

Information Security Questionnaire for Data Processors and Third Parties

Introduction

Devon County Council has a legal requirement under the seventh principle of the Data Protection Act 1998 (the security principle), to ensure that the personal data¹ it processes² is kept secure. In order to comply with the Data Protection Act, Devon County Council must ensure that any person (whether individually or on behalf of an organisation) processing personal data on DCC's behalf (**a data processor**) can provide sufficient guarantees in respect of the technical and organisational security measures governing the processing to be carried out and take reasonable steps to ensure compliance with those measures.

Any data processor who has access (directly or indirectly) to personal data held by the Council **must** complete this questionnaire and where directed, provide evidence showing how they meet the necessary security standards for protecting personal data against unauthorized or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.

Persons processing data on behalf of the Council which **will not** have access to personal data (**a third party**), may still be required to complete this questionnaire if they have access to sensitive business information or business critical systems.

Instructions to data processors and third parties

1. This questionnaire must be completed by the individual responsible for Information Security within the company or business tendering for the work being contracted out by Devon County Council.
2. This questionnaire consists of two columns; the first column lists the security questions and the second column requires the data processor or third party to provide their response to the questions. Data Processors and third parties must not modify or delete any questions. If the question does not apply to the services or work that is to be provided, then an "N/A" (not applicable) in the response column is sufficient.
3. Please complete this questionnaire as fully as possible and provide as much information as you are able to. Incomplete or partial answers may result in additional questions and can delay the process. Once the form has been completed, return it to the designated project lead involved in this contract.

Important note

In December 2009, Devon County Council received compliance status with the Information Security Standard ISO27001. In order to continue to meet compliance with this standard and to meet its security obligations under the Data Protection Act 1998, the Council cannot allow persons access to its information or systems, unless they can provide the same or higher levels of protection to its data.

Companies or other persons who cannot provide Devon County Council with sufficient guarantees in respect of their technical and organisational security measures, will not be given access to Devon County Council's information or systems, until they meet the necessary standards. Responses to this Security Questionnaire will be considered and a decision will be reached as to whether the company's security standards are sufficient, based on the level of sensitivity of the information or data that would be processed. Queries regarding the council's security standards must be emailed to:
KeepDevonsDataSafe@devon.gov.uk

¹ 'Personal data' means data which relate to a living individual who can be identified from the data or from other data or information which is in the possession of, or likely to come into the possession of Devon County Council.

² 'Processing' means obtaining, recording or holding the information or data or carrying out any operation or set of operations on the information or data. This includes organizing, adapting, altering, retrieving, using, disclosure of the information or data by transmission, dissemination or otherwise making available or destroying the information or data.

Information Security Questionnaire for Data Processors and Third Parties

Security Questions	Response
<p>1.0 General information</p> <p>Overview of section</p> <p>Devon County Council requires general information about your company.</p>	
1.1 What is the project name?	
1.2 Please describe the project and the work that is being contracted out.	
1.3 What is the name, email address and telephone number of Devon County Council's lead for this project?	
1.4 What is the name and telephone number of your company?	
1.5 What is your company's postal address? If this is different to where the service or work for Devon County Council would be carried out, please include this address also.	
1.6 Does your company own or manage this environment or premises? If not, please identify who does?	
1.7 What is your company's website address?	
1.8 What is the name, email address and telephone number of your company's Information Security or Data Protection Manager or security lead?	
1.9 Is your company registered under the Data Protection Act 1998, with the Information Commissioner's Office? If yes, what is your registration number? If no, please explain why not.	
1.10 Is your company certified under the Information Security Standard ISO27001 or accredited to any other security related standard or Code? If yes, please provide details.	
1.11 Describe the type of information or data your company would be processing on behalf of Devon County Council.	
1.12 Will your company be processing personal or sensitive data on behalf of Devon County Council?	

Information Security Questionnaire for Data Processors and Third Parties

Security Questions	Response
<p>1.13. Will your company be subcontracting any of the work being tendered for? If yes, please provide full details and confirm that authorization has been given by DCC.</p> <p><i>(NB. Subcontracting is prohibited unless Devon County Council has explicitly authorized this. Subcontractors may be required to complete this questionnaire).</i></p>	
<p>2.0 Human Resources Security Overview of section</p> <p>Devon County Council requires that all individuals who have access to its data are appropriate and trustworthy and are only given access on a strict need to know basis. The Council prohibits the disclosure or distribution of its information to any other third party or data processor, unless explicitly authorized.</p>	
2.1 How many employees does your company have?	
2.2 Please provide details of the background checks your company carries out on new staff or contractors to ensure their reliability and trustworthiness.	
2.3 Please provide a copy of the Data Protection and/or confidentiality clauses included in staff contracts.	
2.4 Please provide details of the information security or data protection training your company provides to its staff. Please include a copy of the training materials.	
2.5 Is information security or data protection training mandatory for your staff and how often is the training provided? If the training is not mandatory for all staff then please explain why not?	
2.6 Please provide details of any incidents involving the loss, misuse or theft of any personal or business sensitive information by your staff in the last 3 years.	
2.7 Has your company self reported any information security incidents to the Information Commissioner's Office or been reported to the Information Commissioner's Office regarding information security incidents in the last 3 years? If so, please describe the incident(s) and the outcome.	

