

Catch22 Policy

Clear Desk and Clear Screen Policy

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Catch22 reserves the right to amend this policy, following consultation, where appropriate.

Policy Owner:	<i>Data Protection Officer</i>
Queries to:	<i>Data Protection Officer</i>
Date created:	31 May 2018
Date of last review:	19/11/2024
Date of next review:	19//2025
Catch22 group, entity, hub:	Catch22 group
4Policies level (all staff or managers only)	All staff

Catch22 GDPR standards

When processing personal data staff will uphold the following standards, where possible:

- **Model of least privilege**
Staff will ensure that security controls are implemented, to data held physically and electronically, to ensure that personal data is only accessed by staff that have a defined need to access it.
- **Data minimisation**
Staff will limit the collection of personal information to that which is directly relevant and necessary to accomplish a specified purpose.
- **Data subject rights**
Staff will ensure that the rights that are afforded to individuals under the UKGDPR are upheld appropriately and in accordance with the regulation and associated legislation.
- **Accountability**
Staff will adhere to and remain compliant with the UK Data Protection Legislation principles and contribute to demonstrating the organisations compliance.
- **Anonymisation, Pseudonymisation and Encryption**
Where possible and appropriate staff will look to anonymise/pseudonymise and encrypt personal data in order to protect the privacy rights of individuals.

1. Policy statement

The Clear Desk & Clear Screen policy summarises the advice provided to all Catch22 representatives regarding clear desks clear screens at all times.

By ensuring staff adhere to the policy the security and confidentiality of Catch22's information assets are improved.

The aims of this policy procedure are to:

- Demonstrate that Catch22 is taking accountability for all information that is processed.
- Ensure staff are aware of their responsibility regarding keeping data secure.
- Reduce the risks of unauthorised access to, loss of, damage to or corruption of data which has been left unattended.
- Reduce the threat of identity theft or a security breach.

2. Scope

This policy applies to all Catch22 representatives including employees, agency staff, volunteers, sub-contractors and third-party suppliers who may use Catch22 premises and information technology infrastructure.

The contents of this policy are also applicable when working remotely or from home.

Only current personnel and authorised sub-contractors and third-party suppliers are granted access to Catch22 premises, equipment, data and infrastructure.

3. Clear Desk

- 3.1 Where practically possible, paper and computer media should be stored in safes, lockable cabinets or other forms of security furniture when not in use, including outside working hours.
- 3.2 Where lockable safes, filing cabinets, drawers, cupboards etc are not available, office / room doors **must** be locked if left unattended.
- 3.3 At the end of each session any personal and/or sensitive information should be removed from the workplace and stored in a locked area. This includes all service user/staff identifiable information, drawings, images, and photographs, as well as any information that is business critical as salaries, contracts, finance and bid information etc.
- 3.4 The use of sticky notes, memos or bits of paper should be limited, especially those containing personal information. They should be kept safe and not on display and must be securely shredded when no longer needed.
- 3.5 Any Confidential, or Highly Confidential information must be removed from desks and locked in a secure place when a desk is left unoccupied at any time.
- 3.6 All printed documents are cleared from printers immediately after printing and print copies are checked to ensure that it is only your own printing being collected.
- 3.7 Any visit, appointment or message books should be stored in a locked area when not in use.
- 3.8 All desks to be always kept as clear as possible to help create a culture of staff

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Responsibility for handling and caring for personal data and other confidential information and demonstrating compliance with UK Data Protection Legislation.

- 3.9 Ensure that all persons identifiable, confidential, restricted, or sensitive information in both hardcopy or electronic form is secured at the end of the day and when expected to be away from their desk for an extended period.
- 3.10 Keys used for access to confidential, restricted, or sensitive information must not be left in or on an unattended desk. Keys for desk drawers, cabinets and other secure areas must be stored securely.
- 3.11 All items that are payments, or devices able to make, or able to take payments are to be physically locked away securely when not in use.
- 3.12 Reception desks can be particularly vulnerable to visitors. These areas should be kept clear of personal information and should not be left unmonitored at any time when the office is open to visitors. No personally identifiable information should be kept on desks within reach or sight of visitors.
- 3.13 Information should be destroyed in line with the **Catch 22 IS 05 Information Classification and Handling Policy**. As a summary Official, Confidential, and Highly Confidential information should be placed in the company provided secure shredders at a minimum level of DIN3 and never in general waste.

4. Clear Screen

4.1 Catch22 computers / computer terminals / laptops are not left logged on when unattended and are password protected in accordance with the **Catch22 IS 07 Acceptable Use Policy**.

4.2 Computer screens are angled away from the view of unauthorised persons and includes external and internal windows and main doorways. If necessary, privacy screens are to be used.

4.3 Individuals must always secure their computer/laptop when not in use:

- Lock – when leaving unattended for any time. This can be done by pressing the windows key and the 'L' key at the same time.

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- Log off – when finished working and another person is needing to use the computer. This can be done via the 'Start' menu.
- Shutdown – when finished working and no other person is needing to use it. This can be done via the 'Start' menu.

