

INFORMATION SECURITY POLICY

February, 2015

Contents

1. INTRODUCTION	
2. PURPOSE	3
3. COVERAGE OF POLICY	4
4. SECURITY ROLES & RESPONSIBILITIES	5
5. ACCEPTABLE USE	
5.1 Electronic Communication 5.2 Internet Acceptable Use	
6. LOGICAL & PHYSICAL ACCESS CONTROLS	
6.1 LOGICAL CONTROLS 6.2 PHYSICAL CONTROLS	
7. COMPLIANCE WITH LEGAL & CONTRACTUAL REQUIREMENTS	
 7.1 AUTHORIZED USE 7.2 MONITORING OF OPERATIONAL LOGS 7.3 ACCESS TO UNIVERSITY RECORDS 7.4 PROTECTION OF SOFTWARE	
8. INCIDENT DETECTION & REPORTING	
8.1 SECURITY BREACH NOTIFICATION & REPORTING	
9. AWARENESS & COMMUNICATION	
9.1 DISASTER RECOVERY 9.2 SECURITY AWARENESS & TRAINING	
10. ASSURANCE	
11. EXCEPTION PROCESS	24
12. POLICY MANAGEMENT & REVISION	25

1. INTRODUCTION

See CSCU, IT-003 Information Security Policy (<u>BOR_IT-003</u>) for system-wide policy.

Information and information system resources are essential assets of Western Connecticut State University (WCSU). The entire University Community (students, faculty, and staff) is responsible for ensuring that computing and communication facilities are used in an effective, efficient, ethical and lawful manner. This Security Policy is provided to all members of university community to provide proper guidelines on each individual's responsibility to protect WCSU information. Every individual should understand their obligations relating to the policy statements described herein.

WCSU staff responsible for planning, acquisition, configuration, deployment, management, and auditing of information systems should apply sound risk management practices when selecting security controls. This would include identifying what information is intended to be protected, what are the threats to that information or information system resource and what are the proper cost-effective safeguards that need to be applied to adequately protect the information.

2. PURPOSE

This Information security policy provides a set of comprehensive security guidelines to ensure that WCSU information and information system resources are properly and consistently protected. This Information Security Policy outlines student, faculty, staff, and contractor responsibilities in supporting the WCSU security program and compliance with this security policy.

The objectives of this policy are:

- i. Provide for uninterrupted services to the University Community;
- ii. Safeguard the integrity and availability of the campus data network through appropriate controls;
- iii. Protect the computing and communication assets of the University including data, software and hardware;
- iv. Reduce the likelihood that computers on campus are used to attack other organizations, bringing liability and disrepute to the University;
- v. Protect WCSU against the loss or misuse of any information;
- vi. Define responsibility and accountability to maintain protection of WCSU information;
- vii. Preserve and support audit and legal compliance.

3. COVERAGE OF POLICY

This policy applies to all information assets of the Western Connecticut State University. The term University Community includes student, faculty, staff, trainee, vendor, volunteer, contractor, consultant and other affiliates of the University. Each member of the University Community with access to institutional information is subject to and has responsibilities under this policy. The term information refers to any intelligible representation of data, including, but not limited to, such things as handwritten notes, software designs, databases, program listings, files, training material, risk assessment documents, business continuity plans, magnetic media (such as hard drive, tapes, CDs and DVDs), printer output, telephone conversations, video tapes, and fax output. The term information system resources refers to information resources consisting of software and hardware designed, built, operated and maintained to collect, record, process, store, retrieve, display and transmit electronic data for a specific business process, including, but not limited to, workstations, laptops, phones, fax machines, servers and network devices.

CSCU policies take precedence over any overlapping areas within this document and are referenced in each section if they exist.

4. SECURITY ROLES & RESPONSIBILITIES

4.1 The University believes that information security is the responsibility of the entire University community including all students, faculty, staff, and contractors, etc. Every person handling information or using University information systems is expected to observe the information security policies and procedures.

4.2 In accordance with BOR Resolution dated 6/21/2012 (BOR.Res.Info.Sec.2012-06-21), this Policy is the responsibility of the WCSU President; supervision of the policy will be undertaken by the Senior Management of the University and the Chief Information Officer (CIO).

Upkeep & compliance of the Information Security Policy will be managed by the Information Security Officer (ISO) or acting designee along with input from other areas as needed.

Implementation of the Information Security Policy is managed through the Director of Infrastructure and other designated personnel in IT (Network Security Specialist and Telecom Manager) and other areas with security responsibilities of the University.

4.3 The responsibility for security of computing and communication systems rests with the CIO or designees including the system administrators who manage those systems. University IT will help system administrators carry out these responsibilities to the extent possible with available resources.

4.4 Heads of departments with computing or communication devices connected to the campus network managing their devices will:

i) Designate an individual if other than the manager of the area, with the responsibility to create and maintain a current contact list of individuals who are responsible for the computer(s) for each location in the department.

