GOVERNMENT ICT STANDARDS

Information Security Standard

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REVISION OF ICT STANDARDS

In order to keep abreast of progress in industry, ICTA Standards shall be regularly reviewed. Suggestions for improvements to published standards, addressed to the Chief Executive Officer, ICT Authority, are welcome.

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# DOCUMENT CONTROL

<table>
<thead>
<tr>
<th>Document Name:</th>
<th>Information Security Standard</th>
</tr>
</thead>
<tbody>
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</tr>
</tbody>
</table>
## Contents

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>FOREWORD</td>
<td>6</td>
</tr>
<tr>
<td>1.0 INTRODUCTION</td>
<td>7</td>
</tr>
<tr>
<td>2.0 SCOPE</td>
<td>8</td>
</tr>
<tr>
<td>3.0 NORMATIVE REFERENCES</td>
<td>8</td>
</tr>
<tr>
<td>4.0 TERMS AND DEFINITIONS</td>
<td>9</td>
</tr>
<tr>
<td>4.1 Abbreviations</td>
<td>10</td>
</tr>
<tr>
<td>4.2 Sub domains</td>
<td>11</td>
</tr>
<tr>
<td>5.0 LEADERSHIP AND ACCOUNTABILITY</td>
<td>11</td>
</tr>
<tr>
<td>5.1 Information Security Policies</td>
<td>11</td>
</tr>
<tr>
<td>5.2 Steering Committee</td>
<td>12</td>
</tr>
<tr>
<td>5.3 Contacts with Authorities</td>
<td>12</td>
</tr>
<tr>
<td>5.4 Information Security in Project Management</td>
<td>12</td>
</tr>
<tr>
<td>6.0 CYBERSECURITY MANAGEMENT</td>
<td>13</td>
</tr>
<tr>
<td>6.1 Mobile device management</td>
<td>13</td>
</tr>
<tr>
<td>6.2 Teleworking</td>
<td>14</td>
</tr>
<tr>
<td>6.3 Forensics</td>
<td>15</td>
</tr>
<tr>
<td>6.4 Malware Defenses</td>
<td>15</td>
</tr>
<tr>
<td>6.5 Administrative Privileges</td>
<td>15</td>
</tr>
<tr>
<td>7.0 SYSTEMS AND APPLICATIONS SECURITY</td>
<td>16</td>
</tr>
<tr>
<td>7.1 Systems acquisition and development</td>
<td>16</td>
</tr>
<tr>
<td>7.2 E-Commerce</td>
<td>18</td>
</tr>
<tr>
<td>7.3 APIs and Interoperability</td>
<td>19</td>
</tr>
<tr>
<td>7.4 Virtualization</td>
<td>19</td>
</tr>
<tr>
<td>8.0 COMMUNICATION SECURITY</td>
<td>20</td>
</tr>
<tr>
<td>8.1 Network Security</td>
<td>20</td>
</tr>
<tr>
<td>8.2 Wireless security</td>
<td>21</td>
</tr>
<tr>
<td>8.3 Electronic messaging</td>
<td>22</td>
</tr>
<tr>
<td>8.4 Information Sharing</td>
<td>22</td>
</tr>
<tr>
<td>8.5 Agreements on information transfer</td>
<td>23</td>
</tr>
<tr>
<td>Section</td>
<td>Title</td>
</tr>
<tr>
<td>---------</td>
<td>--------------------------------------------</td>
</tr>
<tr>
<td>9.0</td>
<td>RISK MANAGEMENT</td>
</tr>
<tr>
<td>9.1</td>
<td>Information Asset Management</td>
</tr>
<tr>
<td>9.2</td>
<td>Information Classification and Sharing</td>
</tr>
<tr>
<td>9.3</td>
<td>Business Continuity Management</td>
</tr>
<tr>
<td>9.4</td>
<td>Threat and Vulnerability Management</td>
</tr>
<tr>
<td>10.0</td>
<td>HUMAN RESOURCES SECURITY</td>
</tr>
<tr>
<td>10.1</td>
<td>Background Screening</td>
</tr>
<tr>
<td>10.2</td>
<td>In-Service</td>
</tr>
<tr>
<td>10.3</td>
<td>Termination or Change of responsibilities</td>
</tr>
<tr>
<td>10.4</td>
<td>Information Security Awareness, Public Education and Training</td>
</tr>
<tr>
<td>11.0</td>
<td>OPERATIONAL SECURITY</td>
</tr>
<tr>
<td>12.0</td>
<td>PHYSICAL AND ENVIRONMENTAL SECURITY</td>
</tr>
<tr>
<td>13.0</td>
<td>CLOUD SECURITY</td>
</tr>
<tr>
<td>14.0</td>
<td>CRYPTOGRAPHY</td>
</tr>
<tr>
<td>15.0</td>
<td>THIRD PARTY RELATIONSHIPS</td>
</tr>
<tr>
<td>16.0</td>
<td>COMPLIANCE</td>
</tr>
<tr>
<td>17.0</td>
<td>APPENDIX I: Compliance Checklist for information Security</td>
</tr>
<tr>
<td>18.0</td>
<td>Appendix II: Guidelines</td>
</tr>
</tbody>
</table>
FOREWORD

The ICT Authority has the mandate to set and enforce ICT standards and guidelines across all aspects of information and communication technology including Systems, Infrastructure, Processes, Human Resources and Technology for the public service. The overall purpose of this mandate is to ensure coherent and unified approach to acquisition, deployment, management and operation of ICTs across the public service in order to achieve secure, efficient, flexible, integrated and cost effective deployment and use of ICTs.

To achieve this mandate, the Authority established a standards committee to identify the relevant standard domains and oversee the standards development process. The committee consulted and researched broadly among subject matter experts to ensure conformity to acceptable international and national industry best practices as well as relevance to the Kenyan public service. The committee eventually adopted the Kenya Bureau of Standards (KEBS) format and procedure for standards development. In an engagement founded on a memorandum of understanding KEBS, participated in the development of these Standards and gave invaluable advice and guidance.

For example, the IT Governance Standard, which falls under the overall Government Enterprise Architecture (GEA), has therefore been prepared in accordance with KEBS standards development guidelines which are, in turn, based on the international best practices by standards development organizations including ISO.

The Authority’s Directorate of Programmes and Standards has the oversight role and responsibility for management, enforcement and review of this standard. The Directorate shall carry out quarterly audits in all the Ministries, Counties, and Agencies (MCA) to determine compliance to this Standard. The Authority shall issue a certificate for compliance to agencies upon inspection and assessment of the level of compliance to the standard. For non-compliant agencies, a report detailing the extent of the deviation and the prevailing circumstances shall be tabled before the Standards Review Board who shall advise and make recommendations to remedy the shortfall.

The ICT Authority management, conscious of the central and core role that standards play in public service integration, fostering shared services and increasing value in ICT investments, shall prioritize the adoption of this standard by all Government agencies. The Authority therefore encourages agencies to adhere to this standard in order to obtain value from their ICT investments.

Dr. Katherine W. Getao, EBS
Chief Executive Officer
ICT Authority
1.0 INTRODUCTION

Data and Information are assets that, like other important government assets, are essential to Government and its operations and consequently need to be suitably protected in order to ensure information confidentiality, integrity and availability. This is especially important taking into consideration the increase in interconnectivity of government departments and systems. As a result, government information is now exposed to a growing number and a wider variety of threats, risks and vulnerabilities.

Information systems security standards aim at guiding in the setting up of appropriate controls that will ensure the protection of information from a wide range of threats in order to ensure continuity in government operations, minimize risk, and maximize return on government IT investments.

The following set of standards guide in the implementation of suitable set of controls, including policies, processes, procedures, organizational structures, software and hardware functions to ensure information security is achieved. These controls need to be established, implemented, monitored, reviewed and improved, where necessary, to ensure that the specific IT security and operational objectives of the government are met.

Information Security is based on the following five elements:

- **Confidentiality** - ensuring that Information is only accessible to those with authorized access
- **Integrity** - safeguarding the accuracy and completeness of Information and processing methods
- **Availability** - ensuring that authorized Users have access to Information when required
- **Compliant Use** - ensuring that MCDA meet all legal and contractual obligations
- **Responsible Use** - ensuring that appropriate controls are in place so that Users have access to accurate, relevant and timely Information but that Users of MCDA ICT resources do not adversely affect other Users or other Systems.
2.0 SCOPE

This ICTA Standard establishes security guidelines for Ministries, Counties and Agencies as custodians of public information and data. The standard is based on a risk management approach and requires MCDA to implement policies and procedures that are proportionate to their level of risk, after conducting and documenting a risk assessment. The objective is to provide a consistent approach to managing information security risks across Government in line with the Government Enterprise Architecture guiding principles.

2.1 Field of Application

This standard will be applicable to the following:

- Central Government of Kenya
- County Governments
- Constitutional Commissions
- State Corporations

3.0 NORMATIVE REFERENCES

The following standards contain provisions which, through reference in this text, constitute provisions of this standard. All standards are subject to revision and, since any reference to a standard is deemed to be a reference to the latest edition of that standard, parties to agreements based on this standard are encouraged to take steps to ensure the use of the most recent editions of the standards indicated below. Information on currently valid national and international standards can be obtained from Kenya Bureau of Standards.

- Center for Internet Security Controls Version 7
For the purposes of this ICTA Standard, the following definitions, abbreviations and symbols apply:

### 4.0 TERMS AND DEFINITIONS

**Asset** - Anything that has value to the MCDA

**Availability** - The property of being accessible and usable upon demand by an authorized entity

**Confidentiality** - The property that information is not made available or disclosed to unauthorized individuals, entities, or processes.

**Information Security** - Preservation of confidentiality, integrity and availability of information; in addition, other properties such as authenticity, accountability, non-repudiation and reliability can also be involved

**Information security event** - An identified occurrence of a system, service or network state indicating a possible breach of information security policy or failure of safeguards, or a previously unknown situation that may be security relevant

**Information security incident** - A single or a series of unwanted or unexpected information security events that have a significant probability of compromising business operations and threatening information security

**Information Security Management System (ISMS)** - That part of the overall management system, based on a business risk approach, to establish, implement, operate, monitor, review, maintain and improve information security

**Integrity** - The property of safeguarding the accuracy and completeness of assets

**Residual risk** - The risk associated with an action or event remaining after natural or inherent risks have been reduced by risk controls

**Risk acceptance** - Decision to accept a risk

**Risk analysis** - Systematic use of information to identify sources and to estimate the risk

**Risk assessment** - Overall process of risk analysis and risk evaluation

**Risk evaluation** - Process of comparing the estimated risk against given risk criteria to determine the significance of the risk

**Risk management** - Coordinated activities to direct and control an MCDA with regard to risk

**Risk treatment** - Process of selection and implementation of measures to modify risk
Application Security- Application security is the use of software, hardware, and procedural methods to protect applications from external threats from development, deployment to maintenance.

Data Security- Data security refers to protective measures that are applied to prevent unauthorized access to computers, databases and websites that may cause data corruption.

Email Security- Email security refers to the collective measures used to secure the access and content of an email account or service.

Hardware Security- Hardware security refers to the collective measures deployed to secure the physical technology that houses and executes the software, stores and transports the data, and provides interfaces for the entry and removal of information from the system.

Network Security- Network security refers to any activities designed to protect the usability, reliability, integrity, and safety of your network and data.

A duress alarm- Is a method for secretly indicating that an action is taking place 'under duress'.

Physical Security- The protection of building sites and equipment (and all information and software contained therein) from theft, vandalism, natural disaster, manmade catastrophes, and accidental damage (e.g., from electrical surges, extreme temperatures, and spilled coffee).

Tele-working- Refers to all forms of work outside of the office, including non-traditional work environments, such as those referred to as "telecommuting", "flexible workplace", "remote work" and "virtual work" environments.

4.1. Abbreviations

<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>GEA</td>
<td>Government Enterprise Architecture</td>
</tr>
<tr>
<td>ISMS</td>
<td>Information Security Management System</td>
</tr>
<tr>
<td>ISO</td>
<td>International Standards Organization</td>
</tr>
<tr>
<td>MCDA</td>
<td>Ministry, Counties, Departments and MCDA</td>
</tr>
<tr>
<td>IT</td>
<td>Information Technology</td>
</tr>
<tr>
<td>ICT</td>
<td>Information and Communication Technologies</td>
</tr>
<tr>
<td>IS</td>
<td>Information Security</td>
</tr>
<tr>
<td>PKI</td>
<td>Public Key Infrastructure</td>
</tr>
<tr>
<td>DMARC</td>
<td>Domain based Message Authentication Reporting and Conformance</td>
</tr>
<tr>
<td>DKIM</td>
<td>Domain Keys Identified Mail</td>
</tr>
<tr>
<td>PCI-DSS</td>
<td>Payment Card Industry – Data Security Standard</td>
</tr>
<tr>
<td>API</td>
<td>Application Program Interface</td>
</tr>
<tr>
<td>VLAN’s</td>
<td>Virtual Local Area Networks</td>
</tr>
<tr>
<td>IDS</td>
<td>Intrusion Detection System</td>
</tr>
</tbody>
</table>
IPS  Intrusion Prevention System
OS  Operating System
WAF’s  Web Application Firewalls
SDLC  Software Development Life Cycle
TCP  Transmission Control Protocol
UDP  User Datagram Protocol
SPF  Sender policy Framework

4.2  Sub domains
a. Leadership and accountability
b. Cybersecurity management
c. Risk management
d. Business continuity management
e. Human resources security
f. Operational security
g. Third party relationships

5.0  LEADERSHIP AND ACCOUNTABILITY

Objective: To establish an information security management framework in-line with MCDA requirements.

5.1  Information Security Policies

5.1.1  Enterprise Information Security Policy

MCDA shall define an enterprise information security policy which is approved by management and which sets out their approach to managing information security objectives.

The enterprise information security policy shall contain:-

a) Definition of information security, objectives and principles to guide all activities relating to information security;
b) Assignment of general and specific responsibilities for information security management;
c) Defined roles;
d) Processes for handling deviations and exceptions.

5.1.2  Issue Specific Security Policy

The enterprise information security policy shall be supported by issue specific policies, which further mandate the implementation of information security controls and are typically structured to address the needs of certain target groups within an MCDA.

The Issue specific policies shall include but not limited;
5.1.2.1 Access control and password management
5.1.2.2 Information classification
5.1.2.3 Acceptable use
5.1.2.4 Mobile devices and tele-working
5.1.2.5 Backup and recovery
5.1.2.6 Supplier relationships
5.1.2.7 Electronic communications
5.1.2.8 Vulnerability and patch management

MCDA may have other issue specific security policies to address certain needs and groups.

5.2 Steering Committee

5.2.2 MCDA shall establish an information security steering committee to coordinate corporate security initiatives at the executive level and thus enable optimized spending, manage their infrastructure and minimize security risk.

5.2.3 Membership of the information security steering committee can include line of business managers, application owners, regional managers, IT/ICT managers, the IT/ICT director, the chief security officer, the corporate risk manager and the chief internal auditor.

5.2.4 There shall be established the function of information security at the MCDA reporting to the Chief Information Officer.

