# Policy Management Guide

Policy Management is a crucial GRC practice that is seldom problematic for most organisations, although if no one knows how many policies are around, what they are used for, who owns them, or if they have been reviewed, Etc then they become useless

In this guide we share our methods that can be used with GRC systems, and deal with most of the common challenges found.

Warning: eramba core philosophy is simplicity: in our language, software and practices. This guide might includes ironic comments of all sorts just to make more digestible for the reader (and us, authors). Although this guide explains how to use our enterprise release it should still be useful for our community users (which might not have as many features as our enterprise release).

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# Introduction

# Challenges

The first challenge in our opinion is to have a list of policies in our organisation (regardless their usefulness) as for some reason over the years we had accumulated quite many.

We then want to make sure they are used for something, useful. Do they mitigate a risk? Which one? One or more compliance requirements? We wanted to be able to see the relationships as clear as possible, so if someone would challenge us on why we need this or that document - voila! The answer is there.

The other challenge is to keep them updated, we need a system that centralises policies and remind owners (and us, the GRC team) when their policies are not updated. We also want to keep tidy records of each review in order to keep auditors happy.

Speaking of auditors, they love having all policies in a single portal. In fact, many of us like that, just to be able to search for what we need without the need of checking ten different sharepoint, wikis, etc.

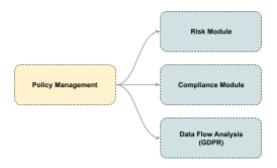
In the end policies are meant to be read and followed by the organisation, we needed some basic e-learning system that would reach out to the right audiences and be able to keep track on whether they read the policies or not.

# **General Concepts**

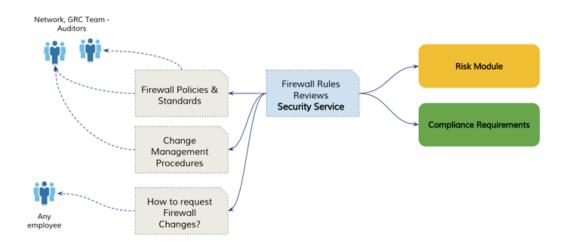
Eramba has a section (Control Catalogue / Policy Management) that allows you to document policies. Policies in eramba are used for:

- Compliance and risk treatment (Compliant Management / Compliance Analysis)
- Security Services (Control) Governance (Control Catalogue / Internal Controls)
- Data Flows (Asset Management / Data Flow Analysis)

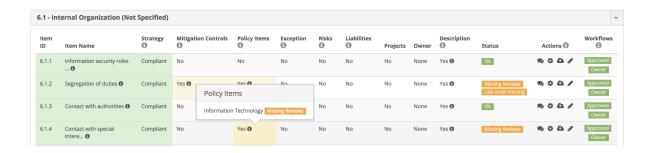
You can use policies to mitigate risks, compliance requirements and make sure each one of your internal controls, for example ISO requires you on 5.1.1 to have a security policy, you can link to that requirement a policy uploaded in this section. That same policy can also be linked to PCI requirements which also state the need for security policy.



Policies are linked to Security Services (Controls) to define their governance (how are they built, why, how they are operated, Etc). If we plan to design a control for "Policy Reviews" we need a standard (that describes how firewalls are built, what firewall rules need to include, etc) a procedure (that explains how firewalls rules are to be managed or how firewall rules are requested).



Once you have your policies documented you can easily link them with each compliance requirement, risks, data flow analysis, etc.



As you can see in the screenshot above, the requirement 6.1.4 from ISO in my organisation is mitigated with the "Information Technology" policy (which by the way, is missing its last review).

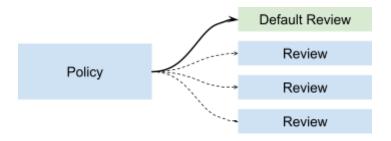
#### In our experience:

We meet many customers that rush to upload their policies to eramba as soon as they finish installing the software. Although that is not necessarily a bad thing we recommend holding up until you have understood risk and compliance modules in detail and are able to link your current policies to those two.

