subcontractors Data Controller

Rachel Mc Ateer – Qualification and Credit Data Controller

Laura Nealis – Strabane Office Data Controller

Seamus McElroy – Omagh Office Data Controller

Clare Mc Connelloogue – L'Derry Office Data Controller

Within our policies and procedures of disclosure of information, CRAFT Training Ltd staff are aware of their duties as to our organisational policies on disclosure of information. To ensure this is carried out to the highest possible standard, all staff have been trained and are monitors to ensure their compliance.

Each person as listed holds a security fob which ensures the highest level of security limiting access to those who are not designated officers. These officers are responsible for the storage, copying and disclosure of all client information and any such information, and are aware through our policies of the limit of information they can provide, how it is stored and to whom they can disclose it.

As stated, CRAFT Training Ltd have experienced data operators using TMS and are experienced on the provision to the Department of Learning of the necessary information through this system.

Client data is retained within the TMS system, virtual management system and paper-based records. All electronic systems are password protected, encrypted for electronic transfer, paper-based information is stores in locked filing cabinets within our supervised main offices and all historical paper-based evidence is contained in each of our three locations in archive rooms secured with dead-locks. Systems and policies for the corruption or loss of client data through electronic threats, technical failure, infrastructure failure or human error are limited by the use of backups taken on a daily basis.

CRAFT Training Ltd ensure they have a backup taken on a daily basis and this is held externally by the General Manager. These backups are available to the Department as per operational guidelines.

CRAFT Training Ltd operates a server to hold all main data with a secure network streamed to the six data controllers. The system is monitored and maintained to a high specification and has password and fob protection.

CRAFT Training Ltd's system of holding data is maintained externally using a support IT company who ensure that all installation and configuration, upgrading, performance monitoring and service monitoring are carried out on a contact of 24/7/365. We have a full support package to include data recovery. CRAFT Training Ltd staff are aware of the procedures if they believe data may have been corrupted, lost or sufficiently degraded.

All staff including data controllers are aware of staff security policy and the procedures within the policy. The policy is reviewed on an ongoing basis. Within the security plan, topics covered include identification of risk, risk assessment, risk reduction, impact reduction and contingency planning.

CRAFT Training Ltd have an effective data security policy which takes into consideration the organisational security in general, asset clarification and control, containing the information in the system, the software and servicing of the system.

Personal security includes staff training, responsibilities, the vetting procedures and awareness as to how staff respond to security instances.

The physical and environmental security which includes protection of equipment and physical information from harm, keeping key location secure as well as physical control of access to information and equipment, appropriate management and security operation of information, processing facilities during day to day activities, access control and those who can gain access to particular information, system maintenance and maintaining information integrity and compliance with relevant national and international laws.

CRAFT Training Ltd are aware of their legal requirements in relation to removal of client data and under our policies must retain all information and documentation for the required time frame. After the time frame, all documentation is shredded and electronic records are deleted.

Within our monthly meetings, security of data is a standing order. Any alteration or changes form part of our development plan and are uploaded to the Department. Where necessary, the Department will immediately be made aware of any changes which are deemed urgent.

Any information in relation to the possibility of security breaches which may be alleviated with the installation or replacement of additional programmes or equipment shall be discussed with the client as to their need, cost and how this could improve the security prior to any changes.

All CRAFT Training Ltd's IT systems have the latest system of Avast anti-virus backed up with anti-spam software. Along with this, the latest Spyware software, Malwarebytes, is used in conjunction with firewalls and site restrictions.

As part of our external IT support contract, the contractors can detect, isolate and destroy any malicious software and where the destruction is not an option, inform all communicators with CRAFT Training Ltd of its existence. Any replacement of software to delete malicious software is expedited immediately.

Where such action has to be taken, CRAFT Training Ltd will comply with the requirements of the Department in relation to cost under the origin of fault.

Seamus Nealis

Managing Director

Reviewed June 2014