# Physical Access Control Standard

## Related Policy

* 300.00 Physical Security Policy

## Purpose

The purpose of this standard is to ensure that effective physical access controls are present at every Alight office location. Effective physical access control includes the use of people, technology, policies and procedures to secure Alight space from unauthorized entry. Physical access controls reduce the risk to Alight colleagues, work product and client information.

## Standard Statements

### Alight Defined Space

* 1. Office space leased or owned which is occupied by all Alight colleagues, vetted service providers and escorted guests will be known as “Alight space”.
  2. Space leased or owned which is intended for access by all of the above and may include unescorted guests will be known as “common area space”.
  3. Interior space, which requires added requirements and authorization to gain access, will be known as “restricted space”.
     1. The Alight colleague in charge of the business operation within the restricted space shall be known as the “Space Owner”.
     2. A space owner will be designated for all restricted space.
     3. Restricted Space access requirements implemented by GSS Global Protection Services (GSS GPS) are established in conjunction with the Space Owner.
  4. “Data Center” space is so designated by Alight’s Information Technology (AIT) practice.
     1. GSS GPS will implement Data Center access controls in conjunction with the AIT practice.

### General Physical Access Controls

* 1. Alight office space must be secured by locking hardware and/or human controls (i.e., staffed entry point) at all times.
  2. As recommended in consultation with GPS, Restricted Space may be secured by one or more of the following physical security access control measures:
     1. ID card/ID card reader and electronic lock as part of parent access control system
     2. ID card/ID card reader and electronic lock and ID card personal identification number entry, as part of parent access control system
     3. Stand-alone electronic lock and hardware
     4. Mechanical locks - door lock & key (off the master keyway system)
     5. Stand-alone electronic lock and hardware, electro-mechanical locks, etc.
     6. The Space Owner establishes the authorization to access Restricted Space.
  3. When appropriate given the type and scope of business and the local physical security risk posture, GSS GPS will assess the need for Alight managed on-site guard service at Alight locations (to support appropriate access controls). Refer to Security Guard Operations standard.
  4. Each office will prominently display notification identifying the office as an Alight business at or near point of entry or visitor reception area.

### Access Authorization

* 1. Alight colleagues are authorized for access to Alight space upon assignment of an Alight colleague number and/or approval from Human Resources (HR) or their Unit Manager.
  2. Contractors who request access to Alight space are authorized for access with approval from an Alight colleague as sponsor, authorized on site active permanent contractors, or may be admitted as a guest with an Alight or active permanent contractor escort.
  3. Guests are authorized to access Alight space by escort only.
     1. Only active Alight colleagues or active contractors may serve as a guest escort.
  4. Authorization to access Restricted Space is controlled by the Space Owner.
     1. No individual may access Restricted Space without prior approval from the Alight Space Owner or alternate, or by escort from a person approved by the Space Owner. Permanent access privileges require written approval from the Space Owner as described under section 3.4.2 below.
     2. The Space Owner must maintain a current access list of all authorized persons who can enter Restricted Space and provide this list to appropriate security personnel and other individuals with a need to know this information in order to control access to this Restricted Space at all times. It is security best practice that Space Owners complete periodic access reviews to ensure the currency and accuracy of all authorized access personnel.