5.2.5 MCDA shall appoint an officer/ officers in charge of information security

5.2.6 To be able to fulfill responsibilities in the information security area the appointed individuals shall be certified in the area and be given opportunities to keep up to date with developments in information security sector

5.2.7 Information security roles and responsibilities shall be documented and approved by senior executive management

5.2.8 MCDA shall ensure segregation of duties to eliminate access, modification or use of assets without authorization or detection by a single person. The initiation of critical events shall be separated from its authorization

5.3 Contacts with Authorities

There shall be established contacts with relevant Authorities to ensure that information security incidents are promptly reported and acted upon for business continuity.

5.3.2 MCDA shall maintain contacts with Law enforcement, Regulatory bodies, Supervisory authorities and Service providers.

5.3.3 MCDA Information Security function shall maintain membership with specialist security forums and professional associations

5.4 Information Security in Project Management
Information security objectives shall be included in all projects objectives being implemented by the MCDA.

5.4.2 MCDA shall ensure the protection of confidentiality, integrity and availability of project information.

5.4.3 MCDA shall identify, address and manage information security risks at all stages of project management.

6.0 CYBERSECURITY MANAGEMENT

Cyber security management can be described as everything an MCDA does to protect its information systems and computer networks from cyber-attacks, intrusions, malware and various types of data breaches

6.1 Mobile device management

This is the process of managing and securing employees’ mobile devices that are deployed across multiple mobile service providers and across multiple mobile operating systems being used within the MCDA.

6.1.2 General

The MCDA in securing mobile devices shall ensure:

6.1.2.1 Development and enforcement of a mobile device policy according to its risk assessment to ensure that organizational information is not compromised.

6.1.2.2 The mobile device policy shall consider:

a) malware protection;
b) remote disabling, erasure or lockout;
c) backups and recovery;
d) separation of private and business use of the devices, including using software to support such separation and protect business data on a private device;
e) encryption
f) device registration
g) tagging

6.1.2.3 Protection shall be in place to avoid the unauthorized access to or disclosure of the information stored and processed by these devices e.g. using cryptographic techniques and enforcing use of secret authentication information.

6.1.2.4 Administrator level accounts shall only be used by authorized ICT administrators. All other users shall use user/basic level accounts.

6.1.2.5 Devices carrying important, sensitive or critical business information shall not be left unattended and, where possible, shall be physically locked away, or special locks shall be used to secure the devices.
6.1.2.6 Each MCDA shall have a specific procedure taking into account legal, insurance and other security requirements of the organization for cases of theft or loss of mobile devices.

6.1.2.7 Training shall be arranged for personnel using mobile devices to raise their awareness of the additional risks resulting from this way of working and the controls that should be implemented.

6.1.3 Bring Your Own Device (BYOD)

This is the practice of allowing the employees of an organization to use their personal computers, smart phones and or other devices for work purposes. MCDA shall include provisions for BYOD within the mobile device policy and shall consider:

6.1.3.1 Network authentication, authorization and accounting of devices login into the organization’s network prior to accessing the network to ensure that each of the organization’s security policies has been enforced in the same manner as local network devices. E.g. valid anti-malware, genuine licensed and supported OS, non-approved software are not installed.

6.1.3.2 Signing acceptance use agreement acknowledging users understand their duties in upholding security (physical protection, software updating, etc.), waiving ownership of business data, allowing remote wiping of data by the organization in case of theft or loss of the device or when no longer authorized to use the service. This policy needs to take account of privacy legislation.

6.2 Teleworking

This is working remotely away from the physical office location using technology and telecommunications to remain in touch with the business and its related systems. It involves use of communication tools to carry out work duties from a remote location.

MCDA allowing tele-working shall define a policy which shall ensure:

6.2.2 Identification of the roles/jobs which may be considered for teleworking

6.2.3 The types of network and application services which may be provided to teleworkers.

6.2.4 The classified information types that should not be made available to teleworkers.

6.2.5 Teleworkers shall be identified, authenticated and authorized before accessing corporate resources

6.2.6 There are specific equipment or software products which must be deployed on the teleworker’s PC and how the connection to the remote PC should be protected i.e. VPN and how data on the machine should be protected

6.2.7 The teleworker’s PC configuration shall be protected, updated and monitored
6.2.8 The user’s understand their role in protecting corporate resources – e.g. appropriate use of resources, user should not modify security configuration, use of anti-virus software, storage of corporate data on local drives and use of encryption tools.

6.2.9 That users understand the possible information risks associated with teleworking, how those risks are addressed, and the user’s role in minimizing the risks.

6.2.10 That a code of practice is signed by teleworkers for accountability if the requirements of the policy are contravened.

6.3 Forensics

Computer forensics is the application of investigation and analysis techniques to gather and preserve evidence from a particular computing device in a way that is suitable for presentation in a court of law. An MCDA shall:

6.3.2 Engage only qualified persons in the identifying analyzing and presenting digital evidence.

6.3.3 Ensure that images of the original media are preserved and a chain of custody is documented.

6.3.4 Ensure that only the images of the media are analyzed and not the original media.

6.3.5 Ensure that the tools used in the digital forensics are internationally or locally accredited as sound forensics tools.

6.4 Malware Defenses

Malware is software that is intentionally designed to cause damage to a computer systems and infrastructure. The MCDA shall;

6.4.2 Utilize centrally managed anti-malware software to continuously monitor and defend each of the organization’s workstations and servers.

6.4.3 Ensure that the organization’s anti-malware software updates its scanning engine and signature database on a regular basis.

6.4.4 Configure devices so that they automatically conduct an anti-malware scan of removable media when inserted or connected.

6.4.5 Configure devices not to auto-run content from removable media.

6.4.6 Send all malware detection events to enterprise anti-malware administration tools and event log servers for analysis and alerting.

6.5 Administrative Privileges

This is the highest level or rights granted to the user of a computer, application system or database or network, it is the ability to make major changes to a system.
The MCDA shall:

6.5.2 Conform to the password policy with regards to administrator accounts

6.5.3 Use automated tools to inventory all administrative accounts, including domain and local accounts, to ensure that only authorized individuals have elevated privileges.

6.5.4 Before deploying any new asset, change all default passwords to have values consistent with administrative level accounts.

6.5.5 Ensure that all users with administrative account access use a dedicated or secondary account for elevated activities. This account should only be used for administrative activities and not daily user activities.

6.5.6 Where multi-factor authentication is not supported, accounts will use passwords that are unique to that system.

6.5.7 Use multi-factor authentication and encrypted channels for all administrative account access.

6.5.8 Limit access to scripting tools to only administrative or development users with the need to access those capabilities.

6.5.9 Configure systems to issue a log entry and alert when an account is added to or removed from any group assigned administrative privileges.

6.5.10 Configure systems to issue a log entry and alert on unsuccessful logins to an administrative account.

7.0 Systems and Applications security

7.1 Systems acquisition and development

System is acquired and designed to meet user functionality and data requirements. Acquisition and development is the result of selection process of a system to optimize the number of resources used.

The MCDA shall:

7.1.1 Ensure vendor supplied defaults for system passwords and other security parameters are changed

7.1.2 Ensure secure coding practices appropriate to the programming language and development environment are being used.

7.1.3 Ensure that explicit error checking is performed and documented for all input, including for size, data type, and acceptable ranges or formats.
7.1.4 Verify that the version of all software acquired from outside the organization is still supported by the developer or appropriately hardened based on developer security recommendations.

7.1.5 Ensure use up-to-date and trusted third-party components for the software developed by the organization.

7.1.6 Use of only standardized and extensively reviewed encryption algorithms for security sensitive information e.g. database hashes for passwords

7.1.7 Ensure that all software development personnel receive training in writing secure code for their specific development environment and responsibilities to reduce dependency on contractors.

7.1.8 Apply static and dynamic analysis tools to verify that secure coding practices are being adhered to for internally developed software.

7.1.9 Establish a process to accept and address reports of software vulnerabilities, including providing a means for external entities to contact the information security group.

7.1.10 Maintain separate environments for production and non-production systems.

7.1.11 Protect web applications by deploying web application firewalls (WAFs) that inspect all traffic flowing to the web application for common web application attacks. For applications that are not web-based, specific application firewalls should be deployed if such tools are available for the given application type. If the traffic is encrypted, the device should either sit behind the encryption or be capable of decrypting the traffic prior to analysis. If neither option is appropriate, a host-based web application firewall should be deployed.

7.1.12 Use standard hardening configuration templates for systems as applicable e.g. web, DNS, mail servers.

7.1.13 Escrow agreements are entered into for safeguarding of source code in the event the system is not fully owned by the MCDA

7.1.14 For both in house and off shelf systems require that quality assurance is guaranteed in meeting the requirements of the system.

7.1.15 Ensure user acceptance testing is performed before acceptance of the system

7.1.16 Ensure proper error handling is performed to only give the required output and not give out excessive information on backend technologies.

7.1.17 Separation of development, testing and operational environments

The MCDA in securing the environment of applications shall ensure;
7.1.18 Rules for the transfer of applications from development to operational status shall be defined and documented;

7.1.19 Development and operational applications shall run on different systems

7.1.20 Changes to operational systems and applications shall be tested in a testing or staging environment prior to being applied to operational systems;

7.1.21 Compilers, editors and other development tools or system utilities shall not be accessible from operational systems

7.1.22 Users shall use different user profiles for operational and testing systems, and menus should display appropriate identification messages to reduce the risk of errors.

7.1.23 Sensitive data shall not be copied into the testing system environment unless equivalent controls are provided for the testing system.

7.2 E-Commerce

Electronic commerce, refers to the buying and selling of goods or services using the internet, and the transfer of money and data to execute these transactions. It is the buying and selling produce by electronic means such as by mobile applications and the Internet.

MCDA shall;

7.2.1 Take measures to protect Personal Identifiable Information of their clients.

7.2.2 Encrypt transmission of confidential information sent through open and public networks.

7.2.3 Protect systems against malware through regular scanning and updating of the anti-malware solutions.

7.2.4 Develop and maintain secure systems and applications through secure software development lifecycle and vulnerability management

7.2.5 Restrict access to sensitive customer information to a “need to know” basis.

7.2.6 Uniquely identify and authenticate access to system components and users to ensure accountability of access to critical data systems.

7.2.7 Tracking and monitoring all access to confidential information through logging mechanisms

7.2.8 Test security systems and processes regularly.

7.2.9 Take into consideration mechanisms and procedures that taken together constitute a security architecture for e-commerce e.g. internet firewalls, Public Key Infrastructure (PKI), Payment Card Industry Data Security Standard (PCI DSS) compliance, password and authentication management.
7.3 APIs and Interoperability

When implementing APIs and designing interoperability of systems the MCDA shall ensure;

7.3.1 Validation of agreed standards for message formats to avoid transmission errors.
7.3.2 Encryption standards are agreed between the parties for API transactions.
7.3.3 Service account credentials must always be secured through encryption/hashing.
7.3.4 Usernames, passwords, session tokens, and API keys should not appear in the URL.
7.3.5 Validation of all request parameters to defend against injection attacks
7.3.6 Relevant error messaging without giving out too much information on the backend technologies.
7.3.7 Proper authentication and authorization to determine messages are from authorized parties only.
7.3.8 Establish controls to guard against manipulation of data in active transactions and attempts to alter transactions should issue alerts and be recorded.
7.3.9 Electronic signatures are used to safeguard against non-repudiation of transactions.
7.3.10 Message authentication codes exist to ensure messages are not altered during transmission.

7.4 Virtualization

In the deployment of virtualization technology MCDA shall take into consideration the following:

7.4.1 Isolation of the guest host from the host operating system e.g. file sharing should be disabled.
7.4.2 Both the host and virtual environments are hardened to only allow the intended use.
7.4.3 Hypervisors are patched as vendor fixes are released.
7.4.4 Access and visibility between the guests hosted within the host operating systems should be restricted
7.4.5 Security monitoring of the hypervisors and auditing to generate reports that flag suspicious configurations and communication between the guests.
7.4.6 Routinely inspect event and task logs
8.0 Communication Security

8.1 Network Security

This is the protection of the access to files and directories in a computer or IT network against hacking, misuse and unauthorized changes to the system.

The MCDA shall;

8.1.1 Maintain an up-to-date inventory of all of the organization’s network perimeters.

8.1.2 Perform regular scans from outside each trusted network perimeter to detect any unauthorized connections which are accessible across the boundary.

8.1.3 Deny communications with known malicious Internet IP addresses and limit access only to trusted and necessary IP address ranges at each of the organization’s network boundaries.

8.1.4 Deny communication over unauthorized TCP or UDP ports or application traffic to ensure that only authorized protocols are allowed to cross the network boundary in or out of the network at each of the organization’s network boundaries.

8.1.5 Deploy network-based Intrusion Detection Systems (IDS) sensors to look for unusual attack mechanisms and detect compromise of these systems at each of the organization’s network boundaries.

8.1.6 Deploy network-based Intrusion Prevention Systems (IPS) to block malicious network traffic at each of the organization’s network boundaries.

8.1.7 Enable the collection and monitoring of Network Flows and logging data on network boundary devices.

8.1.8 Ensure that all network traffic to or from the Internet passes through an authenticated application layer proxy that is configured to filter unauthorized connections.

8.1.9 Decrypt all encrypted network traffic at the boundary proxy prior to analyzing the content. However, the organization may use whitelists of allowed sites that can be accessed through the proxy without decrypting the traffic.

8.1.10 Require all remote login access to the organization’s network to encrypt data in transit and use multi-factor authentication.

8.1.11 Maintain standard, documented security configuration standards for all authorized network devices.

8.1.12 Configure rules that allow traffic to flow through network devices and should be documented in a configuration management system with a specific business reason for each rule.
8.1.13 Compare all network device configurations against approved security configurations defined for each network device in use and alert when any deviations are discovered.

8.1.14 Install the latest stable version of any security related updates on all network devices.

8.1.15 Manage network devices using multi-factor authentication and encrypted sessions where possible.

8.1.16 Separate networks through VLANs or, preferably, on entirely different physical connectivity for different network segments.

8.1.17 Associate active ports, services and protocols to the hardware assets in the asset inventory.

8.1.18 Ensure that only network ports, protocols, and services listening on a system with validated business needs are running on each system.

8.1.19 Perform automated port scans on a regular basis against all systems and alert if unauthorized ports are detected on a system.

8.1.20 Apply host-based firewalls or port filtering tools on end systems, with a default-deny rule that drops all traffic except those services and ports that are explicitly allowed.

8.1.21 Place application layer firewalls in front of any critical network segments to verify and validate the traffic going to the network. Any unauthorized traffic should be blocked and logged.

8.2 Wireless security

This is the prevention of unauthorized access or damage to computers, applications, databases or data using wireless networks.

The MCDA shall;

8.2.1 Maintain an inventory of authorized wireless access points connected to the wired network.

8.2.2 Configure network vulnerability scanning tools to monitor, detect and alert on unauthorized wireless access points connected to the wired network.

8.2.3 Disable wireless access on devices that do not have a business purpose for wireless access or pose a risk in facilitating adhoc wireless connections (computer to computer), by-passing network controls.

8.2.4 Leverage on wireless encryption standards for data in transit.

8.2.5 Ensure that wireless networks use authentication protocols that require multi-factor authentication.

8.2.6 Create a separate wireless network for personal or untrusted devices. Enterprise access from this network should be treated as untrusted and filtered and audited accordingly.
8.2.7 Scan wireless devices for malware before admission to the network.