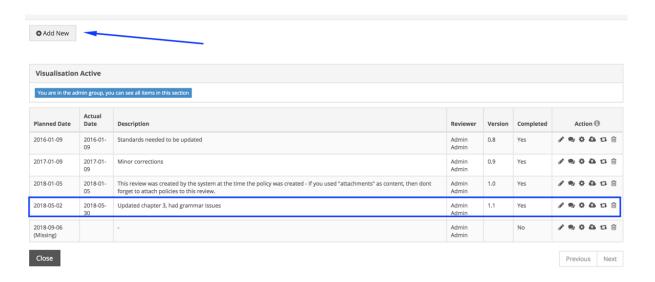
# Policy Reviews

Each policy you upload has one or more reviews attached, is each one of this reviews that lets eramba know what is the latest version of the document. When you create a policy eramba by default will attach two review records:

- Default Review Record (With the date you created the policy)
- Future Review (Based on the future review date you have defined)



This allows eramba to know what version the document is at the time it was created. You will then manage the document content, version, future review date by updating or creating reviews. Essentially, once you upload a policy most of its management is done trough reviews.



The screenshot above shows the review records for a policy, the latest review is the one at the bottom and one row above you will see the "Default Review". It seems in this case the admin clicked in "Add New" to create further reviews with past dates.

Every time you create a policy you must set a "Review Date", that is a date in the future when the policy needs to be "Reviewed". On that day eramba will expect you to update the

expected review record, if you don't, the status of the policy will change from "Ok" to "Missing Review". Everything this policy touches (risks, compliance requirements, etc) will also inherit this status.



A policy showing "Missing review" status, clicking on Manage / Reviews will get you to the list of reviews for this policy

If you configure notifications, eramba will email the roles you defined before (and after) the scheduled review deadline. Read our notifications documentation to understand how that works. You could also create a filter that lists all policies missing a review and have that emailed to you.

# **Policy Content**

When you create a policy in eramba you essentially upload metadata (who is the author, version, owner, what the policy talks about, when it must be reviewed, Etc) and you can also upload the policy itself. You have three options as to where the policy will actually be located:

- Attachments
- URL (you specify the URL where the policy is stored)
- Content (you document the policy in a built in editor eramba has included)

Every time you review a policy it is likely that you will do some update to its content (correct grammar, add sections, Etc). If you manage policies as attachments then you will upload the new version, if you used a URL you'll upload the new URL and if it was "Content", then you will edit the policy on eramba directly.

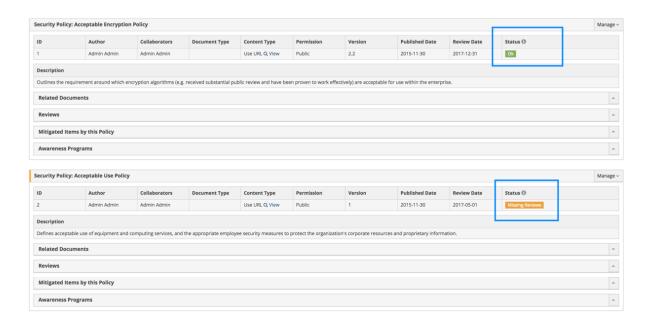


A policy with a content type URL (if you click on view you get the link to the place where the actual policy is located)

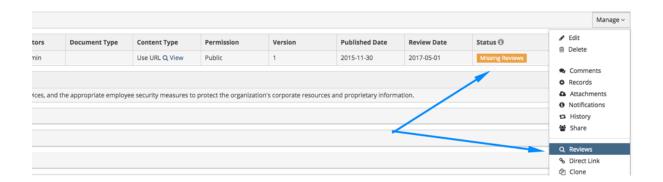
# Policy Lifecycle

As most elements in the GRC ecosystem (risks, compliance items, exceptions, controls, etc) policies also have different stages. In eramba the stages a policy can go through are:

- Missing Reviews (Yellow)
- Ok (Green)

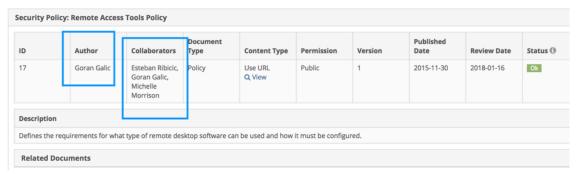


These status are calculated automatically based on the review date you have set, and the review records that the system has uploaded. As usual, the status will be inherited by anything the policy touches, so if you miss reviews, items around this policy will also be tagged in yellow.



