

# Computer and Electronic Usage Policy and Procedure

## Introduction

This policy applies to employees, workers and contractors. This policy sets out the Company's guidelines on access to and the use of the Company's computers and on electronic communications. It sets out the action which will be taken when breaches of the guidelines occur.

Information Governance is a framework for handling personal information in a confidential and secure manner to appropriate ethical and quality standards. All records should meet legal and regulatory compliance and professional practice recommendations.

Interr endeavours to have such policies and procedures that adhere to the HORUS model:

- **Holding** information securely and confidentially
- **Obtaining** information fairly and efficiently
- **Recording** information accurately and reliably
- **Using** information effectively and ethically
- **Sharing** information appropriately and lawfully

In committing to these, Interr will ensure that anyone processing personal data in relation to the organisation will comply with the Data Protection Act 1998.

Interr will ensure that:

- Records are created, maintained and stored to standards which meet legal and regulatory compliance and professional practice recommendations; and
- Customers can be assured of appropriately completed records and that all information is managed within the regulated body to ensure confidentiality. Information will be made available on how to access records and issues governing consent.

This policy sets out the company's policy for supporting and ensuring that no one within the company shall misuse any information or allow others to.

This policy has been written to meet the following legal requirements and best practice Guidance:

- General Data Protection Regulations and Data Protection Act 1998
- Computer Misuse Act 1990
- Copyright, Designs and Patents Act 1988
- Freedom of Information Act 2000

## Your responsibilities

The Company's computer systems and software and their contents belong to the Company and they are intended for business purposes only. You are not permitted to use the Company's systems for personal use, unless authorised in writing by your manager.

You are not permitted to download or install anything from external sources unless you have express written authorisation from the CFO via Interr's IT Administrators.

No device or equipment should be attached to the Company's systems without prior written approval of your manager. The Company has the right to monitor and access all aspects of its systems, including data that is stored on the Company's computer systems as notified to you in the Company's Privacy Notice and in compliance with data protection laws.

If you are a site based employee or worker, under no circumstances should you use our client's computer equipment without the prior written authorisation of both your Line Manager and the person you are reporting to on site.

## System security

You must only log on to the Company's computer systems using your own password which must be kept secret. You should select a password that is not easily broken (e.g. not your surname).

You are not permitted to use another person's password to log on to the computer system, whether or not you have their permission. If you log on to the computer using another person's password, you may be liable to disciplinary action up to and including summary dismissal for gross misconduct. If you disclose your password to another person, you may also be liable to disciplinary action.

To safeguard the Company's computer systems from viruses, you should take care when opening documents or communications from unknown origins. Attachments may be blocked if they are deemed to be potentially harmful to the Company's systems. You are prohibited from installing or upgrading personal or purchased software without permission. You are also prohibited from downloading software, upgrades or add-ins from the internet without permission.

All information, documents, and data created, saved or maintained on the Company's computer system remains at all times the property of the Company.

## Protection against Physical Hazards

Staff must be aware of and comply with the following:

### Water:

- Ensure that the PC or server is not at risk of pipes and radiators which, if damaged, could allow water onto the equipment.
- Do not place PCs near to taps/ sinks.
- Do not place PCs close to windows subject to condensation and water collection on windowsills.
- Ensure that the PC is not kept in a damp or steamy environment.

### Fire / Heat:

- Computers generate quite a bit of heat and therefore we air condition the server room. Desktop PCs should be monitored for excessive heat. Overheating can cause malfunction, as well as creating a fire hazard.
- Try to place the PC away from direct sunlight and as far as possible from radiators or other sources of heat.
- Normal health and safety protection of the building against fire, such as smoke alarms and CO2 fire extinguishers should be sufficient for computers. If backup tapes are kept on the premises they must be protected against fire in a fireproof safe.
- Have the wiring and plugs checked annually.
- Ensure that ventilators on computers are kept clear.
- Do not stack paper on or near computers.

### Environmental Hazards:

- Computers are vulnerable to malfunction due to poor air quality, dust, smoke, humidity and grease. A normal working environment should not affect safe running of the computer, but if any of the above are present consider having an air filter. Ensure that the environment is generally clean and free from dust. Inspect your system visually and have the unit cleaned by a professional to reduce risk of failure or damage.

