People

Employees leaving your business have knowledge about your operations, assets and security vulnerabilities. Sadly, the circumstances surrounding a departure may not always be amicable. There is a risk that the confidentiality, integrity and availability of critical assets could be compromised if no effective exit controls are in place, resulting in financial, legal and operational impacts for your business.

A formal and thorough procedure for all staff and contractor departures will ensure appropriate actions are taken to protect the business without unduly disrupting the employer-employee relationship. CPNI guidance contains an example of a leaver process which businesses may wish to follow. This process should take place over the length of the employee’s notice period and should include the removal of access privileges.

What practices do you have for restricting/denying access to assets (including information) for staff departing from the business?

Information

Your business’s Information is likely to be of interest to a range of actors: nation states, competitors or criminals. Some information will have significant economic value.

Do you know where and how your sensitive information (classified, business critical, personal data) is held?

Risks to information may have increased due to homeworking, resulting in assets stored off-site and potential relaxation of access rights to facilitate remote working.

Have you minimised the sensitive information you hold, is there information you can return or destroy? Reducing the information you hold reduces the risk.

If your business’s ownership or status changed, what information would you need to protect and/or recover from third parties?

What are your legal obligations to protect the information you hold?

Are your suppliers in financial distress, do they hold your information, if so how will you recover this information?

Property

Ensure assets are kept properly accounted for and records kept up to date.

Dispose of assets that are no longer required – if they hold sensitive material they should be sanitised and destroyed in an appropriate way.

Does your business have a plan for how the material will be physically protected if it went into administration or liquidation.

Certain types of locks and alarm systems, used to protect highly classified material are themselves sensitive items and need to be protected. It is important that these are included in the protection plan. It is important that these are not disposed of insecurely.

If in doubt contact CPNI.
Client Organisations

Are you aware of the contractual obligations you have with your suppliers? Are there clauses covering change of ownership or status of these businesses? How well documented are these?

Do you know what assets you have in suppliers’ businesses? Can you identify key custodians of these assets who would be able to assist the officeholder?

How robust are your contracts with suppliers in the event of their insolvency or administration in dealing with your assets?

Do any of those assets have significant economic value to your business? Do these have appropriate protection?

What steps would you take should one of your suppliers face a takeover or be placed in administration or insolvency?

Have you considered your legal obligations to the information you might have in these businesses?

Delivery Organisations

Are you aware of your contractual obligations to your customers regarding their assets?

Do you know when you need to report potential changes in ownership or status to them?

Do you know what third party information you hold and how you have secured it?

Do you have a plan for the return of this information if your business’s ownership or status changes?

Do you know the thresholds for reporting approaches from investors under Foreign Direct Investment? Contact the government department responsible for your sector as soon as possible, or alternatively contact CPNI.

How would you limit access to sensitive assets and ensure they remain secure?

Do you know who to contact to gain access to secure containers? High security containers and locks are often sensitive in their own right, do you know who to contact to dispose of these appropriately? If in doubt contact CPNI.

Have you considered your legal obligations to the information you might have in these businesses?

Insolvency Officeholder

Could you improve your processes for identifying sensitive assets (including classified material) and their owners within the businesses you are responsible for?

Sensitive assets come in a range of formats, including electronic media. Do you have the latest advice on how to dispose of these items appropriately?

How would you access your property if your business went into administration or liquidation to secure sensitive material?

Do you have latest advice on secure transportation and destruction.