

ACC&C Third Party Communication Policy

The information security standard ISO/IEC 27001 recognises the importance of securing exchanges of information, and the objective of section 10.8 is “to maintain the security of information and software exchanged within an organisation and with any external entity.”

Within section 10.8, control A.10.8.1 requires that “Formal exchange policies, procedures and controls should be in place to protect the exchange of information through the use of all types of communication facilities,” while control A.10.8.2 states, “Agreements should be established for the exchange of information and software between the organisation and external parties.”

This Policy document covers all current methods of modern communication, such as email, SMS, social networks/instant messaging and Twitter and video communications, as well as the more traditional methods of voice, fax and paper document. The policy is governed by the framework which is set down as a part of the Data Protection Act.

Classification of Information

Information is classified into the following categories:

1. Highly Sensitive – Information only for the review by individuals who belong to the executive. The loss of control of such information is considered to have potential repercussions such as loss of IP, reputational loss, legal consequence or information material to the negotiations in a contract of value over AUD\$5m or contains material considered private.
2. Sensitive – Information that individuals who belong to the management team group within ACC&C. The loss of control of such information is considered to have embarrassing consequential public scrutiny or results in being the subject of media review. Information also included covers information material to the negotiations in any contract under AUD\$5m.
3. Internal – Information that may only be shared with direct employees in ACC&C. The loss of control of such information is considered to potential pose some risk to the business which may/may not have been identified. This type of information includes corporate emails and marketing SNS content.
4. Controlled – Information that may be shared with parties external to ACC&C if they are bound by a GWorld Non Disclosure Agreement. Includes ACC&C subcontractors and vested interest partners.
5. Unclassified – Information that is not considered sensitive or in the public domain
6. Private – Information that is considered only to be reviewed by a particular individual/s.

Verbal

Guidelines for any verbal information sharing can be categorized based on the sensitivity of the information being shared.

	Control
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Highly Sensitive	Any information considered Highly sensitive that is communicated verbally must be done so only in a secured ACC&C venue or using a technology that ACC&C has encrypted for the purpose of communicating Highly Sensitive information. It is not appropriate to use the telephone or video conferencing to share highly sensitive information unless that service is confirmed to be secured and its traffic encrypted. Individuals involved in the communication of highly sensitive information should consider the nature of the content and pre-communicate to the other party of the sensitive nature of the upcoming exchange. It is a mandatory requirement that the communicating individuals that belong to ACC&C should verbally inform at least one other ACC&C executive of the exchange of information before/after the exchange.
Sensitive	Any information considered Sensitive should not be communicated in a location considered a public area unless there is no more than 2 people within a radius of 5m of the parties in communication.
Internal	Information shared for the furtherance of commercial or deliverable outcomes should be followed up in writing after the sharing of verbal information has occurred. The individual is responsible for the appropriateness and safety of relevant information exchanged.
Controlled	No communication should occur with any party unless a GWorld Non Disclosure Agreement has been executed.
Unclassified	No restrictions. Note: Unclassified information is considered to include anything in the public domain and thus controlled by public domain ethics consideration.
Private	Any private information exchange should NOT be performed using ACC&C resources or whilst considered on active duty. Where Private information exchange must occur and pose a conflicting priority with ACC&C commercial objectives, the individual should notify his/her line manager of the necessity for the private information exchange.

Written Information

The areas that are covered on information sharing of individuals within ACC&C with third parties using a written form such as email, letters, parcels, etc include:

- Responsibilities for dispatch and receipt
- Tracking
- Packaging and encryption standards
- Courier and media format standards
- Labelling
- Copyright and ownership

Highly Sensitive

	Detail
Responsibilities for dispatch and receipt	The individual who has created and distributed the information is responsible for the appropriate dispatch and receipt of the information.
Tracking	The individual responsible for the distribution of the information must track who has receipted the information and when.
Packaging and encryption standards	Information should be marked clearly as Highly Sensitive and encrypted when it is knowingly being sent over unsecured networks. When information is transmitted in any network considered under the control of ACC&C, the information is not required to be encrypted but must be labelled as Highly Sensitive.
Courier and media format standards	Transmission must be via the internal ACC&C parcel delivery service or auditable media transportation such as the ACC&C email service. Information may not be distributed unless it is in a PDF format or printed and labelled appropriately
Labelling	Must be labelled with the date sent, the addressee and marked clearly with the words, Highly Sensitive. Must be labelled with the general ACC&C disclaimer and copyright statements
Copyright and ownership	Fully owned by ACC&C

Sensitive

	Detail
Responsibilities for dispatch and receipt	The individual who has created and distributed the information is responsible for the appropriate dispatch and receipt of the information.
Tracking	The individual responsible for the distribution of the information should optionally track receipt of the information
Packaging and encryption standards	Information should be marked clearly as Sensitive
Courier and media format standards	Transmission maybe executed by a third party contracted service or an auditable media transportation such as the ACC&C email service.
Labelling	Must be labelled with the date sent, the addressee and marked clearly with the words, Sensitive. Must be labelled with the general ACC&C disclaimer and copyright statements
Copyright and ownership	Fully owned by ACC&C