### Back up and System updates:

- Automatic encrypted back ups of all Interr systems are in place on daily basis.
- Staff are encouraged to switch off all devices at the end of the day to allow system updates to configure as well as to reduce risks of cyber attacks which are still possible even in the sleep mode.

### Power Supply:

- Protect against power surges by having an uninterrupted power supply fitted to the server.
- Do not overload socket outlets.
- Frayed or split insulation on power cables give a leakage point for current to electrocute – stop using them immediately if you notice any damage and report it immediately to Interr

## **Cables and power cables:**

- Ensure that the power supply is within the operating range of the device, so it allows the cables or power cables be kept out of the way where possible, to prevent hazard by tripping or falling over a trailing cable.
- If this is not possible, cables must be covered the full length of the cable/s across the floor by a relevant floor cable cover to prevent damage.

## **Equipment maintenance**

Staff who use any work equipment (computers, laptops, tablets, screens, mobile phones, portable devices, smart devices, etc) must use it in the manner prescribed by the manufacturer and must:

- Visually check the equipment for any faults or defects before using it.
- Report any defects or malfunctions without delay and stop using it immediately.
- Take any damaged or unsafe equipment out of use and return to Interr to complete a safe IT disposal in line with the Policy on Secure Disposal of IT equipment.
- Do not carry out repairs or maintenance yourself unless officially trained to do so and approved by Interr.
- Ensure that equipment is regularly maintained by following the manufacturer's instructions.
- Report any incidents or near misses to the human resources department and your line manager.
- Not use equipment for any other purpose than that for which it is intended to be used
- Use safe working procedures.

All electrical equipment must undergo thorough PAT testing on annual basis and records of the testing must be kept. All Display Screening Equipment (DSE) users must have a DSE assessment completed at least annually and records must be kept.

## **Data Security - Protection against Theft or Vandalism via Access to the Building**

The following precautions have been considered to protect the building:

- Burglar alarm with intruder monitor in the building.
- Appropriate locks or keypad access only, on all doors.
- Any keys stored on site are not in an obvious place and any instructions regarding key locations or keypad codes are not easily accessible.
- There is appropriate insurance cover.
- Specific precautions relating to IT hardware are:
  - PCs have been located as far away from windows as possible.
  - We have an asset register for all computer equipment, which includes serial numbers.
  - Ensure every PC is password protected.

## **Mobile Computing**

Laptops, tablet and any other portable devices are more vulnerable than PCs, because they are easier to pick up and remove and therefore more desirable to the opportunist thief. It is also less likely, in some circumstances, that their loss will be noticed immediately.

However, because of their size, it is possible to provide extra protection:

- When the device is not in use, it should be stored in a secure location.
- Where it is left on the premises overnight, it should be stored in a locked cupboard or drawer.
- Where the device is shared, have a mechanism for recording who is responsible for it at any particular time.

Computers should not be left unattended in cars. Where this is unavoidable ensure that the car is locked and the computer is out of sight in the boot or at least covered up if there isn't a boot. The responsible staff member should take the device with them if leaving the vehicle for any length of time.

Where a device is being used in a Public Place it should remain with the member of staff at all times, and care should be taken to ensure that confidential data cannot be overlooked by members of the public, e.g. on public transport. Mobile phone policy should be read in conjunction with this policy.

## **Cloud services**

Interr has a central Head Office based in London and some Interr Head Office employees access services remotely via their portable devices or computers if based at home. Each department uses one or more cloud services.

The list of approved cloud services are:

- SharePoint
- OneDrive
- Oracle NetSuite
- Timegate
- Asana
- Zinc
- MS Office 365
- FreshDesk
- Talent Learning Management System
- BAB Activ Comply
- Dataminr
- ServiceTrac
- Immix
- Nest
- Uboss
- NVS

Only the cloud-based solutions listed above may be used. The installation of unauthorized software on organizationally owned or managed user end-point devices (e.g., workstations, laptops and mobile devices) and IT infrastructure network and systems components is restricted. The cloud security administrator must provide authorization for any third-party cloud service before it is placed into use. The introduction of any unauthorized cloud service will immediately generate a notification for IT security and block the service from use.

The Company shall put into place tools for centralized visibility of the cloud service infrastructure. The tools shall offer traffic analysis, configuration monitoring and assessment, and alerts for configuration issues.