# **Policy Roles**

Policies need someone that will make sure they are kept updated and relevant to the goal they were set to meet. Without people being responsible for such actions, policies don't get enforced, reviewed or updated.



Two roles must be described in each policy, owner and collaborators.

When you create a policy in eramba, you need to define two roles, owner and collaborator. The people you put in there are user accounts created under System / Settings / User Management (and of course can be AD tied).

These can be used anyway you want, for example in our case:

- Collaborator: is one or more individuals responsible for writing, reviewing and enforcing policies. If a policy sets standards for network devices, then is likely the network manager is the right person.
- Owner: is typically the person within your GRC department who is responsible for this policy being kept up to date and reviewed.

Every company has different "roles" with "different" names for them. Your task is to fit your roles in those two fields eramba has for each policy.

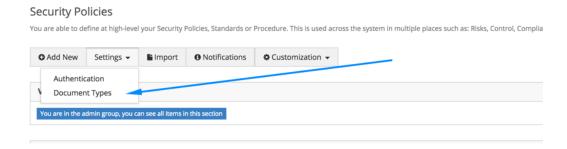
You can set up notifications that will be get sent to these roles and notify people when a review is missing.

# Types of Policies

Although this section is called "policy management", any type of document can be uploaded: policies, procedures, templates, standard configurations, contracts, Etc. Anything that needs to be reviewed, linked to controls, risks, compliance requirements can be linked here too.

You must tell eramba what type of policy (document) you are uploading, you are provided three basic options but you can add more if you want at Settings / Policy Types

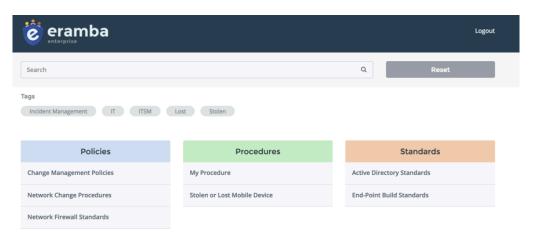
- Policies
- Standards
- Processes



The reason why we set these three as minimum goes back to the idea that <u>controls need</u> <u>proper governance</u> to operate correctly and therefore these three are typically used.

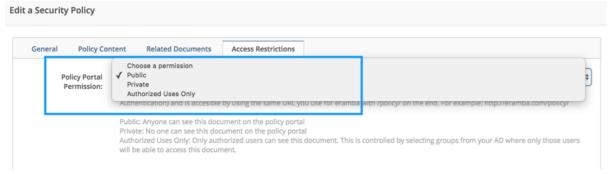
Sometimes you'll find that you have a document that is a bit of each type, in those situations we recommend just choosing the one you think represents the document best.

# **Policy Portal**



This portal is generated using www.eramba.org

Having all policies documented in eramba make it possible to show them in a portal, just like in the screenshot above. You can choose what gets shown at the time of creating a policy, your options are:



When you create a policy, you define if it will be shown on the portal or not. You can also make it available only to AD authenticated users.

You access the portal appending the URI /policy/ to your eramba install (you first need to enable it at System / Settings / Authentication).

For example, https://eramba.mycompany.com/policy/

# **New Policy Checklist**

The following is our policy checklist for creating new policies and for reviewing policies, you might find this useful.

Step	Name	Description	
2	Design	Draw the drivers for policies (all risks, all compliance requirements) and map controls to them. Define how many policies each one of these controls needs and who is the audience.	
2	Development	Meet control / risk / compliance stakeholder as needed and draft the guidelines for each document. Let them do the writing. Review what they wrote and ensure it meets your design requirements.	
3	Sign Off	You and the author must get approval from the individual with authority to approve this.	
4	Distribution	Upload policy to eramba	
5	Awareness	Optional - create an awareness program and launch it.	

