Administrative Data Research Network

An ESRC Data Investment

Breaches policy and procedures

On security and procedural breaches by researchers accessing data via ADRN.

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Scope

This document outlines the Administrative Data Research Network's (ADRN) policy and procedures for managing breaches of the Terms of Use [ADRN021], and other ADRN security procedures, by ADRN researchers. ADRN is committed to protecting the privacy and confidentiality of respondents while promoting good research practice. This document supports these key commitments by providing a framework for applying penalties for misuse of sensitive data and breaches of ADRN procedures. The penalties outlined below do not exclude the possibility of criminal penalties.

Policies and procedures for Incidents involving individuals working for the network, for example for one of the Administrative Data Research Centres or a Trusted Third Party data linkage service provider, are not covered. The network is run by several organisations across the UK and local procedures for each organisation will apply. Individuals working for the network, particularly those employed by Trusted Third Party data linkers who may be handling sensitive identifiable data, are subject to strict controls and procedures to safeguard these data, are subject to detailed vetting procedures, and are required to sign confidentiality declarations. If an internal network breach occurred, in the severest cases dismissal and criminal prosecution under relevant legislation such as the Data Protection Act and Statistics and Registration Services Act could occur.

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For definitions of terms please see the ADRN glossary at **http://www.adrn.ac.uk/using-the-network/documentation**

1. Introduction

The Administrative Data Research Network (ADRN) is a UK-wide partnership between universities, government departments and agencies, national statistics authorities, the third sector, funders and researchers.

We help accredited researchers carry out social and economic research using linked, de-identified administrative data – information which is routinely collected by government organisations.

All researchers accessing ADRN data must be 'fit and proper' people which, among other things[1], means that researchers accessing data via ADRN are required to agree to the Terms of Use, and to be supported in that agreement by a legal representative of their employing organisation.

The agreement demonstrates that the user understands their responsibilities in relation to the data they are accessing and that they and their organisation understand the penalties that may be imposed for non-compliance with security or confidentiality. Mandatory training allows ADRN to ensure that researchers are fully aware of their commitments.

Further, data controllers may impose additional requirements on researchers as a condition of data access; breaches of these additional conditions will also attract penalties under this policy.

ADRN considers that a breach of procedures or data by a researcher is a serious incident which may attract a penalty. In addition where a law has been broken ADRN will work with the ICO and the data controllers to ensure appropriate measures are taken.

There is also the potential for criminal penalties where there has been a non-compliance with the requirements of the Statistics and Registration Services Act, or any other legal gateway under which data access has been granted.

While ADRN takes all reasonable precautions to minimise the possibility of a breach of data access procedure or a release of sensitive data, despite all safeguards in place, a security event or security incident might still occur. A certain amount of trust is placed upon users of ADRN to use the service safely. This is particularly true in cases where secure remote access solutions, where direct supervision of researchers is limited, are allowed.

This document is designed to ensure that any breach of procedures or data is addressed efficiently and consistently across all components of the Network and that ADRN can ensure:

- an effective and timely response;
- that the event is communicated quickly and effectively across all relevant parties;
- that, in case of a security event or incident, the Network complies with applicable legislative and regulatory guidelines;
- that the cause of an event and/or incident is identified and investigated;
- that, in case of a security event or incident, appropriate penalties are enforced on the user and their organisation; and
- that measures are implemented to ensure a process of continuous improvement that minimises the possibility of further event and/or incident of a similar nature occurring.

A list of breaches and penalties with guidance on how these will be applied can be found in Appendix A.

1.1. Security events, incidents and breaches

Throughout this document a distinction is made between security events and security incidents. These terms are defined under ISO27001 as follows:

An information security event indicates that the security of an information system, service, or network may have been breached or compromised, or that an information security policy may have been violated or a safeguard may have failed.

An information security incident is made up of one or more unwanted or unexpected information security events that could very likely compromise the security of information and weaken or impair business operations[i].

[1] http://www.adrn.ac.uk/faq/about-the-researchers

Stated another way – an information security event is any event which creates a situation where a security breach might occur, whereas an information security incident is an event where information security HAS been breached.

In addition to these standard definitions ADRN also considers that breaches of procedures and terms of use are subject to penalties even in cases where information security has not been breached.

