Protective Marking for GCSx Emails Policy

How to protectively mark GCSx emails

Contents

1. What is information security?

The council has a responsibility to balance openness with security and aims to ensure that information is appropriately protected from loss, unauthorised access and disclosure. Information Security is the preservation of the confidentiality, integrity and availability of information.

Confidentiality ensures that information is accessible only to those authorised to have access.

Integrity safeguards the accuracy and completeness of information and processing methods.

Availability ensures that users have access to information and associated assets when required.

2. What is protective marking?

Protective marking is a way of ensuring that access to information and other assets is correctly managed and that assets are safeguarded to an agreed and proportionate level throughout their lifecycle. It is also a way of indicating to others the levels of protection required to prevent the compromise of the information.

The protective marking you apply to information must accurately reflect the sensitivity and value of the information.

Applying too high a protective marking can affect the *availability* of information by inhibiting access, leading to unnecessary and expensive protective controls, and impairing the efficiency of the council's business.

Applying too low a protective marking may lead to damaging consequences and compromise of the *confidentiality* and *integrity* of the information.

The Government Protective Marking System (GPMS) currently has 6 levels of protective marking:

> - **TOP SECRET**
> - **SECRET**
> - **CONFIDENTIAL**
> - **RESTRICTED**
> - **PROTECT**
> - **UNCLASSIFIED**

UNCLASSIFIED and PROTECT are relevant to Barnet Council when looking at marking GCSx emails. The definitions can be seen in the table at Appendix A.

It is rare that something you need to email would be considered RESTRICTED. The GCSx network is not designed to carry RESTRICTED

information. If you feel that you have RESTRICTED information please contact the Information Management Team to discuss alternative ways of sending this. In order to be classified as RESTRICTED information would need to be likely to for example: cause prolonged and significant distress for an individual, cause serious injury, cause public sector loss in excess of £1M, affect authority wide disruption that could pose a health risk.

CONFIDENTIAL is a national security classification used by the government that requires a higher level of security than would be appropriate for any council information; compromise of which would have national security or national economic ramifications. No information handled by you day-to-day will merit a protective marking of CONFIDENTIAL.

2.1. Unclassified marking for GCSx

You are required to use protective marking on every email sent via the GCSx connection. As GCSx is a system designed specifically for the sending of information via a more secure route, you would not normally think it appropriate to mark a GCSx email as UNCLASSIFIED or NOT PROTECTIVELY MARKED. However, as some organisations only have GCSx as their default method of communication you may have no option but to use GCSx regardless of the sensitivity of the message. Thereby resulting in you sending information via GCSx that does not need a higher level of security and could be marked UNCLASSIFIED.

3. What is sensitivity marking (descriptors)?

As the council deals with a large range of information that can be classified by PROTECT you can add a sensitivity marking after the protective marking to allow you to better describe why the information is protected.

For example "PROTECT – INVESTIGATIONS" or "PROTECT – CONTRACTS"

Also known as 'caveats' or 'descriptors', sensitivity markings can provide extra information to enable the 'need to know' principle to be applied effectively. See the table at Appendix B for a list of descriptors for Barnet Council information.

The list is not exhaustive so you can create new ones that are relevant to your area of work. However, you need to inform Information Management if you do so, to enable us to keep track of what descriptors are being used by services.

4. What you need to do

If you are sending an email using your GCSx account you must use the subject line to classify the email using protective marking. This should look like the image below with the protective marking, descriptor (if appropriate) and then subject title.
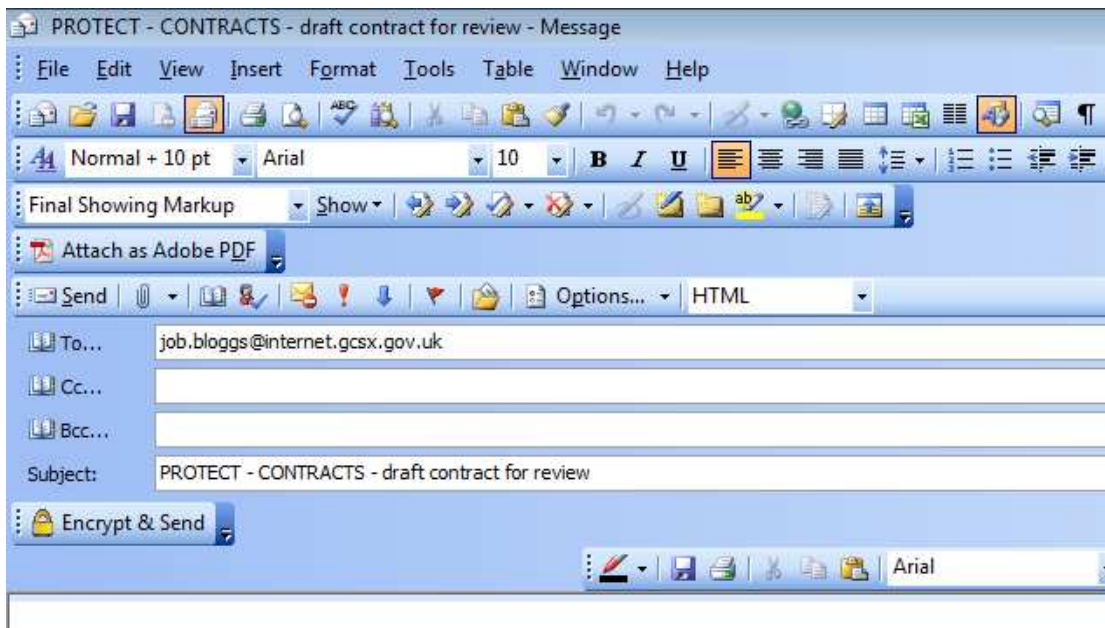
It is the responsibility of the sender to protectively mark the email. If you are including attachments you may need to check with the document author what level of protection is appropriate and therefore what level of protective marking the email requires. Similarly, if you are sending an email on behalf of a colleague or senior manager you may wish to check what level of marking is required if it is unclear.