Internal

	Detail
Responsibilities for dispatch and receipt	The individual who has created and distributed the information is responsible for the appropriate dispatch and receipt of the information.
Tracking	ACC&C audits the tracking of delivery of the information through its platform services such as its mail system or file systems.
Packaging and encryption standards	No special marking or encryption is needed for information classed as Internal
Courier and media format standards	Information may be sent via any corporate approved medium appropriate to the quality standards of engaging with a third party to ACC&C
Labelling	Must be labelled with the general ACC&C disclaimer and copyright statements
Copyright and ownership	Fully owned by ACC&C

Controlled

	Detail
Responsibilities for dispatch and receipt	The individual who has created and distributed the information is responsible for the appropriate dispatch and receipt of the information.
Tracking	The individual who has created and distributed the information must ensure a receipt has been received
Packaging and encryption standards	No special marking or encryption is needed for information classed as Controlled
Courier and media format standards	Information may be sent via any corporate approved medium appropriate to the quality standards of engaging with a third party to ACC&C.
Labelling	Must only be distributed AFTER a GWorld Non Disclosure Agreement has been executed. All information must be labelled with the general ACC&C disclaimer and copyright statements
Copyright and ownership	Fully owned by ACC&C

Unclassified

	Detail
Responsibilities for dispatch and receipt	The individual who has created and distributed the information is responsible for the appropriate dispatch and receipt of the information.
Tracking	ACC&C audits the tracking of delivery of the information through its platform services such as its mail system or file systems.
Packaging and encryption standards	No special marking or encryption is needed for information classed as Internal
Courier and media format standards	Information may be sent via any corporate approved medium appropriate to the quality standards of engaging with a third party to ACC&C
Labelling	Must be labelled with the general ACC&C disclaimer and copyright statements
Copyright and ownership	Fully owned by ACC&C

Private

	Detail
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Responsibilities for dispatch and receipt	The individual who has created and distributed the information is responsible for the appropriate dispatch and receipt of the information.
Tracking	ACC&C audits the tracking of delivery of the information through its platform services such as its mail system or file systems.
Packaging and encryption standards	No special marking or encryption is needed for information classed as Internal
Courier and media format standards	Private information must not be transmitted using ACC&C services or infrastructure (excluding email)
Labelling	Must be clearly labelled with the words PRIVATE and PERSONAL
Copyright and ownership	Fully owned by the content creator

SNS

All SNS content relating to ACC&C is considered high risk information and as such, any published content must be vetted by at least ONE other member of ACC&C staff. Any publication of such content should not be made public until the ACC&C marketing manager has authorised the publication.

SMS & Instant Messaging

Instant messaging is considered a viable tool for business and private communication and collaboration. The ACC&C policy regarding Instant Messaging is to allow discretion to the user. Instant Messaging tools should be used within the same frame work as written information exchange for the control of any information exchange. Where the tool is used for personal use, it should not overly interrupt day to day business priorities. As with any other tool that can be used to communicate, Instant Messaging tools should be used appropriately and not for the purpose of intimidation, sexual harassment or any other behaviour considered inappropriate by the ACC&C personal behaviour standards.

Facsimile

Whilst facsimile is not regularly used by ACC&C, the following policy applies in the event that a facsimile is used. All documents sent via facsimile should be set to produce a send and receive receipt. These receipts should be filed sorted by date alongside the content sent by facsimile in a ACC&C facsimile communications folder.

Images and Videos

ACC&C does not govern the production of images and videos not related to ACC&C or its core business. However where an image or video has however forced ACC&C to decide a formal position on the image/video, the individual who has created such content is to withdraw that information from public scrutiny until such a time as notified by ACC&C.

In the case where an image or video is produced that portrays, mentions or is created for the commercial use or advantage for ACC&C, then individuals who belong to the ACC&C organisation should take due care to present themselves as neat and portray an image of leadership and transparency.

Information Referenceability

All information relating or involving ACC&C must be captured and appended to the ACC&C backup and archive services for access in future reference at ACC&C's discretion at a future date.

Staff should NOT participate in the purge or expunging of any information considered to be corporate data without first notifying their direct line manager. The purge or expunging activity is only considered allowable if and only if the information is otherwise captured in the ACC&C backup systems.

Policy Evolution

This document forms the mandated guidelines that employees or related vested interested parties should adhere to in order to preserve the trust in which ACC&C is built upon. Whilst written in a semi-prescriptive manner, these guideline policies are designed to ensure a level of clarity and transparency in all matters internally and externally to ACC&C.

It is the intent of this policy that it should be maintained and updated no later than six months and every six months after the first implementation of this policy. The updates may be substantial or otherwise, however should always seek to improve efficiency of ACC&C's governing mandate.