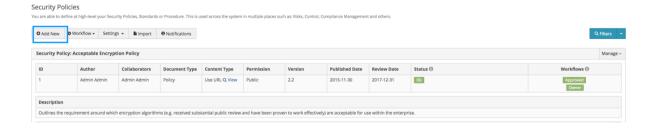
#### Review activities include:

Step	Name	Description
1	Review	Ensure you meet the author and you discuss updates on the content, changes on the audience's, awareness compliance, etc.
2	Sign Off	Regardless of if there were changes or not, get approval and update your GRC system to reflect changes.
3	Distribution	If changes on the document existed, update them into the portal and notify audiences.
4	Awareness	If changes on the document existed, update your awareness program.

# **Managing Policies**

# Manual Input

In order to create a policy you need to use the Control Catalogue / Policy Management module and click "Add New".



Although the fields on the form are pretty clear is worth giving a few bits of advice for each tab.



#### General:

- Make sure you have agreed with the <u>owner and collaborator</u> the scope and audience for this policy and that they are ok to take over policy reviews.
- Once you set a "Next Review" date, you won't be able to change it by editing the policy, all updates will be handled with "Reviews"

### **Policy Content:**

- Here you define where your policies are kept, your options are to upload them as attachments to eramba, use URLs (to your sharepoint, Etc) or use our built in content editor (which is going to be removed sometime soon).
  - If you choose "Attachments", once the policy is created you need to upload your policy "Attachments" to a review (we'll explain this later)
  - o If you choose "URL", you need to include the URL, future changes on this URL will be handled by "Reviews".
- You must include the current policy version, updates to this version will also be handled <u>by "Reviews".</u>

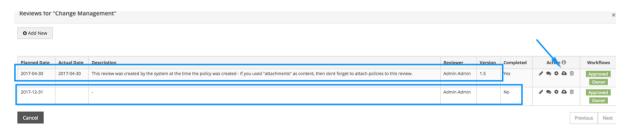
### Access Restrictions:

- You define if this policy will be shown on the policy portal or not.
- If you choose "Authorized Users Only" then you will need <u>LDAP configurations</u>.

Once you save this newly created policy you will notice that under "Manage" / "Reviews" there will be two entries:



One entry refers to the initial review, the review that was created with today's date. Eramba uses reviews to know which is the latest version of the policy and that's why it needs this initial review. Unless you used "Attachments" as content, you don't need to do anything with it (if you used "attachments" then you need to attach to this initial review the policy).



The other entry will refer to the future review you set while creating the policy. We explain on the Reviews chapter how to manage them, so keep reading!

# Reviewing Policies (Work on Progress, please Ignore)

Once a policy is created the version of the policy is handled by its review records, there are a few typical scenarios when handling reviews and we'll try to describe each one of them in this section:

- Update the policy version, description, etc
- Update when the new review should happen
- Update the policy due some error keeping or updating the version

Before we continue is important to understand that from the many review records a policy can have they all basically fall into three types:

- Current: This is the latest, "completed" review that eramba uses to know what is the version and document for the policy.
- Future: this are reviews planned for the future (Planned date is in the future) which are not "Completed". Based on this records eramba will know when a policy is missing review updates or not.
- Past: These are records that are "Completed" and its "Planned Date" is in the past and "Actual Date" in the past or present. The one with the latest "Actual Date" is actually the "Current" review explained above.