### Security ID Cards and Building Access

* 1. At all times, all individuals in the workplace are to visibly display, at or above the waistline, an Alight-issued identification card where such cards are available. Refer to [Appendix I: Alight Security ID Card Templates](#_Appendix_I_–) below to view the Alight Security ID card types and template designs. This includes Alight colleagues, contractors, vendors, guests, and service providers.
     1. The identity of each person must be positively verified before issuing an Alight ID card. Identification will need to be verified by presenting a personal, photo identification credential (Driver’s license, State ID, or passport).
     2. All Alight colleagues are expected to comply with this core business requirement and managers are expected to monitor colleague compliance.
     3. Alight colleagues without proper identification will be approached by Security personnel to verify identity; specific procedures may vary by region or location.
  2. Alight colleagues are expected to help maintain a safe and secure work environment by adhering to the following:
     1. Present your Alight ID card to the card reader, even when following another colleague into the Alight workspace.
     2. Display your ID card at all times and have your picture facing forward. This enables other Alight colleagues and Security to easily verify your identity and avoids unnecessary delays. Do not store it in your briefcase, purse, or pocket, or leave it on your desk once you have entered an Alight facility.
     3. Display your ID card at or above the waistline. Avoid locations such as the bottom of an untucked shirt or on a pocket behind an untucked shirt or sweater. Clips and necklace-style cords will be provided with Alight’s Photo ID cards to give Alight colleagues flexibility in wearing the cards.
     4. Keep all building access doors locked and direct all guests to the visitor reception entrances.
     5. Do not open doors for unidentified individuals unless you are prepared to verify the person's identity and escort them to reception or Security, if necessary.
     6. Be alert for unknown individuals in your work area and notify Security if individuals cannot be identified.
     7. Escort clients and other guests while on Alight property and remind them to return their guest ID cards to the receptionist or security guard at the conclusion of their visit.
     8. Security ID cards should not be altered in appearance or have stickers or pins affixed to the card. Alight colleagues must exercise care in the treatment of their ID card, unless specific instruction and approval has been provided by GSS GPS.
     9. Alight colleagues who have lost or forgotten their Security ID card must be screened and issued a temporary, non-photo ID card. Alight colleagues will be required to provide personal, photo identification as part of the screening process. Temporary ID cards must be returned at the end of the same business day. Alight colleagues with no visible ID card will be stopped for identity verification.
     10. Do not open doors for Alight colleagues not showing an Alight ID card unless you are prepared to escort them to reception or Security, if necessary.
     11. Alight colleagues not displaying their cards are expected to cooperate and produce their ID card upon reasonable request.
     12. ID cards are Alight property and are intended for use only by the person to whom it is issued. They are not transferable and must be returned and accounted for at the time of employment termination. Alight colleagues are prohibited from lending or sharing their ID card with others.
     13. Lost ID cards must be immediately reported to your local ID card administrator, receptionist, or security office (as appropriate for your office location) so that they can be deactivated. A replacement ID card will be issued.
     14. Occasionally, lost or damaged ID cards are unavoidable; however, Alight colleagues who repeatedly lose or damage their ID card may be required to pay for replacements.

