

CPNI

Centre for the Protection
of National Infrastructure

SCA FOR

MODIFICATION OR IMPROVEMENT OF AN EXISTING BUILT ASSET (INCLUDING BUILDINGS AND INFRASTRUCTURE)



MANAGING THE SCA PROCESS

A SCA should be carried out when undertaking a significant modification or improvement of an existing built asset, whether a building or infrastructure. The asset owner(s) should therefore ensure that processes are in place, and implemented, to initiate the SCA process at the start of the project.

These processes should include the nomination of a suitable individual who will be responsible for initiating and managing the associated SCA process. The individual fulfilling this role should be employed by, or report directly to, the asset owner's organisation.

The individual responsible for initiating and managing the SCA process on behalf of the commissioning organisation should ensure that an appropriately qualified and experienced specialist or small team of two or more specialists is appointed to undertake a SCA (see 'Undertaking a Security Considerations Assessment').

It is important that sufficient notice of when a SCA will be required is given, with each of the relevant parties agreeing a timeframe for completion.

THE SCA STAGES

A Stage 1 SCA facilitates embedding of security-mindedness from the planning stages of the project when access to project information and potential sensitivities is limited to a relatively small group of individuals.

A Stage 2 SCA provides an opportunity for any security issues to be reviewed and, where necessary, re-elevated before the project moves from planning to delivery.

A Stage 3 SCA provides an opportunity for any security issues to be reviewed at the end of the project.

A Stage 4 SCA allows the ongoing implementation of the security-minded approach to be reviewed and relevant improvements to be adopted.

Additional SCAs can be included as part of the procurement process for consultants or contractors or for the procurement of specialist contractors supplying, or with access to, sensitive assets.

Interim SCAs can be undertaken if there is concern or awareness that the nature of the threats or vulnerabilities has altered since the last SCA was undertaken. Under these circumstances, the list of documentation that would be provided for the next SCA stage due should be provided.



STAGE 1 SCA

Timing

Ideally, a Stage 1 SCA should be concluded when only those involved in determining the strategic aim of the modification or improvement work are privy to information. This may include specialist security advisers providing guidance in respect of relevant security threats, vulnerabilities and/or mitigations.

Scope

The Stage 1 SCA should:

1. list the information provided and record the information that is not available, noting the reason for this where provided;
2. review the security risk assessment documentation to identify any potential weaknesses in the process, in particular:
 - a. any threats, vulnerabilities or risks which it would be appropriate and proportionate to include; and
 - b. whether the documentation provides a robust record of the risk assessment process and outcome;
3. consider how security risk mitigation measures are reflected in policies, processes and planning of the modification or improvement of the built asset;
4. identify and detail any gaps and inconsistencies within, and between, the documentation, policies and processes provided;
5. assess how policies and processes are being conveyed to those who need to follow them; and
6. for points 2 to 5 above, provide a summary of all the issues identified and set out appropriate and proportionate recommendations for addressing each issue.

Documentation required

The portfolio of information provided should include:

1. a summary of the built asset's current use, including layout, occupation, utilisation and accessibility to members of the public;
2. a summary of the project being undertaken, including any changes to current use, layout, occupation, utilisation, or accessibility to members of the public;
3. details of any protection measures already in place, whether personnel, physical or cyber;
4. documentation relating to:
 - a. the identification of any change in those assets that will need to be protected or the level of protection required, including identification of those that are deemed critical;
 - b. security risk assessment and mitigation; and
 - c. identification of information already in the public domain;
5. where digital engineering techniques are going to be used in the built asset's modification or improvement, information security risk assessment and mitigation documentation;
6. the policies and processes in place for identifying, and responding to, security breaches and incidents, including near misses; and
7. the policies and processes in place for monitoring, auditing, reviewing and updating security risk management processes.

STAGE 2 – 4 SCA

Timing

The Stage 2 SCA should be undertaken when the detailed design/planning of the project has been completed, and prior to the start of modification or improvement work.

The Stage 3 SCA should be undertaken on completion of the modification or improvement work.

A Stage 4 SCA should be undertaken 12 months after the Stage 3 SCA and then at regular intervals thereafter, at a frequency considered appropriate by the commissioning organisation.

Scope

The Stage 2, 3 and 4 SCAs should:

1. re-examine the previously identified and assessed security risks to determine whether there have been any changes, whether for political, economic, social, technological, legal or environmental reasons;
2. review the effectiveness of the security measures implemented to date with an examination of any security breaches or incidents, including near misses;
3. examine the consistency of implementation of security mitigation measures;
4. review security-related monitoring and auditing activities undertaken;
5. review the issues raised in the previous report and reiterate any that have not been satisfactorily resolved and are still believed to be of importance.

Documentation required

The portfolio of information provided for each SCA stage should include, in addition to the documentation provided in the previous SCA:

1. the previous SCA and SCA response reports;
2. a summary of any significant changes to the project since the previous SCA that could impact on security requirements, including occupation, utilisation or accessibility to members of the public;
3. details of any changes to:
 - a. those aspects of the built asset considered to be sensitive;
 - b. security risk assessment and mitigation documentation;
 - c. policies and processes for the implementation of security-related risk mitigation measures;
 - d. policies and processes for responding to security breaches and incidents;
4. details of any occurrences of security incidents and/or breaches and the actions taken at the time of, and subsequent to, the breach or incident; and
5. copies of reports from security-related monitoring and auditing undertaken.

ADDITIONAL SCAS – PROCUREMENT OF CONSULTANTS AND/OR CONTRACTORS

Timing

The first stage of this additional SCA should be undertaken prior to the issue of any tender for consultants or contractors to support the project in question. The second stage should form part of the selection and final appointment process.

Scope

Prior to the issue of tender documentation, the additional SCA should review the security requirements set out in the tender documentation against the agreed security risk mitigation measures.

During the selection and appointment process, the additional SCA should:

1. assess the completeness of the submission documentation that relates to the security requirements;
2. identify and detail any issues that have not been addressed or appear to have been addressed insufficiently;
3. assess the consultant's or contractor's ability to deliver the relevant security mitigation measures and the extent of any support needed to enable them to fulfil the security requirements; and
4. provide a high-level assessment of the consultant's or contractor's organisational readiness to implement the required security measures.

Documentation required

The portfolio of information provided should include:

1. the tender documentation; and
2. the parts of the submission documentation that relate to the security requirements set out in the tender information.

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