8.3 **Electronic messaging**

This is the creation, storage, exchange, and management of text, images, voice, e-mail, paging, and Electronic Data Interchange over a communications network.

MCDA shall develop and implement policies taking into consideration:

8.3.1 Protecting messages from unauthorized access, modification or denial of service commensurate with the classification scheme adopted by the organization.

8.3.2 Ensuring correct addressing and transportation of the messages;

8.3.3 Reliability and availability of the service;

8.3.4 Requirements for electronic signatures;

8.3.5 Obtaining approval prior to using external public services such as instant messaging, social networking or file sharing;

8.3.6 Implementation of cryptographic technologies to protect user authentication and email data.

8.3.7 The mail clients are deployed, configured, and used properly to meet the security requirements of the organization.

8.3.8 Use of sandboxing to analyze and block inbound email attachments with malicious behavior

8.3.9 Domain based Message Authentication Reporting and Conformance (DMARC) policy, the Sender Policy Framework (SPF) and the Domain Keys Identified Mail (DKIM) standards.

8.4 **Information Sharing**

MCDA shall develop formal transfer policies, procedures and controls to protect the transfer of information through the use of communication facilities and shall consider the following items:

8.4.1 Procedures designed to protect transferred information from interception, copying, modification, mis-routing and destruction;

8.4.2 Procedures for the detection of and protection against malware that may be transmitted through the use of electronic communications

8.4.3 Procedures for protecting communicated sensitive electronic information that is in the form of an attachment;

8.4.4 Policy or guidelines outlining acceptable use of communication facilities
8.4.5 Personnel, external party and any other user’s responsibilities not to compromise the organization, e.g. through defamation, harassment, impersonation, forwarding of chain letters, unauthorized purchasing, etc.

8.4.6 Use of cryptographic techniques e.g. to protect the confidentiality, integrity and authenticity of information

8.4.7 Retention and disposal guidelines for all business correspondence, including messages, in accordance with relevant national and local legislation and regulations;

8.4.8 Controls and restrictions associated with using communication facilities, e.g. automatic forwarding of electronic mail to external mail addresses.

8.4.9 Advising personnel to take appropriate precautions not to reveal confidential information;

8.4.10 Not leaving messages containing confidential information on answering machines since these may be replayed by unauthorized persons, stored on communal systems or stored incorrectly as a result of misdialing;

8.4.11 Advising personnel about the problems of using facsimile machines or services, namely:

a) Unauthorized access to built-in message stores to retrieve messages;
b) Deliberate or accidental programming of machines to send messages to specific numbers;
c) Sending documents and messages to the wrong number either by misdialing or using the wrong stored number.
d) Compliance with any relevant legal requirements

8.5 Agreements on information transfer

8.5.1 MCDA shall be subject to terms of agreements to address the secure transfer of business information between the organization and external parties.

8.5.2 The information security content of the agreement shall reflect the sensitivity of the business information involved.

8.5.3 The Information transfer agreements should incorporate the following:

a) Management responsibilities for controlling and notifying transmission, dispatch and receipt;
b) Procedures to ensure traceability and non-repudiation;
c) Minimum technical standards for packaging and transmission;
d) Courier identification standards;
e) Responsibilities and liabilities in the event of information security incidents, such as loss of data;
f) Use of an agreed labeling system for sensitive or critical information, ensuring that the meaning of the labels is immediately understood and that the information is appropriately protected

g) Technical standards for recording and reading information and software;
h) Any special controls that are required to protect sensitive items, such as cryptography

j) Maintaining a chain of custody for information while in transit;
9.0 RISK MANAGEMENT

9.1 Information Asset Management

Information asset refers to any device or media used to store information in any form. In management of information assets, the MCDA shall;

9.1.1 Implement and maintain an inventory of assets associated with information and information processing facilities

9.1.2 For each of the identified assets, ownership of the asset shall be assigned and the classification shall be identified

9.1.3 The owner shall ensure the assets are appropriately classified and protected,

9.1.4 MCAs shall ensure labelling of classified information. Physical labels and metadata shall be used

9.1.5 The owner shall define and periodically review access restrictions and classifications to important assets, taking into account applicable access control policies;

9.1.6 The owner shall ensure proper security of information when the asset is retired or destroyed.

9.1.7 Rules for the acceptable use of information and of assets associated with information and information processing facilities shall be identified, created, documented and implemented.

9.1.8 Employees and external party users using or having access to the organization’s assets shall be made aware of the information security requirements of the organization’s assets associated with information and information processing facilities and resources

9.1.9 Use of messaging and collaboration, social media, BYOD shall conform to the systems and applications standard

9.1.10 All employees and external party users shall return all of the organizational assets in their possession upon termination of their employment, contract or agreement unless there exists a pre-arrangement for transfer of ownership.

9.1.11 The termination process shall be formalized to include the return of all previously issued physical and electronic assets owned by or entrusted to the organization with item

9.1.12 In cases where an employee or external party user purchases the organization’s equipment or uses their own personal equipment, procedures shall be followed to ensure that all relevant information is transferred to the organization and securely erased from the equipment.
9.1.13 In cases where an employee or external party user has knowledge that is important to ongoing operations, that information shall be documented and transferred to the organization.

9.1.14 During the notice period of termination, the organization shall control unauthorized copying of relevant information (e.g. intellectual property) by terminated employees and contractors.

9.1.15 MCDA shall develop and implement a clear desk policy for papers and removable storage media and a clear screen policy for information processing facilities.

9.1.16 The clear desk and clear screen policy shall take into account the information classifications, legal and contractual requirements and the corresponding risks and cultural aspects of the organization. The following guidelines shall be implemented:

a. Sensitive or critical business information, e.g. on paper or on electronic storage media, shall be locked away (ideally in a safe or cabinet or other forms of security furniture) when not required, especially when the office is vacated.

b. Computers and terminals shall be left logged off or protected with a screen and keyboard locking mechanism controlled by a password, token or similar user authentication mechanism when unattended and shall be protected by key locks, passwords or other controls when not in use;

c. Unauthorized use of photocopiers and other reproduction technology (e.g. scanners, digital cameras) shall be prevented;

9.1.17 Ensure the physical asset is maintained in accordance with the supplier’s recommended service intervals and only authorized maintenance personnel shall carry out repairs and service equipment.

9.1.18 Records shall be kept of all suspected or actual faults, and of all preventive and corrective maintenance;

9.1.19 Appropriate controls shall be implemented when the asset is scheduled for maintenance, taking into account whether this maintenance is performed by personnel on site or external to the organization; where necessary, information shall be cleared from the asset or the maintenance personnel shall be cleared;

9.1.20 All maintenance requirements imposed by insurance policies shall be complied with;

9.1.21 Before putting the asset back into operation after its maintenance, it shall be inspected to ensure that it has not been tampered with and does not malfunction.

9.1.22 MCAs shall develop procedures for the management of removable media in accordance with the classification scheme adopted by the organization.

9.1.23 MCA shall document formal procedures for the secure disposal of media and assets to minimize the risk of confidential information leakage to unauthorized persons. All users shall be made aware of the security requirements and procedures for protecting unattended equipment, as well as their responsibilities for implementing such protection.
9.2 Information Classification and Sharing

This is a process in which organizations assess data that they hold and the level of protection it should be given, this is usually classified in terms of confidentiality. The MCDA shall ensure that;

9.2.1 Information shall be classified in terms of legal requirements, value, criticality and sensitivity to unauthorized disclosure or modification and aligned to the access control policy

9.2.2 Each level shall be given a name that makes sense in the context of the classification scheme’s application.

9.2.3 The scheme shall be consistent across the whole organization so that everyone will classify information and related assets in the same way, have a common understanding of protection requirements and apply the appropriate protection.

9.2.4 Classification shall be included in the organization’s processes, and be consistent and coherent across the organization. Results of classification shall indicate value of assets depending on their sensitivity and criticality to the organization. Results of classification shall be updated in accordance with changes of their value, sensitivity and criticality through their life-cycle.

9.2.5 Information confidentiality

Classification scheme shall be based on four levels as follows:

a. Disclosure causes no harm
b. Disclosure causes minor embarrassment or minor operational inconvenience
c. Disclosure has a significant short term impact on operations or tactical objectives
d. Disclosure has a serious impact on long term strategic objectives or puts the survival of the organization at risk.

9.2.6 MCDA shall ensure labelling of classified information using physical labels and metadata

9.2.7 MCDA shall ensure access restrictions supporting the protection requirements for each level of classification;

9.2.8 MCDA shall ensure maintenance of a formal record of the authorized recipients of assets;

9.2.9 MCDA shall ensure protection of temporary or permanent copies of information to a level consistent with the protection of the original information;

9.2.10 MCDA shall ensure storage of IT assets in accordance with manufacturers’ specifications;

9.2.11 MCDA shall ensure clear marking of all copies of media for the attention of the authorized recipient.

9.2.12 MCDA shall document and implement the following guidelines to protect media containing information being transported:
a. Reliable transport or couriers shall be used;
b. A list of authorized couriers shall be agreed with management;
c. Procedures to verify the identification of couriers shall be developed;
d. Packaging shall be sufficient to protect the contents from any physical damage likely to arise during transit and in accordance with any manufacturers’ specifications, for example protecting against any environmental factors that may reduce the media’s restoration effectiveness such as exposure to heat, moisture or electromagnetic fields;
e. Logs shall be kept, identifying the content of the media, the protection applied as well as recording the times of transfer to the transit custodians and receipt at the destination.

9.3 Business Continuity Management

Business continuity planning (BCP) and Disaster Recovery Planning is the process involved in creating a system of prevention and recovery from potential threats to a company. The plan ensures that personnel and assets are protected and are able to function quickly in the event of a disaster.

9.3.1 Information Backup

This is the creation of a copy of computer data and stored in a different location so that it may be used to restore the original data in the event of a data loss event

a. MCDA shall define a backup policy to define the organization’s requirements for backup of information, software and systems.
b. When designing a backup plan, the following items shall be taken into consideration:
c. Accurate and complete records of the backup copies and documented restoration procedures
d. The extent [e.g. full or differential backup] and frequency of backups
e. Criticality of the information to the continued operation of the organization;
f. The backups shall be stored in a remote location, at a sufficient distance to escape any physical damage from a disaster at the main site;
g. Backup information shall be given an appropriate level of physical and environmental protection consistent with the standards applied at the main site;
h. Backup media shall be regularly tested to ensure that they can be relied upon for emergency use when necessary; this shall be combined with a test of the restoration procedures and checked against the restoration time required.
i. Testing the ability to restore backed-up data shall be performed onto dedicated test media, not by overwriting the original media in case the backup or restoration process fails and causes irreparable data damage or loss;
j. In situations where confidentiality is of importance, backups shall be protected by means of encryption.
k. Operational procedures shall monitor the execution of backups and address failures of scheduled backups to ensure completeness of backups.
l. Backup arrangements for individual systems and services shall be regularly tested to ensure that they meet the requirements of business continuity plans.
m. Backup arrangements should cover all systems information, applications and data of critical systems that are necessary to recover the complete system in the event of a disaster.
n. The retention period for essential business information shall be determined, taking into account any requirement for archive copies to be permanently retained.
9.3.2 Business Continuity and Disaster Recovery Plan

a. MCDA shall develop, implement and maintain business continuity and disaster recovery plan. Information security requirements shall be determined when planning for business continuity and disaster recovery.

b. The organization shall establish, document, implement and maintain processes, procedures and controls to ensure the required level of continuity for information security during an adverse situation.

c. MCDA shall ensure that:

- Adequate management structure is in place to prepare for, mitigate and respond to a disruptive event using personnel with the necessary authority, experience and competence;
- Incident response personnel with the necessary responsibility, authority and competence to manage an incident and maintain information security are nominated;
- Documented plans, response and recovery procedures are developed and approved, detailing how the organization will manage a disruptive event and will maintain its information security to a predetermined level, based on management-approved information security continuity objectives.

d. MCDA shall establish, document, implement and maintain:

- Information security controls within business continuity or disaster recovery processes, procedures and supporting systems and tools;
- Processes, procedures and implementation changes to maintain existing information security controls during an adverse situation;
- Compensating controls for information security controls that cannot be maintained during an adverse situation;
- Appropriate business continuity plans for recovering from malware attacks, including all necessary data and software backup and recovery arrangements.

e. MCDA shall verify their information security management continuity by exercising and testing the functionality of information security continuity processes, procedures and controls to ensure consistency.

f. MCDA shall identify business requirements for the availability of information systems. Where applicable, redundant information systems shall be tested to ensure the failover from one component to another component works as intended.

9.3.3 Availability

a. Critical MCDA systems shall be designed to be resilient to single failures of infrastructure and application components and as such shall run on robust reliable hardware and software supported by alternative or duplicate facilities.
9.4 Threat and Vulnerability Management

Threat and Vulnerability Management is the cyclical practice of identifying, assessing, classifying, remediating, and mitigating security weaknesses together with fully understanding root cause analysis to address potential flaws in policy, process and, standards

9.4.1 MCDA’s shall develop and maintain an effective management process for technical vulnerabilities

9.4.2 The organization shall define and establish the roles and responsibilities associated with technical vulnerability management, including vulnerability monitoring, vulnerability risk assessment, patching, asset tracking and any coordination responsibilities required;

9.4.3 Information resources that will be used to identify relevant technical vulnerabilities and to maintain awareness about them shall be identified for software and other technology based on the asset inventory list.

9.4.4 Timeline shall be defined to react to notifications of potentially relevant technical vulnerabilities;

9.4.5 Once a potential technical vulnerability has been identified, the organization should identify the associated risks and the actions to be taken; such action could involve patching of vulnerable systems or applying other controls;

9.4.6 Patches shall be tested and evaluated before they are installed on a production system to ensure they are effective and do not result in side effects that cannot be tolerated; if no patch is available, other controls shall be considered, such as:

a. Turning off services or capabilities related to the vulnerability;

b. Adapting or adding access controls, e.g. firewalls, at network borders

c. Increased monitoring to detect actual attacks;

d. Raising awareness of the vulnerability;

9.4.7 The technical vulnerability management process shall be regularly monitored and evaluated in order to ensure its effectiveness and efficiency;

9.4.8 An effective technical vulnerability management process should be aligned with incident management activities, to communicate data on vulnerabilities to the incident response function and provide technical procedures to be carried out should an incident occur;

9.4.9 MCDA shall define a procedure to address the situation where vulnerability has been identified but there is no suitable countermeasure

9.4.10 MCDA shall establish a formal policy prohibiting the use of unauthorized software and implement controls that prevent or detect the use of unauthorized software suspected malicious websites.

9.4.11 MCDA shall establishing a formal policy to protect against risks associated with obtaining files and software either from or via external networks or on any other medium, and reducing vulnerabilities that could be exploited by malware, e.g. through technical vulnerability management.
9.4.12 Regular reviews of the software and data content of systems supporting critical business shall be conducted and the presence of any unapproved files or unauthorized amendments shall be formally investigated.

