

Commonwealth Games England

Data Classification Policy

Introduction

In order to preserve the confidentiality, integrity and security of Commonwealth Games England's (CGE) information assets, CGE must ensure that all data items are suitably protected against unauthorised access, modification, loss or disclosure. Whilst this is critical for assets falling under the remit of the UK's suite of data protection legislation, the protection is also relevant for general information assets across CGE.

An integral part of the protection process is to ensure that each data asset is assigned to a specified classification group, with protection protocols set according to each classification group and the risks associated with each group's characteristics.

Scope

This policy applies to:

- The head office of Commonwealth Games England, and any permanent or temporary satellite offices, including home working.
- All staff of Commonwealth Games England regardless of their physical working location.
- All contractors, suppliers and other people (including team leaders and secondees) working on behalf of Commonwealth Games England

It applies to all data that CGE holds, regardless of subject matter or storage medium.

Any legal or contractual stipulations concerning data classification take precedence over the provisions of this policy.

Responsibilities

Commonwealth Games England board

The board of Directors, supported by its operating committees, is ultimately responsible for ensuring that Commonwealth Games England meets its legal obligations. As such they ensure that adequate resources are made available to support this policy.

Commonwealth Games England Chief Executive

The CGE Chief Executive (CEO) is responsible for reviewing, updating and amending this policy as required as the business and legislative framework develop over time.

The CEO is also responsible for implementing organisational and technology controls (both internally and externally across Software as a Service, software, hardware and infrastructure support functions including hard copy filing) to support the functioning of this policy, and for ensuring that all users receive adequate training to understand and use these controls.

All Commonwealth Games England staff (and associated personnel)

All members of Commonwealth Games England community (i.e. those individuals classed as Internal Contacts in the CGE Privacy Policy) are responsible for assessing and classifying the information they work with, and for applying the appropriate controls and safeguards. If anyone is in any doubt they should refer to the Chief Financial Officer for guidance.

Data Classification Definitions

The following data classification levels have been adopted by Commonwealth Games England

Confidential

Confidential information has significant intrinsic value to CGE, either in terms of its commercial value or in terms of the potential damage (both financial and reputational) which could arise from loss of this data. Data which is defined under UK GDPR as “special category personal data” falls into this category, together with commercially sensitive data which is being collated, processed or stored by CGE.

Access to confidential information is controlled by rigorous electronic and/or physical controls, as appropriate. The principles of “need to know” and “least privilege” are applied to this category of information in order to minimise the degree to which this data can be accessed. Under these principles, only those who explicitly need access in order to do their work are granted access, and when granted this access is at the lowest possible degree of access commensurate with completing the job.

Confidential information is not to be shared outside of CGE without fully compliant consent from the data subject (if it is personal data) and explicit documented permission from a member of the Board.

Restricted

Restricted information has less commercial value, or negative consequences of loss, than confidential data. Data which is defined under the UK GDPR as “personal data” falls into this category.

Access to restricted information is limited to security controlled access (either electronic or physical control, as appropriate) by the smallest possible group of employees in order to ensure the smooth and efficient running of the business.

Restricted information is not to be shared outside of CGE without fully compliant consent from the data subject (if it is personal data) and explicit documented permission from a member of the Board.

Internal Use

Internal use information has limited commercial value and, most importantly, contains no data which falls under the control of the UK GDPR.

Internal use information can be disclosed, shared or otherwise communicated amongst any and all individuals classed as Internal Contacts in the CGE Privacy Policy without any restrictions on use.

Internal use information is not to be shared outside of Commonwealth Games England without permission from the document owner. If documentation is prepared as part of a commercial relationship with a specific client, stakeholder or supplier (or a specific group of such entities) then this permission for sharing is considered to be implicit.

Public

Public information is the default category for anything that does not fall into any of the three more restricted categories.

Public information can be disclosed, shared or otherwise communicated with anyone as required by the needs of the business.

Examples

Security Level	Definition	Examples
<p>1. Confidential</p>	<p>Normally accessible only to the absolute minimum number of specified and / or relevant members of Commonwealth Games England staff and other Internal Contacts</p>	<p>1. UK GDPR-defined Special category data:</p> <ul style="list-style-type: none"> • racial/ethnic origin, • political opinion, • religious beliefs, • trade union membership, • physical/mental health condition, • sexual life, <p>2. individuals' bank details;</p> <p>3. passwords;</p> <p>4. HR system data;</p>
<p>2. Restricted</p>	<p>Normally accessible only to specified and / or relevant members of Commonwealth Games England staff and other Internal Contacts.</p>	<p>1. UK GDPR-defined Personal Data (information that identifies living individuals) including:</p> <ul style="list-style-type: none"> • Addresses (post and e mail), • CV's, • telephone numbers, • photographs <p>2. Board and Committee papers and minutes;</p> <p>3. research reports containing sensitive, controversial or financially significant subject matter;</p> <p>4. financial systems data;</p> <p>5. other business systems data;</p>

		6. commercial bids, contracts and supporting documentation;
3. Internal Use	Normally accessible only to members of Commonwealth Games England staff and other Internal Contacts.	<ol style="list-style-type: none"> 1. Internal correspondence; 2. CGE policy and procedures documentation; 3. operational documentation and handbooks; 4. final published working group papers and minutes;
4. Public	Openly accessible to all staff, visitors and members of the public if published on Commonwealth Games England, other associated website or any other external media	<ol style="list-style-type: none"> 1. Anything remaining after items categorised as Confidential, Restricted or Internal Use have been removed.