1.2. Roles and responsibilities

This section defines the 'roles' responsible for the various actions and decisions required. These roles are formally assigned and a list made publicly available via ADRN website. The roles may be taken by staff in different positions across the ADRCs, but no one person will ever hold more than one role. All roles will also have a designated second in case of absence, unavailability of the primary role holder, or where the nominated Security Director is associated with a researcher or project under investigation. The role holders (or their nominated seconds) must be contactable at all times so that security event can be dealt with in a timely and efficient manner.

It should be noted that while the document refers to the ADS Security Director and Manager contacting data controllers, where the relationship is held by the ADRC in a devolved country the communication will be managed by the ADRC (as outlined in [ADRN058] ADRN D*ata Custodian Engagement Policy*),

ADRC roles:

- 'ADRC Security Director': the role of ADRC Security Director is typically taken on by the Director of the ADRC, but this could also be a Co-Director or Principal Investigator responsible for information security. The ADRC Security Director has overall responsibility for the information security within an ADRC. In case of a security incident the ADRC Security Director is responsible for determining the appropriate penalty for researchers and organisations involved in collaboration with the other Security Directors (see Breaches Committee below). They are also responsible for assigning the role of ADRC Security Manager, or approving it for external safe settings.

- 'ADRC Security Manager(s)': the ADRC Security Manager is responsible for the day-to-day running of the on-site secure access facilities. In case a security event is reported, the ADRC Security Manager is responsible for the security event assessment and, where necessary, the security incident investigation. A Security Manager will be assigned for each safe setting within the ADRC.

ADS roles:

- 'ADS Security Director': this role is typically taken on by the ADS Co-Director (Data and User Services). The ADS Security Director is responsible for setting minimum and maximum penalties for security incidents, liaising with the ADRC Security Directors in determining appropriate penalties for breaches, and for informing relevant parties (such as the Management Committee, data controllers, other data services and funders) of any security incident and the measures taken to address that incident including penalties imposed and corrective actions taken.

- 'ADS Security Manager': this role is typically taken on by the ADS User Services Manager. The ADS Security Manager is responsible for keeping record of all security events and incidents that occur within the Network. During a security incident investigation the ADS Security Manager will be responsible for communication with data controllers, the Information Security Working Group and other elements of the Network as appropriate, allowing the ADRC Security Manager to focus on the investigation.

Network roles:

- Breaches Committee: The Breaches Committee is made up of all the ADRC Security Directors and the ADS Security Director. The committee is responsible for determining the level of penalty to be applied in case of a breach, in line with the guidance in this

document.

- 'Information Security Working Group (ISWG)': ISWG is responsible for developing, approving and implementing any corrective measures resulting from an information security event or incident, and for amending the Network's information security policy where appropriate in order to ensure continuous improvement, and to minimise the occurrence of security events and incidents.
- 'Management Committee (MC)': The MC must be kept informed of all security incidents and events. In case of a security incident, the MC will report to ADRN Governing Board. Note: the MC consists or representatives from all ADRCs, the ADS and the Economic and Social Research Council (ESRC).

A list of role holders will be available on the ADRN website.

2. Event assessment

It is the responsibility of all ADRN staff, ADRN users and users' organisations to report security events to the relevant ADRC's Security Manager as soon as they suspect an event may have occurred.

2.1. Actions

Once a security event has been identified the ADRC Security Manager must ensure that the following actions are undertaken as soon as possible (at most within 24 hours of the event being reported):

- Suspend access from all researchers and projects affected, as well as related projects;
- Inform the ADRC Security Director and ADS Security Manager of the security event;
- Perform a security event assessment;
- Determine whether a security incident occurred.

Suspension

The ADRC Security Manager will immediately suspend access to all ADRN services for all users registered on projects involved in the event, including projects that share users with the suspended projects.

It is the ADRC Security Manager's responsibility to inform all users involved of their suspension and the pending security event assessment. In case not all researchers can be reached in the first instance, it is the responsibility of the users registered on the research projects to inform each other. In exceptional circumstances (where none of the researchers can be reached, the organisations can be contacted by ADS Security Manager).

This suspension will remain in place until a security event assessment (see below) has been completed. At that stage, the suspension is either lifted or maintained depending on whether a security incident has been identified

Note: see local procedures on how users and projects are suspended.

