The Board of Directors and management of Cognus Limited, located at 24 Denmark Road, Carshalton, SM5 2JG, which delivers services to support education, are committed to preserving the confidentiality, integrity and availability of all the physical and electronic information assets throughout their organisation in order to preserve its competitive edge, cash-flow, profitability, legal, regulatory and contractual compliance and commercial image. Information and information security requirements will continue to be aligned with Cognus's goals and the Information Security Management System (ISMS) is intended to be an enabling mechanism for information sharing, for electronic operations, for e-commerce and for reducing information-related risks to acceptable levels.

Cognus's current strategic business plan and risk management framework provide the context for identifying, assessing, evaluating and controlling information-related risks through the establishment and maintenance of an ISMS. The Risk Assessment, Statement of Applicability and Risk Treatment Plan identify how information-related risks are controlled. The Head of Resources is responsible for the management and maintenance of the risk treatment plan. Additional risk assessments may, where necessary, be carried out to determine appropriate controls for specific risks.

In particular, business continuity and contingency plans, data backup procedures, avoidance of viruses and hackers, access control to systems and information security incident reporting are fundamental to this policy. Control objectives for each of these areas are contained in the business continuity plan and within the London Borough of Sutton ICT procedures and are supported by specific documented policies and procedures contained at https://intranet.sutton.gov.uk/task/information-security.

Cognus aims to achieve specific, defined information security objectives, which are developed in accordance with the business objectives, the context of the organisation, the results of risk assessments and the risk treatment plan.

All Employees/Staff of Cognus and external parties identified in the ISMS are expected to comply with this policy and with the ISMS that implements this policy. All Employees/Staff, and certain external parties, will receive or be required to provide appropriate training. The consequences of breaching the information security policy are set out in the disciplinary policy and in contracts and agreements with third parties.

The ISMS is subject to continuous, systematic review and improvement.

Cognus has established an Information Security Committee Chaired by the Head of Resources and including the Managing Director, the Services Director, the Head of People and the Business Systems Information Manager to support the ISMS framework and to periodically review the security policy.

Cognus is committed to achieving Cyber Essentials certification of its ISMS and compliance with the GDPR.

This policy will be reviewed to respond to any changes in the risk assessment or risk treatment plan and at least annually.

In this policy, 'information security' is defined as:

Preserving
This means that management, all full time or part time Employees/Staff, sub-contractors, project consultants and any external parties have, and will be made aware of, their responsibilities (which are defined in their job descriptions or contracts) to preserve information security, to report security breaches and to act in accordance with the requirements of the ISMS. All Employees/Staff will receive information security awareness training and more specialised Employees/Staff will receive appropriately specialised information security training.

the availability,

This means that information and associated assets should be accessible to authorised users when required and therefore physically secure. The computer network must be resilient and Cognus must be able to detect and respond rapidly to incidents (such as viruses and other malware) that threaten the continued availability of assets, systems and information. There must be appropriate business continuity plans.

confidentiality

This involves ensuring that information is only accessible to those authorised to access it and therefore to preventing both deliberate and accidental unauthorised access to Cognus's information and propriety knowledge and its systems including its network(s), website(s), extranet(s), and e-commerce systems.

and integrity

This involves safeguarding the accuracy and completeness of information and processing methods, and therefore requires preventing deliberate or accidental, partial or complete, destruction or unauthorised modification, of either physical assets or electronic data. There must be appropriate contingency including for network(s), e-commerce system(s), website(s), extranet(s) and data backup plans and security incident reporting. Cognus must comply with all relevant data-related legislation in those jurisdictions within which it operates.

of the physical (assets)

The physical assets of Cognus including, but not limited to, computer hardware, data cabling, telephone systems, filing systems and physical data files.

and information assets

The information assets include information printed or written on paper, transmitted by post or shown in films, or spoken in conversation, as well as information stored electronically on servers, website(s), extranet(s), intranet(s), PCs, laptops, mobile phones and PDAs, as well as on CD ROMs, floppy disks, USB sticks, backup tapes and any other digital or magnetic media, and information transmitted electronically by any means. In this context, 'data' also includes the sets of instructions that tell the system(s) how to manipulate information (i.e. the software: operating systems, applications, utilities, etc).

of Cognus.

The ISMS is the Information Security Management System, of which this policy and other supporting and related documentation is a part, and which has been designed in accordance with the specification contained in ISO 27001:2013.

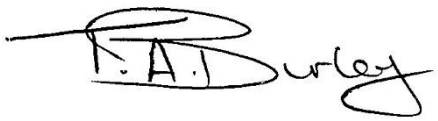
A **SECURITY BREACH** is any incident or activity that causes, or may cause, a break down in the availability, confidentiality or integrity of the physical or electronic information assets of Cognus.

Document Owner and Approval

The Head of Resources is the owner of this document and is responsible for ensuring that this policy document is reviewed in line with the requirements of the GDPR.

A current version of this document is available to all members of staff on the Cognus Limited Intranet. It does not contain confidential information and can be released to relevant external parties with appropriate permission.

This information security policy was approved by the Board of Directors on 22nd May 2018 and is issued on a version controlled basis under the signature of the Managing Director.



Signature: Date: 22/05/2018

Change History Record

Issue	Description of Change	Approval	Date of Issue
1	Initial issue	Board of Directors	25/05/18