### ID Card Types

* 1. All new Alight colleagues will be eligible to receive a Colleague Photo Security ID Card upon initial employment with Alight (refer to [Appendix I: Alight Security ID Card Templates](#_Appendix_I_–) below to view the Alight ‘Colleague Photo Security ID Card’). However, the type of ID card issued will depend upon business need, colleague office assignment, and work pattern.
  2. Office-based Alight colleagues
     1. Office-based Alight colleagues are defined as those assigned to a permanent Alight office. Office-based Alight colleagues will be issued an ID card with their first and last name shown on the front of the card.
  3. Virtual Alight colleagues
     1. Colleagues working virtually are defined as those Alight colleagues that are not office-based, but those that are working at client sites, telecommuting, or traveling extensively. Upon request, Alight colleagues working virtually will be issued an Alight Colleague Photo Security ID Card
  4. Traveling Alight colleagues (Across Geographic Locations)
     1. In addition to policies and procedures governing ID card usage, the requirements below also apply to card usage by traveling Alight colleagues.
     2. Use of Traveling Colleague Access Request form, where necessary
        1. Alight colleagues traveling from one Alight office location to another may be able to activate and use their Alight photo ID card for access to the destination office (where security system configuration allows) by submitting a [Traveling Colleague Access Request](http://Notes://xxxxx/86256461007CC4CB/01EC277B041BAF10862562F8006256A5/DFD9B740B656868686256B6D00597168) form at least (36) hours in advance of the travel date (where necessary). Access the request form via the Alight Avenue home page (search under ‘Office Access Request Form’ to locate form). All requests will be subject to approval and processing by the ID badging administrator at the local office. Other local access requirements may still apply.
     3. Non-use of Traveling Colleague Access Request form
        1. For office locations where the Traveling Colleague Access Request form is not used or applicable, Alight colleagues arriving from another Alight location are to check in with the receptionist or Security.
        2. Reception/security may ask for a local contact name. Identification will need to be verified by presenting a personal, photo identification credential, (driver’s license, State ID, or passport).
        3. Once verified, the visiting colleague will be issued an Alight Colleague Temporary Security ID card or activate the Alight colleague ID in case feasible to facilitate circulation throughout the premises (refer to [Appendix I: Alight Security ID Card Templates](#_Appendix_I_–) below to view the Alight ‘Colleague Temporary Security ID Card’).
        4. Colleague temporary cards will have a unique control number and location identifier for tracking purposes.
     4. Temporary access cards must be returned and accounted for at the end of the colleague's visit, not necessarily on a daily basis if the colleague will be visiting for longer than one day. These cards are to be returned at the conclusion of your visit and not retained for future use.
  5. Guests
     1. Guests are defined as clients, prospective applicants, former Alight colleagues, relatives, and friends of current Alight colleagues, or any other visitors. Generally, guests do not include contractors or vendors who provide goods and services to the firm on an ongoing basis. The following policies and guidelines apply to all guests:
        1. Notify reception or security staff in advance that you are expecting guests.
        2. All guests of the firm, including former Alight colleagues, are required to register at the reception lobby and will be issued an Alight Guest Temporary Security ID Card that is to be displayed while on the premises (refer to [Appendix I: Alight Security ID Card Templates](#_Appendix_I_–) below to view the Alight ‘Guest Temporary Security ID Card’).In an effort to verify the personal identity of all individuals entering Alight office space, all guests will be asked to present a valid form of photo identification as part of the screening process. Guests without valid photo ID will still be admitted to Alight space after verification by the host colleague, but will be reminded to bring a valid form of photo ID if they are going to visit in the future. The guest(s) will then be announced to the hosting colleague. It is the hosting colleague's responsibility to greet the guest at the reception or security lobby and provide escort throughout their stay.
        3. Guests must be escorted at all times by the hosting colleague or their designate while within Alight office space. Guests are not permitted to circulate unescorted in the workplace.
        4. Guests will be issued a uniquely numbered guest identification card, identifying the building and location of their visit.
        5. Alight colleagues are responsible for escorting all guests to the reception area upon completion of their visit, both as a courtesy to the guests and to facilitate the sign-out and the return of guest ID cards.
     2. In some locations, for group meetings of 10 or more, or under extenuating circumstances and where feasible, Alight Guest Temporary ID Sticker Badges will be issued in lieu of guest ID cards (refer to [Appendix I: Alight Security ID Card Templates](#_Appendix_I_–) below to view the Alight ‘Guest Temporary ID Sticker Badge’). Issuance of these one-day, self-expiring guest ID sticker badges will expedite the check-in and checkout process for our guests and Alight colleagues.
  6. Long-Term Vendors: Vendor Photo ID Cards
     1. A long-term vendor is defined as an individual who routinely works on-site, has a continuous and daily relationship with the firm lasting minimally two weeks or longer, and is qualified to receive an Alight Long-Term Vendor Photo Security ID card (refer to [Appendix I: Alight Security ID Card Templates](#_Appendix_I_–) below to view the Alight ‘Long-Term Vendor Photo Security ID Card’). Vendor Photo ID cards include both the names of the individual and the vendor organization by which they are employed. Vendor ID cards have a contrasting background, making them distinguishable from colleague ID cards. Alight colleagues are responsible for requesting a Vendor Photo ID Card for sponsored vendors.
     2. The following policies and guidelines apply to all long-term vendors:
        1. Long-term vendors must display a vendor photo ID card at all times.
        2. All policies and procedures governing colleague Security ID card usage also apply to card usage by long-term vendors.
        3. Alight colleagues sponsoring vendors are responsible for managing the vendor access process to include requesting photo ID cards, establishing space access rights, retrieving ID cards upon termination, and immediately reporting terminations to Alight Security and other appropriate Alight business functions/groups that need to be advised of the termination.
  7. Short-Term Vendors: Vendor Temporary Security ID Cards
     1. A short-term vendor is defined as an individual who occasionally visits Alight premises to provide service and support. Short-term vendors such as the copier technician, electrician, computer hardware technician, and elevator technician may visit on a weekly, biweekly, monthly or other short-term basis. Short-term vendors are required to present the name of an Alight contact person who can verify their service visit and authorize entrance into the building. Vendor requirements will be posted and shared at the time of check-in. The following policies and guidelines apply to all short-term vendors. To eliminate confusion, vendors should be notified in advance of these policies.
     2. Short-term vendors are required to sign in and will be issued a Vendor Temporary Security ID Card (refer to [Appendix I: Alight Security ID Card Templates](#_Appendix_I_–) below to view the ‘Vendor Temporary Security ID Card’). Vendors are required to properly display their vendor ID card at all times while on the premises.
     3. As part of the registration process, vendors will be required to produce and leave a valid form of personal, photo identification such as a driver's license or company ID card. This is done to verify identification and ensure return of the Alight Vendor Temporary Security ID card.

