CPNI
Centre for the Protection of National Infrastructure

SCA FOR

A DATA ANALYSIS AND OPTIMISATION PROJECT

MANAGING THE SCA PROCESS

The project manager(s) should ensure that processes are in place, and implemented, to initiate the SCA process as early as possible in the planning stages 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

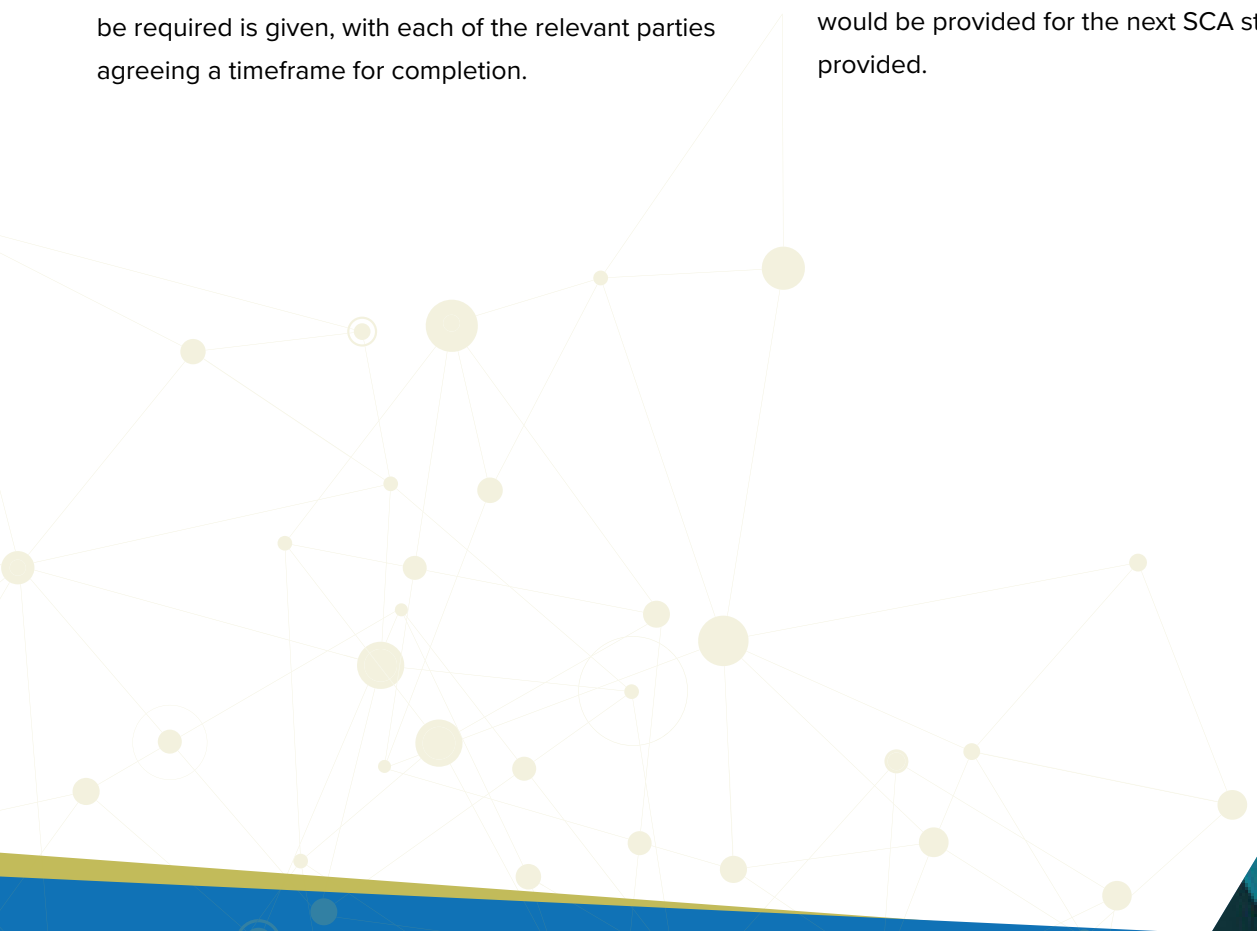
A Stage 1 SCA facilitates embedding of security-mindedness from the planning stages of the project when access to project information and potential sensitivities is limited to a relatively small group of individuals.

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.

There is no Stage 3 SCA for this type of activity.

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

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

A Stage 1 SCA should be undertaken as early as possible in the planning stages of the project when a limited number of people have access to project information.

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;
    c. consider how security risk mitigation measures are reflected in policies, processes and planning of the new built asset;
3. identify and detail any gaps and inconsistencies within, and between, the documentation, policies and processes provided;
4. assess how policies and processes are being conveyed to those who need to follow them; and
5. 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 project being undertaken, including the intended purpose, scope, outcome and consumer;
2. the data and/or information being utilised and its source;
3. a summary of any terms under which any data and/or information from third parties has been provided;
4. identification of any data and information that needs to be protected for legal, commercially sensitive or security reasons;
5. security risk assessment and mitigation documentation;
6. details of the security-related policies and processes for the implementation of security-related risk mitigation measures;
7. the policies and processes in place for identifying, and responding to, security breaches and incidents, including near misses; and
8. the policies and processes in place for monitoring, auditing, reviewing and updating all security risk management processes.

STAGE 2 AND STAGE 4 SCA

Timing

The Stage 2 SCA should be undertaken at the end of the planning stage before the project moves into implementation.

A Stage 4 SCA should be undertaken 12 months after the Stage 2 SCA and then at regular intervals thereafter and a frequency considered appropriate by the commissioning organisation. If the project is of shorter duration than 12 months, it may be deemed necessary by the commissioning organisation that a Stage 4 SCA is not required.

Scope

The Stage 2 and 4 SCA 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 the intended purpose, scope, outcome and consumer;
3. details of any changes to:
    a. the data and/or information being utilised and its source;
    b. the data and information that needs to be protected for legal, commercially sensitive or security reasons;
    c. security risk assessment and mitigation documentation;
    d. policies and processes for the implementation of security-related risk mitigation measures; and
    e. policies and processes for responding to security breaches and incidents;
4. details of any additional relevant data and information sets found to already be published or shared;
5. 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
6. 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 the 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.

Disclaimer

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