
Data Classification Procedure

Version 1.2

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This procedure explains how all data in University College Cork is classified and an owner for all data sets is defined

Document Location

<http://www.ucc.ie/en/it-policies/procedures>

Revision History

Date of this revision: 25/10/2017	Date of next revision: 25/10/2018
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Revision Number	Revision Date	Summary of Changes	Changes marked
0.1	31/12/2012	Original	
0.2	23/03/2013	Revised Draft based on feedback from ISMT	
1.1	29/9/16	2016 Review: No changes required	
1.2	25/10/2017	Updated description of Confidential Data to include Personal Data and Special Categories of Personal Data in line with GDPR terminology	

Approval

This document requires the following approvals:

Name	Title	Date

This procedure will be reviewed on a periodic basis.

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1. PURPOSE

The Data Management Policy requires Data Owners to classify their data according to its sensitivity and criticality. This procedure sets out how this classification is to be performed.

2. ROLES AND RESPONSIBILITIES

Data Owner

The Data Owner will classify their data and ensure that the Data Inventory with respect to their data is accurate and up to date.

3. SCOPE

This procedure applies to all Data Owners as described in the Data Management Policy.

This procedure applies to electronic data only, for data classification of non-electronic data, please refer to University College Cork records management policy.

4. DATA CLASSIFICATION PROCEDURE

As per ISO 27002 the purpose of information classification is to ensure that information/data receives an appropriate level of protection.

Following on from this, University College Cork – National University of Ireland classifies its data based on the level of impact that would be caused by inappropriate access and/or data loss.

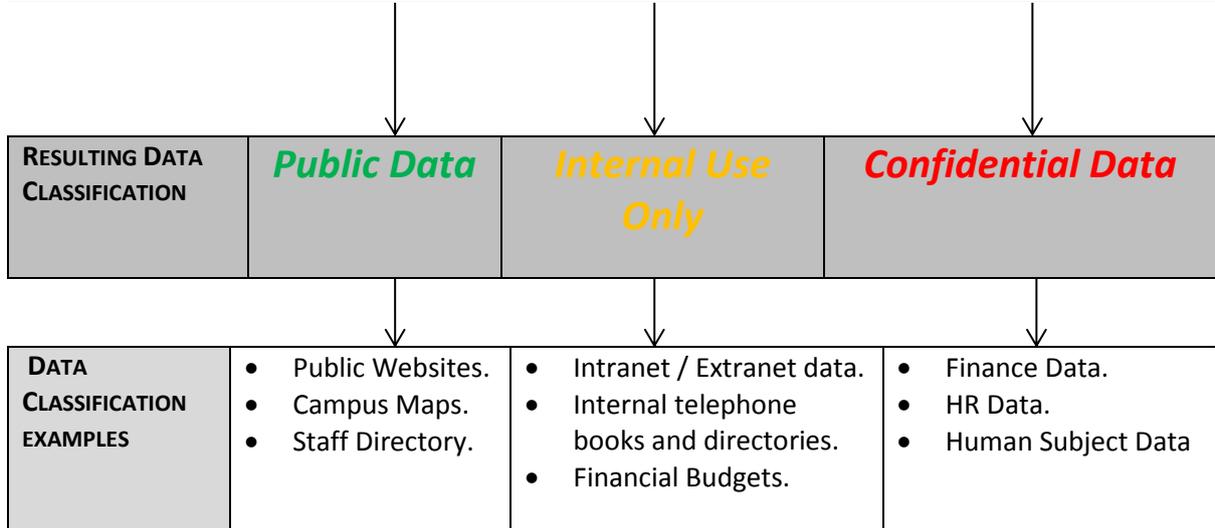
There are three classifications as follows:

1. Public data
2. Internal Use Only data
3. Confidential data

Classification of data is independent of its format.

The following table provides an indication of how classifications get assigned through considering the impact of various risks (Refer to Appendix II for Further Guidance):

Risk ↓	IMPACT IS CONSIDERED FROM FOUR MAIN PERSPECTIVES- LEGAL, REPUTATIONAL, FINANCIAL, AND OPERATIONAL (REFER TO APPENDIX II FOR FURTHER GUIDANCE)		
Inappropriate access causing breach of confidentiality/data protection rules	Minor	Moderate	Serious
Inappropriate access resulting in unauthorised amendments	Minor	Moderate	Serious
Data loss	Minor	Moderate	Serious
UNAUTHORISED DISCLOSURE	Minor	Moderate	Serious



Data that is not yet been classified should be considered confidential until the owner assigns the classification. Long term classification of Data as confidential for this reason is not acceptable.

Public Data

Public data is information that may be open to the general public. It is defined as information with no existing local, national or international legal restrictions on access or usage. Public data can be made available to all members of the University College Cork – National University of Ireland community and to all individuals and entities external to the University College Cork – National University of Ireland community.

By way of illustration only, some examples of public data include:

- Publicly posted content on all external facing web sites;
- Publicly posted press release;
- Publicly posted schedules of classes;
- Publicly posed interactive UCC maps, newsletters, newspapers and magazines.

