Security Incident Procedure

Introduction

The Lower Earley Family Contact Centre (LEFCC) will manage any security incidents. A security incident is an issue that potentially impacts on the confidentiality, integrity or availability of the centres systems or services. This procedure details the actions and roles required when a security incident occurs. All security incidents are recorded.

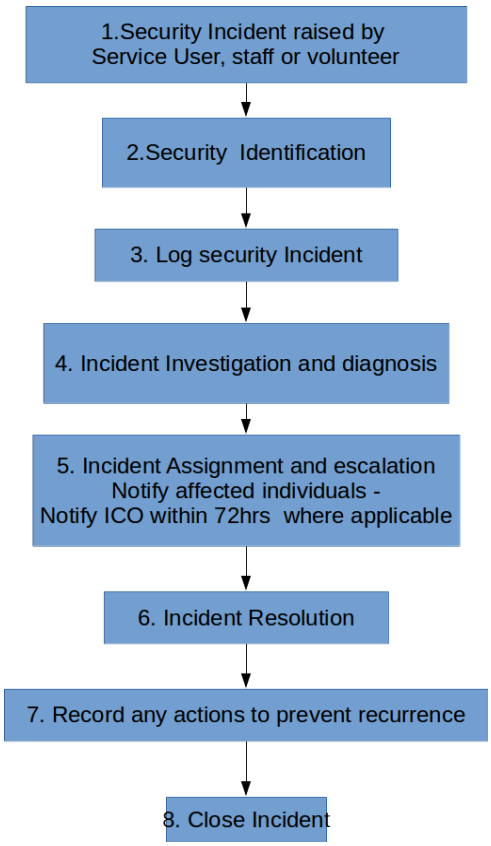
This is provided as guidance to volunteers.

Procedure

Security incidents will be reported to Centre Coordinator.

On receipt of the security incident report Centre Coordinator will take the following actions:

1. Receive notification that an incident has occurred from a volunteer or service user e.g. stolen laptop, or complaint
2. Confirm the type of incident and gather any additional information required by the ICO (see appendix: ICO data required)
3. Log the incident including a brief description, time and date of the incident, who notified the incident and assign a High, Medium or Low (See Appendix: Definitions)
4. Investigate the incident.
5. Diagnose the incident and identify any actions required to resolve the incident (See Appendix: Incident types and responses). Where necessary escalate to ICO as soon as possible and within 72hrs. Notify any affected individuals.
6. Incident Resolved - update incident record with details of actions taken and results of any investigation regarding the cause whether this was human error or a systemic issue.
7. Record any details of how recurrence can be prevented – whether this is through better processes, further training, or other corrective steps.
8. Close incident



Appendix

Incident types and responses

Personal Data Leakage
If the incident results in the loss of personal data as defined in the DPS (2018) / GDPR then it must be reported to the ICO.

Examples of a personal data breach can include:

- access by an unauthorised third party;
- deliberate or accidental action (or inaction) by a controller or processor;
- sending personal data to an incorrect recipient;
- computing devices containing personal data being lost or stolen;
- alteration of personal data without permission; and
- loss of availability of personal data.

Under the GDPR there is a requirement for organisations to report a personal data breach that affects people's rights and freedoms, without undue delay and, where feasible, not later than 72 hours after having become aware of it. Organisations should be aware that the ICO will have the ability to issue fines for failing to notify and failing to notify in time. Fines can be avoided if organisations are open and honest and report without undue delay, which works alongside the basic transparency principles of the GDPR.

Serious breaches should be reported to the ICO using our DPA security breach helpline on 0303 123 1113 (open Monday to Friday, 9am to 5pm). Select option 3 to speak to staff who will record the breach and give you advice about what to do next.

Further information can be found at;
https://ico.org.uk/for-organisations/guide-to-eidas/breach-reporting/

Criminal Attack
If the incident is a potential attack incident, the incident will be reviewed and if an attack is confirmed it should be reported as such to the customer who will report it to the relevant law enforcement body. The LEFCC will zip and sign the relevant evidence, collected from logs etc. earlier. This evidence will be made available to the customer as required, subject to confidentiality undertakings (it will contain non-customer specific sensitive information). The complete pack will be preserved for subsequent law enforcement action.

Denial of Service (DoS)
This has become an increasing threat recently, often manifested as a distributed denial of service (DDoS) attack, which is more difficult to combat. Access to bot-nets is becoming increasingly widespread so that individuals with grievances have access to facilities hitherto only available to criminal organisations. The attack could be directed at LEFCC or LEFCC could be subject to collateral damage due to attacks on adjacent services. DoS and particularly DDoS attacks can result in:

- The LEFCC web site being unable to respond to legitimate transactions as they are swamped by a flood attack. This would be a direct attack from a low-capacity resource.
- The hosting site being forced to suspend the service to enable other services on their site to continue. If this is a direct attack, LEFCC would be suspended, if LEFCC was suffering collateral damage this would re-open LEFCC.
- The ISP switching off access to the LEFCC to prevent their service from being overwhelmed. Again, if this is a direct attack, LEFCC would be suspended, if LEFCC was suffering collateral damage this would re-open LEFCC.

For a DoS attack or low capacity[1] DDoS, action from the hosting provider to block traffic from

1 Where the number of attacking IP addresses are such that all the attacking addresses could be filtered.

specific incoming IP addresses should be taken. Arrangements for this action will be made with each hosting site.

Malware Discovery
Where malware is discovered by routine application of anti-malware measures, this should be logged.

Web Exploit
As no confidential information is held on the LEFCC website, LEFCC will not experience Web Exploit attacks.

Definitions

Incidents will be classified according to their impact on the LEFCC systems or services.

Level	Impact
High	Actual breach effecting the availability, integrity or confidentiality of the LEFCC critical information assets.
Medium	Vulnerability discovered which, if exploited could give rise to a data breach
Low	Other types of security incident

ICO data required

A description of the nature of the personal data breach including, where possible:

- the categories and approximate number of individuals concerned; and
- the categories and approximate number of personal data records concerned;
- the name and contact details of the data protection officer (if your organisation has one) or other contact point where more information can be obtained;
- a description of the likely consequences of the personal data breach; and
- a description of the measures taken, or proposed to be taken, to deal with the personal data breach, including, where appropriate, the measures taken to mitigate any possible adverse effects.