
IT policy breach procedure



This procedure explains to user how a breach of IT policy is dealt with and escalated.

Document Location

<http://www.ucc.ie/en/it-policies/procedures>

Revision History

Date of this revision: 31/12/2012	Date of next revision:
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Revision Number	Revision Date	Summary of Changes	Changes marked
0.1	1/10/2012	Original	
0.2	20/10/2012	Redrafted based on updates from IT department	
0.3	14/11/2012	Changes suggested by M Farrell and N Geary in internet security meeting	

Approval

This document requires the following approvals:

Name	Title	Date
ISMT		
IS & ER		
OCLA		

This procedure will be reviewed on a periodic basis.

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1. PURPOSE

The purpose of this document is to clarify for management and IT staff, the procedure for handling a breach of existing IT policies arising out of the inappropriate use of technology on the UCC network. The document should provide guidance on the steps to follow to ensure that breaches in IT policies are handled consistently and have appropriate escalation points where required.

2. DEFINITION

The Digital Estate Working Group (DEWG, dewg@ucc.ie)

The DEWG manage the day-to-day running of the university's websites and social media presence. The group implements policy, define standards and agrees content on a weekly basis. It is comprised of IT, Marketing and Communications, Media and Public Relations, Registrar's Office, (reference the Digital Estate Governance Policy for more information).

The Digital Estate Steering Group

The Digital Estate Steering Group comprises representative content directors and interested parties from across the university. These represent the academic, research, student and administrative functions of the university, The Director of IT Services, the Director of Marketing and Communications, VP of Student Experience, Deputy Corporate Secretary and the Academic Secretary are members of the Digital Estate Steering Group.

Low Severity Incident: is deemed, in the opinion of the DEWG, as the issue itself breaches our acceptable usage, but not in a way that is personally damaging to the university or to others.

High Severity Incident: is deemed, in the opinion of the DEWG, as an incident that may result in the following.

- Incidents that may result in disciplinary action against staff or students
- Incidents that may result in the invocation of the university emergency response plan
- Incidents that may result in a legal action or where there are clear legal implications.
- Incidents that may warrant a communication plan for internal or external stakeholders

3. ROLES AND RESPONSIBILITIES

IT Services

To respond in a timely manner to such notifications/communications and to escalate those matters which cannot be resolved with the user(s) involved to IT Director and relevant management team.

IT Director

To chair the Digital Estate Working Group, to escalate issues where required or to agree the action plans of issues from the Digital Estate Working Group

Digital Estate Working Group

- To assess incidents/policy breaches and to agree the next steps.
- To escalate more serious issues where appropriate.
- To manage any operational risk to the university, from breaches of approved IT policies.

Digital Estate Working Group Steering

To act as an escalation point for serious incidents or breaches of policy, examples of these include

- Incidents that may result in disciplinary action against staff or students.
- Incidents that may result in the invocation of the university emergency response plan.
- Incidents that may result in a legal action or where there are clear legal implications.
- Incidents that may warrant a communication plan for internal or external stakeholders.

Office of Corporate and Legal Affairs (**OCLA**) will sit on the Steering Group and will offer advice on the legal implications for actions of the Digital Estate Working Group.

HR

Will manage any issues affecting staff via the university's approved staff disciplinary procedure. Once an issue is escalated to HR, they will manage any further communications with the staff member involved.