Inform Security Director and ADS

The ADRC Security Manager is responsible for informing the ADRC Security Director and the ADS Security Manager of all security events immediately. The ADRC Security Manager can either contact the ADS Security Manager directly or through ADRN Helpdesk phone line.

Security assessment

The ADRC Security Manager will complete an assessment of the security event as soon as possible. The security event assessment will consider whether any actions taken by a user potentially violate their terms and conditions of access, in order to establish if a breach of ADRN information security policy occurred.

Note: the assessment is expected to be completed within 24 hours; this period may be extended if users are hard to reach.

Did a security incident or breach of procedures occur?

As soon as the security assessment is completed, the ADRC Security Manager (supported by the ADS Security Manager) needs to determine whether a breach in information security or a breach of Terms of Use occurred (i.e. whether or not the security event has resulted in a security incident or a breach of procedures).

If a security incident or breach did NOT occur, the ADRC Security Manager will lift all earlier imposed suspensions, and the research can resume as normal. The ADS Security Manager is responsible for informing the Chair of the Information Security Working Group (ISWG). ISWG in turn is responsible for amending the information security policy where appropriate to limit the probability of a similar security event occurring again, and for adjusting local procedures accordingly.

If a security incident did occur, the process continues with incident investigation (see section 3).

2.2. Reporting

To report on the details of the security event, the ADRC Security Manger will complete a report capturing:

- Date and time of security event
- User(s) involved with the event
- User(s) organisation
- Project involved
- Other user(s) on the project
- Data available to user
- Data controllers
- Nature of the event

The first part of the document concludes with a judgement on whether or not the security event led to a security incident.

3. Incident investigation

This section covers the actions and reporting required in case the ADRC Security Manager has established that a security event led to a security incident.

3.1. Actions

If it has been established that a security incident has occurred, the following actions are expected to be completed within 72 hours:

- Determine whether security incident affects the rest of the Centre [ADRC];
- Inform the Management Committee, data controller, and (in cases where a statutory offence has occurred) the ICO. [ADS];
- Perform security incident investigation [ADRC, supported by ADS];
- Provide data controller with all relevant information in case a statutory offence occurred [ADS, supported by ADRC];
- Prepare Security Incident Report for ISWG [ADRC, supported by ADS].

Impact on Network

If there is any possibility that at any point the security incident may affect other elements of the service provided by the ADRC, the ADRC is expected to shut down any part of the service that might pose a risk due to the incident, and suspend all access to data. The ADRC Security Manager is responsible for following local procedures to prevent related security events and incidents from occurring.

Inform relevant parties

ADS Security Manager is responsible for informing all relevant parties of the security incident as soon as possible:

- Management Committee

  The Management Committee will take note of the incident and await the Security Incident Report.

- Data controller(s).

  After informing the data controller the ADS Security Manager will function as a go-between the data controller and the ADRC, allowing the ADRC Security Manager to complete the incident investigation effectively.

- Information Commissioner' Office

  Where a statutory offence has been committed the ADRN will work with the ICO in line with our legal responsibilities.

- ISWG

  The ISWG will receive a copy of the redacted security incident report

A full list of the parties that will be informed in case of security incidents will be available on the ADRN website.

Security incident investigation

The ADRC Security Manager, in conjunction with other members of staff, and with the support of the ADS where requested, will investigate the details of the incident and the circumstances leading to the incident, which will determine any penalties that are to be applied to the user and/or their organisation.

Users are expected to play an active role in the investigation, and should make time available to answer all queries by the ADRC Security Manager promptly and transparently; a failure to do so may lead to an increase in the severity of the penalty applied.

All contact with the user(s), via email, phone or in person will be logged by the ADRC Security Manager in order to better support the investigation and reporting.

Note: the incident investigation phase is expected to be completed within 72 hours; this period may be extended if, for instance, users are hard to reach.

Statutory offence

Where the investigation finds evidence that a statutory offence has been committed (for example, a violation of statistical or data protection legislation), the ADRC Security Manager will immediately inform the ADRC Security Director, the ADS Security Manager and the ADS Security Director, whilst completing their own investigation. The ADS Security Manager will contact the data controller immediately, and the ICO and Police may also be informed.

The ADS Security Manager is responsible for collating all evidence and findings to support any decision on whether or not to pursue criminal charges.

