Remote Working Risk Assessment: Data Protection, Security, and Fraud and Error

Introduction

In response to the coronavirus pandemic, the social distancing elements of the 'Delay' phase in the government's strategy has led to the decision to move Social Security Scotland staff to remote working, including those who require access to client record systems - such as SPM (Social Programme Management) and Searchlight. Access to these systems is ordinarily restricted to Social Security Scotland premises by policy. However, given the extraordinary risk to service delivery, the appetite for data protection, security and fraud and error risks has increased. This paper seeks to articulate these risks and explores mitigating measures which can be put in place to help to control these for the temporary period that organisation-wide remote working is required.

Impact of Remote Working

The likelihood of risks associated with data protection, security and fraud are increased due to remote working. While the activities associated with operational roles will not change, deterrent and detective controls which exist in the workplace are either removed or reduced when staff work from home. Some of these include:

- Entering and leaving place of work
- Controlled access to work spaces
- Clocking in and out using the Flexi system via the online interface or building terminals
- Sitting beside colleagues - conversations overhead and audience for actions
- Managers visible, physically monitoring activities
- Equipment used and stored onsite (laptops, Searchlight tokens, secure drives etc.)
- Secure disposal of hard copy information

Removal of these control mechanisms may lead some to conclude that the risk of detection and punishment is reduced – therefore the risk of malicious actions increases, and may induce spontaneous attacks (rather than carefully planned, premeditated actions). These risks are aggravated because current technical controls are in an, as yet, maturing state.

Risk Analysis

Some key risks are outlined below. These risks are in the main not unique to remote working; rather the likelihood is increased due to the reduction in actual or perceived difficulty of successful perpetration.

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Aggravating Factors

These existing issues exacerbate the risks identified.

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Mitigating Controls

To respond to the deployment of remote working across all operations within the agency, increased mitigation controls have been considered.

We have deployed the following measures:

- [redacted]
- Commissioned development of an online learning video to support staff around understanding risks, mitigations and obligations
- A Code of Conduct document has been created, and staff must agree to these conditions before accessing client data from remote locations
- A bespoke Mobile and Remote Working Policy has been created tailored to our requirements
- [redacted]

Our provision for monitoring [redacted]

[redacted]

We are also working towards introduction of the following provision, subject to relevant approvals:

[redacted]

Our colleagues in CDO are undertaking work as a matter of urgency to explore the possibility of introducing the following additional provisions:

[redacted]

Conclusion

Moving to remote working, especially for colleagues who require access to client records systems, has increased the risk of fraud, coercion, data harvesting and unauthorised or inappropriate data disclosure.

However the extraordinary risk posed to service delivery as a result of the social distancing requirements due to the COVID-19 response has necessitated use of special measures such as remote working for a temporary period.

We have taken steps to mitigate the risks by developing the procedural and policy controls, user training and technical monitoring controls which are available to us.

These controls do not eliminate the risks but with careful messaging and reassignment of some resource could reduce them.