



Ideagen Disclosure Compliance

Service Definition Document

G-Cloud 15

Lot 2b Software as a Service (SaaS)

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Company Overview

Ideagen brings clarity and confidence to those businesses that put resilience at the heart of their operations.

Trusted by over 18,000 organisations worldwide – including over 1000 government agencies, more than 2000 hospitals and healthcare settings, as well as education, blue light services, life science and not-for-profit – our AI enabled solutions are proven to keep people, products and processes safe, increase efficiencies and streamline operations.

By unifying decades of deep regulatory expertise and innovation with affordable, best-in-class software we provide trusted, meaningful intelligence to support regulated and high-compliance industries with their audit, risk, health and safety, quality and compliance needs.

We are committed to continually improving the quality of our solutions, the environmental impact of our operations, and the security of the information that we safeguard. This commitment is demonstrated by our company certifications to ISO 9001, ISO 14001, ISO 27001 and ISO 45001. Ideagen also follows the guidance provided by ISO 26000.

Service Overview

Overview of the Service

Ideagen Disclosure Compliance is a comprehensive compliance software solution built on Microsoft 365 SharePoint that enables organisations to systematically identify, disclose, manage, and mitigate conflicts of interest across their workforce. The platform provides automated workflows for annual disclosure campaigns, real-time conflict tracking, and centralised reporting to meet regulatory requirements including SOX, Dodd-Frank, and industry-specific compliance mandates.

As a cloud-native SaaS solution integrated with Microsoft 365, Ideagen Disclosure Compliance delivers enterprise-grade security, scalability, and ease of use whilst maintaining full compliance with UK data residency requirements through hosting in Microsoft Azure UK South and UK West datacentres.

Features and Benefits

Comprehensive Conflict Management

- Annual disclosure campaigns with automated reminders and escalations
- Real-time conflict of interest tracking and monitoring
- Centralised repository for all conflict disclosures and documentation
- Gift and entertainment tracking with approval workflows
- Outside business activities and family relationship disclosures

Automated Workflows and Approvals

- Configurable multi-level approval processes
- Automated routing based on disclosure type and severity
- Email notifications and escalations for overdue reviews
- Mobile-responsive interface for approvals on any device
- Complete audit trail of all actions and decisions

Regulatory Compliance and Reporting

- Pre-configured compliance frameworks (SOX, Dodd-Frank, UK regulations)
- Real-time dashboards and executive reporting
- Customisable disclosure forms and questionnaires
- Audit-ready documentation and reporting
- Automated compliance status tracking and alerts

Microsoft 365 Integration

- Native SharePoint integration with familiar user interface
- Single sign-on through Azure Active Directory
- Role-based access control aligned with Microsoft 365 groups
- Leverage existing Microsoft 365 security and compliance features

- No additional infrastructure or licensing required beyond Microsoft 365

Outcomes and Deliverables

Organisations implementing Ideagen Disclosure Compliance achieve:

- Enhanced regulatory compliance and reduced audit findings
- Increased transparency and accountability across the organisation
- Streamlined disclosure processes reducing administrative burden by up to 60%
- Real-time visibility into potential conflicts enabling proactive risk management
- Improved employee compliance rates through intuitive user experience
- Complete audit trail and documentation for regulatory inquiries

Technical Requirements

Ideagen Disclosure Compliance operates as a native Microsoft 365 SharePoint application and requires:

- Microsoft 365 subscription (E3, E5, or Business Premium)
- SharePoint Online environment
- Azure Active Directory for user authentication
- Modern web browsers: Microsoft Edge, Chrome, Firefox, or Safari (latest 2 versions)
- Internet connectivity with access to Microsoft 365 services
- No additional hardware or server infrastructure required

Hosting Options and Locations

UK Data Residency

All customer data is hosted exclusively within the United Kingdom to ensure full compliance with UK data protection and residency requirements. Ideagen

Disclosure Compliance leverages Microsoft Azure UK datacentres:

- **Primary Region:** Microsoft Azure UK South (London)
- **Secondary Region:** Microsoft Azure UK West (Cardiff)
- Data never leaves UK sovereign territory
- Geo-redundant storage within UK regions for high availability
- Compliant with UK GDPR and Data Protection Act 2018

Infrastructure and Architecture

The service operates on Microsoft's enterprise-grade cloud infrastructure with:

- Multi-tenant architecture with logical data segregation
- Automatic scaling to meet demand
- Load balancing across availability zones
- Redundant power, cooling, and network connectivity
- 24/7 monitoring and infrastructure management

Data Back-Up and Restoration

Backups are configured through Microsoft Azure managed services to support our Recovery Time Objective (RTO) and Recovery Point Objective (RPO) requirements. Backups are stored redundantly across multiple facilities within the UK.