9.4.13 MCDA shall carry out installation and regular updates of anti-malware software

9.4.14 Procedures and responsibilities to deal with malware protection on systems, training in their use, reporting and recovering from malware attacks shall be defined

9.4.15 The organization shall define and enforce strict policy on which types of software users may install and identify and document what types of software installations are permitted and what types of installations are prohibited.

10.0 HUMAN RESOURCES SECURITY

MCDA's shall ensure that both employees and contractors understand their information security responsibilities and are suitable for the roles for which they are considered.

10.1 Background Screening

This is a pre-employment procedure done to help reassure organizations that they are hiring trustworthy individuals.

10.1.1 MCDA shall conduct background verification checks on all candidates for employment in accordance with relevant laws, regulations and ethics.

10.1.2 The screening shall be proportional to the business requirements, the classification of the information to be accessed and the perceived risks.

10.1.3 Internal promotions that involves the person accessing mission critical assets shall also attract further and more detailed vetting.

10.1.4 MCDA shall have contractual agreements (code of conduct) with their employees and contractors that reflect the organization’s policies for information security.

10.2 In-Service

MCDA shall ensure that all employees and contractors:

10.2.1 Are provided with guidelines to state information security expectations of their role within the organization;

10.2.2 Conform to the terms and conditions of employment, which includes the organization’s information security policies and appropriate methods of working;

10.2.3 Are provided with an anonymous reporting channel to report violations of information security policies or procedures (“whistle blowing”).

10.2.4 There shall be a formal and communicated disciplinary process in place to take action against employees who have committed an information security breach.

10.3 Termination or Change of responsibilities
MCDA shall put in place a framework to protect their interests as part of the process of changing or terminating employment by ensuring.

10.3.1 Termination or change of responsibilities is communicated appropriately to all relevant functions.
10.3.2 All access rights issued shall be disabled or reassigned in accordance to the access control policy

10.4 Information Security Awareness, Public Education and Training

10.4.1 MCDA shall conduct an information security awareness programme in line with the organization’s information security policies and relevant procedures, taking into consideration the organization’s information to be protected and the controls that have been implemented to protect the information.

10.4.2 The awareness programme shall include a number of awareness-raising activities such as public campaigns (e.g. an “information security day”) and issuing booklets or newsletters.

10.4.3 The awareness programme shall be planned taking into consideration the employees’ roles in the organization, and, where relevant, the organization’s expectation of the awareness of contractors.

10.4.4 Information security education and training shall take place annually. Initial education and training applies to those who transfer to new positions or roles with substantially different information security requirements, not just to new starters and should take place before the role becomes active.

10.4.5 An assessment of the employees’ understanding shall be conducted at the end of an awareness, education and training course to test knowledge retention and understanding.

11.0 OPERATIONAL SECURITY

MCDA shall ensure correct and secure operations of information processing facilities.

11.1 Access Control

Control mechanisms based on business owner requirements and assessed/accepted risks for controlling access to all information assets and ICT assets have been established

11.1.1 Access control policy

This outlines controls placed on both physical access to the computer system and to the software in order to limit access to computer networks and data.

a. MCDA shall establish, document and review an access control policy based on business and information security requirements. The policy shall take account of the following:

b. Security requirements of business applications;
c. Information dissemination and authorization considering least privilege, the need to know and information security levels and classification of information

d. Consistency between the access rights and information classification policies of systems and networks;

e. Relevant legislation and any contractual obligations regarding limitation of access to data or services

f. Management of access rights in a distributed and networked environment which recognizes all types of connections available;

g. Segregation of access control roles, e.g. access request, access authorization, access administration;

h. Requirements for formal authorization of access requests

i. Requirements for periodic review of access rights

j. Requirements for disabling and removal of access rights

k. Archiving of records of all significant events concerning the use and management of user identities and secret authentication information;

l. Roles with privileged access

m. Role based provisioning of accounts

11.1.2 Access to networks and network services

MCDA shall develop a policy concerning the use of networks and network services. This policy shall cover:

a. The networks and network services which are allowed to be accessed;

b. Authorization procedures for determining who is allowed to access which networks and networked services;

c. Management controls and procedures to protect access to network connections and network services;

d. The means used to access networks and network services (e.g. use of VPN or wireless network);

e. User authentication requirements for accessing various network services;

f. Monitoring of the use of network services.

g. The policy on the use of network services should be consistent with the organization’s Access Control Policy.

11.1.3 Access control to program source code

a. MCDA shall document the following guidelines to control access to such program source libraries in order to reduce the potential for corruption of computer programs:

b. Where possible, program source libraries shall not be held in operational programs;

c. The program source code and the program source libraries shall be managed according to established procedures;

11.2 Support personnel should not have unrestricted access to program source libraries;

11.3 The updating of program source libraries and associated items and the issuing of program sources to programmers shall only be performed after appropriate authorization has been received;

11.4 Program listings shall be held in a secure environment;
11.5 An audit log should be maintained of all accesses to program source libraries;
11.6 Maintenance and copying of program source libraries shall be subject to strict change control procedures;
11.7 If the program source code is intended to be published, additional controls to help getting assurance on its integrity (e.g. digital signature) should be considered.

11.8 User access management

This is the administration of giving individual users in a system access to the resources they need at the as and when needed, this usually includes access to applications, permissions, and security requirements

11.8.1 User registration and de-registration

a. MCDA shall develop a formal user registration and de-registration process to enable assignment of access rights. The process for managing user IDs should include:

- Using unique user IDs to enable users to be linked to and held responsible for their actions; the use of shared IDs should only be permitted where they are necessary for business or operational reasons and should be approved and documented;
- Immediately disabling or removing user IDs of users who have left the organization;
- Periodically identifying and removing or disabling redundant user IDs;
- Ensuring that redundant user IDs are not issued to other users.

11.8.2 User access provisioning

The provisioning process for assigning or revoking access rights granted to user IDs shall include:

- Obtaining authorization from the owner of the information system or service for the use of the information system or service;
- Separate approval for access rights from management may also be appropriate;
- Verifying that the level of access granted is appropriate to the access policies and is consistent with other requirements such as segregation of duties;
- Ensuring that access rights are not activated (e.g. by service providers) before authorization procedures are completed;
- Maintaining a central record of access rights granted to a user ID to access information systems and services;
- Adapting access rights of users who have changed roles or jobs and immediately removing or blocking access rights of users who have left the organization;
- Periodically reviewing access rights with owners of the information systems or services.

11.8.3 Managed privileged access rights

MCDA shall ensure the allocation of privileged access rights is controlled through a formal authorization process in accordance with the relevant access control policy. The following steps shall be considered:

- The privileged access rights associated with each system or process, e.g. operating system, database management system and each application and the users to whom they need to be allocated should be identified;
b. Privileged access rights shall be allocated to users on a need-to-use basis and on an event-by-event basis in line with the access control policy i.e. based on the minimum requirement for their functional roles;

c. An authorization process and a record of all privileges allocated should be maintained. Privileged access rights shall not be granted until the authorization process is complete;

d. Requirements for expiry of privileged access rights shall be defined;

e. Privileged access rights shall be assigned to a user ID different from those used for regular business activities. Regular business activities shall not be performed from privileged ID;

f. The competences of users with privileged access rights shall be reviewed regularly in order to verify if they are in line with their duties;

g. Specific procedures should be established and maintained in order to avoid the unauthorized use of generic administration user IDs, according to systems’ configuration capabilities;

h. For generic administration user IDs, the confidentiality of secret authentication information shall be maintained when shared (e.g. changing passwords frequently and as soon as possible when a privileged user leaves or changes job, communicating them among privileged users with appropriate mechanisms).

11.8.4 Management of secret authentication information of users

a. MCDA shall document a formal management process for the allocation of secret authentication information. It shall include the following:

a. Users shall be required to sign a statement to keep personal secret authentication information confidential and to keep group (i.e. shared) secret authentication information solely within the members of the group; this signed statement may be included in the terms and conditions of employment

b. When users are required to maintain their own secret authentication information they shall be provided initially with secure temporary secret authentication information”, which they are forced to change on first use;

c. Procedures shall be established to verify the identity of a user prior to providing new, replacement or temporary secret authentication information;

d. Temporary secret authentication information should be given to users in a secure manner; the use of external parties or unprotected (clear text) electronic mail messages should be avoided;

e. Temporary secret authentication information should be unique to an individual and shall not be guessable;

f. Users shall acknowledge receipt of secret authentication information;
g. Default vendor secret authentication information shall be altered following installation of systems or software.

h. MCDA shall also use passwords for secret authentication information. Other types of secret authentication information are cryptographic keys and other data stored on hardware tokens (e.g. smart cards) that produce authentication codes.

11.8.5 Review of user access rights

a. MCDA shall review users’ access rights at regular intervals. The review of access rights shall consider the following:

a. Users’ access rights should be reviewed at regular intervals and after any changes, such as promotion, demotion or termination of employment;

b. User access rights shall be reviewed and re-allocated when moving from one role to another within the same organization;

c. Authorizations for privileged access rights should be reviewed at more frequent intervals;

d. Privilege allocations should be checked at regular intervals to ensure that unauthorized privileges have not been obtained;

e. Changes to privileged accounts should be logged for periodic review.

11.8.6 Removal or adjustment of access rights

a. The access rights of all employees and external party users to information and information processing facilities shall be removed upon termination of their employment, contract or agreement, or adjusted upon change.

11.9 User responsibilities

IT user responsibilities are set up by an IT systems administrator, and specifies what applications a user may access; transactions they may perform and what data they may access and carry out transactions on.

11.9.1 Use of secret authentication information

All users shall be advised to:

a. Keep secret authentication information confidential, ensuring that it is not divulged to any other parties, including people of authority;

b. Avoid keeping a record (e.g. on paper, software file or hand-held device) of secret authentication information, unless this can be stored securely and the method of storing has been approved (e.g. password vault);

c. Change secret authentication information whenever there is any indication of its possible compromise;

d. When passwords are used as secret authentication information, select quality passwords with sufficient minimum length which are:

a) Easy to remember;

b) Not based on anything somebody else could easily guess or obtain using person related information, e.g. names, telephone numbers and dates of birth etc.;

c) Not vulnerable to dictionary attacks (i.e. do not consist of words included in dictionaries);
d) Free of consecutive identical, all-numeric or all-alphabetic characters;
e) If temporary, changed at the first log-on;
f) Not share individual user’s secret authentication information;
e. Ensure proper protection of passwords when passwords are used as secret authentication information in automated log-on procedures and are stored;
f. Not use the same secret authentication information for business and non-business purposes.

11.10 Information access restriction

The MCDA shall;

11.10.1 Implement restrictions to access based on individual business application requirements and in accordance with the defined access control policy and consider the following in order to support access restriction requirements:

11.10.2 Providing menus to control access to application system functions;

11.10.3 Controlling which data can be accessed by a particular user;

11.10.4 Controlling the access rights of users, e.g. read, write, delete and execute;

11.10.5 Controlling the access rights of other applications;

11.10.6 Limiting the information contained in outputs, applications or systems.

11.11 Child Online Protection

MCDÁs will ensure that they enforce child online safety policy on Internet use that includes the operation of a technology protection measure that protects children on-line.

The MCDA shall;

11.11.1 Protect access by minors to inappropriate matter on the Internet;

11.11.2 Ensure the Safety and security of minors when using electronic mail, chat rooms and other forms of direct electronic communications under their responsibility;

11.11.3 Control unauthorized access and other unlawful activities by minors online;

11.11.4 Control unauthorized disclosure, use, and dissemination of personal information regarding minors; and

11.11.5 Provide Measures restricting minors’ access to materials harmful to them.
11.12 Digital Values and Education.

MCDA shall incorporate positive values in all their mentorship programs as a means of ensuring a responsible and technology savvy generation.

11.13 Secure log-on procedures

MCDA shall
11.13.1 Design a procedure for logging into a system to minimize the opportunity for unauthorized access. The log-on procedure shall disclose the minimum information about the system or application, in order to avoid providing an unauthorized user with any unnecessary assistance. The procedure shall address

11.13.2 Not display system or application identifiers until the log-on process has been successfully completed;

11.13.3 Display a general notice warning that the computer should only be accessed by authorized users;

11.13.4 Not provide help messages during the log-on procedure that would aid an unauthorized user;

11.13.5 Validate the log-on information only on completion of all input data. If an error condition arises, the system shall not indicate which part of the data is correct or incorrect;

11.13.6 Protect against brute force log-on attempts;

11.13.7 Log unsuccessful and successful attempts;

11.13.8 Raise a security event if a potential attempted or successful breach of log-on controls is detected;

11.13.9 Display the following information on completion of a successful log-on:
11.13.10 Date and time of the previous successful log-on;

11.13.11 Details of any unsuccessful log-on attempts since the last successful log-on;

11.13.12 Not display a password being entered;

11.13.13 Not transmit passwords in clear text over a network;

11.13.14 Terminate inactive sessions after a defined period of inactivity, especially in high risk locations such as public or external areas outside the organization’s security management or on mobile devices;

11.13.15 Restrict connection times to provide additional security for high-risk applications and reduce the window of opportunity for unauthorized access.

11.14 Password Management system

MCDA shall establish a password management system which shall;
11.14.1 Enforce the use of individual user IDs and passwords to maintain accountability;

11.14.2 Allow users to select and change their own passwords and include a confirmation procedure to allow for input errors;

11.14.3 Enforce the password policy;

11.14.4 Not display passwords on the screen when being entered;

11.14.5 Store password files separately from application system data;
11.14.6 Store and transmit passwords in protected form.
11.14.7 Allow users to select and change their own passwords and include a confirmation procedure to allow for input errors;

11.15 Use of privileged utility programs

In case MCDA is using utility program, the following shall be considered and documented:

11.15.1 Use of identification, authentication and authorization procedures for utility programs;
11.15.2 Segregation of utility programs from applications software;
11.15.3 Limitation of the use of utility programs to the minimum practical number of trusted, authorized users
11.15.4 Authorization for ad hoc use of utility programs;
11.15.5 Limitation of the availability of utility programs, e.g. for the duration of an authorized change;
11.15.6 Logging of all use of utility programs;
11.15.7 Defining and documenting of authorization levels for utility programs;
11.15.8 Removal or disabling of all unnecessary utility programs;
11.15.9 Not making utility programs available to users who have access to applications on systems where segregation of duties is required.

11.16 Change Management

MCDA shall ensure the following:
11.16.1 Identification and recording of significant changes;
11.16.2 Planning and testing of changes;
11.16.3 Assessment of the potential impacts, including information security impacts, of such changes;
11.16.4 Verification that information security requirements have been met;
11.16.5 Communication of change details to all relevant persons;
11.16.6 Fall-back procedures, including procedures and responsibilities for aborting and recovering from unsuccessful changes and unforeseen events;
11.16.7 Provision of an emergency change process to enable quick and controlled implementation of changes needed to resolve an incident;
11.16.9 An audit log containing all relevant information shall be retained.

11.17 Incident Management

Incident management is the process of describing the activities of an organization to identify, analyze, and correct hazards to prevent a future re-occurrence of ICT incidences.

11.17.1 Management of information security incidents and improvements
a. MCDA shall ensure a consistent and effective approach to the management of information security incidents, including communication on security events and weaknesses.

