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Cloud Policy

Nōnahea i Whakarerekē | Last Modified Rā Arotake | Review Date Mana Whakaae | Approval Authority Āpiha Whakapā | Contact Officer November 2021
May 2022
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Kupu Whakataki | Introduction

This document codifies an enabling framework to manage the way the University accesses and uses Cloud services, while avoiding a 'shadow IT' environment.

Kaupapa Here | Policy Statements

'The Cloud' is shorthand for the provision of computing services that are accessed via the internet. For this reason, they are readily accessible and can be scaled up or down as required. Their use though, is not without risk. Adopting a service from "the Cloud", particularly a business system, may not be any less challenging to implement than an inhouse service, and indeed may expose users to unanticipated risks, costs and/or service outages.

To address these risks and accommodate the requirements of different user communities across campus, this document establishes the University's position on selection, use and business rules surrounding the use of Cloud services.

1. Establishment of a Cloud Management Framework

The Cloud management framework applies to the University as a whole, but recognises that different University functions have different requirements. The Cloud management framework is aligned with the national <u>Cloud Computing Risk and Assurance Framework</u>, <u>agreed by Cabinet in 2013 (ICT.Govt.NZ website)</u> and overseen by the Government Chief Information Office.

This policy codifies a Cloud selection and management framework that:

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- Sets out the University's approach to Cloud use and adoption, and integrates this with existing University information management policies;
- Aligns this with the wider New Zealand Government approach to Cloud Services;
- Lists a series of underlying adoption principles and selection criteria;
- Where appropriate, provides a technical implementation schedule

The University's Cloud Management Framework includes

- A Cloud Policy (this document);
- A Cloud Management Framework document;
- A Cloud Request and Registration Process; and
- Advice, guidance documentation and support materials/services.

2. Risk Management

Cloud services must be chosen, implemented and used with reference to the University's risk management models and frameworks, and approval of Cloud services will be guided by the Government Chief Information Officer's Risk and Assurance Framework. Risk assessments will be right sized and appropriate to service type and the information type.

3. Compliance Assurance

Cloud services must be able to comply with the University's legal obligations, and must enable the repatriation of content to the University to allow legal obligations to be fulfilled. These include mandatory retention of corporate content under the Public Records Act 2005 (New Zealand Legislation website), the appropriate management of personal information under the Privacy Act 2020 (New Zealand legislation website), and the ready access to University information under the Official Information Act 1982 (New Zealand Legislation website). In addition, other regulations and legislative requirements may apply and will be considered as part of the approval process.

4. Registration and Management

All Cloud services must be centrally requested and registered via the Cloud Registration and Approval workflow to enable the management of their content and contractual terms and conditions, and to ensure they meet the University's security, access and non-functional requirements for IT systems. The workflow includes approval by the Information and Records Manager and Chief Information Officer (CIO).

5. Usage

All Cloud services commissioned under this policy (and the associated Cloud Management Framework) and the content they create and maintain, are University services and must be used appropriately and in line with other University policies and procedures, including

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security and access. Although not located within the University, Cloud services are nevertheless IT services and must be considered within that context, and with ITS and Financial Services policies and procedures especially.

6. Recognition of Cloud Service Limitations

Many Cloud service providers, particularly those that offer "Software as a Service" ("SaaS"),

- May use proprietary and/or highly controlled data/software formats. These often do not have export capabilities that enable the continued processing or editing of the content on a different platform (either cloud or in-house). For example, they may limit data export to PDF "printouts" rendering subsequent processing infeasible; and/or
- Have charging models that make extraction or repatriation of information expensive or overly complicate; and/or
- Use contractual terms and conditions that take ownership of data/content, enable the
 re-use of data in ways users do not anticipate or that is contrary to New Zealand law;
 enable the on-selling of data to third parties or indemnify themselves from data loss,
 theft or alteration
- May cease to exist with little or no notice, be sold, or otherwise alter their business model meaning data/content is rendered lost, inaccessible or deleted

When considering a cloud services these limitations should be taken into account and assessed. They will be considered during the review and approval process. Decision making factors will include, but are not limited to, the Information Value level of the content proposed to be created/stored in the Service, its IP value and whether it contains personal or sensitive personal information.