There is a documented Business Continuity and Disaster Recovery (BCDR) Plan for the solution which is tested at least annually. Findings from BCDR testing are tracked to ensure continuous improvement of the recovery procedures.

Security

Information Assurance

Ideagen maintains a suite of corporate security policies cover the management of security for both its internal operations as well as the services Ideagen provides to its customers, and applicable to all Ideagen employees as well as any relevant third parties and stakeholders. These policies, which are aligned with the ISO/IEC 27001:2022 standard to which Ideagen is externally certified, govern all areas of security applicable to the services. All policies are formally reviewed and signed off by management at least annually or on significant change, in line with our ISO 27001 Certification.

Additionally, Ideagen is certified under both Cyber Essentials and Cyber Essentials Plus. A comprehensive overview of Ideagen policies, standards, and procedures, can be supplied upon request.

The information security of the business is currently overseen by our VP Global Cyber Security, who works closely with our IT Teams, our Product Managers and our Group DPO to ensure that all Technical and Organisational Measures are in place and maintained. Ideagen utilises the Microsoft Azure, M365 product suite and AWS cloud services and therefore has the benefit of the Microsoft and Amazon infrastructure and controls.

Privacy by Design

Ideagen has embedded privacy by design principles throughout its product and development lifecycle, prioritising the protection of User data throughout all processing activities. The service implements core privacy principles including data minimization, purpose limitation, and privacy by default, ensuring Users benefit from the highest privacy settings without additional configuration.

The service employs strong encryption and granular access controls to ensure Buyer Data remains secure. Privacy safeguards are integrated from initial design

through to data deletion, with regular privacy reviews conducted as features evolve.

Ideagen has appointed a qualified and certified Data Protection Officer who oversees data protection compliance across the organisation and is registered with the Information Commissioner's Office in the UK.

Full details are available in [Data Protection Policy | Safeguarding your privacy](#)

Development Life Cycle

Ideagen delivers its software through agile methodologies and has adopted the core principles of the Scrum framework, as defined in the Scrum Guide at Scrum.org, to achieve this.

Ideagen developers follow OWASP guidelines. There are Lead Developers who ensure that our development processes are followed, such as peer reviews, testing against the OWASP top 10, etc.

The Cyber Security Unit (CSU) actively undertake regular penetration testing and vulnerability scans to discover any potential vulnerabilities within Ideagen software.

Our Software Development Lifecycle (SDLC) Document forms part of our ISO 27001 and ISO 9001 Frameworks and is reviewed by the Document Owner and our Risk & Audit Team at least annually or on event of a change.

Buyer Responsibilities

Whilst Ideagen provides and maintains the Ideagen Disclosure Compliance platform, customers retain certain responsibilities:

- Maintaining valid Microsoft 365 subscription and licensing
- Managing user access and permissions within their tenant
- Configuring disclosure forms and workflows to match organisational requirements
- Training end users on system usage and compliance procedures

- Managing disclosure campaigns and approval processes
- Data quality and accuracy of information entered by users
- Compliance with organisational policies and regulatory requirements

Working Together for Success

To ensure you get the most from our Services, we'll need you to designate a primary contact person before we begin. This person will be our go-to for important updates like maintenance notifications and service requests and should have the authority to handle matters such as data releases, restorations, and configuration changes. Just share their name and email address with us, and we'll make sure they stay informed on everything that matters.

Your Role in Managing the Solution

To help you maintain control and get the best results from our Software and Services, you'll take care of:

- Managing user security and permissions within the Software
- Setting up and maintaining your user desktops and network access
- Implementing, testing, and configuring your database as your needs evolve
- Providing us with accurate information as outlined in our guidance
- Keeping us updated on any operational changes that might affect the Services
- Creating and configuring user accounts
- Meeting your obligations on time and in line with applicable laws

Access and Collaboration

To deliver great service, we may occasionally need access to your equipment, information, data, personnel, or systems. We'll always keep our requests reasonable and work around your schedule. If our Team visits your premises, we ask that you help us maintain a safe and secure working environment, we'll do the same if you visit us!

Onboarding and Offboarding

45-Day Implementation Programme

Ideagen Disclosure Compliance is delivered through a structured 45-day (9-10 week) implementation programme ensuring successful deployment and user adoption. The programme is structured across five distinct phases with defined deliverables and milestones.

