

City Policy – IT Cloud Services (Corporate Data Structure, Standards & Rules)

Policy Statement

1. City of Albany business functions, including the storage of information, is not be transacted on a cloud service without approval.
2. Proposals to utilise cloud services must be assigned a risk category in accordance with Table 1 – Matrix of Cloud Risk Levels.

Matrix of Cloud Service Risk Levels

		Service Type Risk Assessment		
Data Classification	Sub Classification	Private Cloud	Shared Cloud	Public Cloud
Public Information		Low	Low	Low
Non- Public Information	Unclassified	Low	Medium	Medium
	Personal	Medium	Medium	High
	Confidential	Medium	High	High

Table 1 – Matrix of Cloud Service Risk Levels

3. Responsibility is assigned as follows:

Assessment Process:

- a. The Information Technology (IT) Management Team is responsible for:
 - assisting business units gather the required information;
 - conducting a risk assessment; and
 - making a recommendation to either approve or reject the proposal.
- b. The Risk Management Team is responsible for:
 - reviewing the IT Management Team assessment and making a recommendation to the ICT Steering Committee to either endorse or reject the proposal.
- c. ICT Steering Committee is responsible for:
 - Approving or rejecting the proposal; or
 - Referring the proposal to the Executive Management Team for a final decision if the risk assessment rating is HIGH.
- d. Any request for a cloud service that results in a HIGH risk rating must be referred to the ICT Steering Committee for approval.
- e. The ICT Steering Committee is responsible for:
 - Reviewing all risk assessments.
 - Escalating all rejected (not approved) to Executive Management Team for review.
 - Staff will not enter into any contractual arrangements with cloud service providers prior to receiving approval from either the ICT Steering Committee or the Executive Management Team.

Approval Authority:

4. The following details the groups and/or persons who are delegated the power to approve cloud services:
 - Information Manager and/or IT Administrator (Low Risk);
 - ICT Steering Committee (Medium Risk); and
 - Executive Management Team (High Risk).

Procedure:

5. The following procedure applies to all proposals to utilise cloud services:
 - **Step 1** – Business Unit prepares project proposal which is tabled at the ICT Steering Committee.
 - **Step 2** - If Committee approves the proposal, endorsement will be given to proceed with further investigation and IT Team resources committed (help desk request raised) to assist with gathering the required information from the vendor and facilitate the risk assessment process.
 - **Step 3** – Business Unit and ICT Team will present finding to the ICT Steering Committee for final approval.

Objective

6. Even though the use of IT related Cloud Services is vital to the City from an operational perspective; stringent controls are required to ensure risks associated with using these services are identified and managed.
7. The objective of this policy position is to protect the City's data, operations and reputation from exposure to risks associated with storing and transacting data in the cloud.

Scope

8. This policy pertains to any person and/or business unit requesting to use cloud services to store or transact City of Albany business data.

Legislative and Strategic Context

9. Community Strategic Plan, Albany 2013: 5. Civic Leadership
 - 5.1 To establish and maintain sound business and governance structures;
 - 5.1.2 Develop informed and transparent decision making processes that meet our legal obligations.

Review Position and Date

10. This policy and procedure is to be reviewed by the document owner annually.

Associated Documents

11. City Strategy – Cloud Services Framework incorporating:
 - Project Proposal
 - Cloud Service Vendor Questionnaire
 - Cloud Services Checklist
 - Cloud Service Risk Assessment

Definitions

Definitions		
Public Information	Freely available to members of the public	
Non-public Information	Available internally to the City	
	Unclassified	Information that is internal to the City but is not required to be classified. E.g. Non confidential email, reports etc
	Personal	Information pertains to a person's personal information e.g. Name, address, contact details, hr related
	Confidential	Top secret, highly sensitive internal documents. Access restricted by law or regulation to groups of people, mishandling incurs criminal penalties
	Protected	Information not personal or confidential requiring protection/ e.g. Compromise may lead to serious harm to an individual, against commercial/economic interest, undermines financial viability of organisations, impedes the investigation of or facilitates commission of serious crime
Cloud Service Type	Private Cloud	City has exclusive use of cloud infrastructure and technology, located on City or vendor premises and managed by the City or the vendor.
	Shared Cloud	Involves a private cloud that is shared by several organisations with similar security requirements and need to store or process data of similar sensitivity.
	Public Cloud	Involves the City using a vendor's cloud infrastructure and or technology which is shared via the internet with many other organisations and members of the public.

- **Cloud Service.** A cloud service is any resource that is provided over the Internet. The most common cloud service resources are Software as a Service (SaaS), Platform as a Service (PaaS) and Infrastructure as a Service (IaaS).

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Manager Governance, Risk & ICT Services		Executive Director Corporate Services	
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0.2	Manager Governance & Risk Management	Draft 2 – Prepared for review and adoption by the Executive Management Team.	23/09/2015
1.0	Manager Governance, Risk & ICT Services	Approved with the following amendment: <u>Approval Authority:</u> The following details the groups and/or persons who are delegated the power to approve cloud services: <ul style="list-style-type: none"> Information Manager and/or IT Administrator (Low Risk); ICT Steering Committee (Medium Risk); and Executive Management Team (High Risk). 	8/10/2015