TSC STAFF SUPERANNUATION SCHEME

INFORMATION AND COMMUNICATION TECHNOLOGY POLICY, 2024

VISION

An exceptional pension scheme offering comfort in retirement

MISSION

To ensure prudent utilization of Scheme Funds and provide timely benefits to members and their beneficiaries

CORE VALUES

- **Integrity**
- **Equity and fairness**
- **Respect for members**
- **Accountability**
- **Innovativeness**

Contents

1.0 Introduction

The Teachers Service Commission Staff Superannuation Scheme recognizes the critical role that Information and Communication Technology (ICT) plays in achieving its mission. This policy establishes the framework for managing ICT resources effectively and securely, ensuring compliance with relevant legal requirements, and safeguarding the integrity and availability of information.

2.0 Objectives

- To ensure the secure, efficient, and effective use of ICT resources.
- To protect the confidentiality, integrity, and availability of data.
- To ensure compliance with legal, regulatory, and industry standards.
- To establish clear guidelines for the responsible use of ICT resources.

3.0 Scope

This policy applies to all ICT resources owned, leased, or used by the Scheme, including hardware, software, networks, data, and communication systems. It covers all users, including Trustees, Members, employees, contractors, and service providers.

Where the Scheme does not have ICT professionals it shall work with the ICT function of the Sponsor.

4.0 ICT Governance

4.1 ICT Oversight Structure

- **Administration & Communications Committee:** Responsible for overseeing the implementation of the ICT strategy and policies.
- **ICT Officer:** Oversees the day-to-day management of ICT resources and ensures compliance with this policy.
- **Data Protection Officer (DPO):** Ensures that data protection practices comply with the Data Protection Act 2019 and other relevant laws.

4.2 ICT Strategy

The ICT strategy will align with the Scheme's overall strategic objectives, supporting innovation, efficiency, and compliance. The strategy will be reviewed annually by the Administration and Communications Committee.

5.0 ICT Asset Management

- **Procurement:** All ICT hardware and software shall be procured through a competitive process, ensuring value for money and compliance with the Public Procurement and Asset Disposal Act 2015.
- **Asset Registration:** All ICT assets shall be registered in the ICT asset management register , with details such as serial numbers, purchase dates, and assigned users. Maintenance: Regular maintenance schedules shall be established for all critical systems to ensure optimal performance.
- **Disposal:** Obsolete or redundant ICT assets shall be disposed of in accordance with the Procurement and Disposal Policy 2015, ensuring data is securely erased.

6.0 Data Security and Protection

6.1 Information Security Framework

- **Security Policies:** The Scheme will implement security policies that cover access controls, encryption, data backup, and incident management.
- **Access Control:** Access to ICT systems and data shall be controlled through a role-based access control system, ensuring that users have the minimum necessary privileges.
- **Encryption:** Sensitive data shall be encrypted both in transit and at rest, using industry-standard encryption protocols.

6.2 Data Backup and Recovery

- **Backup Schedule:** Regular backups of all critical data shall be conducted, with backups stored securely off-site.
- **Disaster Recovery:** A disaster recovery plan shall shall be in place, tested annually, and updated as necessary to ensure the continuity of operations in the event of a disaster.

7.0 User Management and Conduct

7.1 User Account Management

Account Creation: User accounts shall be created based on documented approval processes, with access rights aligned to the user's role.

Password Policies: Passwords shall meet complexity requirements, be changed regularly, and not be shared.

7.2 Acceptable Use Policy

- **Internet and Email Usage:** Users shall adhere to guidelines that prohibit the use of the internet and email for illegal activities, personal gain, or activities that could harm the Scheme's reputation.
- **Social Media:** Users shall not post any information related to the Scheme on social media platforms without prior approval.

8.0 Compliance and Audit

8.1 Legal and Regulatory Compliance

- **Compliance Monitoring:** Regular audits will be conducted to ensure compliance with legal requirements, including the Retirement Benefits (Good Governance Practices) Guidelines, 2018, and the Data Protection Act 2019.
- **Reporting:** Any non-compliance shall be reported immediately to the Administration and Communications, with corrective actions implemented promptly.

8.2 Audits

- **Internal Audits:** Regular internal audits will be conducted to assess the effectiveness of ICT controls and compliance with this policy.
- **External Audits:** External auditors may be engaged to review the ICT environment as part of the Scheme's overall audit process.

9.0 Incident Management

9.1 Incident Reporting and Response

- **Incident Reporting:** All ICT incidents, including data breaches, shall be reported immediately to the ICT Officer and the DPO.
- **Response Plan:** An incident response plan shall be in place, detailing the steps to be taken in the event of a security breach or other ICT-related incidents.

9.2 Data Breach Notification

- **Breach Notification:** In the event of a data breach, affected individuals and relevant authorities shall be notified as required by law.

10.0 Training and Awareness

- **Training:** All users to shall undergo training on ICT security, data protection, and the acceptable use of ICT resources.
- **Ongoing Awareness:** Regular awareness campaigns will be conducted to keep users informed of emerging threats and best practices.

11.0 Review and Revision of Policy

This policy will be reviewed every three years or as required by changes in legal, regulatory, or business requirements. Any revisions shall be approved by the Board of Trustees.

12.0 Adoption and Sign Off

This policy is adopted by the Teachers Service Commission Staff Superannuation Scheme and is effective from the date of approval by the Board of Trustees.

Signed by the Trustees of **Teachers Service Commission Staff Superannuation Scheme** on this...20TH.....day of ..SEPTEMBER..... 2024

COMMISSIONER MBAGE NJUGUNA NG'ANG'A

MR. FRANKLIN KIPRONO CHOGE

MR. GEORGE MUNENE GICHONJO

MS. JENNIFER WAITHIRA NDEGE

MS. ERICA KIPSOISOI RUTTO

MR. GEORGE ONYANGO ODAWO

MR. SAMUEL MWENDA KITHINJI

MR. JOSHUA KITHUNU KAMANA

In the presence of the Trust Secretary

MRS. SALOME KARAMBURI MWITI