When you create a policy, subsequent changes to the reviews work as stated:

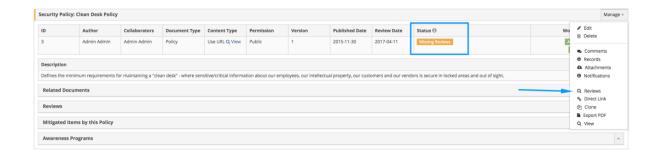
	When Creating Policy for the first time	Edit existing review	Add a new review
Publish Date	Present or Past date	NA	Same as column on the left
Planned Date	NA	You can not edit it	Present or Past
Actual Date	NA	Present or Past (but not before the "planned date")	Same as column on the left
Next Review Date	Future Date	Eramba here suggest any date for any review that is:  - Not completed - Has a "Planned date" in the future  Instead of suggesting that date we should force the date (disable the field) to that specific date.	Same as column on the left
Version	anything	If there is a previous record with the following conditions:  - Is completed - The closest actual Actual date to now()  Then suggest the policy version of that review and complete the field.	Same as column on the left

### **Notifications**

If you configured email notifications, everyone (the authors, collaborators, etc) should be aware of the need for a review. Once their review is completed (perhaps no modifications were required) you can review their work and if all is ok get an ACK.

# Upload Policy Review Records

The process for reviewing them is simple, just select the policy you want to review and click Manage / Review.

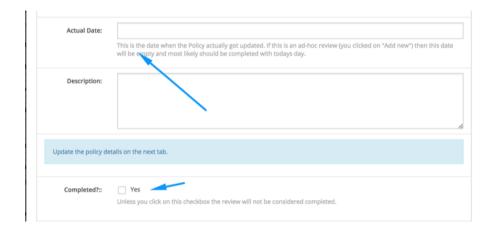


The review process applies equally to policies no matter if they miss reviews or not (you might just want to create a new version and for that purpose you also create a review by clicking on "Add New").

The list of review records will be shown in a new window, you can click on "Edit" on the review you want to complete or click "Add New" if you just want to create one ad-hoc.



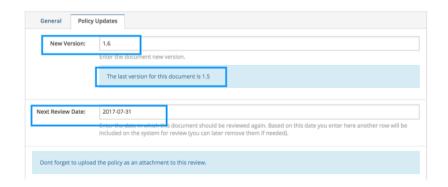
The same form will popup in either case, make sure that on the first tab you complete the date when the review took place and tick the "Completed" checkbox (otherwise reviews are not considered completed)



The next tab is important since you will need to define:

- The new version of the policy
- In the case of policies that use URL, you will need to include the new URL.

If eramba has a previous completed review, it will remind you what were the previous values for both these fields.



You will also need to provide a date for a next review, if eramba finds a review with a date in the future that has not been completed it will suggest you to use that date (in order to avoid creating more reviews with future dates).

Once you save the review it should be completed. If you used "Attachments" don't forget to attach your new policies and sign-off documents (emails, Etc) as attachments on the policy you have just reviewed.



Remember that when clicking on "View" for a policy eramba displays policies attributes based on the last completed review!



### **Useful Filters**

Filters are used in eramba to display data in a table format, you can select what fields you want to show, set conditions (such as only display policies with missing reviews, or policies used for PCI-DSS, Etc) and sort. The output can be exported in CSV or PDF so you can later use Spreadsheets for deep analysis or graphics.



You can filter data based on the policies or reviews, each will have a different scope, a few examples of useful filters:

Filter Type	Examples
Policies	<ul> <li>What policies do we have, who owns them?</li> <li>Which policies are missing reviews?</li> <li>Which policies are used in PCI-DSS?</li> <li>Which policies are missing reviews and are used in PCI-DSS?</li> </ul>
Reviews	- What reviews are we missing?

Once you find a filter you like, you can save it and get it sent to you as an email report. This will be useful to keep an eye on policies not being reviewed on time.

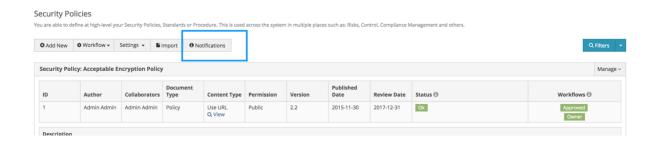
For more information on how filters work, please review our <u>filters documentation</u>.

