1. **Scope**

All internal and external communications determined by Retirement Capital are within the scope of this procedure.

Where relevant, Retirement Capital’s policies, procedures and work instructions may determine the requirements for specific internal or external communications. Where this is the case, those documents supersede the procedure below.

1. **Responsibilities**

The Department Manager or Managing Director are responsible for identifying when internal or external communication will be necessary.

The Director (CISO) is responsible for identifying requirements for internal and external communications and scheduling any necessary regular internal communications relevant to the ISMS.

The Board of Directors are responsible for determining requirements for external communications and approving external communications.

1. **Internal communications**
   1. The Department Manager or Managing Director identifies the necessity for internal communication based on any changes to the organisation, the external regulatory environment, competitive analysis, success stories, etc.
   2. The Director (CISO) identifies the content of the communication according to the following conditions:
      1. Cause for the communication
      2. Classification of the information being communicated
      3. Classification of the communication itself
      4. Need to know
   3. The Director (CISO) identifies the appropriate audience for the communication according to the following conditions:
      1. Classification of the information being communicated
      2. Need-to-know
      3. The medium of communication (e.g. email, staff room notice, mandatory signed notification, etc.)
      4. Other relevant factors
   4. The Director (CISO) composes the communication as appropriate.
   5. The communication is subject to review and approval by The Board of Directors, according to the level of the communication.
2. **External communications**
   1. Retirement Capital is not party to any information sharing networks:
   2. The Director (CISO) identifies the necessity for external communication based on changes to the organisation, its products, customers and suppliers, etc.
   3. The Director (CISO) identifies the content of the communication according to the following conditions:
      1. Cause for the communication
      2. Classification of the information being communicated
      3. Classification of related information
      4. Other relevant factors
   4. The Director (CISO) identifies the appropriate audience for the communication according to the following conditions:
      1. Cause for the communication
      2. Classification of the information being communicated
      3. Contractual, statutory or regulatory obligations
      4. The medium of communication (e.g. email, staff room notice, mandatory signed notification, etc.)
      5. Other relevant factors
   5. The Director (CISO) composes the communication as appropriate, in accordance with Retirement Capital’s style guide for external communications.
   6. The communication is subject to review and approval by The Board of Directors or parent company Board, according to the level of the communication.

**Document Owner and Approval**

The Director (CISO) is the owner of this document and is responsible for ensuring that this procedure is reviewed in line with the review requirements of the ISMS.

A current version of this document is available to all members of staff on the corporate intranet.

This procedure was approved by the Chief Information Security Officer on 14/11/2020 and is issued on a version-controlled basis under his/her signature.

Signature: Date: 14/11/2020

**Change History Record**

|  |  |  |  |
| --- | --- | --- | --- |
| Issue | Description of Change | Approval | Date of Issue |
| 1 | Initial issue | Gavin McCloskey | 14/11/2020 |
|  |  |  |  |
|  |  |  |  |