11.17.2 Responsibilities and procedures

a. MCDA shall establish management responsibilities and procedures to ensure a quick, effective and orderly response to information security incidents.
b. Management responsibilities shall be established to ensure that the following procedures are developed and communicated adequately within the organization:

a) Procedures for incident response planning and preparation;
b) Procedures for monitoring, detecting, analyzing and reporting of information security events and incidents;
c) Procedures for logging incident management activities;
d) Procedures for handling of forensic evidence;
e) Procedures for assessment of and decision on information security events and assessment of information security weaknesses;
f) Procedures for response including those for escalation, controlled recovery from an incident and communication to internal and external people or organizations;

c. Procedures established shall ensure that:

a. competent personnel handle the issues related to information security incidents within the organization;
b. a point of contact for security incidents’ detection and reporting is implemented;
c. appropriate contacts with relevant entities, external interest groups or forums that handle the issues;
d. related to information security incidents are maintained;
d. Reporting procedures

MCDA shall

a. Ensure all employees and contractors shall be made aware of their responsibility to report information security events as quickly as possible.
b. Establish an internal process for identifying and reporting security incidents.
c. Create awareness to employees on its internal incident reporting process.
d. Establish a suitable feedback processes to ensure that those persons reporting information security events are notified of results after the issue has been dealt with and closed.

11.17.3 Assessment of information security events

a. Information security events shall be assessed and it shall be decided if they are to be classified as information security incidents.
b. The point of contact shall assess each information security event using the agreed information security event and incident classification scale and decide whether the event
shall be classified as an information security incident.
c. Classification and prioritization of incidents can help to identify the impact and extent of an incident.
d. In cases where the organization has an information security incident response team (ISIRT), the assessment and decision can be forwarded to the ISIRT for confirmation or reassessment.
e. Results of the assessment and decision shall be recorded in detail for the purpose of future reference and verification.

11.17.4 Response to information security incidents

a. MCDA shall document procedures for response to information security incidents which shall include the following:
   a. Collecting evidence as soon as possible after the occurrence;
   b. Conducting information security forensics analysis
   c. Escalate as required;
   d. Ensuring that all involved response activities are properly logged for later analysis;
   e. Communicating the existence of the information security incident or any relevant details thereof to other internal and external people or organizations with a need-to-know;
   f. Dealing with information security weakness(es) found to cause or contribute to the incident;
   g. Once the incident has been successfully dealt with, formally closing and recording it.
   h. Post-incident analysis should take place, as necessary, to identify the source of the incident.

11.17.5 Learning from information security incidents

a. Knowledge gained from analyzing and resolving information security incidents shall be documented and used to reduce the likelihood or impact of future incidents.
b. There shall be mechanisms in place to enable the types, volumes and costs of information security incidents to be quantified and monitored. The information gained from the evaluation of information security incidents should be used to identify recurring or high impact incidents.

11.17.6 Collection of digital evidence

a. The organization shall define and apply procedures for the identification, collection, acquisition and preservation of information, which can serve as evidence.
b. Where available, certification or other relevant means of qualification of personnel and tools shall be sought, so as to strengthen the value of the preserved evidence.
c. The procedures shall take account of:
   a) chain of custody;
   b) safety of evidence;
   c) safety of personnel;
   d) roles and responsibilities of personnel involved;
   e) competency of personnel;
   f) documentation;
   g) incident briefing
11.18 Event Monitoring

This is a log of information that is analyzed and monitored for higher level intelligence. It captures many different types of system information relating to transactions, access, etc. Logs from mission critical systems shall be stored for a minimum duration of 12 months.

11.18.1 Event logging

a. Event logs recording user activities, exceptions, faults and information security events for mission critical systems shall be produced, kept and regularly reviewed by MCDA.

b. Event logs shall include:
   a) user identification;
   b) system activities;
   c) dates, times and details of key events, e.g. log-on and log-off;
   d) device identity or location if possible and system identifier;
   e) records of successful and rejected system access attempts;
   f) records of successful and rejected data and other resource access attempts;
   g) changes to system configuration;
   h) use of privileges;
   i) use of system utilities and applications;
   j) files accessed and the kind of access;
   k) network addresses and protocols;
   l) alarms raised by the access control system;
   m) activation and de-activation of protection systems, such as anti-virus systems and intrusion detection systems;
   n) records of transactions executed by users in applications.

c. Event logs can contain sensitive data and personally identifiable information. Appropriate privacy protection measures shall be taken.

d. System administrators shall not have permission to erase or de-activate logs of their own activities.

11.18.2 Protection of log information

a. Logging facilities and log information shall be protected against tampering and unauthorized access.

b. Controls shall aim to protect against unauthorized changes to log information and operational problems with the logging facility including:

   a) alterations to the message types that are recorded;
   b) log files being edited or deleted;
   c) storage capacity of the log file media being exceeded, resulting in either the failure to record events or over-writing of past recorded events.

11.18.3 Administrator and operator logs

a. System administrator and system operator activities shall be logged and the logs
protected and regularly reviewed.

11.18.4 Clock synchronization

a. External and internal requirements for time representation, synchronization and accuracy shall be documented.

b. A standard reference time for use within the organization shall be defined. The organization’s approach to obtaining a reference time from external source[s] and how to synchronize internal clocks reliably shall be documented and implemented.

12.0 PHYSICAL AND ENVIRONMENTAL SECURITY

In putting measures to protect systems, buildings, and related supporting infrastructure against threats associated with their physical environment, the MCA shall ensure;

12.1.1 Security perimeters or areas that contain either sensitive or critical information or information processing facilities are defined.

12.1.2 The date and time of entry and departure of visitors shall be recorded, and all visitors shall be supervised.

12.1.3 Access to areas where confidential information is processed or stored shall be restricted to authorized individuals.

12.1.4 All employees, contractors and external parties shall be required to wear some form of visible identification and shall immediately notify security personnel if they encounter unescorted visitors and anyone not wearing visible identification.

12.1.5 External party support service personnel shall be granted restricted access to secure areas or information processing facilities only when required; this access shall be authorized and monitored.

12.1.6 Access rights to secure areas shall be regularly reviewed and updated, and revoked when necessary.

12.1.7 Establish measures to protect against external and environmental threats such as earthquake, explosion, civil unrest and other forms of natural or man-made disaster.

12.1.8 Buildings shall be unobtrusive and give minimum indication of their purpose, with no obvious signs, outside or inside the building, identifying the presence of information processing activities;

12.1.9 Directories and internal telephone books identifying locations of information processing facilities shall not be readily accessible to anyone unauthorized.

12.1.10 Access to a delivery and loading area from outside of the building shall be restricted to identified and authorized personnel;
12.1.11 The delivery and loading area shall be designed so that supplies can be loaded and unloaded without delivery personnel gaining access to other parts of the building;

12.1.12 The external doors of a delivery and loading area shall be secured when the internal doors are opened;

12.1.13 Incoming material shall be inspected and examined for explosives, chemicals or other hazardous materials, before it is moved from a delivery and loading area;

12.1.14 The following cabling security controls shall be implemented

a. Power and telecommunications lines into information processing facilities shall be underground, where possible, or subject to adequate alternative protection;
b. Power cables shall be segregated from communications cables to prevent interference;
c. For sensitive or critical systems further controls to consider include:
   I. Installation of armored conduit and locked rooms or boxes at inspection and termination points;
   II. Use of electromagnetic shielding to protect the cables;
   III. Initiation of technical sweeps and physical inspections for unauthorized devices being attached to the cables;
   IV. Controlled access to patch panels and cable rooms.

12.1.15 Establish procedures for secure removal of assets from information processing facilities.

12.1.16 The use of any mission critical information storing and processing equipment outside the organization’s premises shall be authorized by management. This applies to equipment owned by the organization and that equipment owned privately and used on behalf of the organization.

12.1.17 Packaging shall be sufficient to protect the contents from any physical damage likely to arise during transit and in accordance with any manufacturers’ specifications, for example protecting against any environmental factors that may reduce the media’s restoration effectiveness such as exposure to heat, moisture or electromagnetic fields;

12.1.18 Logs shall be kept, identifying the content of the media, the protection applied as well as recording the times of transfer to the transit custodians and receipt at the destination.
13.0 CLOUD SECURITY

Cloud computing is the on-demand availability of computer data storage and computing power system resources without direct active management by the user. This mainly defines data centers available to many users over the Internet.

MCDA’s shall ensure

13.1.1 Effective governance, risk and compliance are catered for by ensuring the following measures are taken into consideration;

13.1.2 Risk assessment of the cloud solution has been undertaken and the controls to the risks have been implemented

13.1.3 Continued availability of the information systems and data by considering business continuity planning that seeks to prevent interruption of mission-critical services, and to reestablish full functionality.

13.1.4 Integrity of the information stored within the system and while on transit

13.1.5 Confidentiality of sensitive data while stored and in transit

13.1.6 Conformity to applicable laws and regulations

13.1.7 If possible include a right of audit in the contract

13.1.8 Request proof of independent security reviews and certification reports that meet the MCDA compliance requirement

13.1.9 The use of private cloud deployment model only, no multi-tenancy, for additional security

13.1.10 The MCDA in safeguarding its interest shall also ensure that the following policies are effected:

a. Privacy policy - A privacy policy document informs readers how a technology or other product or service will use an MCDA’s personal information. The term privacy policy is often used because many IT systems gather and use personal information from users in many different ways. It is important to ensure that a privacy policy is in place to protect or cover the MCDA against this risk of exposure.

b. Confidentiality policy - The purpose of a Confidentiality Policy is to lay down the principals that must be observed by all that have access to information on the cloud service mostly confidential information.

c. Data Sovereignty laws - Data sovereignty is the idea that data is subject to the laws and governance structures within the nation it is collected or stored.

d. Data integrity (data modification) policy - Data integrity is the maintenance and assurance of data accuracy and consistency over its entire life-cycle
14.0 CRYPTOGRAPHY

Cryptography refers to secure information and communication techniques derived from mathematical concepts and a set of rule-based calculations called algorithms that are used to transform messages in ways that are hard to decipher. The objective is to protect confidentiality, Authenticity or Integrity of Information.

14.1 Cryptographic controls

14.1.1 The MCDA shall develop and implement a policy on the use of encryption for protection of information. The policy shall address the following:

a. Use of cryptographic controls
b. Principles under which business information should be protected
c. Type, strength and quality of the encryption algorithm required
d. The use of encryption on information transported by mobile or removable media devices or across communication lines
e. Methods to deal with the protection of cryptographic keys and the recovery of encrypted information.
f. Roles and responsibilities
g. Standards to be adopted
h. The impact of using encrypted information on controls

14.1.2 The MCDA shall consult relevant authorities to get specialist advice in selecting appropriate cryptographic controls.

14.2 Key Management

Key management is the process of administering or managing cryptographic keys. It involves the generation, creation, protection, storage, exchange, replacement and use of specific security keys and with another type of security system built into large cryptosystems, enables selective restriction for certain keys.

14.2.1 Government entity shall develop and implement a policy on the use, protection and lifetime of cryptographic keys. The policy shall be based on agreed set of standards, procedures and secure methods for generating and managing keys.

14.2.2 Activation and deactivation dates for keys shall be defined to reduce the likelihood of improper use.

14.2.3 The authenticity of public keys shall also be considered to securely manage secret and private keys.
14.2.4 The contents of service level agreements or contracts with external suppliers of cryptographic services, e.g. with ICT authority, shall cover issues of liability, reliability of services and response times for the provision of services.

14.2.5 Procedures may need to be considered for handling legal requests for access to cryptographic keys.

14.3 Digital Signatures

A digital signature is a mathematical technique used to validate the authenticity and integrity of a message, software or digital document.

14.3.1 MCDA proposing to use Digital Signature shall use digital signature certificates duly issued by a licensed certifying authority.

14.3.2 MCDA shall define the roles and responsibility of various users for the usage of Digital Signature and their revocation.

14.3.3 In case a Digital Signature Certificate is compromised, the signature owner shall immediately contact the respective Certifying Authority to initiate revocation.

15.0 THIRD PARTY RELATIONSHIPS

Third party is someone who may be indirectly involved but is not a principal party to an arrangement, in this context, third party will mostly refer to vendors and suppliers that work with MCDA’s to provide ICT goods and services.

15.1 Information security in supplier relationships

15.1.1 Information security policy for supplier relationships

a. MCDA shall agree with suppliers and document policies for supplier’s access to the organization’s assets.

b. These controls shall address processes and procedures to be implemented by the MCDA, as well as those processes and procedures that the MCDA shall require the supplier to implement, including:

c. Identifying and documenting the types of suppliers, e.g. IT services, logistics utilities, financial services, IT infrastructure components, whom the MCDA will allow to access its information;

d. A standardized process and lifecycle for managing supplier relationships; defining the types of information access that different types of suppliers will be allowed, and monitoring and controlling the access;

e. Minimum information security requirements for each type of information and type of access to be granted.
f. Serve as the basis for individual supplier agreements based on the organization’s business needs and requirements and its risk profile;

g. Processes and procedures for monitoring adherence to established information security requirements for each type of supplier and type of access, including third party review and product validation;

h. Accuracy and completeness controls to ensure the integrity of the information or information processing provided by either party;

i. Types of obligations applicable to suppliers to protect the organization’s information;

j. Handling incidents and contingencies associated with supplier access including responsibilities of both the organization and suppliers;

k. Resilience and, if necessary, recovery and contingency arrangements to ensure the availability of the information or information processing provided by either party;

l. Awareness training for the organization’s personnel involved in acquisitions regarding applicable policies, processes and procedures;

m. Awareness training for the organization’s personnel interacting with supplier personnel regarding appropriate rules of engagement and behavior based on the type of supplier and the level of

n. Supplier access to the organization’s systems and information; Conditions under which information security requirements and controls will be documented in an agreement signed by both parties;

o. Managing the necessary transitions of information, information processing facilities and anything else that needs to be moved, and ensuring that information security is maintained throughout the transition period.

15.1.2 Addressing security within supplier agreements

a. Supplier agreements shall be established and documented to ensure that there is no misunderstanding between the organization and the supplier regarding both parties’ obligations to fulfil relevant information security requirements.

b. The following terms shall be considered for inclusion in the agreements in order to satisfy the identified information security requirements:

c. Description of the information to be provided or accessed and methods of providing or accessing the information;

d. Classification of information according to the organization’s classification scheme if necessary also mapping between the organization’s own classification scheme and the classification scheme of the supplier;
e. Legal and regulatory requirements, including data protection, intellectual property rights and copyright, and a description of how it will be ensured that they are met;

f. Obligation of each contractual party to implement an agreed set of controls including access control, performance review, monitoring, reporting and auditing;

g. Rules of acceptable use of information, including unacceptable use if necessary

h. Either explicit list of supplier personnel authorized to access or receive the organization’s information or procedures or conditions for authorization, and removal of the authorization, for access to or receipt of the organization’s information by supplier personnel;

i. Information security policies relevant to the specific contract;

j. Incident management requirements and procedures (especially notification and collaboration during incident remediation);

k. Training and awareness requirements for specific procedures and information security requirements, e.g. for incident response, authorization procedures;

l. Relevant regulations for sub-contracting, including the controls that need to be implemented;

m. Relevant agreement partners, including a contact person for information security issues;

n. Screening requirements, if any, for supplier’s personnel including responsibilities for conducting the screening and notification procedures if screening has not been completed or if the results give cause for doubt or concern;

o. Right to audit the supplier processes and controls related to the agreement;

p. Defect resolution and conflict resolution processes Supplier’s obligation to periodically deliver an independent report on the effectiveness of controls and agreement on timely correction of relevant issues raised in the report;

q. Supplier’s obligations to comply with the organization’s security requirements.