Glossary of Terms Associated with Cloud Services

Users of Cloud services and those involved in IT within the University may encounter technical jargon. The below are examples of what is likely to be encountered, with the explanation of the term provided.

- Business System is any system that holds or processes data that is either part of the
 business record of the University, as defined by the <u>Public Records Act 2005 (New
 Zealand Legislation website)</u>, or a system that has information about an identifiable
 person, as defined by the <u>Privacy Act 2020 (New Zealand Legislation website)</u>.
- Cloud Management Framework shorthand for the University of Canterbury approach
 to managing the selection, implementation, deployment and management of Cloud
 services to support University activities. As well as this document, the Framework
 includes an application and registration form and workflow, a register of approved Cloud
 services, and support and guidance documents that provide specific and targeted advice
 on the Framework's various elements.
- Information Value a short hand description of the classification model for determining retention periods and disposal outcomes for University information. These align with

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Disposal Authority 337 issued by the Chief Archivist, and outlined in the General Disposal Authority for New Zealand University Records. University of Canterbury's Information Values are prescribed in the <u>Records Management Policy (PDF, 496KB)</u>.

- laaS 'Infrastructure as a Service' this type of Cloud service provides base hardware (real or virtual) onto which the University must load an operating system and application(s). Other than physical hardware, and in the case of virtual hardware, the managing of the hypervisor, the University of Canterbury is responsible for all aspects of the service. Examples include Microsoft Azure, Linode, Digital Ocean, Firehost, Hurricane Electric.
- PaaS 'Platform as a Service' this type of Cloud service provides the operating system and the University supplies the applications to be run by the platform. The University is responsible for "spinning up" the applications, and managing the provision, scaling, availability and backup of the service. Examples include Amazon AWS, Microsoft Azure, Google Cloud Platform

Tautuhinga | Definitions

Non-Functional Requirements —also known as 'quality attributes', non-functional requirements are used by ITS to define system attributes such as performance, security, usability and compatibility. University's Non Functional Requirements are maintained by the ITS' Architecture Office.

SaaS – '**Software as a Service'** – this type of Cloud service provides access to cloud based software designed for a specific purpose or function. The Cloud provider manages all aspects of the provision of service, including running the application, storing the data and rendering it available. Examples include Dropbox, Google Apps, Trello, Microsoft Office365

He korero ano | Related Documents and Information

Whakaturetanga | Legislation

- Official Information Act 1982 (New Zealand Legislation website)
- Privacy Act 2020 (New Zealand Legislation website)
- Public Records Act 2005 (New Zealand legislation website)

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- Password Policy (PDF, 292KB)
- Privacy Policy (PDF, 744KB)
- Procurement Policy (PDF, 194KB)
- Records Management Policy (PDF, 496KB)
- Risk Management Framework (PDF, 655KB)

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Mōwaho | External

- Cabinet Minute CAB Min (13)37/6b (ICT.Govt.NZ website)
- Cloud Computing Risk and Assurance Framework (ICT.Govt.NZ website)
- ITS Standard Non-Functional Requirements
- <u>New Zealand Information Security Manual (Government Communications Bureau</u> website)
- New Zealand Universities General Disposal Authority (Archives New Zealand website)
- Privacy Impact Assessment Handbook (Office of the Privacy Commissioner website)

Document History and Version Control Table			
Version	Action	Approval Authority	Action Date
1.00	Document development and creation	University Registrar	July 2018
2.00	Scheduled review, minor changes to content layout, hyperlinks updated.	Policy Unit	March 2019
2.01	Review date pushed out for 6 mths	Policy Unit	May 2021
2.02	Unscheduled review, change of AA and CO, reformatting of template	Policy Unit	Nov 2021

This policy remains in force until it is updated

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