VP of Student Experience

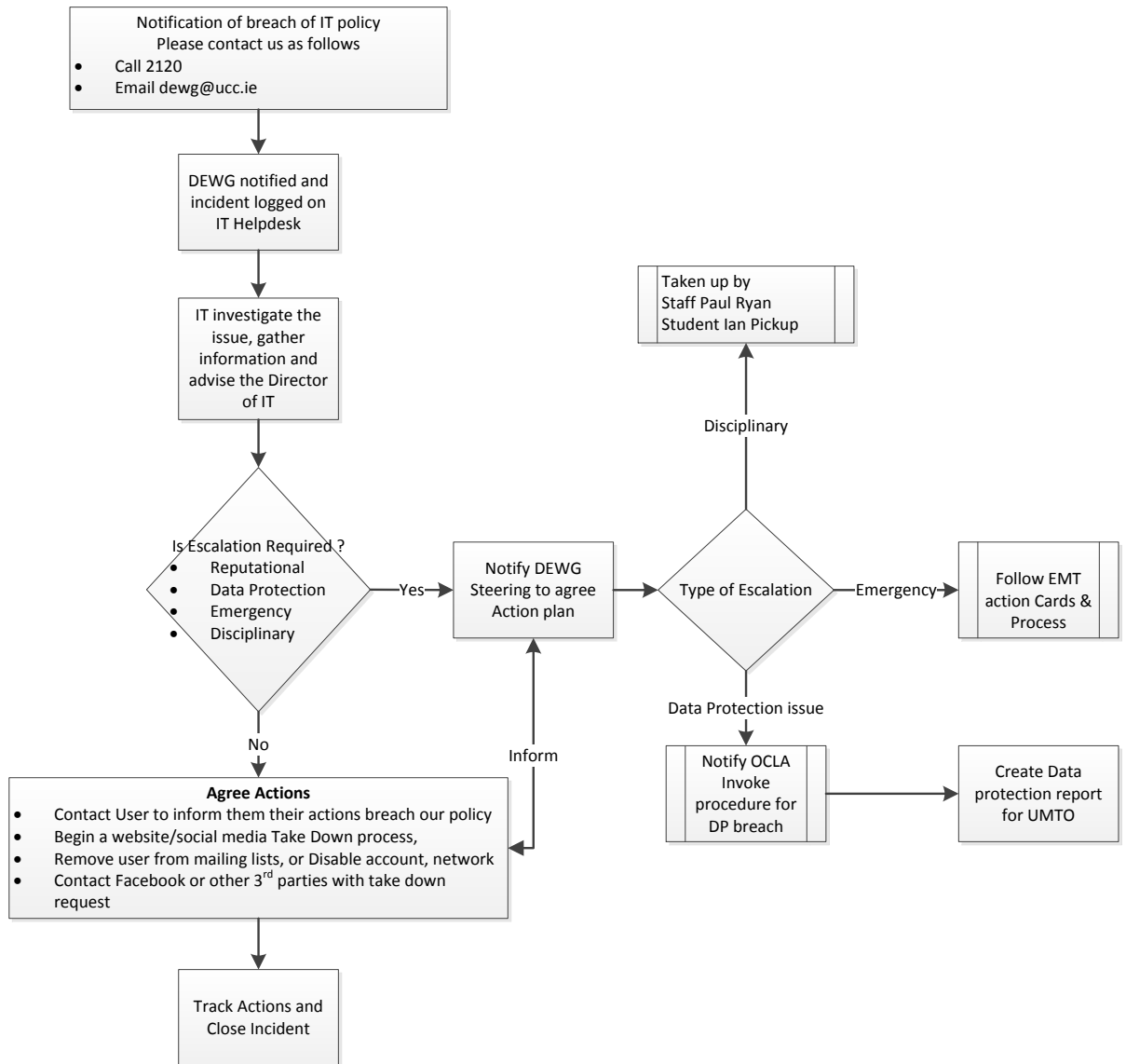
Will manage any issues affecting students via the approved student disciplinary procedure. When an issue is escalated to the VP of Student Experience, he manages any further communications with the individuals involved.

4. SCOPE

The scope of this procedure includes all incidents relating to breaches of approved UCC IT policies as listed on our website <http://www.ucc.ie/en/it-policies/> . This includes

- social media issues
- acceptable use issues, such as on email or websites
- security issues, password loss
- notification of loss of sensitive equipment, hardware
- copyright Infringement issues
- cyber bullying or harassment issues.

5. IT Policy breach handling protocol



Step	Action	Executor
	<p>If a user (Staff or Student) notices a breach of IT policy, for example</p> <p>Abuse of email</p> <p>Abuse of social media</p> <p>Any form of Cyber bullying or harassment. They should</p> <p>Email: DEWG@ucc.ie where the issues will be analysed or dealt with, if they cannot email, they can call the IT Helpdesk on 2120 and report the issue</p>	
2	The e-mail is forwarded to the relevant IT services team for more detailed analysis and a response from IT Team is sent to Director of IT, as chair of the DEWG.	DEWG
3	<p>IT Services validate the plausibility of the abuse claim based on IP address and time</p> <ol style="list-style-type: none"> Was the activity likely to have been running on that IP address at that time? Was that IP address in use by the expected node? Are the email signatures valid and authentic? 	SNE
7	<p>If the issue is a high severity matter or if the user/owner is unwilling to comply or has ignored previous warnings, DEWG should escalate the matter to the chair {IT Director} who will escalate to the DEWG Steering. Escalation will normally take place when the issue is related to</p> <ul style="list-style-type: none"> Reputational Damage to the University Data protection damage A disciplinary matter Emergency <p>Otherwise the DEWG will deal with the issue</p>	IT Director
5	<p>From the DEWG mailbox, IT Director will contact user/owner</p> <ol style="list-style-type: none"> Advise them of the complaint Request immediate removal of the material Remind/warn them of their responsibilities under AUP <p>Depending on the issue, Other actions may include</p> <p>Removal of the account from distribution lists</p> <p>Removal of offensive material from site or social media</p> <p>Writing to Social media providers to remove material</p>	DEWG
8	Where the issue has been escalated, DEWG Steering will advise on next steps with respect to the user	IT Director
9	If the issue requires staff disciplinary action, DEWG Steering will escalate to Paul Ryan in HR, who will manage the issue through the staff disciplinary channel.	Paul Ryan
10	If the issue requires student disciplinary action, DEWG Steering will escalate the matter to the VP of Student Experience who will take charge of the issue and follow Student disciplinary action policy	Ian Pickup
11	In the case of incident resulting in an emergency, DEWG Steering will invoke the Emergency Repsonse Plan and relevant action cards will be followed	DEWG Steering EMT plan
12	If the issue puts at risk the reputation of the University, Trevor Holmes will take the lead on the matter.	Trevor Holmes
13	If the issue is a data protection matter, email foi@ucc.ie and follow the data protection breach procedure.	Catriona O Sullivan

6. CLAIMS HANDLING EXAMPLES

Scenario
Low impact: Copyright Infringement notice Mistaken breach of policy, unwelcome social media comments
High impact: Abusive email/ offensive social media complaint made against a member of staff