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REVIEW OF DATA INTEGRITY AND SECURITY

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INFORMATION PAPER

Review of Data Integrity and Security.

At TCC a number of countries raised concerns about the integrity of data and security within the Secretariat following a discussion about VMS data integrity. This discussion culminated in the resignation of Peter Flewwelling from the Commission. Para 163 notes:

"163. The Executive Director announced that the Secretariat will conduct a review of its data integrity and security standards and procedures and post the results of this review prior to WCPFC8."

This review has now been conducted and has centered on the rules that the Commission has established and the internal controls and checks within the Commission Secretariat.

Commission Rules.

The Commission adopted an Information Security Policy in 2007. (WCPFC Information Security Policy). This is a very detailed policy on how the Commission and hence the Secretariat should develop, implement and review security around all aspects of the Commission business. This policy is underpinned by a Information Security Plan that is to be implemented and reviewed by the ICT Manager.

The covering paper TCC3 2007/16 in paragraph 4 states…." The accompanying documents are designed to govern the information management, policy and standards for the WCPFC Secretariat. These constitute and Information Security Plan….." This is further elaborated in the covering paper WCPFC4-2007/ IP03.

Specifically applying to data management are two supporting documents

1 Rules of Procedure for the protection, Access to, and Dissemination of Data Compiled by the Commission (Dec 2007), and
2 Rules and Procedures for the Protection, Access to, and Dissemination of High Seas Non-Public Domain Data and Information Compiled by the Commission for the Purpose of Monitoring, Control and Surveillance (MCS) Activities and the Access to and Dissemination of High Seas VMS Data for Scientific Purposes. (Dec 2009).

What is obvious from a review of these Commission documents is that the Commission is very well served in terms of Security policy for all aspects of the Commission work. If these policies are correctly implemented and the review processes adequately developed issues such as the VMS breach should not have occurred.

Procedures.

In trying to determine how this breach occurred it is evident that if proper process and policy had been followed it would not have occurred. As such what is missing from the original intention of the Security Policy is a review and audit mechanism to check and ensure security and integrity. With this in mind the Secretariat has commenced the following to strengthen internal procedures.

1 The Secretariat will put in place a Security Committee under the ED and including the Finance, Compliance and IT managers. The committee will meet every two months and review the security arrangements within the Secretariat in line with the Information Security Plan (ISP).
2 Regular update and awareness training will be arranged for staff on the importance of security controls.
3 The Secretariat has developed a form to be used for data information requests that will need to be signed off by the ED.
4 The Secretariat through its Security Committee will develop procedures to ensure that all access to secure data is consistent with approvals under the ISP and Rules of procedure for data access.
5 The Secretariat has written to the FFA as the VMS Service Provider to arrange a monthly access report on all of those who accessed the VMS system so that it can be checked for approvals and integrity. We have a draft of that report but it may require trialing and enhancement.
6 On the 1 May each year the Secretariat will engage a consultant to undertake an audit of the Commissions information security practices and application. This will be part of the annual VMS security audit as both issues are linked and this approach will minimize cost. The results of this audit will be made available to TCC.

In addition to the above the Secretariat has checked for and removed the inappropriate VMS access raised at TCC and will ensure that no further access is granted to member countries until the VMS Template is agreed.

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