# **Policy Notifications**

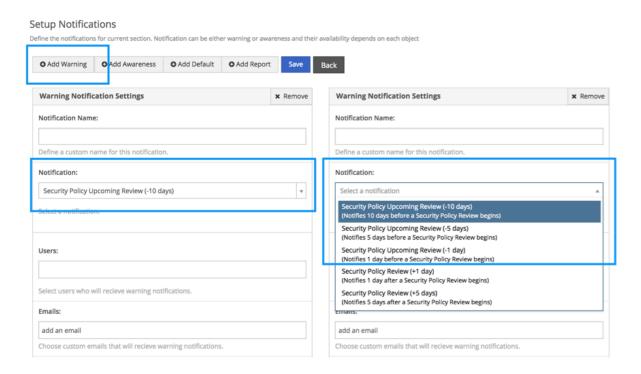
Perhaps the most useful notification we can create are:

- Emails to remind of reviews (Warning type)
- Emails with reports of coming or expired reviews (you need a saved filter first)

In any case you can set up notifications by clicking on "Notifications".



Clicking on "Warning" type of notifications you can set one or more notifications (10, 5 and 1 day before the review deadline). Customising the email will let you include on the subject and body of the email the policy name, description, version, review date, Etc.



Another useful notification is a "Report" type, that takes saved filters as inputs and sends them out in CSV or PDF at regular intervals. Having a filter that shows all policies with missing reviews to you might be useful to keep track on how on time reviews are being performed.

For details on notifications we recommend you reading our notifications guide.

# Importing Policies with a CSV

You can import policies in a bulk process with the Import feature located on the top of the screen, review our <u>import documentation</u> to understand how this feature works in detail.

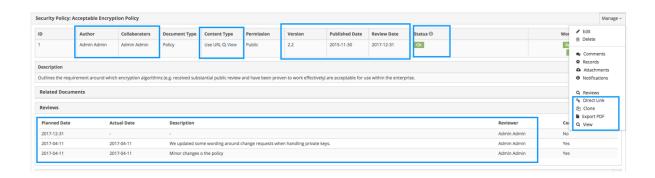


You will need to download the template and complete as per its instructions. If you have policies already created, you can download an "Export" which could be used as a reference to create a blank template.

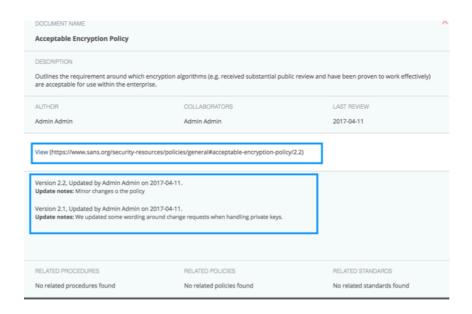
We have created a <u>template with NIST policies</u> that might help you as a reference to get started. We recommend you use CSV imports on a testing environment as sometimes you might import data that might not be right.

# Visualising Policies

Once you create policies is important to understand how to visualise them.



On the top you will find who has been defined as author and collaborators, the content type (with a link to the policy, if clicked it will display the policy on a popup), the current policy version (remember, this is obtained based on your last completed policy review) and the publish and next review date among other things.

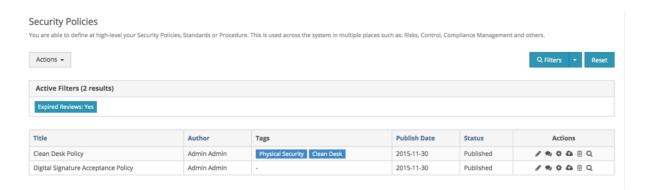


When you click on "View", the policy will be displayed with all its information based on the policy and latest review information. The policy status will be "Ok" or "Missing Reviews" if there are missing reviews. The list of reviews is shown as well under "Reviews", look on the right to make sure they are "Completed".



At the bottom of the form, if you have associated awareness trainings for this policy (Security Operations / Awareness Programs) you will be shown what compliance percentage has that program.

You can also use filters to visualise policies, they show data in table format which can be useful if you just need to pull certain attributes of each policy. You can also apply filters (show me policies used in SOX, Etc), sort data, export it on CSV, etc.



We have documented a couple of useful filters you might want to have a look on. Remember that filters can be saved and used later as "Views", sent over email regularly on CSV or PDF format for you to keep an eye on the status of your policy management practices.