Access control methods to be used shall include:

- Auditing of attempts to log on to any device on the company network
- Server access rights
- Firewall permissions
- Network zone and VLAN ACLs
- Web authentication rights
- Database access rights
- Network segregation

Access controls apply to all networks, servers, workstations, laptops, mobile devices, cloud applications and websites, cloud storages, and services.

Identity and access controls include authentication, data access standards, credential lifecycle management and access segmentation.

Data protection includes encryption, data remediation, data erasure, and data recovery. Other technical controls include network security and wireless security (such as VPNs and firewalls). Interr has the latest and up to date firewall FortiGate that defends Interr's data centres against DDoS attacks by leveraging an extensive collection of known DDoS methodologies, creating a multi-layered approach to mitigate attacks.

#### **Removable media**

Removable media refers to computer storage devices that are not fixed inside a computer and include (not limited to):

- Tapes
- Removable or external hard disk drives
- Optical disks i.e., DVD and CD
- Solid state memory devices including memory cards, pen drives, memory sticks (USB) etc.
- SD cards

The use of removable media and auto-run on any plugged devices is prohibited within the Company and restrictions from using any portable removable media are implemented. This restriction has been put into place to mitigate and reduce risks, maintain the integrity of our systems and prevent unintended or deliberate consequences of misuse, loss or damage. Removable media is only accessible by Administrators on dedicated terminal off network.

## Processing personal data

You may have access to the personal data of other individuals and of our customers and clients that is being processed within the Company's computer systems in the course of your employment. Where this is the case, the Company relies on you to help meet its data protection obligations to staff and to customers and clients.

If you have access to personal data, you are required:

- to access only data that you have authority to access and only for authorised purposes;
- not to disclose data except to individuals (whether inside or outside the Company) who have appropriate authorisation;
- to keep data secure by complying with rules on access to premises, access to computers including password protection and secure file storage and destruction;
- not to remove personal data, or devices containing or that can be used to access personal data, from the Company's premises without adopting appropriate security measures (such as encryption or password protection) to secure the data and the device; and
- not to store personal data on local drives or on personal devices that are used for business purposes.

Failure to observe these requirements may amount to a disciplinary offence which will be dealt with under the Company's disciplinary procedure. Significant or deliberate breaches of this policy, such as accessing employee, customer or client data without authorisation or a legitimate reason to do so, may constitute gross misconduct and could lead to your dismissal without notice.

### Use of e-mail

All material sent from, received by, uploaded to, or downloaded from Interr's email servers or other third-party applications must be handled in a manner appropriate to its security classification.

The use of Interr's provided email or any other electronic messaging system provided by or used on behalf of Interr is subject to all relevant laws, policies, codes of practice and guidelines. All users must comply with Interr's Policies. Interr's email is provided for conducting our business, the account remains the property of Interr Ltd, and any communication using it should not be considered private.

Where the Company's computer systems contain an e-mail facility, you should use that e-mail system for business purposes only. E-mails should be written in accordance with the standards of any other form of written communication and the content and language used in the message must be consistent with best practice. Messages should be concise and directed to relevant individuals on a need to know basis.

Messages sent via the email system are to be written in accordance with the standards of any other form of written communication and the content and language used in the message must be consistent with best company practice. Messages should be concise and directed to those individuals with a need to know. General messages to a wide group should only be used where necessary and the blind carbon copy facility (BCC) should be used to protect customer/client confidentiality, so that the customer, staff or clients' details cannot be seen.

Employees must not:

- send messages from someone else's account, except under proper 'delegated' arrangements which retain individual accountability;
- create email congestion by sending trivial messages or unnecessarily copying emails;
- forward information known or believed to be confidential without the approval of the sender or information owner. If unsure whether the information is confidential, assume that it is.
- Open an email attachment unless it was expected and confirmed with the sender that it is genuine

All Interr's security classified information or any other communication which contains identifiable personal data must be sent via an encrypted email or via a password protected PDF document. Passwords for password protected PDF's must be sent via a separate means and not in the email including the attachment.

You should take care when opening e-mails from unknown external sources. Attachments to e-mails may be blocked if they are deemed to be potentially harmful to the Company's systems.

E-mails can be the subject of legal action (for example, claims of defamation, breach of confidentiality or breach of contract) against both the person who sent them or the Company. As e-mail messages may be disclosed to any person mentioned in them, you must always ensure that the content of the e-mail is appropriate.