Phase 1: Project Initiation (Week 1)

- Project kick-off meeting with stakeholders
- Requirements gathering and documentation
- Project introduction training (2 hours) – overview of implementation process
- Environment provisioning and access setup
- Project plan finalisation and communication

Phase 2: Configuration (Weeks 2-3)

- Disclosure form design and configuration
- Approval workflow setup
- Email notification templates
- Role-based access control configuration
- Dashboard and reporting setup
- Deployment training (3 hours) – system configuration and administration

Phase 3: Testing & Validation (Week 4)

- System configuration review
- User acceptance testing (UAT)
- Workflow testing and validation
- Super user training (4 hours) – advanced features and administration
- Documentation and user guides

Phase 4: Go Live Preparation (Weeks 7-8)

- End user training sessions (multiple 2-hour sessions)
- Communication plan execution

- Go Live readiness assessment
- Support procedures finalisation
- Hypercare support planning

Phase 5: Go Live & Stabilisation (Week 9)

- Go Live Criteria: Minimum 250 documents migrated
- Production cutover
- Hypercare support (first 2 weeks post-Go Live)
- Issue resolution and system optimisation
- 60-day follow-up review meeting
- Project wrap-up and handover to support

Training Summary

The implementation programme includes the following training sessions:

Training Session	Duration	Audience
Project Introduction	2 hours	Project Team, Stakeholders
Deployment Training	3 hours	System Administrators
Super User Training	4 hours	Power users, Compliance Team
End User Training	2 hours per session	All System Users

Professional Services

Beyond standard implementation, Ideagen offers additional professional services:

- Custom form and workflow development
- Integration with third-party systems
- Advanced reporting and analytics
- On-site training and workshops

- Managed services and outsourced administration

Service Constraints

Maintenance Windows

Scheduled maintenance is performed during defined windows to minimise business impact:

- **Standard Maintenance Window:** Sundays 02:00–06:00 GMT
- **Frequency:** Monthly for routine updates
- **Notification:** 5 business days advance notice via email
- **Emergency Maintenance:** May occur outside window for critical security patches
- **Expected Impact:** Service unavailable during maintenance; average duration 2 hours

Customisation Limitations

As a SaaS platform, Ideagen Disclosure Compliance operates within defined customisation boundaries:

- Configurable disclosure forms and workflows within standard framework
- Custom fields and dropdown values supported
- Branding customisation (logos, colours) available
- Source code modifications not permitted
- Extensive customisation may require professional services engagement

Outage and Maintenance Management

Ideagen is notified of vulnerabilities through our own internal testing along with independent external assessments and system patch monitoring. Each vulnerability is reviewed to determine if it is applicable to Ideagen's hosting environment and its potential impact. If a zero-day vulnerability is discovered, we

will assess its impact to the system and if required patch at the earliest opportunity.

Backups are configured through Microsoft Azure managed services to support our Recovery Time Objective (RTO) and Recovery Point Objective (RPO) requirements. Backups are stored redundantly across multiple facilities within the UK.

All products are monitored using a managed SIEM/UEBA parsing. If any thresholds are met, alerts are presented via our ticketing system to our Cloud and Cyber Operations Team with automatic escalation procedures. Ideagen operates a formal Incident Management Policy and confidential processes that form part of our ISO 27001:2022 programme and as such is reviewed and externally audited at least annually. This area is further evidenced through the Ideagen ISO 27001:2022 Certificate and the Statement of Applicability.

Service Levels

We will be available for support through our online support portal, email or phone for the term of this Agreement, Monday through Friday, please refer to the SLA available at: [Ideagen Support Service Level Agreement \(SLA\) – Help | Ideagen Luminate](#)

In the event there are errors with the Software, the Company will endeavour to solve the issue within 72 hours of receipt of the problem. However, the Client acknowledges that some issues may require longer to resolve.

Ideagen offer three levels of Customer Success Plans which can be purchased offering three levels of support; Premier, Standard and Essential, full information can be found at: [Plan comparisons – Ideagen Customer Excellence \(Standard\)](#)

After Sales Support

You will be assigned a designated Account Manager who will be the primary contact point for any questions post implementation. The Premier Success Plan also provides access to an in-region Buyer Success Manager as well as a dedicated phone number for directly contacting the Support Team.

The Account Manager / CSM will actively seek to contact you to establish monthly and quarterly reviews at a mutually convenient time to ensure that you are maintaining value from your solution, and happy with the service provided by Ideagen.

For all service level information, please refer to: [Ideagen Support Service Level Agreement \(SLA\) – Help | Ideagen Luminare](#)

Access to Data (upon exit)

We want to make sure you have everything you need when our Contract comes to an end. Please remember to download and save any of your data from the Software before the termination date, this is important because your data will be permanently deleted from our systems after that point.

Once the Contract ends, and unless otherwise agreed, we won't be able to maintain your data or other information you've submitted, and we'll proceed with deleting all copies from our systems (unless we're required by law to keep them).

If you'd like our assistance extracting your data from the Software, just let us know at least 30 days before your termination date, we'll do our best to help. Please note that any assistance we provide will be subject to our standard professional services rates to cover our time and costs.

Contact Details

Please email g-cloud@ideagen.com with a brief description of your requirements and include the following contact details:

- Name
- Role
- Contact e-mail
- Telephone number
- The solution you are interested in

Ideagen will pass your enquiry to the most appropriate Team Member who will contact you to contact you to gather any additional information.