Cloud Services
Information session
Updated: December 2019
Agenda

- Today’s objective
- Context
- Risks & considerations
- What do we need to change?
- Process highlights & sensitive data
- Considerations to be aware of
- What do we expect from you?
- Tools available
- Next steps
Our Objective Today...

- Provide an understanding of what **Cloud Services** means to **all of us** at McGill and the **support** we need from you.

- Explain how we can **work together** to **protect ourselves and the reputation of McGill** by safeguarding our data.
Why are you here?

You are in direct contact with members from the McGill community who acquire or use cloud services.

You can influence others in doing things right.
What are Cloud Services?

Instead of running a software application and storing/accessing your stored data on your desktop or on McGill’s network, this is **provided to you remotely** as a service (by an external service provider) and **accessed over the Internet**.

- Reduces costs of maintaining our systems
- Allows for quicker implementation times
- Provides us with additional flexibility to connect to the university anywhere, anytime

There is a significant number of cloud solutions in use at McGill, and this number is increasing rapidly.

• Since our data is no longer kept within the walls of our organization, we don’t have the knowledge or control of who has access to our data without performing due diligence.
Protecting ourselves & our organization

Secure personal & sensitive information

Protect proprietary information and Intellectual Property (IP)

Comply with laws, regulations and standards

Protect the privacy & rights of individuals and the reputation of McGill
Finding

Process to acquire/use cloud services **not** formally documented/communicated

Acquisition/use of cloud services **without** understanding the risks associated

Use of cloud services **not** managed consistently

**2018 Audit**

**Action plan**

Actions are underway *since May 2019 and planned until December 2020 (and beyond)* to ensure the processes are clarified and key stakeholders are informed.
Consequences of acting alone...

Self-provisioned cloud services have not been vetted through the cloud services acquisition process.

Decision not approved!

DID YOU KNOW?

When self-provisioning cloud services, the McGill employees involved assume accountability for any data breaches and security incidents related to this data.
Risks

Risk of non-compliance with laws and regulations

Risk of acquiring cloud services whereas a comparable solution is already available

Risk of getting locked into a contract that does not fulfill your needs
Requestor considerations for all Cloud Services

**Before**

- Have you defined your needs?
- Will you be able to adapt your processes to the solution?
- Are you really dealing with cloud services?
- What kind of data could be accessible to the provider or other 3rd parties?
- Does McGill already have a similar, vetted solution?

**During use & at renewal**

- Resources and expertise are available to support the ensuing maintenance and monitoring of the cloud services
- Changes to scope are assessed from a privacy and security perspective
- Significant changes to laws, regulations and industry standards are reviewed for compliance
- Service issues with vendor are addressed
- Vendor changes to processes, systems, or « flow of data » are evaluated
- Breach of contract related to security, performance or privacy compliance are addressed to McGill’s satisfaction
We need to take ownership!

We are all responsible for the security of McGill’s data!

This does not only concern Procurement or IT Services.

We need to become pro-active and work together.

We need to protect sensitive data in the cloud.

Adhering to process and performing our due diligence are key to protecting McGill and ourselves.
Highlights of Cloud Services Acquisition Process

This process applies to both free & paid cloud services!

Steps 2, 4, 5 & 6:

1. Assess your needs (requester/user)
2. Contact Data Trustee(s) for concept approval
3. Submit Procurement Mandate Form
4. Privacy Assessment
5. IT Risk Assessment
6. Contract Assessment
7. Final Decision

Note: This is an extract from a more detailed process.
Which data is sensitive/confidential?

**Regulated institutional data**
- Mandated by law, regulation or industry requirement
  - Confidential

**Public institutional data**
- Non-confidential information
  - Non-confidential

**Protected institutional data**
- Data that is not regulated, nor public
  - Confidential

**Examples**
- Personal information
- Student/employee records
- Passwords
- Legal files

- Press releases
- Public access website pages
- Published documents, ex. brochures, annual reports, academic calendars, campus maps, course descriptions, etc.

- Internal memos
- Meeting minutes
- Documents incl. proprietary information
- Research grant applications
- Etc.

*Note: Research data is subject to the same provisions*
McGill developed the privacy addendum to be able to comply with data privacy legislation. It entails contractual clauses to ensure that our vendors respect privacy obligations. The addendum takes precedence over contractual clauses. Data hosting locations and data access locations are key elements in the privacy addendum.
You have a critical role to play!

Spread the word!

• Explain the process to others
• Make them aware of the time required to follow the process
• Ensure they understand why the process has to be followed

Be a guardian!

• Ensure you understand the cloud acquisition process
• Ask questions if needed
• Do not proceed with any cloud service until due diligence is performed

Controls will be added to monitor cloud usage!
Tools available

Some of the tools that will be available for you:

<table>
<thead>
<tr>
<th><strong>Cloud Services 101</strong></th>
<th>• A basic introduction to cloud services explaining what it is, the benefits and risks as well as the expectation of the requestor’s role in the process.</th>
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<tbody>
<tr>
<td><strong>Cloud Process</strong></td>
<td>• High-level and more detailed overview of the Cloud Service Evaluation Process, for anyone at McGill planning to acquire or use a cloud service.</td>
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<tr>
<td><strong>Cloud considerations</strong></td>
<td>• A set of questions to ask yourself as a guideline prior to the acquisition, during the use, and at renewal of a cloud service.</td>
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<tr>
<td><strong>Cloud directive &amp; guidelines</strong></td>
<td>• The official document that prescribes when and where you can store (and transmit) McGill data, depending on data security and privacy needs.</td>
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Visit our web page: [https://mcgill.ca/cloud-directive](https://mcgill.ca/cloud-directive)
Next Steps

• You will receive the presentation and tools available
• Contact us if you have questions

For any questions, please send an email to:

cloudservices.procurement@mcgill.ca
Any Questions