

Tuesday 27 May 2003

**Mr John Carter
The Secretary
Joint Committee of Public Accounts and Audit
Parliament House
Canberra ACT, 2600**

RE Inquiry into the Management and Integrity of Electronic Information in the Commonwealth

Dear Mr Carter

Mr Luttrell's letter of 29 April to Ms Whittaker, asked several questions relating to EDS' evidence to the above inquiry.

EDS' response to those questions is attached.

Yours sincerely,

Michael Smith

Enterprise Client Executive

Training

The EDS staff induction process includes modules relating to the requirement to maintain strict controls over the integrity and privacy of our clients' data. Staff are aware of the expectations of the clients and that any breach of the privacy of the data will be dealt with in the most severe manner by the EDS disciplinary processes.

Staff joining a group supporting a client are made aware of any specific requirements of that client. Support requirements are documented in the Account Management Manual provided for each client. Each person supporting a client has the responsibility of being aware of the detail of the Account Management Manual and the associated practices. Any changes to requirements of clients are also distributed to the support staff and the manual and practices are updated accordingly. Depending on the changes to requirements, the contract between EDS and The Commonwealth may also require amendment. In our current arrangements to deliver services to the Australian Taxation Office (ATO) and the Australian Customs Service (ACS), our staff also attend security briefings provided by these agencies, focussing on the specific security requirements of these agencies.

Social Engineering

The ***EDS Code of Business Conduct*** is the guide to the EDS corporate standard for ethical behaviour. Each EDS staff member must certify annually that they have access to the Code, have read it and have understood it. Below is an excerpt from the Code:

Preserving Client Confidentiality

A critical element in our relationship with clients is our promise to keep our knowledge of their private business affairs in strict confidence. When using and managing confidential client information, we must follow the specific rules and obligations as set forth in the written agreement we reach with our clients.

Oftentimes, we find ourselves working in very sensitive areas of our client's operations. We must never use these opportunities to gain proprietary or trade secret information unless the client provides the information under the terms of our agreement. In all circumstances, use client information only for the business purpose defined under the written terms of the agreement with our client. Together, we can preserve our reputation for trustworthiness by adhering to the highest standards of ethics and integrity in collecting, using and protecting client information.

All employees must refrain from discussing EDS' or its clients' business, confidential, sensitive or proprietary information with anyone who does not have a legitimate, business-related need to know, unless specifically authorized to do so. Exercise particular care when discussing or conducting business in public places such as airplanes, restaurants, social gatherings, elevators and taxis. Use good judgment when

using mobile phones, the Internet, speakerphones and other forms of unsecured communications.

EDS believes that the maintenance of the highest ethical standards is a significant means of guarding against the use of "social engineering" to frustrate privacy and security obligations.

Archival Integrity

EDS delivers archival integrity according to the requirements of individual clients. Our solutions, methodologies and procedures are tailored and designed to provide long term archival integrity according to client requirements.

EDS recognises that in a Commonwealth Government context archival integrity requirements are defined by Commonwealth legislation, policy and individual departmental needs. Our delivered solutions and services are built on industry data security best practice meeting the defined needs of our clients.

As an example, the following approaches have been applied in service provision to Australian Commonwealth Government clients:

- **Distributed storage of multiple archives** - EDS has implemented solutions which store data archives on tapes at multiple locations
- **Auditing and Verification of Archived data** - EDS performs verification activities against archived data (eg setup of a virtual tape environment which results in data tapes being re-read and hence the integrity continually assured) and is also subject to and available to Client Audits of our archives and our approaches to archival integrity
- **Working with our Clients to plan long term archival approaches and activities** - For example as legacy platforms are to be decommissioned, information on the number of archive tapes is supplied to our client to determine the feasibility of conversion to the new platforms

ANAO Better Practice Guide

EDS is aware of the April 2001 ANAO Better Practice Guide for Government Program Managers on Internet delivery decisions. As the IT infrastructure provider for ATO and ACS, EDS has a responsibility to advise those agencies of the best practice for the use of the infrastructure. EDS does not have a role in determining the content or use of the Agencies' web-sites.

Insofar as the guide relates to the provision of the infrastructure, EDS is cognisant of the issues raised in the Guide.

EDS also makes reference to other ANOA publications, particularly Audit Reports, improve our service to Government clients.