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Engineering and Software Services



# **ESS Guidelines for Handling of Confidential Information**

*Engineering and Software Services Division  
Space Telescope Science Institute*

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# ESS Guidelines for Handling Confidential Information

## Background

There are times when management or a team working on a given project will have information that needs limited distribution. The handling and distribution of confidential information often generates discussion and concerns. Some of these are:

- That it is difficult to determine whether information should or should not be designated as confidential.
- That interspersing confidential and non-confidential information can cause confusion.
- That the unnecessary designation of information as confidential can create a lack of trust by the staff.
- That inconsistent dissemination of confidential information undermines the confidence in STScI management.

This document defines a set of ESS guidelines for the handling of confidential information that addresses these concerns. The establishment of clear guidelines and practices for dealing with information that cannot be shared allows us to effectively maintain confidentiality when it is required while instilling staff confidence that these practices are used appropriately and only as necessary.

## Confidential Defined

The term confidential implies that information received by a person will be kept secret and not disseminated to others<sup>1</sup>. In general, this designation should be applied to any detailed information that if made public could have negative consequences for an individual or group of individuals. This can be applied to either factual data (e.g. salary information, performance appraisals) or information regarding a task or decision that is not complete (e.g. office moves). For ESS purposes, we have defined four different sub-categories associated with the confidential term. They are:

- Private: Material contains information that is sensitive and should be closely guarded.
- Incomplete Draft: Material is still in work and could be misconstrued if shared before it is completed.
- Competitive: Material is deemed as holding STScI material that might diminish or jeopardize our competitive stance.
- MC/DO: Material deemed confidential by the Management Council (MC) or Director's Office (DO) that is being shared with a limited group for review.

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<sup>1</sup> Paraphrased from Webster's definitions of confidential and confidence.

## ESS Policy on Confidential Information

*It is policy of the Engineering and Software Services Division to maintain an open environment for horizontal and vertical communication. Only information produced by ESS that clearly fits the definition of confidential will receive this designation. When designated as confidential, ESS members shall handle this information in accordance with its guidelines. When a confidential designation removed, that information will be distributed more broadly as quickly as possible.*

### Confidential Guidelines

To support the ESS policy on confidential information, the following guidelines should be applied.

**Guideline 1: Confidential information is not subject to interpretation.**

The designation of confidential or proprietary is not subject to interpretation by a recipient. It is the responsibility of the originator to determine this designation. If an individual believes that a confidential designation is questionable, they should query the originator (or their supervisor) for reclassification. It is the responsibility of the originator to change the designation and resubmit the information when needed.

**Guideline 2: All confidential information will be appropriately identified.**

It is important that any information considered confidential or proprietary is immediately recognized to prevent accidental distribution.

- a) **Email subject lines will begin with the appropriate term followed by the actual subject header.**  
Example: Confidential: ESS Salary Information
- b) **Documents will place the appropriate term in the page header or footer.** This will assure that the designation appears on each page.  
Example: CONFIDENTIAL: DO NOT DISTRIBUTE
- c) **Hard copy versions that do not contain the appropriate header or footer information will be stamped confidential.**
- d) **Envelopes for internal routing will be sealed.**

**Guideline 3: You should try not to intersperse confidential information with non-confidential information.**

The mixing of confidential information with other information makes it difficult to recognize which information fits into a designated category. In the case of meeting minutes, it is difficult to not have confidential/non-confidential information together. In these cases, the minutes themselves should be classified as confidential (ex: not distributed further), but those non-confidential portions can be communicated outside the minutes document.

**Guideline 4: Confidential information will not be forwarded unless the originator provides specific forwarding instructions.**

The more any document is passed around, the more likely it is to become public information. The originator of any confidential information has the responsibility to indicate the extent to which that information can be disseminated. In the absence of these instructions, it must be assumed that further forwarding of the information or discussion with parties outside the distribution list is not to occur.

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**Guideline 5: Only individually addressed or administered email distribution lists will be used for sending confidential information.**

Many of the distribution lists at STScI allow anyone to subscribe to a particular list. To prevent inappropriate receipt of confidential information, senders (or forwarders) should verify all recipients. Similarly, care should be taken to assure that a distribution list only contains individuals meant to receive a particular piece of confidential information.