Update and operationalise IA policy and procedures.

Once an incident investigation has been completed, and the report created (see below), the ADRC Security Manager must assess whether the security incident is falls into the categories listed in Appendix A.

If the incident is not of a type listed in Appendix A the ADRC Security Manager will inform and liaise with the ADS Security Director. It is the responsibility of the ADS Security Director to add the incident (or generic description of the incident) to the list of incidents and the Breaches Committee to decide on appropriate minimum and maximum penalties, irrespective of the current incident.

Once the incident has been defined along with the associated minimum and maximum penalties, whether this is new definition or an amendment in light of lessons learned, the next stage of the process is to determine an appropriate penalty for the occurrence of the incident under investigation. (See next section).

3.2. Reporting

Once the security incident investigation is completed the ADRC Security Manager will complete the Security Incident Report. This will cover the following information:

- Date and time of security event
- User(s) involved with the event
- User(s) organisation
- Project involved
- Other user(s) on the project
- Data available to user
- Nature of the incident
- Whether ADRN Information Security procedures have been neglected or breached
- The specific terms that have been broken, or legislation that may have been breached.
- The nature of any unauthorised activity
- The potential risk to confidentiality
- Whether any unauthorised modifications to software applications or hardware have been made
- What information was disclosed or potentially disclosed as a result of the incident
- Any evidence that the host organisation's systems were affected by the incident
- Preliminary assessment of the extent to which the event was cause by intentional efforts by the user

Following completion of the Security incident report and sign off by the ADRC Security Manager, the Report will be used to inform the process of determining appropriate penalties for users and/or their organisations. A full copy of the report will be shared with the ADS. Summaries as appropriate will be shared with the ISWG, all affected users and their organisations, and other parties (e.g. data controllers) where legal and appropriate.

4. Applying Penalties

This section covers the actions and reporting of the final phase, applying penalties.

4.1. Actions

After completion of the incident investigation phase, the following actions are expected to be completed within 48 hours:

- Determine appropriate penalty [Breaches Committee];
- Implement penalty locally [ADRC];
- Apply penalty across the network [ADS];
- Inform relevant parties [ADS].

Determine appropriate penalty

The Breaches Committee is responsible for determining the appropriate penalty for the user(s) and or organisation(s) involved. The Security Incident Report will inform the process of determining the appropriate penalty; the remainder of this text and Appendix A are designed as a guide through this process.

This guidance will be applied in all cases where security incidents occur within ADRN to ensure that penalties are applied consistently across the Network.

Incidents and penalties

Appendix A provides a list of categories of potential security incidents. Listed against each incident is a minimum and maximum penalty.

The first step in determining the appropriate penalty is to determine the category into which the incident falls from the list. In order to determine where the penalty will fall on the scale from maximum to minimum the following areas will be considered when assessing the incident and users involved. The penalty to apply on the scale from the minimum to the maximum penalty, the incident and users involved will be assessed on the criteria listed below.

Assessment criteria

- *What is the sensitivity of the data involved? – Consider the sensitivity of variables and the type of data involved, for example, a* breach involving data may be more serious than one involving results, as results usually contain a lower degree of statistical disclosure risk.
- *Was the incident malicious/deliberate?* – Did the user deliberately ignore or circumvent procedures?
- *Will the penalty be effective?* –a time limited ban can either hugely impede the researcher, or have no effect at all, depending on when the ban comes into effect. It is important to ensure that any ban has the desired impact.
- *What is the researcher's attitude towards the breach?* – Do the researchers give the impression they are contrite about the security incident?
- *What is the likely impact of a data breach within the current project?* – What is the likely impact on data subjects and data controllers in case of a breach? Are vulnerable populations affected? Note: The Statistics and Registration Service Act 2007 considers the 'level of distress caused'.

Determining the penalty

Following the guidance in Appendix A the penalty for the incident and users will use the assessment criteria above to determine the appropriate penalty to apply on the scale between the maximum and minimum. Once the penalty has been determined the Breaches Committee will produce a Penalty Report giving details of the breach, the penalty assigned and the researchers, projects and institutions affected.

Implement penalty locally

It is the responsibility of the Security Manager to implement the penalty set by the ADRC Security Director. In order to do so, the ADRC Security Manager will follow local procedures.