Internal Use Only

Internal only data is confidential information that must be protected due to proprietary, ethical, or privacy considerations, and must be protected from unauthorized access, modification, transmission, storage or other use. Internal use data is information that is restricted to members of the University College Cork – National University of Ireland community who have a legitimate purpose for accessing such data.

By way of illustration only, some examples of official use data include:

- Intranet / Extranet data.
- Internal telephone books and directories.
- Financial budgets

Internal Use only data must be protected to prevent loss, theft, unauthorized access and/or unauthorized disclosure.

Confidential Data

Confidential data is information or data protected by statutes, regulations, *UCC* or contractual obligation. Confidential data may be disclosed to authorised individuals on a need-to-know basis only.

In UCC we sub-categorise Confidential Data into: Secret, Personal Data and Special Categories of Personal Data (Previously referred to Sensitive Personal Data).

The following table describes the types of Confidential Data and gives examples of each type. The examples in given in this table are by way of illustration only and this is not an exhaustive list.

Confidential Data Type:	Description:	Example:
Secret Data	Commercially Sensitive data for which we have an institutional obligation to protect	High value data that comprises intellectual property for research projects Commercial contracts
Personal Data	Data relating to a living individual who is or can be identified from the data	Name Address Credit Card Number CCTV Footage Student Records Personnel and Payroll Records Bank Account Details
Special Categorise of Personal Data	There are specific categories of data which are defined by the GDPR (General Data Protection Regulation) as special categories of personal data	Physical or mental health Racial origin Political opinions Religious or other beliefs Sexual life Criminal convictions Biometric data Trade Union membership

Confidential data, when stored in an electronic format, must be protected with strong passwords and stored on servers that have appropriate access control measures in order to protect against loss, theft, unauthorized access and unauthorized disclosure.

Technical considerations for electronically storing Special Categories of Personal Data should be considered on a case-by-case basis, the Data Owner should engage with the Data Custodian (please reference the [Data Management Policy](#) for more details) to ensure the appropriate technical protections and control measures are in place for protecting this type of data in line with UCC's obligations under the [Data Protection Policy](#).

Confidential data must not be disclosed to parties without explicit management authorization from the data owner, (refer to data management policy). Confidential data must only be used for the purpose for which it was originally gathered. If, for legitimate teaching, learning and/or research activities confidential data is used for a purpose other than that of which it was originally gathered the data must be anonymised. For additional information on Data Protection, please refer to the Universities Data Protection Policy.

Classification Record

The data inventory as per the template in Appendix I should clearly indicate the data classification assigned to individual data sets for University College Cork – National University of Ireland processes. It is the responsibility of individual data owners to input into the data inventory. It is the responsibility of the Director of IT to coordinate and update this data inventory.

1. APPENDICES

Appendix I – Data Inventory

Note: an additional column to indicate Data Steward nomination can be included in the below also.

<Institute Name> Data Inventory							
Process Name	Data Set	Data Owner Name	Data Storage Location (Application/database; Network directory location)	Data Processor Name	Data Classification: (Public Data; Internal use Only Data; Confidential Data)	Data Retention Period (Months or Years)	Data disposal technique (Purge or archive)
Finance				Public Data Internal use Confidential Data		
Human Resources							
Student Administration							
Health and Safety							
Research							

Appendix II – Guidance on Impact Criteria – Application of Classifications

	Minor	Moderate	Serious
Legal	<ul style="list-style-type: none"> Failed litigations or litigations which result in payment of no more than €X. Minor Compliance breaches. 	<ul style="list-style-type: none"> Litigations which result in payment of no more than €X – Significant compliance breaches 	<ul style="list-style-type: none"> Litigations which result in payment of no more than €X. Serious compliance breach
Reputational	<ul style="list-style-type: none"> Adverse internal media attention – Institute publications Insignificant or no impact on quality framework (including staff, programmes, delivery, research) Minor Injuries not requiring admission to hospital or minor distress not requiring leave from work/studies to recover 	<ul style="list-style-type: none"> Adverse local/regional media attention Injury or distress requiring hospitalisation or leave from work/studies Significant adverse impact on quality framework (incl. staff, programmes, delivery, research) 	<ul style="list-style-type: none"> Adverse national media attention and/or adverse social media attention Serious debilitating injury or loss of life; Serious distress resulting in long term leave Serious/Pervasive adverse impact on quality framework (incl. staff, programmes, delivery, research)
Financial	<ul style="list-style-type: none"> Financial loss equivalent to an annual loss of no more than €X 	<ul style="list-style-type: none"> Financial loss equivalent to an annual loss of between €X and €X 	<ul style="list-style-type: none"> Financial Loss equivalent to an annual loss of greater than €X
Operational	<ul style="list-style-type: none"> Less than two hours downtime in one specific department Low level of staff /student interruption Insignificant or no process anomalies 	<ul style="list-style-type: none"> Half day disruption to several staff and students Significant irregularity in processes. 	<ul style="list-style-type: none"> Closure/interruption of entire Institute; or Closure/Interruption of significant portion of Institute for a half day or more Serious or pervasive irregularity in processes.
RESULTING DATA CLASSIFICATION	Public Data	Internal Use Only	Confidential Data