



# Information Classification Policy

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# Information Classification Policy

*This policy outlines the information classification scheme we have in place as well as our information handling standards. The aim of the policy is to ensure that information is appropriately protected from loss, unauthorised access or disclosure.*

## 1. Introduction

- 1.1. Procreation UK Limited collects information required for users to access its webinars, video chats and diary booking services. Information, like any other asset, must be appropriately protected.
- 1.2. In order to preserve the appropriate confidentiality, integrity and availability of information, we must ensure information is protected against unauthorised access, disclosure or modification. This is critical for all activities conducted across the organisation.
- 1.3. We have a duty and a responsibility to be as open and transparent as possible; this policy therefore outlines our information classification scheme and our information handling standards.

## 2. Policy statement

- 2.1 Information should be classified, valued and risk assessed in accordance to its confidentiality, integrity and availability; regardless of the media on which it is stored, the manual or automated systems that process it, or the methods by which it is distributed.
- 2.2 All information will fall into one of three **information classification categories** based upon its confidentiality, integrity and availability.
- 2.3 When considering the classification of information, appropriate appraisal criteria should be used.
- 2.4 The classification of our information assets supports our efforts to:
  - 2.4.1 Appropriately protect our assets;
  - 2.4.2 Support organisational assets and the effective use of information;
  - 2.4.3 Meet external requirements and obligations.
- 2.5 There are risks associated with inappropriate handling of personal, sensitive or confidential information. We have a responsibility to account for and to safeguard the information of our service users, our people, as well as organisational data. This policy aims to ensure appropriate protection and handling of our information assets, in accordance with their classification, to help mitigate risks, including

Integrity value	Low	Medium	High
Description	Negligible or low impact arising from breach in Integrity	Moderate impact arising from breach in Integrity	High impact arising from breach in Integrity
Examples	Internal websites	Internal workflows	Donor facing websites/Treasury systems

those relating to data protection and confidentiality, financial and/or reputational risk.

2.6 This policy applies to all of our information, irrespective of the data location or the device it resides on. It should be used by all our people and any third party working on our behalf.

2.7 There may be specific legal or contractual stipulations relating to information classification that apply in addition to the standards set out in this policy.

2.8 Our information classification scheme has three categories: **PUBLIC**, **INTERNAL USE** and **CONFIDENTIAL**.

2.9 The levels of classification are summarised in the table below:

LEVEL	CONFIDENTIALITY	INTEGRITY	AVAILABILITY
0	<b>PUBLIC</b>	LOW	LOW
1	<b>INTERNAL USE</b>	MEDIUM	MEDIUM
2	<b>CONFIDENTIAL</b>	HIGH	HIGH

2.10 Access to, and use of, LEVEL 2 (Confidential) information is restricted to authorised users with an immediate need to know; and then only for so long as that need exists and only to the extent of that need. Information classified as LEVEL 2 (Confidential) must be subject to protection at all times.

2.11 When exchanging data with other organisations or third parties which has been classified/labelled, recipients should ensure that conflicts of variances in classification systems are resolved. Data imported onto our systems should be annotated with the approved organisational classification and any conflicting labelling by the originator should be removed.

2.12 Documents marked 'Public' may not be re-classified to any other level, but that documents in the three other levels are likely, over time, to move into the 'Public' classification.

2.13 Value of the integrity of information should be assessed as follows:

Integrity value	Low	Medium	High
Description	Negligible or low impact arising from breach in Integrity	Moderate impact arising from breach in Integrity	High impact arising from breach in Integrity
Examples	Internal websites	Internal workflows	Donor facing websites/Treasury systems

2.14 The availability value of information should be based upon the impact any period of partial or full unavailability:

Availability value	Low	Medium	High
Description	Information where the owner is prepared to accept a medium to long term loss of availability of information/service	Information where the owner is prepared to accept a short to medium term loss of availability of information/service	Information where the service is critical and absolutely minimal loss of availability of information/service is acceptable
Examples	Internal informative websites	Service user/ supporter informative websites	Core infrastructure systems

### 3 Responsibilities

- 3.1 The **Chief Information Officer (CIO)** is the designated owner of this policy on behalf of Procreation UK Limited.
- 3.2 The **Chief Information Officer (CIO)** is the policy lead and is responsible for the ongoing review and maintenance of this policy and for responding to queries on a day to day basis.
- 3.3 **Document Authors** are responsible for assigning a classification category to the documents they create and protectively marking the document.
- 3.4 **Information Asset Owners** are responsible for assigning a classification category to assets they own, ensuring the classification is recorded on the information asset inventory, and where possible, ensuring information produced or created from databases or using reporting software is protectively marked.
- 3.5 **All our people** are responsible for protecting information in accordance with this Policy and for meeting the standards set within it. They must respect the security classification of any information as defined. Data breaches should be reported immediately to the Chief Information Officer so that action can be taken.

#### **4 Laws and regulations**

4.1 This policy supports our compliance with relevant UK legislation and regulation, including the *General Data Protection Regulations*.

#### **5 Monitoring and compliance**

5.1 Regular internal audits on compliance with Information Governance policies will be undertaken. Audit findings will inform organisational improvement needs (e.g. training, policy or procedure development, increased communications etc.).

#### **6 Training and support**

6.1 All our people who handle information on our behalf are required to undertake Information Governance training as part of the induction process. This training must be taken annually, with completion rates closely monitored.

6.2 Additional support - either ad-hoc or regular – to further support compliance with our data management policies and/or procedures can be requested from the Chief Information Officer.

#### **7 Review and maintenance**

7.1 This policy was last updated in October 2022, and is next scheduled to be reviewed in October 2023.

#### **8 Appendices**

8.1 Appendix 1: definitions

8.2 Appendix 5: legislative requirements

#### **Appendix 4: definitions**

- **Information Classification** – puts information into categories depending on the harm that could result from loss or unauthorised disclosure. All information assets must be assessed to determine the appropriate classification category. The criteria to determine the appropriate classification category for our information can be found in the guidance document '**How to categorise information.**'
- **Protective marking** – displays the classification category on electronic or paper documents and it indicates to others the classification category to ensure they are aware of the level of protection needed in handling, transferring, storing and disposing of information.
- **Information protection/handling** – the information classification category determines how information must be protected/handled. Information in the LEVEL 2 (Confidential) category must be handled, transferred, stored and disposed of in according with the organisation's '**Information Handling Standards**'
- **Data** – data is a collection of facts from which information is constructed via processing or interpretation.

- **Information** – information is the result of processing, gathering, manipulating and organising data in a way that adds to the knowledge of the receiver.
- **Information Asset Owner (IAO)** – a senior member of staff who is responsible for making decisions about an information asset/system. The owner can assign day to day responsibility for each information asset to an administrator.
- **Information Asset Administrator (IAA)** – the person responsible for the day to day operation of an information asset/system.
- **Personal data** - shall mean any data relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier. This definition provides for a wide range of personal identifiers to constitute personal data (for example: name, address, national insurance number, identification number, location data or online identifier, and the way organisations collect information about people, etc.)
- **Sensitive information referred to as “special category”** – shall have the same meaning as under the General Data Protection Regulation (GDPR) namely data consisting of racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation.
- **Confidentiality** – access to data shall be confined to those with appropriate authority.
- **Integrity** – information shall be complete and accurate. All systems, assets and networks shall operate correctly, according to specification.
- **Availability** – information shall be available and delivered to the right person, at the time when it is needed.

#### **Appendix 5: legislative requirements**

This policy is subject to all relevant laws passed in the areas in which we operate, whether or not they are specifically mentioned in this document.