15.1.3 Information and communication technology supply chain

a. Agreements with suppliers shall include requirements to address the information security risks associated with information and communications technology services and product supply chain.

b. The following topics shall be considered for inclusion in supplier agreements concerning supply chain security:

c. Defining information security requirements to apply to information and communication technology product or service acquisition in addition to the general information security requirements for supplier relationships;
d. For information and communication technology services, requiring that suppliers propagate the organization’s security requirements throughout the supply chain if suppliers subcontract for parts of information and communication technology service provided to the organization;

e. For information and communication technology products, requiring that suppliers propagate appropriate security practices throughout the supply chain if these products include components purchased from other suppliers;

f. Implementing a monitoring process and acceptable methods for validating that delivered information and communication technology products and services are adhering to stated security requirements;

g. Implementing a process for identifying product or service components that are critical for maintaining functionality and therefore require increased attention and scrutiny when built outside of the organization especially if the top tier supplier outsources aspects of product or service components to other suppliers;

h. Obtaining assurance that critical components and their origin can be traced throughout the supply chain;

i. Obtaining assurance that the delivered information and communication technology products are functioning as expected without any unexpected or unwanted features;

j. Defining rules for sharing of information regarding the supply chain and any potential issues and compromises among the organization and suppliers;

k. Implementing specific processes for managing information and communication technology component lifecycle and availability and associated security risks

l. This includes managing the risks of components no longer being available due to suppliers no longer being in business or suppliers no longer providing these components due to technology advancements

15.2 Supplier service delivery management

15.2.1 MCDA’s shall regularly monitor, review and audit supplier service delivery and shall involve:

a. Monitoring service performance levels to verify adherence to the agreements;

b. Reviewing service reports produced by the supplier and arrange regular progress meetings as required by the agreements;

c. Conducting audits of suppliers, in conjunction with review of independent auditor’s reports, if available, and follow-up on issues identified;

d. Providing information about information security incidents and review this information as required by the agreements and any supporting guidelines and procedures;
e. Reviewing supplier audit trails and records of information security events, operational problems, failures, tracing of faults and disruptions related to the service delivered;

f. Resolving and manage any identified problems;

g. Review information security aspects of the supplier’s relationships with its own suppliers;

h. Ensuring that the supplier maintains sufficient service capability together with workable plans designed to ensure that agreed service continuity levels are maintained following major service failures or disaster

16.0 COMPLIANCE

16.1 Identification of applicable legislation and contractual requirements

16.1.1 MCDA shall avoid breach of legal, statutory, regulatory or contractual obligations related to information security and of any security requirements.

16.1.2 All relevant legislative statutory, regulatory, contractual requirements and the MCDA’s approach to meet these requirements shall be explicitly documented and kept up to date for each information system and the organization

16.1.3 The controls and individual responsibilities to meet these requirements shall also be documented.

16.1.4 Managers shall identify all legislation applicable to their MCDA in order to meet the requirements for their type of business.

16.2 Intellectual property rights

16.2.1 The following guidelines shall be considered to protect any material that may be considered intellectual property:

a. Publishing an intellectual property rights compliance policy which the legal use of software and information products;

b. Acquiring software only through known and reputable sources, to ensure that copyright is not violated;

c. Maintaining awareness of policies to protect intellectual property rights and giving notice of the intent to take disciplinary action against personnel breaching them;

d. Maintaining appropriate asset registers and identifying all assets with requirements to protect intellectual property rights;

e. Maintaining proof and evidence of ownership of licenses, master disks, manuals, etc.;

f. Implementing controls to ensure that any maximum number of users permitted within the license is not exceeded;
g. Carrying out reviews that only authorized software and licensed products are installed; - Providing a policy for maintaining appropriate license conditions; - Providing a policy for disposing of or transferring software to others;

h. Complying with terms and conditions for software and information obtained from public networks;

i. Not duplicating, converting to another format or extracting from commercial recordings audio| other than permitted by copyright law;

j. Not copying in full or in part, books, articles, reports or other documents, other than permitted by copyright law.

16.3 Protection of records

16.3.1 To meet these record safeguarding objectives, the following steps should be taken within an organization:

a. Guidelines shall be issued on the retention, storage, handling and disposal of records and information;

b. A retention schedule shall be drawn up identifying records and the period of time for which they shall be retained;

16.4 Privacy and protection of personally identifiable information

16.4.1 MCDA shall develop and implement a data policy for privacy and protection of personally identifiable information This policy shall be communicated to all persons involved in the processing of personally identifiable information.

16.5 Compliance with security policies and standards

16.5.1 Managers shall regularly review the compliance of information processing and procedures within their area of responsibility with the appropriate security policies, standards and any other security requirements.

16.5.2 Managers shall identify how to review that information security requirements in policies, standards and other applicable regulations are met. Automatic measurement and reporting tools shall be considered for regular review.

If any non-compliance is found as a result of the review, managers shall:

a. Identify the causes of the non-compliance;

b. Evaluate the need for actions to achieve compliance;

c. Implement appropriate corrective action;

d. Review the corrective action taken to verify its effectiveness and identify any or weaknesses.
### 17.0 APPENDIX I: COMPLIANCE CHECKLIST FOR INFORMATION SECURITY

<table>
<thead>
<tr>
<th>Sub-domain</th>
<th>Subject</th>
<th>Requirement</th>
<th>Compliance (Yes/No)</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Information Security</td>
<td>Information security policy</td>
<td>1 An information security policy exists</td>
<td>Yes</td>
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<td>Governance and Management</td>
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<td>2 All mandatory clauses in the standard can be located in the information security policy</td>
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<td>3 There has been consultation across major business areas within the MCDA</td>
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<td>4 Business requirements have been documented within the policy</td>
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<td>5 A risk assessment has been documented and the results have informed the development of the policy</td>
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<td>6 Legislative requirements relevant to the MCDA have been documented within the policy</td>
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<td>7 Staff are aware of and trained in the use of the policy with refresher courses available</td>
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<tr>
<td>Information Security Plan</td>
<td></td>
<td>8 The policy can be easily accessed by all employees</td>
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<td>9 Senior Executive signoff/endorsement can be located within the policy or brief</td>
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<td></td>
<td></td>
<td>10 The date of the policy’s last review is no more than 24 months old</td>
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<td>11 The date for the policy’s next review is documented within the policy, and appropriate review mechanisms in place</td>
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<tr>
<td>Information Security</td>
<td>Information security plan</td>
<td>12 An information security plan exists</td>
<td>Yes</td>
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<td></td>
<td></td>
<td>There has been consultation across major business areas within the MCDA and business requirements have been documented within the plan</td>
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<tr>
<td>13</td>
<td></td>
<td>A risk assessment has been documented and the results have informed the development of the plan</td>
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<tr>
<td>14</td>
<td></td>
<td>A threat and risk assessment has been conducted and documented for all ICT assets that create, store, process or transmit security classified information. The date of the last assessment is no more than 12 months old</td>
<td></td>
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<tr>
<td>15</td>
<td>Governance</td>
<td>Senior executive management group agenda/minutes include information security matters</td>
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<tr>
<td>16</td>
<td></td>
<td>There's an information security steering committee</td>
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<td>17</td>
<td></td>
<td>Information security roles and responsibilities documented and approved by senior executive management</td>
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<td>18</td>
<td></td>
<td>Employees with information security roles and responsibilities have signed a document stating that they understand their roles and responsibilities</td>
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<tr>
<td>19</td>
<td>External Party Governance</td>
<td>Standard templates for service level agreement and operational level agreements include clauses dealing with information security requirements</td>
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<tr>
<td>21</td>
<td>Minutes of Information security steering committee meetings include outcomes of routine checks on inclusion of information security requirements in SLAs, and audits to ensure third party adherence to these agreements</td>
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<tr>
<td>22</td>
<td>Risk management plan has been put in place that includes identification, qualification and prioritisation of risks against acceptance criteria and identifies appropriate controls to protect against risks.</td>
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<tr>
<td>23</td>
<td>Risk analysis against the agencies information Asset register has been completed</td>
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<tr>
<td>24</td>
<td>MCDA Records Management Program in Place. MCDA has an Information Management Policy outlining governance arrangements, roles and responsibilities of all staff for the management of information</td>
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<tr>
<td>25</td>
<td>Records Manager appointed with up to date statement of duties</td>
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<tr>
<td>26</td>
<td>Information asset register in place, Information Owners and Custodians are identified on the register. MCDA has security classified each asset.</td>
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<tr>
<td>27</td>
<td>Procedures for the protective control of information assets have been documented and approved by the Information security committee.</td>
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<td>29</td>
<td>An ICT asset register exists, that documents the security classification of application and technology assets (in accordance with the policy and the manual or in the case of national security information relevant national arrangements) and the corresponding controls that are applied to that asset (actual controls may be documented elsewhere)</td>
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<tr>
<td>30</td>
<td>ICT asset register has been completed and is updated at least annually</td>
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<tr>
<td>31</td>
<td>ICT asset register identifies the ICT asset custodian for all assets</td>
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<tr>
<td><strong>Information Security Classification</strong></td>
<td><strong>32</strong></td>
<td>Procedures for the classification of information assets have been documented and approved by the Information security committee</td>
<td></td>
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<tr>
<td><strong>33</strong></td>
<td>MCDA has a complete information asset register, where all information assets are assigned a classification, or in the case of national security information, as per national arrangements</td>
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<tr>
<td>34</td>
<td>The information security classification policy and procedure document state that legislative obligations override the classification scheme. For example, the security classification of an information asset does not prevent it from being considered for release under the freedom of information</td>
<td></td>
<td></td>
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<tr>
<td>Physical Environment Security</td>
<td>Building controls and security areas</td>
<td>35</td>
<td>Physical security protection controls (commensurate with the security classification of information levels) have been implemented for all offices, rooms, storage facilities and cabling infrastructure in line with the standards</td>
<td></td>
</tr>
<tr>
<td>Asset Management</td>
<td>36</td>
<td>Control policies (including clear desk/clear screen) has been implemented in information processing areas that deal with security classified information</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Asset Management</td>
<td>37</td>
<td>MCDA equipment is located in secure areas. Records of routine checks confirm that these areas are accessible only to authorised personnel</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Asset Management</td>
<td>38</td>
<td>MCDA information security policies address the protection and monitoring of ICT assets that are offsite</td>
<td></td>
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</tr>
<tr>
<td>Asset Management</td>
<td>39</td>
<td>Policies are implemented for the secure disposal or reuse of ICT assets which are commensurate with the information asset’s security classification level</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Asset Management</td>
<td>40</td>
<td>Processes are implemented for the secure disposal or reuse of ICT assets which are commensurate with the information asset’s security classification level</td>
<td></td>
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</tr>
<tr>
<td>Information and Communications Technology</td>
<td>41</td>
<td>Operational procedures ensuring information assets and ICT assets, including information systems and network tasks, are managed consistently in accordance with the required level of security, have been documented and approved</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Third Party Service Delivery</td>
<td>42</td>
<td>Agreements clearly articulate the level of security required, are regularly monitored and endorsed by the relevant senior executives and governance body</td>
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<tr>
<td>Capacity planning and system acceptance</td>
<td>43</td>
<td>System acceptance include confirmation of the application of appropriate security controls and of the capacity requirements of the system</td>
<td></td>
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<tr>
<td></td>
<td>44</td>
<td>System capacity is regularly monitored to ensure risks of system overload or failure, which could lead to a security breach, are avoided</td>
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</tr>
<tr>
<td>Malicious and Mobile Code Control</td>
<td>45</td>
<td>Adequate controls have been defined and implemented for the prevention, detection, removal and reporting of attacks of malicious code on all ICT assets</td>
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<td></td>
<td>46</td>
<td>Details of vulnerability/integrity scans have been documented including what core software has been scanned, when it has been scanned, when the next scan is due, and the scan results</td>
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<td></td>
<td>47</td>
<td>Employee education about malicious code and associated processes have been conducted, for example through induction programs, training programs/plans and awareness campaigns (eg. emails, posters, factsheets, intranet contents etc)</td>
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<tr>
<td>Backup procedures</td>
<td>48</td>
<td>Comprehensive systems maintenance processes and procedures (including operator and audit/fault logs), information backup procedures and archiving have been implemented</td>
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<tr>
<td>Network security</td>
<td>49</td>
<td>Network security policy and guidelines have been documented and approved. Network administrators are aware of and follow these documents</td>
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<td></td>
<td>50</td>
<td>Firewall rule and associated network architecture testing processes are documented. MCDA records document tests, their results and any corrective action taken</td>
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<td></td>
<td>51</td>
<td>Processes for reviewing and updating network security design, configuration, vulnerability and integrity are documented. MCDA records demonstrate that periodic network security checks, reviews and updates are occurring</td>
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<td></td>
<td>52</td>
<td>A policy on scanning has been documented and approved. Supporting processes to ensure adherence to the manual have also been developed</td>
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<td>53</td>
<td>Processes relating to IT change management (including maintenance of network systems) and configuration management processes are established and updated as required</td>
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<tr>
<td>Information Technology Media Management</td>
<td>54</td>
<td>Media handling procedures have been documented and implemented</td>
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<td></td>
<td>55</td>
<td>All the requirements of the manual have been documented within these procedures</td>
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<tr>
<td><strong>Electronic Information Transfer</strong></td>
<td>56</td>
<td>A Network policy has been implemented to ensure the security of data during transportation over communication networks</td>
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<td></td>
<td>57</td>
<td>Methods for exchanging information within the MCDA, between agencies, through online services, and/or third parties are compliant with legislative requirements</td>
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<tr>
<td></td>
<td>58</td>
<td>Appropriate authorisation has been obtained and documented for the type and level of encryption used within the MCDA.</td>
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<tr>
<td></td>
<td>59</td>
<td>All information exchanges over public networks, including all online or publicly available transactions/systems must be authorised either directly or through clear policy</td>
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<tr>
<td>e-commerce</td>
<td>60</td>
<td>A policy to control email, has been approved by the relevant senior executive/governance body and has been implemented within the MCDA</td>
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<td></td>
<td>61</td>
<td>Details of penetration testing have been documented, including what critical online services have been tested, when the testing has occurred, when the next test is due and test results</td>
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</tbody>
</table>
62. Policies and controls have been developed to manage all aspects of on-line and internet activities including anonymity/privacy, data confidentiality, use of cookies, applications/plugins, types of language used, practices for downloading executables, web server security configuration, auditing, access controls and encryption.

63. There is a policy for adoption of PKI digital signatures for e-commerce.

64. Details of operator and audit/fault logs have been documented including what events are logged, when and who will review and monitor logs, where and for how long the logs are stored, are logs adequately protected.

65. All assets have a synchronized time source which is visible.

66. Control mechanisms based on business owner requirements and assessed/accepted risks for controlling access to all information assets and ICT assets have been established.