Abusive, obscene, discriminatory, harassing, derogatory or defamatory e-mails must never be sent to anyone. If you do so, you may be liable to disciplinary action up to and including dismissal without notice.

### **Internet access**

You are required to limit your use of the internet to sites and searches appropriate to your job. The Company may monitor all internet use by everyone using the Company's system. The Company allows reasonable personal use of the Company's internet system on authorised breaks.

You are expressly forbidden from accessing web pages or files downloaded from the internet that could in any way be regarded as illegal, offensive, in bad taste or immoral.

### **Text, WhatsApp and any other electronic messaging**

While the Company accepts that you may communicate with clients and customers via text or WhatsApp (and other forms of social media, or electronic messaging pre-approved by Interr Ltd), you should be mindful that all communication should reflect the highest professional standards at all times.

You have overall responsibility for confidentiality, trust and acceptable behaviour towards colleagues or clients and that this applies as much to electronic forms of communication as it does to any other social interactions.

Any communication that employees make messaging applications must not breach confidentiality and data protection for example by revealing information owned by the organisation; giving away confidential or personal information about an individual (such as a colleague or customer contact). Furthermore, any sensitive and any confidential data must not be shared through any electronic messaging (i.e. text, Teams, WhatsApp), but via face to face or by using encrypted / password protected documents sent via emails.

Devices (computers, laptops, tablets, phones) used to access messaging applications should not be accessible to others and should require a passcode immediately and for it to lock out after a short period of not being used. They also should have message notifications disabled on the device's lock-screen and should have the remote-wipe feature enabled in case the device is lost or stolen

### **Monitoring**

Monitoring of the Company's computer systems and electronic communications may take place as and when required.

### **Use of own devices**

The Company understands that you may wish to use your own computers or devices, such as laptops, tablet and hand held devices and smart watches, to access social media websites while you are at work. You must limit your use of social media on your own equipment and ensure that it does not interfere with your duties and takes place substantially out of normal working hours (i.e. during lunch breaks or before or after work). Use of Own devices should be done on Guest Networks and not staff networks.

## **Procedure**

### **Records**

#### **Information Asset Register**

Interr maintains an Information Asset Register that identifies all types of patient and staff data that is retained and identifies how it is kept secure. Business impact assessments and business continuity plans are undertaken/reviewed whenever there is a structural change in the IT infrastructure, including replacement of servers.

## Customer Information

Identifiable customer information is only recorded only where:

- Necessary for the delivery of high quality service from Interr,
- Record retention is a regulatory requirement.

## Staff Information

Staff information is retained for HR purposes in electronic form. Any paper documentation received is scanned to the staff members electronic file and then the paper version is shredded.

## Data Protection

### Data Security - Storage and Backup

Any data stored on a computer hard drive is vulnerable to the following:

- Loss due to a computer virus.
- Physical loss or damage of the computer e.g. Theft, Water damage, Fire or physical destruction, Faulty components, Software.

In particular, there is a risk of breach of confidentiality where a computer is stolen or otherwise falls into unauthorised hands. Precautions to be taken include:

- The server should not be used as regular workstations for any application.
- Access to the server should be authorised by senior personnel.
- A full backup of the server must be taken every working day.
- At least 2 revolving backups should be taken off the server with a copy taken off site at least weekly.
- The server should be sited away from risk of accidental knocking, spillage of drinks, leaking pipes, overheating due to radiators and be inaccessible to the public.
- All computers are to be completely shut down at the end of the working day.
- All users are allocated a system security level appropriate to their needs.
- Where a PC is standalone, ensure that important data on the hard drive is backed up regularly and any confidential data is password protected.

### Data Security - Protection against Viruses

Data is vulnerable to loss or corruption caused by viruses. Viruses may be introduced from, CDROM/DVDROM, usb sticks other storage media and by direct links via e-mail and web browsing.

