

Information Security Policy

1. Scope

This policy applies to all Babington colleagues.

2. Purpose

- To communicate the Board and Executive's commitment to protecting the confidentiality, integrity and availability of the organisations' information assets.
- To set out the strategic direction for the management of information security.
- To specify the implementation of an Information Security Management System (ISMS) and to achieve and maintain Certification of that ISMS to ISO27001:2013.
- To serve as the overarching policy from which the framework of policies, procedures, and records that form the ISMS derive.
- To promote a risk-based approach into the organisation's culture.
- To set out the organisations' information security objectives.

3. The Policy

- Department Heads are committed to ensuring all information assets held, stored or processed, including those processed on Babington's behalf by a third party, are securely protected against unauthorised access, disclosure, alteration or loss in accordance with legal, regulatory and contractual obligations.
- Babington's information security management and processes are aligned with and support the aims and objectives set out in strategic business plans. Information related risks will be identified, assessed and mitigated through risk assessments, risk treatment plans and a register of security controls known as the Statement of Applicability.
- The organisation's commitment to, and management of, information security is governed by the Information Security Steering Group (ISSG) which reports to the Executive and Board. The ISSG is chaired by the Chief Finance Officer and the Group provides overarching governance for information security and data protection and comprises management representatives from key departments. The Chief Executive Officer has delegated the role of Senior Information Risk Owner to the Chief Finance Officer. The ISSG Terms of Reference support the ISMS framework and requires periodic reviews of ISMS policies, including an annual Management Review attended by the Chief Finance Officer.

4. Objectives

- To demonstrate continual improvement and maintain ongoing ISO27001:2013 Certification by the continued evaluation and review of our effectiveness measurements and ongoing internal information security audits to identify and address areas for improvement.
- To ensure the organisation fulfils its legal, regulatory and contractual responsibilities under Data Protection and other relevant Legislation.
- To ensure information security is embedded throughout the organisation and is taken account of in all established management frameworks, strategic aims and objectives and organisational process and practice.
- To preserve the confidentiality, integrity and availability of all information assets. This will be achieved by:

- Determining and documenting the processes into which information security should be integrated across all functions of the organisation.
 - Ensuring that all users who access Babington's ICT system and/or premises are aware of their security responsibilities.
 - Ensuring that all information and associated assets are accessible to authorised users when required and that information is only accessible to those authorised and to prevent unauthorised access to Babington's information, intellectual property and information processing assets.
 - Ensuring that safeguards are in place to protect the accuracy and completeness of information and to prevent deliberate or accidental, partial or complete, destruction or unauthorised modification of data or any other information asset.
- To ensure a risk-based approach underpins all strategic decision making and that privacy and information security issues and risks are identified, assessed and managed as part of this decision making process.
 - To ensure the organisation implements and maintains a fully integrated records management process which meets its legal and contractual obligations and assigns responsibility for facilitating the timely disposal/deletion of all records.
 - To ensure performance against these objectives form part of the Effectiveness Measurement monitoring by the ISSG.

5. Owner and Approval

The Chief Finance Officer is the owner of this document and is responsible for ensuring that this policy is reviewed in line with the review requirements of the Management Review of the ISMS.

The current version of this document is available to all colleagues on the corporate intranet. It does not contain confidential information and can be made available to relevant interested parties.

The Information Security Policy was first approved by the ISSG and is issued on a version controlled basis under the signature of the Chief Finance Officer.

Adrian Fantham
Chief Finance Officer and designated SIRO
20th April 2022