Apply penalty across the network

It is the responsibility of the ADS Security Director to apply the penalty across the network, i.e. inform the researcher(s) and/or organisation(s) of the penalties imposed, inform all other ADRCs of the penalty that has been applied, and inform all other affected parties, see below.

Researchers affected will receive a Penalty Report; other relevant parties will receive redacted versions of the Security Incident Report.

Inform relevant parties

It is the responsibility of the ADS Security Director to inform all relevant parties: data controller(s); the Management Committee; the Information Assurance Working and Expert Groups; other data services; other funders; and the ICO where necessary. A full list of the parties that will be informed in case of security incidents will be available on the ADRN website. The data controller(s) will be informed of the penalty imposed on researcher(s) and/or organisation(s) and will get a redacted copy of the Security Incident Report.

The Management Committee will take note of the security incident, and will get a copy of the Security incident report. In turn, the Management Committee is tasked with reporting all security incidents to ADRN Board.

The Information Security Working Group will amend the information security policy as appropriate to minimise the risk of a similar security event or incident occurring. The Information Assurance Expert Group will note the incident and comment on the appropriateness of the amendments made.

Other data services will be informed of the security incident and penalties applied. This information is shared for them to inform their information security policy, and to ensure that bans and suspension are effective.

Other funders will be informed of penalties applied where penalties affect them.

Where a statutory offence has occurred the ICO will be informed as part of the ADRN's legal obligations.

Anonymity

The researcher(s) who committed the breach will only be identified to the parties who require the information for security purposes or to impose penalties. Therefore the Security Incident Report will be redacted to remove identifying information and the Management Committee, Expert and Working Groups will not usually receive the redacted copy.

4.2. Reporting

Once the appropriate penalty has been determined, the ADRC Security Director is responsible for completing a penalty report. These reports can be extracted from the penalty assessment tool and will contain the following information:

- User(s) the penalty applies to
- Organisation(s) the penalty applies to
- Date and time of security incident
- Type of security incident
- Minimum and maximum penalties associated with the security incident
- Scores on the assessment criteria
- Overall score
- Penalty applied
- Start date of penalty

- End date of penalty

4.3. Organisational penalties

In certain circumstances the ADS Security Director can also impose penalties on organisations. Examples of when these penalties might be imposed include but are not restricted to

- multiple security incidents are caused by researchers from the same organisation.
- the organisation is partially responsible for the security incident (e.g. not keeping anti-virus/malware software up-to-date in case of secure remote access);

Appendix A provides more detail for what security incidents organisational penalties are imposed. It also sets out what penalties can be imposed in case of multiple incidents committed by users from the same organisation.

4.4. Appeals process

Users can appeal against penalties. Appeals are considered if the researcher has provided evidence that:

- the security incident investigation, and assessment of appropriate penalties was not conducted in accordance with ADRN policies and procedures;
- some other material irregularity related to the process has occurred.

Appeals against the judgement of the Breaches Committee will not be considered.

To lodge an appeal the researcher must notify the ADRN Board [simon.whitworth@statistics.gsi.gov.uk] who convenes the Appeals Panel that they intend to appeal within 10 working days of receipt of the Penalty Report. The appeal must be submitted within 4 weeks of the receipt of the report and will be acknowledged within 10 days of receiving the appeal.

First, appeals will be subject to an initial scrutiny and additional background information might need to be gathered. This stage is to ensure that the appeal is made on the grounds indicated earlier with appropriate evidence in place. Appeals that do not meet the specified criteria (grounds, timescale) will be rejected and no further appeal can be made.

Appeals that are made on the grounds specified with evidence and within the specified time frame will proceed to a formal appeal's stage.

- The Appeals Panel will convene a meeting three weeks after the submission deadline for the appeal.
- In reaching a decision the Appeals Panel will have access to all documents seen and produced by the ADRC Security Director. The Appeals Panel may also draw on any relevant expertise in reaching their decision.

The Board's judgement is final and cannot be subject to further appeal.

5. Penalty tariffs

Penalties for individual researchers range from an official warning to a suspension from ADRN services (these services include data access at each of the ADRCs, user support, and the processing of applications).

In addition to a suspension from ADRN services, the ADS will notify other data services (a full list will be available on the website), in some cases, particularly for more serious breaches researchers may also be banned from these other services.