## Communications

Questions regarding this Standard should be directed to GSS GPS at [global.security.services@aon.com](mailto:global.security.services@aon.com).

## Legal Conflicts

Alight’s Security Policies and Standards were drafted to address the protections found in existing laws and regulations and may be amended as necessary due to law, regulation, or business requirements. There is no intent to conflict with relevant laws or regulations. In the event of any conflict with relevant laws or regulations, they will control.

Alight’s Security Policies and Standards may be supplemented by other policies or standards of Alight. In the case of a conflict or ambiguity, the more specific provisions of any such policy or standard of Alight shall take precedence over the more general provisions contained in Alight’s Security Policies and Standards.

## Exceptions

Application of the global physical security policies and standards may vary by region and office, and exceptions and variations may occur, if and when approved by GSS GPS. Please contact GSS GPS at [global.security.services@aon.com](mailto:global.security.services@aon.com) for further guidance on any exceptions or variations that may apply.

## Applicable Standards

* None

References & Mandates

* None

Appendix I – Alight Security ID Card Templates

The new Alight Security ID card templates are currently under development and will be posted under this section once completed. Until which time, Alight colleagues will continue to utilize the existing photo and non-photo ID card templates deployed.

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## Document Control Information

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| Primary Contact | Alight Global Security Services | [global.security.services@aon.com](mailto:global.security.services@aon.com) |
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# Revision History

Revision History

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| --- | --- | --- | --- |
| Revision Level | Date | Description | Change Summary |
| 1.0 | 2012 March | Original | Restructured policy due to Aon Hewitt acquisition |
| 1.1 | 2013 June | 2013 Annual Review | Reviewed and validated |
| 1.2 | 2014 June | 2014 Annual Review | Reviewed and validated |
| 1.3 | 2015 June | 2015 Annual Review | Reviewed and validated |
| 1.4 | 2016 June | 2016 Annual Review | Clarified wording and replaced all instances of Security Risk Management (SRM) with Global Security Services (GSS) to reflect new organization name |
| 1.5 | 2017 January | 2017 Update | Name change from Corporate Protection Services (CPS) to Global Protection Services (GPS) |
| 1.6 | 2017 May | 2017 Rebranding | Rebranded policy due to Aon Hewitt divestiture |
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