67. Access control rules are consistent with business requirements.

68. Access control rules are consistent with information classification.

69. Access control rules are consistent with legislative obligations.
<table>
<thead>
<tr>
<th>Category</th>
<th>Code</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Authentication</td>
<td>70</td>
<td>MCDA records indicate that all authentication requirements have been assessed against the standard. Business requirements for all online transactions and services include consistency with the standard. MCDA records indicate that online transactions and services have been assessed against the standard.</td>
</tr>
<tr>
<td></td>
<td>71</td>
<td>MCDA records indicate that all authentication of users external to the MCDA have been assessed against the standard.</td>
</tr>
<tr>
<td>User access</td>
<td>72</td>
<td>MCDA information systems cannot be accessed without specific authorisation. MCDA records that may indicate evidence of compliance include completed system access request forms for all users.</td>
</tr>
<tr>
<td></td>
<td>73</td>
<td>MCDA records indicate that each user is issued a unique personal identification code and secure means of authentication.</td>
</tr>
<tr>
<td>Network access</td>
<td>74</td>
<td>MCDA records indicate that system and network access and use is logged, monitored and reviewed. Events are recorded.</td>
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<tr>
<td></td>
<td>75</td>
<td>MCDA records indicate that authorisation has been obtained and documented for new and existing access to networks.</td>
</tr>
<tr>
<td></td>
<td>76</td>
<td>All wireless communications have appropriate configured product security features and afford at least the equivalent level of security of wired communications.</td>
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<td>No.</td>
<td>Description</td>
<td>Details</td>
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<tr>
<td>77</td>
<td>MCDA records indicate that a risk assessment has been performed for all ICT facilities and devices (including non-government equipment) prior to connection. Records all indicate that appropriate controls have been implemented based on this risk assessment</td>
<td></td>
</tr>
<tr>
<td>78</td>
<td>Operating system access</td>
<td>MCDA has documented and approved access controls for operating systems that cover user registration, authentication, user responsibilities. Access to operating systems is conducted in compliance with these controls</td>
</tr>
<tr>
<td>79</td>
<td>Mobile computing and tele-work access</td>
<td>MCDA records indicate that mobile technologies and tele-working facilities are not introduced unless a risk assessment has been performed</td>
</tr>
<tr>
<td>80</td>
<td>Mobile computing and tele-work access</td>
<td>MCDA has documented and approved processes for mobile technologies and teleworking facilities</td>
</tr>
<tr>
<td>81</td>
<td>Mobile computing and tele-work access</td>
<td>MCDA system security controls are commensurate with the highest level of security classification of the information stored and passing through the system</td>
</tr>
<tr>
<td>82</td>
<td>Mobile computing and tele-work access</td>
<td>Business requirements for all systems include information security requirements</td>
</tr>
<tr>
<td>83</td>
<td>Mobile computing and tele-work access</td>
<td>Records of audit results are documented for new or significant changes to financial or critical business information systems</td>
</tr>
<tr>
<td>84</td>
<td>Mobile computing and tele-work access</td>
<td>Documented system security controls address acquisition, development and maintenance stages</td>
</tr>
<tr>
<td>No.</td>
<td>Description</td>
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<tr>
<td>85</td>
<td>MCDA records document change control, acceptance and system testing, planning and migration control measures have been taken when upgrading or installing software</td>
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</tr>
<tr>
<td>86</td>
<td>MCDA records document change control, acceptance and system testing, planning and migration control measures have been taken when upgrading or installing software</td>
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<tr>
<td>87</td>
<td>Access controls have been identified and implemented including access restrictions and segregation/isolation of systems into all infrastructures, business and user developed applications</td>
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<tr>
<td>88</td>
<td>Cryptographic controls are implemented</td>
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<tr>
<td>89</td>
<td>Access controls for system files are documented</td>
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<tr>
<td>90</td>
<td>Records of the processes for secure development have been documented</td>
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<tr>
<td>91</td>
<td>Audit logs for UNCLASSIFIED and security classified information log activity</td>
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<tr>
<td>92</td>
<td>Existence of an audit log for all technical vulnerability procedures undertaken</td>
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<tr>
<td>93</td>
<td>Patch management program is implemented and documented including any tests that are carried out</td>
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</table>

**Personnel and Awareness**  
**Pre-employment**  
94  Job descriptions include information security requirements
<p>| 95 | MCDA policies addressing information security issues within human resources have been approved by the senior executive management group/CEO |
| 96 | Procedures for addressing information security within human resource management have been documented and approved |
| 97 | Induction program documentation includes information security |
| 98 | An information security training plan has been approved by the CEO (note that this may be part of the MCDA’s general information security plan). Attendance records for information security training |
| 99 | Security awareness programs have been implemented to ensure that employees are aware of and acknowledge their security responsibilities. Example evidence of compliance might include emails, posters, fact sheets, intranet content etc that communicate information security responsibilities |
| 100 | Induction program documentation includes an overview of the MCDA’s information security policies and processes and details of where employees can go to get further information |
| 101 | The information security training plan includes targeted training in the MCDA’s information security policies and processes |</p>
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<tbody>
<tr>
<td><strong>102</strong></td>
<td>Training attendance records or documents signed by all employees that document that they have been shown and understand MCDA information security policies and processes including how to use MCDA ICT assets</td>
<td></td>
</tr>
<tr>
<td><strong>103</strong></td>
<td>Information security roles and responsibilities documented and approved by senior executive management</td>
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<tr>
<td><strong>104</strong></td>
<td>Roles and responsibilities have been physically assigned to employees (with appropriate records retained)</td>
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<tr>
<td><strong>105</strong></td>
<td>Employees with information security roles and responsibilities have signed a document stating that they understand their roles and responsibilities</td>
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<tr>
<td><strong>Post-Employment</strong></td>
<td><strong>106</strong> Procedures for the separation of employees within the MCDA have been approved</td>
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<tr>
<td></td>
<td><strong>107</strong> MCDA records demonstrate that all employee separations follow the approved procedure</td>
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<tr>
<td></td>
<td><strong>108</strong> Procedures for the movement of employees within the MCDA have been approved</td>
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</tr>
<tr>
<td></td>
<td><strong>109</strong> MCDA records demonstrate that all employee movements within the MCDA follow the approved procedure</td>
<td></td>
</tr>
<tr>
<td><strong>Incident Management</strong></td>
<td><strong>Incident Management Controls</strong></td>
<td><strong>110</strong> Copies of information security incident reports are present. Receipt of incident reports by relevant management channels</td>
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<td></td>
<td></td>
<td><strong>111</strong> Agency records indicate that information security incidents are reported to appropriate authorities (e.g. police) where applicable</td>
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<td></td>
<td>112</td>
<td>Training attendance records or documents signed by all employees, contractors and third parties that document that they understand their responsibilities to report events/weaknesses and incidents</td>
</tr>
<tr>
<td>Incident procedures</td>
<td>113</td>
<td>Agency information security incident management procedures have been documented and covers the review of and response to incidents</td>
</tr>
<tr>
<td></td>
<td>114</td>
<td>Records of information security incident reports and corresponding investigations are present.</td>
</tr>
<tr>
<td></td>
<td>115</td>
<td>Disciplinary processes for deliberate violations or breaches of information security policy have been approved by the senior executive management group/CEO. Where these incidents have occurred, agency records demonstrate that these processes have been applied</td>
</tr>
<tr>
<td></td>
<td>116</td>
<td>Existence of a current agency information security incident and response register</td>
</tr>
<tr>
<td>Business Continuity Management</td>
<td>Business continuity</td>
<td>117</td>
</tr>
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<td>118</td>
</tr>
<tr>
<td>119</td>
<td>Business continuity risk and impact assessment processes have been approved. Agency records indicate that these assessments are made, and inform the development of the agency’s business continuity plan</td>
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<tr>
<td>120</td>
<td>Existence of a risk register that documents how known risks will be managed</td>
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<tr>
<td>121</td>
<td>Business continuity plan is regularly updated. Business continuity tests are conducted and any weaknesses identified as a result are addressed</td>
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<tr>
<td>122</td>
<td>Records show that a business impact analysis has been undertaken, and the results have been used to reduce risks</td>
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<tr>
<td>123</td>
<td>Records show that all critical business processes and associated assets have been identified, prioritised and documented</td>
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<tr>
<td>124</td>
<td>An information and ICT asset disaster recovery register has been established to assess and classify systems to determine their criticality</td>
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<tr>
<td>125</td>
<td>An ICT disaster recovery plan has been established to enable information and ICT assets to be restored or recovered in the event of a disaster</td>
<td></td>
</tr>
<tr>
<td>126</td>
<td>Processes that enable the information environment to be restored or recovered in the event of a disaster have been approved</td>
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</tr>
<tr>
<td>127</td>
<td>Existence of a risk register that documents how known risks will be managed</td>
<td></td>
</tr>
<tr>
<td>128</td>
<td>Disaster recovery plan is regularly updated. Disaster recovery tests are conducted and any weaknesses identified as a result are addressed</td>
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</tr>
<tr>
<td>129</td>
<td>Clearly defined maximum acceptable downtimes are documented within ICT disaster recovery plans</td>
<td></td>
</tr>
<tr>
<td>130</td>
<td>Maximum acceptable downtimes for ICT services are documented in all service and operational level agreements with external parties</td>
<td></td>
</tr>
<tr>
<td>131</td>
<td>Copies of ICT disaster recovery plans are located in multiple locations including at least one offsite location</td>
<td></td>
</tr>
<tr>
<td>Monitoring for Compliance</td>
<td>Legal requirements</td>
<td></td>
</tr>
<tr>
<td>132</td>
<td>Agency has identified and documented all its legal obligations relating to information security and its response to these</td>
<td></td>
</tr>
<tr>
<td>133</td>
<td>A list of legislation compliance has been developed and is cross referenced against all information security policies and processes on a regular basis (including when changes to legislation occur)</td>
<td></td>
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<tr>
<td>134</td>
<td>The results of compliance reviews against information security policies and processes have been reported to appropriate agency management</td>
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<tr>
<td>135</td>
<td>All information security requirements (including contracts with third parties) have been reviewed for legislative compliance on a regular basis</td>
<td></td>
</tr>
<tr>
<td>136</td>
<td>Agency has identified and documented processes for assessing compliance against its information security related legal obligations. Agency records indicate that these processes are being conducted</td>
<td></td>
</tr>
<tr>
<td>137</td>
<td>All reporting obligations relating to information security have been complied with and managed appropriately</td>
<td></td>
</tr>
<tr>
<td>138</td>
<td>All reasonable steps have been taken to monitor, review and audit agency information security compliance</td>
<td></td>
</tr>
<tr>
<td>139</td>
<td>Employees with information security roles and responsibilities have signed a document stating that they are understand their roles and responsibilities</td>
<td></td>
</tr>
</tbody>
</table>
## 18.0 Appendix II: Guidelines

<table>
<thead>
<tr>
<th>Subject</th>
<th>Requirement</th>
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</table>
| **General** | All MCDA computing resources must be used in an acceptable manner consistent with the policy.  
Use may include, but is not limited to, access of Internet/Intranet/Extranet resources via web, email, file transfer or other network-based services, instant messaging, or accessing non-networked resources, such as through dedicated consoles or management systems.  
The MCDA shall come up with acceptable use of computing resources (assets) |
| | Computing resources are defined as all digital or analog computational devices owned by the MCDA.  
The MCDA owns all computing resources provided. Permission for use of computing resources is granted to employees on an as-needed basis in accordance with this and all other application policies and agreements.  
These devices may include, but are not limited to, computer equipment, software, operating systems, storage media, network infrastructure, and network or local accounts, such as for access to network- or host-based resources. |
| **Guidelines for Acceptable Use** | The information security discipline evaluates risks according to the concepts of confidentiality, integrity and availability. The evaluation of risks may also weigh applicable laws and regulations as well as MCDA policies, standards, guidelines and procedures. The following guidelines are provided to assist users in making proper decisions about whether certain uses of computing resources are acceptable. |
| 1. **Confidentiality** | Maintaining the confidentiality of data and people is of the utmost importance. When using computing resources, ask yourself the question: “Am I intentionally violating the confidentiality of the business, corporate data or an individual?” If the answer to this question is “yes” then determine whether or not you are authorized to view the information or data in question. If you are authorized, then determine whether or not you have a need to view the information or data. If you are not authorized to view the data or information, then do not view it. If you believe that you have inappropriate access to data or information, immediately report this finding to the proper owner or management. |
2. Integrity
Integrity is defined as the soundness of data or systems and the certainty that data is authentic and unaltered.
- Modifying data or information without proper authorization is unacceptable use and a violation of data integrity.
- Accessing systems without proper authorization or through unapproved methods is also unacceptable and a violation of system integrity.
- Always access data or systems through approved methods. If you believe that data or systems are accessible through unapproved methods, it is your responsibility to report the error.
Violations of integrity may include, but are not limited to,
- Circumvention of simple controls on data files, access to systems through unapproved methods,
- Unauthorized escalation of privileges on a system,
- Modifying data without permission, or
- Intentionally corrupting data. Violation of data or system integrity on systems external to the MCDA through the use of MCDA assets is also unacceptable use.

3. Availability
Intentionally denying access to data or systems without authorization, or outside the intended function of an application or system is unacceptable use. Some applications and systems contain locking features designed to control access to data or processes (e.g. version control software). This behavior is expected and acceptable. Use of MCDA computing resources to deny access to internal or external systems is unacceptable use. When accessing data or systems, ask yourself the question: “Am I denying authorized access to data or systems as a result of my actions?” If the answer to this question is “yes” then determine whether you are authorized to undertake this action, and then determine whether or not there is a business need for the action.
Availability also applies to client-side applications, such as mail readers and web browsers. Intentionally causing an application to crash, lock or otherwise perform errantly is unacceptable use. By extension, knowingly allowing your system to become or remain infected with malicious code may be deemed a violation of this policy. All perceived violations must be reported to the appropriate contact or management immediately. Reporting suspected infections in a timely manner will often exonerate a user from direct responsibility, pending the outcome of an investigation.
### 4. Legal compliance

It is important to be aware of applicable laws and regulations when accessing or using data or systems that are internal or external to the MCDA. Areas of consideration should include, but are not limited to, copyright, trademark, patent, privacy, wiretap, confidentiality and communication laws and regulations. Use of computing resources to violate laws or regulations represents a violation of this policy, regardless of intent or jurisdiction. Software must be used in accordance with its licensing terms and MCDA policies. Access of systems must not be in contravention of The Computer Fraud and Abuse Act (18 USC 1030) or other applicable laws. Use of systems to send communication in violation of Human Resources (HR) policies and applicable laws will be considered a serious breach of this policy and will be addressed swiftly and strictly. Communication must be appropriate for a business environment and in line with the Professional Standards of Conduct (PSC). All users are expected to act in a professional and courteous manner at all times and in all forms of communication. Suspected violations of this tenet of the policy should be reported to the appropriate contact immediately. The appropriate contact may be a member of management, HR, PSC or Legal. It is recommended that management be approached first, unless the suspected violation directly involves management.