Precautions to be taken include:

- Ensure virus protection software is installed on ALL computer equipment.
- Anyone discovering a virus must report this to the CFO or CEO.
- All software must be purchased, installed and configured by the specialist Outsourced Provider. This includes all software packages, software upgrades and add-ons – however minor. It also includes shareware, freeware and any items downloaded from the internet.
- No document or file from any source outside the organisation can be used unless it has been scanned for viruses using the virus scanning software.
- Staff should treat email attachments that they are not expecting with extreme caution – it does not matter if the sender is known to you. Viruses are often sent this way. If unsure what an attachment is for, or why someone has sent it, this should not be opened.
- Staff should note that intentionally introducing files which cause computer problems could result in prosecution under the Computer Misuse Act 1990.
- Staff must not violate licence agreements by making illegal copies of software. It is not permissible to download software from the internet or install from CD or disc without prior authorisation. Software licensing will be arranged and recorded as part of the procurement and/or installation process. Any unlicensed software found on a practice PC must be deleted or disabled.

### Data Security - Installation of Software

Software purchases will be authorised by the CFO and the specialist Outsourced Provider will supervise the loading of the software onto the system or individual PCs in accordance with the software licence.

Staff are prohibited from installing or upgrading personal or purchased software without written permission. Staff are prohibited from downloading software, upgrades or add-ins from the internet without written permission.

## **Confidentiality**

Any personal information given or received in confidence for one purpose may not be used for a different purpose or passed to anyone else without the consent of the provider of the information.

## **IT equipment**

Interr outsources its IT requirements to a specialist provider (IPI Integration) who provides hardware, software, technical support and strategic IT advice.

## **Hardware**

Specialist advice is taken with regard to all hardware purchases.

## **Software**

Specialist advice is taken with regard to all software purchases. Antivirus software is updated according to advice from technical support and is automated.

## **Technical support**

Specialist support is retained to ensure smooth operation of systems including remote support and emergency support for both hardware and software.

## **User training**

Staff are required to develop good IT skills and are used to working with information systems, business and office packages as required by their job roles

## **Disaster recovery**

A business impact assessment and business continuity plans are undertaken/reviewed whenever there is a structural change in the IT infrastructure, including replacement of servers.

The Gravesend Data Centre houses a dedicated server for Interr, which is running Microsoft Windows Server 2012, ESET Anti-virus and StorageCraft software to manage the reception and ongoing control of the backup data sets. That combined with a cloud based exchange and technical support that can provide a fully-configured replacement server within 48 hours comprise the key components of our disaster recovery plan.

## **Access Control Policy**

System security comprises the following

### **Risk Assessments**

#### **The system security requirements**

Prior to implementation of strategic systems changes, a risk assessment will be undertaken to determine the security requirements given the data concerned. For example, the level and type of access controls, location of hardware associated with the system, type of data held, etc.

### **User Account Management**

User accounts should be amended immediately upon there being a change in the staff team to ensure that all user accounts are appropriate. This could be the existence of an account of the level of information to which the member of staff has access and includes creation and removal of access rights.

The Chief Executive is responsible for ensuring that access rights are appropriate

### **Network Security**

Interr ensures that its local network is protected by authentication, encryption and network connection controls which prevent unauthorised access including via wireless technology.

### **Secure Logon Procedures**

All computer systems should have a logon procedure that includes at least a unique user ID and password.

The following features should be put in place for all Interr systems:



- System/application identifiers are not to be displayed until the logon procedure has been successfully completed.
- Where login errors are made there should be no indication as to which part of logon information is incorrect. This prevents unauthorised users identifying patterns when attempting to gain access to systems.
- The number of unsuccessful consecutive logon attempts is limited to three.
- There is no limit as to the maximum time allowed for any one logon. However, password protected screen savers are used prevent unauthorised use.
- The password being entered is not displayed in clear text. The systems show a number of asterisk characters.
- Passwords should not be transmitted in clear text over the network under any circumstances.

## Identifying users

In order to facilitate access control and audit functions all users have unique identifiers in the form of a unique username and password combination. Group IDs are not to be used.

## Password management system

A password management system should operate as follows:

- No group passwords on the system; all users will be identified as individuals (including system administrators) when they log on.
- Users should change their initial password (issued by the system administrator) following their first logon.
- The system should log user passwords and prevent re-use.
- Users should change their own passwords at least quarterly but can do so more often where they feel their current one has been compromised.
- There are to be no restrictions on the use of alphas and/or numeric in order that users can set memorable passwords and are therefore encouraged to change them frequently.
- Passwords should be stored separately from application system data.
- Passwords stored and transmitted in encrypted or hashed form? All passwords should be stored or transmitted using encryption or hashed.

