



# System Level Security Policy

First introduced March 2015

Reviewed 1<sup>st</sup> February 2018

Next review due 1<sup>st</sup> Feb 2020

**Physiotherapy2fit Ltd is committed to ensuring that, as far as it is reasonably practicable, the way we provide services to the public and the way we treat our staff reflects their individual needs and does not discriminate against individuals or groups on the basis of their age, disability, gender, race, religion/belief or sexual orientation. Should a member of staff or any other person require access to this policy in another language or format (such as Braille or large print) we will do our best to provide this in a format the user is able to access. Physiotherapy2fit Ltd will do its utmost to support and develop equitable access to all policies. The Director is responsible for ensuring staff are aware of Physiotherapy2fit Ltd policies and that staff adhere to them. It is also the Director's responsibility to keep staff up to date with new policy changes.**

**Staff are responsible for ensuring they are familiar with policies, know where to locate the documents on Physiotherapy2fit's main website, and seek out every opportunity to keep up to date with them**

**Independent contractors are expected to identify a lead person to be responsible for ensuring staff employed within their place of work are aware of Physiotherapy2fit Ltd policies.**

## 1. Introduction

This System Level Security Policy (SLSP) is intended to demonstrate understanding of information governance risks and commitment to address the security and confidentiality needs of P2F.

It relates to the complete data handling of personal sensitive information.

## 2. System Details

### a. Information Asset Owner

Sarah Booker - Director

### b. Caldicott Guardian

Sarah Booker - Director

## 3. System Security

### a. Information Security Policy

### b. Security manager

Sarah Booker

### c. TM2 security countermeasures:

All login details are created by the director. Once created the member of staff is instructed to change their password as per NHS guidelines. All login details are end-dated; end dates will automatically stop access and require the end user to proactively contact administration to extend access as needed. Passwords are changed 3 monthly

### d. Network security measures:

All devices with internet access are installed with Malware and Virus protection software as per Director guidelines.

## **System Level Flow Diagram – See Appendix 1**

### System Management

#### a. Development

TM2 is a private practice software which has been designed and developed by clinicians. All PID is held as per NHS IG guidelines.

#### b. Access

Access is only for P2F employees, temporary staff or 3<sup>rd</sup> part contracted staff which have all signed confidentiality agreements.

### System Design

P2F system design can be seen in the flow diagram

## Operational Processes

### Staff guidance on operating procedures

Processing NHS patients – see individual P2F Guidelines for Processing NHS Patients

**Any errors of information omissions should be highlighted on the register and then corrected.**

### Storage of data

Personal sensitive data is stored on TM2.

TM2 is a separate cloud based software which does not transmit outside the UK and follows all NHS IG requirements.

Patient data is not anonymised on the central admin computer as access to it is limited to valid personnel only.

### Processing of data

Patient data will be processed only on secure servers and any data printed is the responsibility of the individual where it was printed

### Disposal of stored data

Stored data will be kept for 25 years on a password protected hard drive. Any disposal of data will be performed by an approved 3<sup>rd</sup> party organisation that has signed our confidentiality agreement.

### System Recovery

In the event of system failure the Director should be notified immediately. She will advise the most appropriate person to recover the data. This may be one of the admin team or a 3<sup>rd</sup> party IT specialist that has signed P2Fs confidentiality agreement.

### Staff Training

All staff have had IG and software training for use of TM2.

### Staff Responsibilities

All staff members should operate within the above system processes. No changes should be made to these processes without authorization from the Director. All system process changes will be notified in writing following staff meeting.

## Business continuity and disaster recovery:

See business continuity policy

## System Audit

TM2 Audits can be performed by the system manager – Sarah Booker the Director or Debbie Box our Finance and Admin Manager. This shows access log and can also provide information on the reports generated.

## System risk assessment – see the PIA of NHS Patient Data

Summary of risk level defined in the information asset register

## System Protection

### a. OCS disaster recovery arrangements

See System design diagram for system back up

### b. Business Continuity arrangements

See business continuity policy

### c. Security or confidentiality breach procedures

Breaches in confidentiality will be dealt with in line with the Information Security and Confidentiality policy.

## System Level Security Policy Ownership

### a. Ownership

This SLSP shall be the responsibility of the Director of P2F.

### b. Distribution

Available on P2F website.

## Data Protection Registration

P2F is registered with the ICO. Registered number is 00041089252

## References

ICO (2012) Identifying ‘data controllers’ and ‘data processors’ Data Protection Act 1998

Available at:

[http://www.ico.gov.uk/for\\_organisations/guidance\\_index/~/\\_media/documents/library/Data\\_Protection/Detailed\\_specialist\\_guides/data\\_controllers\\_and\\_data\\_processors.ashx](http://www.ico.gov.uk/for_organisations/guidance_index/~/_media/documents/library/Data_Protection/Detailed_specialist_guides/data_controllers_and_data_processors.ashx)

DH (2012) Information Governance Toolkit News Article

Available at:

<https://nwww.igt.connectingforhealth.nhs.uk/NewsArticle.aspx?tk=411895273086188&lnv=1&cb=9a28f53d-2f13-42fc-ad20-24e8ae1b35d5&artid=95&web=yes>