### 5. Policy compliance

All users of computing resources must be familiar with applicable policies, standards, guidelines and procedures. Training and awareness programs will be provided to inform the user of corporate policies and applicable laws in order to ensure the ability of users to comply with acceptable computing policies. If a user is in doubt of whether or not a given action is acceptable, it is that user’s responsibility to seek clarification before proceeding.
## Specific Prohibitions and Restrictions on Use

The following activities are generally prohibited or restricted. Certain individuals may be exempted from these rules in order to perform their required job responsibilities (e.g., Operations Security is authorized to actively monitor network traffic and respond in a disruptive manner to mitigate a detected threat). Employees are not authorized, under any circumstances, to actively engage in activities deemed illegal under applicable jurisdictions. The list provided below is not comprehensive, but should be used as a baseline for helping determine whether or not a proposed action is unacceptable. Omission of an action from this list does not imply that it is an acceptable use. Any violations of these specific prohibitions and restrictions will be treated severely and may reasonably result in immediate termination of employment.

### 1. Illegal use

Computing resources must be used within the confines of the law. Any use of computing resources to infringe intellectual property protections, such as copyrights, trademarks, patents or trade secrets, is prohibited. Infringing acts may include, but are not limited to, unauthorized copying of copyrighted materials, use of a trademark without authorization or exporting software, technical information, encryption or technology in violation of export control laws. Any action, intentional or unintentional, that serves to copy or transmit protected materials without proper authorization is an unacceptable use.

### 2. Threats, harassment or harm to minors

Computing resources must not be used to threaten, harass or harm others. Unauthorized uses of this type may include, but are not limited to:

- communication that is threatening, abusive, harassing, defamatory, libelous, deceptive, fraudulent, invasive of another’s privacy, tortuous, or containing explicit or graphic descriptions or accounts of sexual acts (including but not limited to sexual language of a violent or threatening nature directed at another individual or group of individuals);
- communication that victimizes, harasses, degrades, or intimidates an individual or group of individuals on the basis of religion, gender, sexual orientation, race, ethnicity, age, or disability;
- any form of harassment via email, telephone, paging or instant messaging, whether through language, frequency, or size of messages;
- use of computing resources to harm, or attempt to harm, minors in any way.
### 3. Fraud, forgery or impersonation

Any use of computing resources to commit fraud, forgery or impersonation is strictly prohibited. All users must truthfully and accurately represent their identity at all times. Adding, removing or modifying identifying network header information in an effort to deceive or mislead is prohibited. Attempting to impersonate any person by using forged headers, including email header information, or other identifying information is prohibited. Postings to public places intended to mask your employment status and employer, may be allowed.

Users may not utilize computing resource to make fraudulent offers to sell or buy products, items, or services or to advance any type of financial scam such as "pyramid schemes," "Ponzi schemes," and "chain letters." Unless part of normal job duties, making statements about warranty, expressly or implied, is also prohibited.

### 4. SPAM / SPIM

Creation, sending and forwarding of unsolicited advertising, junk or bulk email ("SPAM") or instant messages ("SPIM") are strictly prohibited, unless explicitly authorized as part of your normal job duties. Undertaking any activities that serve to facilitate unsolicited commercial email or unsolicited bulk email, whether or not that email is commercial in nature, are prohibited. Use of instant messaging facilities to accomplish the same is also prohibited.

### 5. Unauthorized access or circumvention of access controls

Any access to systems or data that is not specifically authorized is prohibited. Any circumvention of access controls, whether for accessing systems with or without authorization, is also prohibited. Users may not circumvent authentication or security of any host, network or account.
6. Collection of confidential data

Use of computing resources to collect confidential data, such as about members, employees or intellectual property, is prohibited. Collection, or attempts to collect, personal information about third parties, without their knowledge or consent, is prohibited and may constitute a violation of MCDA privacy policies and agreements. The MCDA strictly limits its liability in cases where individuals act of their own accord and without proper authorization. Any attempts to harvest or collect confidential data without explicit and proper authorization is prohibited and will be subject to severe disciplinary actions, up to and including termination of employment.

7. Disrupting network services or access to data

Rendering systems, networks, applications or data inaccessible or unusable due to an unauthorized disruption or corruption, is prohibited. Such prohibited acts may include, but are not limited to, ping floods, packet spoofing, executing denial of service or distributed denial of service attacks, forging routing information, corrupting data upon which an application or system relies, or removing or disabling a service, such as a process or application, on a host or network. Port or security scanning without prior authorization by Operations Security is strictly prohibited. Using any automated tool, such as a program, script or command, to send any message with the intent to interfere with or disable terminal sessions is not acceptable.

8. Making public statements under cover of MCDA identity

Individuals making public statements under the cover of their Organization identity, including through email, web postings, instant messaging or public presentations, must seek explicit authorization and approval from management. Communications department is the only department authorized to publish Press Releases and to communicate with members of the journalistic community ("the press"). Any public statement made in contravention of this policy and related policies is expressly prohibited and may result in severe disciplinary action, up to and including termination of employment. "Whistle blowing," or the disclosure of information about questionable internal practices, may be a legally protected form of disclosure. However, these disclosures must not occur in a public arena, but must be limited to specific conversations with law enforcement or regulators. Disclosure of protected information in public under the guise of "whistle blowing" will be subject to legal action against the individual by the MCDA.
<table>
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<tr>
<th>Section</th>
<th>Description</th>
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<tbody>
<tr>
<td>9. Disclosure of protected information</td>
<td>Disclosing MCDA confidential information is prohibited. Disclosures may include, but are not limited to, unique account names, account passwords or lists of employees, contractors, consultants, vendors or products. All information must be treated as confidential and protected unless labeled otherwise, in accordance with the Confidentiality, Non-Competition and Proprietary Rights Agreement. Certain information may be disclosed, including email address, assigned desk phone number, fax number, mailing address or title.</td>
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<tr>
<td>10. Monitoring or interception of network traffic</td>
<td>Monitoring or intercepting any form of network traffic or data not intended for your own host is prohibited, unless authorized as part of your normal job duties. Monitoring or intercepting network traffic may violate the privacy or confidentiality of the data being transmitted.</td>
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<td>12. Introduction of network services or routing configurations</td>
<td>The introduction of routing patterns or network services that are inconsistent with established patterns or services and/or that may disrupt or interfere with the intended patterns or services are expressly prohibited. Examples of unacceptable use include, but are not limited to, broadcasting routing information, providing Dynamic Host Control Protocol (DHCP) services in conflict with authorized services, or sending network messages designed to terminate network connections (such as TCP RST packets, or “sniping”).</td>
</tr>
<tr>
<td>13. Use of MCDA resources to conduct non-MCDA business</td>
<td>MCDA resources may not be put to use for any business purpose outside of government business. These includes, but is not limited to, the use of MCDA computers to store, forward, copy or manage information for any other MCDA; the use of MCDA equipment to produce printed or electronic documents for any other MCDA or MCDA; or the use of any MCDA resources, including personnel time, for the furtherance of any other MCDA or MCDA. Specific exemptions to this policy may be granted by management for specific charitable, promotional, or in-kind business partnerships, but such exemptions must be specifically authorized and must comply with all relevant laws and regulations.</td>
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<tr>
<td>14. Release of information regarding security incidents</td>
<td>Authorization to release information regarding security incidents involving the MCDA is restricted solely to management and its assigned agents (e.g. legal counsel or public relations agents). In the event of a security incident involving the MCDA, individuals are not authorized to communicate news of such incidents to any outside party. It is solely the MCDA’s responsibility to appropriately notify public MCDA of security incidents in compliance with state and federal regulations.</td>
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<tr>
<td>Policy Enforcement and Limitation of Liability to the MCDA</td>
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<td>The MCDA will take all reasonable measures to ensure that compliance with all applicable laws occurs with respect to the acceptable use of computing resources. The MCDA will also undertake training and awareness programs to ensure that all employees, contractors, temporaries and vendors are informed of this, and other policies. The MCDA is responsible for the disclosure of expected performance with respect to acceptable use of computing resources. Any failure of an individual to comply with this policy, despite the reasonable efforts of the MCDA to inform and educate, are the sole responsibility of the individual. Any violations that result from an internal or external investigation and that may include legal actions are strictly assigned to the individual.</td>
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1. Reporting violations or seeking clarification

All suspected violations of this policy must be reported to management or through the communication methods provided by the MCDA. Failure to report knowledge of a suspected policy violation will itself be considered a violation and will be subject to disciplinary review and action. It is the responsibility of all employees to help minimize risk to the MCDA as a whole.

2. Automated methods for policy enforcement

The MCDA will implement automated methods for monitoring MCDA assets for unacceptable use and abuse. These automated methods will assist the MCDA in taking reasonable measures to ensure that violations do not occur. Disabling or tampering with these automated methods is strictly prohibited and may result in disciplinary action. These tools are intended strictly to monitor MCDA assets for acceptable use of computing resources. These tools are not intended as a method for “spying” on employees or to violate any privacy protections afforded employees.

3. Procedures for remediation of violations

All potential violations will be considered through due process. Ownership for the violation will be determined and the need for disciplinary review and action will be addressed. If the MCDA finds that it is in violation of this policy, immediate actions will be taken to bring the MCDA into compliance. If the MCDA finds that the violation is the result of individual actions that were not properly authorized, the individual or individuals directly responsible will be referred for disciplinary review.
4. Process for levying disciplinary action

Once a determination is made that a violation has occurred as a result of the actions of an individual or individuals, management will refer the matter to Human Resources for consideration and action under the disciplinary plan. Disciplinary actions may include, but are not limited to, levying of fines, suspension or termination of employment. In all cases, the violating behavior must be immediately stopped. If a determination is made that the MCDA caused or authorized the violation, a decision will have to be made about whether or not the offending action should be halted or permitted.

5. Periodic policy review

This document will be periodically reviewed, no less than annually, and suggestions for changes will be reviewed and voted upon by a Policy Review Committee to be assigned by the Board of Directors. This committee will collect comments and suggestions for policy change between meetings, and will decide upon suggestions in a timely fashion. Legal must review all policy changes before they can be accepted and implemented. Changes to policy will be announced to the MCDA through appropriate channels, including but not limited to, MCDA wide electronic mail, announcement at MCDA meetings, and the distribution of updated MCDA policy documents.
| Agreement to and Acceptance of this Policy | • By accepting employment with the MCDA and using computing resources owned by the MCDA, the user is accepting the terms of this policy and agreeing to abide by its provisions.  
• The following signature by the user signifies acceptance of this policy in its entirety and represents a commitment to make use of computing resources in an acceptable and responsible manner.  
• Failure to comply with this policy may result in disciplinary action, up to and including termination of employment. The signature of a witness affirms that the user has been apprised of this policy and been given an opportunity to voice questions or concerns up front.  
• Sample employer agreement form |
| --- | --- |
| I, the below signed, agree to the requirements and guidelines set forth in this, the “Acceptable Use of Computing Resources” policy, and promise to use computing resources, provided by the MCDA to perform my job duties, in an acceptable, appropriate and professional manner. Furthermore, I waive my right to privacy, except for those rights specifically guaranteed by the law, and accept that the MCDA may monitor and respond to my use of computing resources in accordance with this, and other, MCDA policies.  
Name: ____________________________________ Employee ID: ___________________________ Signature: ___________________________ Date: ___________________ | I, the below signed, have witnessed the signing of this agreement. I have ensured that the above-signed has received a current copy of the “Acceptable Use of Computing Resources” policy and that I have answered or referred for answer any questions or concerns that the above-signed has expressed.  
Name: ____________________________________ Employee ID: ___________________________ Signature: ___________________________ Date: ___________________ |
| Ethical, moral and legal implications of the “acceptable use of computing resources” | Policy must consider the ethical, moral and legal implications of its provisions and entirety. The primary focus of the policy is to outline expected patterns of behavior and professional conduct with respect to use of computing resources. Furthermore, provisions within the policy set expectations for monitoring and enforcement of the policy, as well as to document potential disciplinary actions. |
A. **Ethical Implications: Fairness**

- An ethical analysis of a policy must consider the fairness of the rules of behavior codified in the policy. The concept of fairness, in this case, pertains to whether or not the MCDA is fairly allowing and limiting access to and use of computing resources. Specifically, there is an inherent contradiction in the requirement of employees to have access to computing resources and the desire of the business to limit use and abuse of these resources.

- From the standpoint of fairness, the policy should provide a general guideline for acceptable use, while adding specific prohibitions and restrictions that are considered unacceptable use under most, if not all, circumstances.

A. **Moral Implications: Right vs. Wrong**

- MCDA are not allowed to promote illegal or illicit activity and are constrained to ensure, within reason, that their employees are compliant with the requirements. In limiting the ability and permission of employees to use computing resources, the business will exceed reasonable restrictions and should stipulate limits on use that are not only legal, but quite possibly protected or necessary.

- Situations where an action falls into the gap between acceptable and unacceptable use, the right and reasonable approach is for the user to seek clarification before undertaking the action.
### A. Legal Implications: Indemnification Against Direct Liability

- The creation and promotion of policies, standards, guidelines and procedures are used by MCDA to limit the liability they might otherwise incur in instances where bad things have happened.
- In this specific case, one of the primary objectives of the policy is to clearly define legal behavior as acceptable and illegal behavior as unacceptable.
- Coupled with an active training and awareness program, the policy serves to transfer some, if not most, of the responsibility for illegal behavior onto the individual.
- The MCDA bears the responsibility of proving that due diligence has been performed with respect to monitoring and enforcement of the policy, implementation and maintenance of access controls, and implementation and maintenance of security countermeasures.
- By reading and agreeing to the policy, the employee accepts responsibility for their actions and indemnifies the MCDA against being held directly responsible for the actions of an individual.
- By defining the expectations for disciplinary action as a result of violating this policy, the MCDA protects itself against lawsuits from terminated employees in which this policy will have been used as the basis for the disciplinary action.
- Automated and manual monitoring and response tactics must be developed and deployed.

### A. Legal Implications: Fairness and Due Process

- This has to do with the fair and consistent application of rules to all employees without discrimination.
- Rules must be applied to every employee in the MCDA, regardless of title, race, gender, etc. If the policy is not applied fairly and consistently, then the legal issue of discrimination may arise.
- To recapitulate, this policy must be applied fairly and without discrimination. All resulting actions, whether for monitoring and enforcement or a resulting disciplinary action, must be undertaken in an objective manner that does not target the individual out of context, but instead considers the situation objectively and within the full context.
<table>
<thead>
<tr>
<th>A. Legal Implications: Adequate Training and Awareness</th>
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<tbody>
<tr>
<td>• A comprehensive training and awareness program is fundamental to the success of policies like the acceptable use policy. Responsibility is placed on the MCDA to fully educate its users about the hazards of interconnected computing and how to make use of computing resources in an acceptable, responsible and safe manner.</td>
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INFORMATION SECURITY STANDARD WORKING GROUP

<table>
<thead>
<tr>
<th>Name</th>
<th>Organization</th>
</tr>
</thead>
<tbody>
<tr>
<td>EDMOND WANDERA</td>
<td>ICTA</td>
</tr>
<tr>
<td>MICHAEL ODHIAMBO</td>
<td>KWS</td>
</tr>
<tr>
<td>ANDREW WAMBUA</td>
<td>ICTA</td>
</tr>
<tr>
<td>NANCY WAMBUGU</td>
<td>NIB</td>
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