Information Security Questionnaire for Data Processors and Third Parties

Security Questions	Response
<p>3.0 Policy and awareness</p> <p>Overview of section</p> <p>Devon County Council expects your company to have a formal data protection and/or information security Policy, outlining the measures your company takes to protect personal data and or sensitive business data.</p>	
3.1 Please provide a copy of your company policy (or policies) which refers to information security and data protection.	
3.2 Please provide details of how your company promotes awareness of these policies to staff and contractors and any formal training and sign off required.	
3.3 Please provide details of your company's policy for dealing with Freedom of Information or Subject Access requests that would require the disclosure of Devon County Council data.	
3.4 Please provide details of your company's policy with regard to Data Retention and Data Destruction.	
<p>4.0 Physical security</p> <p>Overview of section</p> <p>Access to Devon County Council data must be strictly controlled. All data processing devices holding the Council's data must be held in secure rooms with controlled access. Access to physical media and documentation must also be controlled and must always be held in locked storage when not attended.</p>	
4.1 Describe the physical and electronic security measures used to protect Devon County Council's information on the premises where the information would be held.	
4.2 If the information or data is to be held electronically, where will the data back ups be held and what physical and electronic security will be used to secure them?	
4.3 If requested, can a representative from Devon County Council visit the company's facilities to observe the physical security controls in place (announced or unannounced)?	

Information Security Questionnaire for Data Processors and Third Parties

Security Questions	Response
<p>5.0 Technical controls <i>Overview of section</i></p> <p>Devon County Council requires companies and other persons to have appropriate technical measures in place to protect the Council's personal data and sensitive business data, from unauthorized or unlawful processing and against accidental loss or destruction of or damage to the data.</p>	
<p><i>Segregation of Information between Clients</i></p> <p>5.1 Please provide details of the security controls in place to keep Devon County Council systems and data separate from that held on behalf of your company's other clients.</p>	
<p><i>Operating System Security</i></p> <p>5.2 Please provide details of the Information Security procedures your company uses for protecting its systems against vulnerabilities.</p>	
<p>5.3 Please provide details of the routine vulnerability scanning your company performs of its customer environment and the system tools that are used?</p>	
<p>5.4 What application security test reports for public facing internet based applications allowing access to Devon County Council data is your company able to provide?</p>	
<p>5.5 What is your company's patch management process?</p>	
<p>5.6 What anti-virus software does your company deploy on its systems and how often are virus definitions updated?</p>	
<p><i>Authentication and Authorization</i></p> <p>5.7 Please provide details of the secure encrypted protocols the company uses to manage servers and network devices.</p>	
<p>5.8 What type of authentication is required to access servers and network devices, both from on-site and remote access (e.g. passwords, SecurID)?</p>	
<p>5.9 How is access to the data/information the company would be processing on behalf of the Council controlled? How are duties segregated between staff?</p>	
<p>5.10 Please describe the procedure and system requirements for company's employees to access its network remotely.</p>	

Information Security Questionnaire for Data Processors and Third Parties

Security Questions	Response
<p><i>Protection of Sensitive Data</i></p> <p>5.11 How is electronically held personal data and sensitive business information, protected from unauthorized or unlawful processing?</p>	
<p>5.12 How is electronically held personal data protected against accidental loss, destruction or damage?</p>	
<p>5.14 How will personal or sensitive business data be encrypted both in transit and in storage? Please describe key management practices and the encryption algorithms used.</p>	
<p>5.15 Will your company be holding personal data, belonging to the Council, on its own server or on cloud servers? If yes, is your server or the cloud server held in the European Economic Area? If answering no, please provide details.</p>	
<p><i>Network Security</i></p> <p>5.16 Please provide details of the Firewall software that will be used to protect Devon County Council data and systems from the Internet and other untrusted networks, and the formal security accreditations they possess.</p>	
<p>5.17 Please provide details of any intrusion detection/prevention systems used.</p>	
<p>5.18 Please provide details of how frequently security logs are monitored to detect malicious activity.</p>	
<p>5.19 Please provide details of how the company correlates security events from different sources.</p>	
<p>5.20 Please provide details of any wireless technology that will be used and how it will be protected.</p>	
<p>6.0 Organisation standards</p> <p><i>Overview of section</i></p> <p>Devon County Council requires companies and other persons to have appropriate standards in place to protect its data. Security incidents must be reported to: KeepDevonsDataSafe@devon.gov.uk These include, but are not limited to, unauthorized access, denial of service, loss or theft of information and data corruption.</p>	

Information Security Questionnaire for Data Processors and Third Parties

Security Questions	Response
6.1 What is your company's process for disposing of sensitive written or printed material?	
6.2 What is your company's process for disposing of computer equipment used in processing of data?	
6.3 How often are permissions for access to written or printed material and access to computer systems (i.e. physical and logical access) periodically reviewed?	
6.4 What methods would your company employ to verify a user's identity in respect of access to Devon County Council's data (this must include physical and logical access)?	
6.5 What are your company's procedures for reporting security incidents to your clients?	

Information Security Questionnaire for Data Processors and Third Parties

Declaration

Project name / description of the work to be undertaken:

I confirm that the information I have provided on this questionnaire is true and accurate to the best of my ability.

Print Name: _____

Position: _____

Signature: _____