4.2 Individuals are accountable for all computer activity, emails sent, and transactions entered using their user ID, whether or not they were present at the time.

4.3 A password protected Windows Security Lock will activate after 5 minutes of inactivity, but this is long enough for someone to compromise any available information or software systems.

5. General

5.1 Whiteboards/Flipcharts containing restricted and/or personal identifiable and sensitive information should be erased.

5.2 Portable computing devices such as unused laptops, digital cameras and tablets must be locked away in a drawer or the server room.

5.3 Mass storage devices such as CDROM, DVD or USB drives should be treated as being sensitive data and must be locked away in a drawer or the server room.

6. Related Policies

- Data Protection: Over-arching policy 2021
- Data Protection: Data incident policy 2021
- IS 01 Information Security Policy
- IS 02 Access Control Policy
- IS 03 Asset Management Policy
- IS 04 Information Security Risk Management Policy
- IS 05 Information Classification and Handling Policy
- IS 07 Acceptable Use Policy
- IS 08 Mobile and Teleworking Policy
- IS 09 Business Continuity Policy
- IS 10 Backup Policy
- IS 11 Malware and Antivirus Policy
- IS 12 Change Management Policy
- IS 13 Third Party Supplier Security Policy
- IS 14 Continual Improvement Policy

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- IS 18 Physical and Environmental Security Policy
- IS 19 Cryptography Policy
- IS 20 Record & Document Management Policy
- IT Password Policy
- Code of Conduct Policy

7. Policy Compliance

Compliance Measurement

The Information Security Management Review Team will verify compliance to this policy through various methods, including but not limited to, business tool reports, internal and external audits, and feedback to the policy owner.

Exceptions

Any exception to the policy must be approved and recorded by the Data Protection Officer in advance.

Non-Compliance

An employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

Continual Improvement

The policy is updated and reviewed as part of the continual improvement and process.

8. Document Version Control

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	Last Modified	Last Modified By	Changes Made
0.1	31/05/2018	Data Governance Lead	Policy created
1.0	31/01/2022	Beverley Clark	Policy reviewed, approved, and signed off at the Management Review Meeting 31/01/2022.
1.1	30/06/2023	Beverley Clark	Document reviewed – no amendments made.
1.2	02/02/2024	Pembe Salih	Annual review – no amendments
1.3	19/11/2024	Michael Oniyitan	Policy reviewed; deleted page 2 which was blank.

Annex 1: Equality Impact Assessment

1. Summary

This EIA is for:	Data protection: Clean Desk, Clean Screen – Jan 2022
EIA completed by:	Beverley Clark, Data Protection Officer
Date of assessment:	31 January 2023
Assessment approved by:	

Catch22 is committed to always: avoiding the potential for unlawful discrimination, harassment and victimisation; advancing equality of opportunity between people who share a protected characteristic and those who do not; and, foster good relations between people who share a protected characteristic and those who do not.

An Equality Impact Assessment (EIA) is a tool for identifying whether or not strategies, projects, services, guidance, practices or policies have an adverse or positive impact on a particular group of people or equality group. Whilst currently only public bodies are legally required to complete EIA's under the Equality Act 2010, Catch22 has adopted the process in line with its commitment to continually improve our equality performance.

Policy owners are required to complete or review the assessment indicating whether the policy has a positive, neutral or negative impact for people who it applies to and who share one or more of the 9 protected characteristics under the Equality Act 2010.

Definitions are based on the Equality & Human Rights (EHRC) guidance.

Objectives and intended outcomes
This EIA has been completed in order to ensure that the implications and potential impact, positive and negative, of this policy have been fully considered and addressed, whether or not people share a protected characteristic.

2. Potential Impacts, positive and negative

Equality Area	Positive	Neutral	Negative	Please give details including any mitigation for negative impacts
Age Does this policy impact on any particular age groups or people of a certain age?	☐	☒	☐	
Disability Does this policy impact on people who have a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day to day activities?	☐	☒	☐	
Gender reassignment (transsexual, transgender, trans) Does this policy impact on people who are transitioning from one gender to another (at any stage)	☐	☒	☐	
Marriage and civil partnership Does this policy impact on people who are legally married or in a civil partnership?	☐	☒	☐	
Pregnancy and maternity (in work this is linked to maternity leave, non-work this is for 26 weeks after giving birth) Does this policy impact on people who are pregnant or in their maternity period following the birth of their child?	☐	☒	☐	
Race Does this policy impact on people as defined by their race, colour and nationality (including citizenship) ethnic or national origins	☐	☒	☐	

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Religion and belief Does this policy impact on people who practice a particular religion or none, or who hold particular religious or philosophical belief or none?	☐	☒	☐	
Sex Does this policy impact on people because they are male or female?	☐	☒	☐	
Sexual orientation Does this policy impact on people who are sexually attracted towards their own sex, the opposite sex or to both sexes?	☐	☒	☐	

3. More information/notes

Please add any links to key documents or websites to evidence or give further detail on any impacts identified.