## Use of system utilities

System utilities are identified, disabled where not necessary, and access to and use of any functional system utilities is strictly controlled.

## Session time-out

Timed and password protected screen savers should be used to prevent unauthorised access to data for timed-out sessions. The screen saver should be set to come on at 15 minutes or less.

## Information access restrictions

File storage systems should be constructed in order to ensure all and only appropriate personnel have access to a folder which can then be viewed, altered, copied or deleted. Data file owners are required to password protect all files which contain identifiable patient or staff data.

## Sensitive system isolation

All Interr systems are considered to hold sensitive data and therefore there controls apply to all systems and isolation strategies are not considered appropriate/beneficial.

## Acceptable use of IT equipment

### Prohibited Activities

Staff should not create, store, transfer (from any media or via email) or deliberately receive material that could be judged to be offensive.

Offensive/inappropriate material or activities can include:

- Material that is abusive, threatening, serves to harass or bully, discriminates, encourages discrimination on racial/ethnic grounds, or on grounds of gender, sexual orientation, marital status, disability, political or religious beliefs.
- Material that may be obscene, indecent or tasteless.

- Material that may cause distress, inconvenience or anxiety.
- Material about illegal activities, including pornography, drugs, computer hacking, militant/extremist behaviour, violence or weapons – unless it is clearly related to your professional role.
- accessing on-line chat rooms, blogs, social network sites
- use of on-line auction sites
- loading or running unauthorised games or software
- forwarding electronic chain letters or similar material

If staff receive inappropriate email or become unintentionally connected to a website, which contains offensive or inappropriate material, the member of staff should disconnect from the site immediately and inform their Line Manager.

Deliberate activities with any of the following consequences are prohibited:

- Corruption or inappropriate destruction of data
- Using equipment in a way that makes systems unavailable to others
- Wasting staff effort or computing resources
- Introducing any weakness to, or compromising IT security.

Staff should not download and/or install any software unless authorised in writing by their line manager.

Any evidence of misuse may result in disciplinary action up to and including dismissal without notice. If necessary, information gathered in connection with the investigation may be handed to the police.

### **User names and passwords**

When staff are logged into a computer under their own username, they must either log out, 'lock' the computer or activate a password protected screensaver if they leave it.

Should staff wish to use an unattended computer where a previous user has left their access open, they must log out from that session before they commence their own session.

Staff must not disclose a personal password to anyone. A username and personal password is for one person's use only. If a member of staff thinks someone else knows their password they must change it immediately and inform the CEO.

### **Monitoring of activity**

Interr reserves the right to monitor and access all aspects of the Company's systems, including data that is stored on the Company's computer system in accordance with the Data protection Act 1998. Where monitoring of systems takes place to identify system failure/capacity problems and misuse there will not be any monitoring of individual users unless there is justification to do so from general monitoring or concerns raised.

### **Virus Protection**

To protect the practice from computer viruses, no floppy disk, CD or other media should be used unless it has been scanned for known viruses. Should staff receive a virus warning message from a friend or colleague via email, do not forward it on to others, instead notify the CEO verbally.

### **Personal use of IT equipment**

Staff can use IT equipment and facilities for personal use, provided that it is of an appropriate nature, isn't during work time, and cannot be considered as 'excessive' based on the following:

#### **Timing of personal use:**

- Staff may make personal use of email & Internet, provided that they only do so during 'unpaid' break periods, such as lunchtime, coffee break or outside of 'general work' hours.

#### **Excessive use:**

- Sending large 'attachments' (such as letters, photographs) in personal emails takes up system storage space and communication capacity that is required for practice purposes.
- Sending large numbers of personal emails especially if this is likely to stray into general work hours.
- Downloading large files from the internet.

- Not installing external software, storage of music files and others.

**Large files:**

- Any file (or combination) that is larger than 5 Megabytes.

**Complaints of bullying and harassment**

If you feel that you have been harassed or bullied or are offended by material received from a colleague, you should inform your manager or the HR department immediately.

**Policy Review and Assessment**

Any breach of this Usage Policy may be considered as misuse and an investigation may take place. This policy may be amended by Interr at any time in order to take into account changes in legislation and best practice.



Mick Tabori - CEO  
July 2022