Finally, some penalties also include funding sanctions. Where such penalties are applied researchers will lose ESRC funding, and potentially other funding bodies (a list of funding bodies that will apply sanctions for ADRN breaches can be found on the ADRN website). Researchers will also be ineligible to apply for future funding for the duration of the ban.

ADRN aims to extend the list of funding bodies who will apply sanctions in case of breaches of ADRN Terms of Use. ADRN may also extend the list of data services that are notified in case of a breach. ADRN Researchers will be notified when a change is made to the list.

Details of penalties associated with different types of breach can be found in appendix A of this document: Table 1 lists security types of incidents, alongside examples of breaches that might fall under each type, and their associated minimum and maximum penalty, for one-off and repeat offences. Penalties for repeat offences may be applied to individuals who have caused a similar security incident on more than one occasion; they may also be applied to research teams where more than one individual in the same research team cause similar security incidents.

The last column of the Table 1 lists organisational penalties where these apply. The full lists of penalties available to the ADRN are listed in tables 2 and 3 in Appendix A.

In certain circumstances the ADRN Breaches Committee can also impose penalties on organisations. Table 1 below shows which classes of incident may be subject to organisational penalties, and the appropriate penalty in the case of a single incident.

It is up to the discretion of the ADRN Breaches Committee, to apply organisational penalties in case researchers of a single organisation are involved with multiple security incidents.

Appendix A

Table 1: Security Incidents

#	Description of security incident	First offence		Repeat offence		Potential Organisational Penalty
		MIN	MAX	MIN	MAX	
S01	Non communication of research impact	P1	P4	P2	P7	
S02	Providing inaccurate information about data (ownership, copyright, consent etc).	P1	P9	P4	P9	
S03	Breach of information security procedures (grade 1)	P1	P9	P3	P11	Q2+
S04	Breach of information security procedures (grade 2)	P4	P14	P5	P14	Q2+
S05	Data breach (contained)	P2	P11	P5	P14	Q2+
S06	Data breach (uncontained)	P5	P14	P7	P14	Q1+
S07	Providing false information on application forms	P11	P14			

Table 2: Penalties for Individual Researchers

P1	Official warning
P2	Suspension until retraining taken
P3	1 month suspension from ADRN services + notification to listed data services
P4	3 month suspension from ADRN services + notification to listed data services
P5	6 month suspension from ADRN services + notification to listed data services
P6	9 month suspension from ADRN services + notification to listed data services
P7	12 month suspension from ADRN services + notification to listed data services
P8	18 month suspension from ADRN services + notification to listed data services
P9	2 year suspension from ADRN services + notification to listed data services
P10	2 year suspension from ADRN services + 12 month suspension from listed data services
P11	Permanent suspension from ADRN services + 12 month suspension from listed data services
P12	Permanent suspension from ADRN services

	+ Permanent suspension from listed data services
P13	Permanent suspension from ADRN services + permanent suspension from listed data services + 2 year sanction from listed funders
P14	Permanent suspension from ADRN services + permanent suspension from listed data services + permanent sanction from listed funders

Table 3: Penalties for Organisations

Q1	6 month suspension from ADRN services
Q2	12 month suspension from ADRN services
Q3	12 month suspension from ADRN services + 12 month sanction from listed funders
Q4	2 year suspension from ADRN services + 12 month sanction from listed funders
Q5	2 year suspension from ADRN services + 2 year sanction from listed funders
Q6	5 year suspension from ADRN services + 2 year sanction from listed funders
Q7	5 year suspension from ADRN services + 5 year sanction from listed funders

Appendix B: Responsible positions.

	Security Director / Second	Security Manager / Second
ADRC-E	Emma White/	
Southampton		Andy Cullis/
Titchfield		Jonny Tinsley/
UCL		Grant Thiltgen/
ADRC-NI	Robert Beatty/Maire Brolly	
NISRA		Brian Green/Orla Bateson
ADRC-S	Chris Dibben/	
		Anthea Springbett/
ADRC-W		
Cardiff		
Swansea		
ADS	Tanvi Desai/ Melanie Wright	John Sanderson/Kakia Chatsiou

Information Security Working Group Chair Steve Pavis

[i] http://www.praxiom.com/iso-27000-definitions.htm#Information_security_event