5.   Material originating outside of the council

There is no agreed UK system for marking sensitive material, although terms such as **private** and **confidential** are in common use, particularly in relation to personal information. Any material originating outside of the council, that is not covered by a recognisable protective marking, international agreement, contract or other arrangements, but is marked in such a way to indicate sensitivity, must when handled by the council, be protected to at least the level offered by the PROTECT marking, and a higher marking may be considered.

6.   Information Rights

The protective markings do not impose any classification to restrict or to supply information under the Freedom of Information Act, Data Protection Act or Environmental Information Regulations. However, they may indicate that all or some of the information may be subject to exemptions, for example personal information. A protectively marked email is not automatically exempt from any information rights legislation.

It is worth noting that any information which has been (or would be) released in response to a FOI request would normally be considered as UNCLASSIFIED.

7. APPENDIX A - Protective Marking Categories

Protective Marking Categories for GCSx emails

Impact that *would be likely* if the data is disclosed, lost or stolen and misused	Protective Marking	Examples	Impact Level
Little or no impact on the finances of the council Little or no inconvenience or distress to the customer Little or no financial impact to the customer Little or no impact on the council's standing or reputation.	**NOT PROTECTIVELY MARKED / UNCLASSIFIED**	Policies and procedures Documents available in the public domain or on the council's website Property address where it does not identify the individual owner or residents (a full postcode can sometimes be considered to identify an individual) Names and contact details of specific employees or individuals that are in the public domain or where an individual has authorised this	0 or 1
Short-term inconvenience, harm or distress or significant embarrassment to an individual Cause financial loss or loss of earning potential, or to facilitate improper gain Damage to the council's standing or reputation Financial impact to the council (up to £1M) Breach proper undertakings to maintain the confidence of information provided by individuals or third parties Breach statutory restrictions on the disclosure of information	**PROTECT**	Personal information relating to any customer or employee such as a name, address and contact details, bank details, VAT number or National Insurance number, for which we have a duty of care Exempt Committee papers excluded from the public under Local Government Act An employee record including a disciplinary or grievance file A customer case file Draft documents before approval for release into public domain	2

Unclassified marking for GCSx

The term "UNCLASSIFIED" or "NOT PROTECTIVELY MARKED" may be used to indicate positively that a protective marking is not needed.

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Under no circumstances should UNCLASSIFIED be used where a decision has not yet been made on the classification of a document or email.

RESTRICTED classification

It is rare that something you need to email would be considered RESTRICTED. The GCSx network (and the Encrypt and Send application) is not designed to carry RESTRICTED information. If you feel that you have RESTRICTED information please contact the Information Management Team to discuss alternative ways of sending this.

In order to be classified as RESTRICTED information would need to be likely to for example: cause prolonged and significant distress for an individual, cause serious injury, cause public sector loss in excess of £1M, affect authority wide disruption that could pose a health risk.

8. APPENDIX B - Descriptors for Protective Marking

The table below defines how a descriptor may be used with the PROTECT marking based on information content. For example, PROTECT – CONTRACTS. They are not mandatory and they do not mean that, for example, every contract must be considered to have the PROTECT classification.

The descriptors serve to help those handling the information to decide which people should have access to the material. Information received from public sector partners may use one of these descriptors so you may receive information marked in this way. The list is not exhaustive so you can create new ones that are relevant to your area of work. However, you need to inform Information Management if you do so, to enable us to keep track of what descriptors are being used by services.

Descriptor	
COMMERCIAL	Disclosure would be likely to damage a third party or commercial establishment's processes or affairs
CONTRACTS	Tenders in progress and contract terms accepted
INTERNAL	Only available to LBB employees and should not be published or circulated outside of LBB without permission
INVESTIGATIONS	Investigations into disciplinary affairs or may lead to criminal cases
LEGAL PROFESSIONAL PRIVILEGE	Contains legal opinion that would be considered exempt under the Freedom of Information Act or could harm the council's interests if disclosed
MANAGEMENT	Policy and planning affecting the interests of the Authority or staff
MEDICAL	Medical reports, records and material relating to an individual
PERSONAL	Information that is personal to an individual or the sender and/or recipient
POLICY	A report or policy document that is for debate and consideration (policies once agreed would normally be publicly available)
STAFF	Contains references to named or identifiable staff or personal confidences