4.5 University IT will:

i) Prepare and publish security alerts, notices, recommendations and guidelines for network and system administrators.

ii) Monitor backbone network traffic, as necessary and appropriate, for the detection of unauthorized activity and intrusion attempts.

iii) When a security problem (or potential security problem) is identified, follow local procedures in support of the CSCU Information Security Incident Response Procedures (V1 3/20/2012). As part of the incident handling process, IT will seek the co-operation of the appropriate contacts for the systems and networks involved in order to resolve such problems. In the absence or unavailability of such individuals, IT may need to act unilaterally to contain the problem, up to and including temporary isolation of systems or devices from the network, and notify the responsible system administrator when this is done.

iv) Carry out and review the results of automated network-based security scans of systems and devices on University networks in order to detect known vulnerabilities or compromised hosts.

v) When appropriate, IT will inform the system administrators and department managers of the planned scan activity providing detailed information about the scans, including time of scan, originating machine and vulnerabilities that were tested. The security or functionality of the scanned machines should not be endangered by the scan. Some scanning may affect operations and will be mitigated by time of day & recovery procedures.

vi) Report the results of scans that identify security vulnerabilities only to the system administrator contact responsible for those systems.

vii) Report recurring vulnerabilities over multiple scans to the Departmental Head, and or appropriate manager.

viii) If identified security vulnerabilities, deemed to be a significant risk to others and which have been reported to the relevant system administrators, are not addressed in a timely manner, IT will take steps to disable network access to those systems and/or devices until the problems have been rectified.

ix) Provide assistance and advice to system administrators to the extent possible with available resources.

x) Co-ordinate investigations into any alleged computer or network security compromises, incidents and/or problems.

xi) Co-operate in the identification and prosecution of activities contrary to University policies and/or the law. Actions will be taken in accordance with relevant University Policies, Codes and Procedures with, as appropriate, the involvement of the University Police and law enforcement agencies. **4.6** "System Administrator" refers to the individual who is responsible for system and network support for computing devices in a local computing group. In some instances, this may be a single person while in other instances the responsibility may be shared by several individuals, some of whom may be at different organizational levels. If an administrator is not designated, the owner of a computer is considered the System Administrator. System Administrators will:

i) Protect the communication networks and computer systems for which they are responsible.

ii) Employ IT recommended practice and guidelines where appropriate and practical.

iii) Co-operate with IT in addressing security problems identified by network monitoring.

iv) Address security vulnerabilities identified by IT scans deemed to be a significant risk to others.

v) Report significant computer security compromises to the University Information Security Team (<u>wcsu_uc_security_team@wcsu.edu</u>). The IT leaders will follow the CSCU Information Security Incident Response Procedures (V1 3/20/2012) to notify the CSCU Security & Policy Program Office.

vi) All computer resources must provide a notice before logon stating that the computer and network are solely for use of users authorized by University IT and that any unauthorized access is prohibited and may result in prosecution.

vii) Information, which by law is confidential, must be protected from unauthorized access or modification. Data, which is essential to critical functions, must be protected from loss, contamination, or destruction.

Data Classification is the process of grouping data elements together by risk level. WCSU has identified four Data Classification Levels (DCL) from 0 to 3. Appropriate security controls will be applied to each classification level. Increasingly restrictive data management and security practices are required for each level, with DCL0 requiring limited protection to DCL3 (formerly referred to as Class A Data) requiring the most protection.

Data Classification			
Data Classificatio n Level (DCL)	Description	Examples	
3 DCL3 (Protected Confidential)	Level 3 is protected confidential data, which comprises identity and financial data that, if improperly disclosed, could be used for identity theft or to cause financial harm to an individual or WCSU. Security at this level is very high (highest possible).	 Identity Data with: Social Security number Bank account or debit card information Credit card number & cardholder information Student Loan Data 	
2 DCL2 (Restricted)	Level 2 is restricted data that is available for disclosure, but only under strictly controlled circumstances. Such information must typically be restricted due to proprietary, ethical or privacy considerations. An example of such restrictions is the <u>FERPA</u> guidelines that govern publication and disclosure of student information. Security at this level is high.	 Identity Data with: Birth date Mother's maiden name Academic records (e.g. Grades, Test scores, Courses taken, etc.) Student Records (e.g. Advising records, Disciplinary actions) Employee Records 	

1 DCL1 (Internal)	Level 1 is internal data that has not been approved for general circulation outside WCSU where its disclosure would inconvenience WCSU, but is unlikely to result in financial loss or serious damage to credibility. Security at this level is controlled but normal.	 Internal memos Minutes of meetings Internal project reports
0 DCL0 (Public)	Level 0 is public data that has been explicitly approved for distribution to the public. Disclosure of public data requires no authorization and may be freely disseminated without potential harm to WCSU. Security at this level is minimal.	 Advertising Public Directory Information Press Releases Job postings Campus Maps WestConn Account (Windows Account)

5. ACCEPTABLE USE

See CSCU, IT-001, Acceptable Use Policy (<u>BOR_IT-001</u>) for system-wide policy.

WCSU provides information system resources for support of WCSU academic and business operations. Users authorized to use WCSU information system resources, with supervisor's and the CIO's written permission, may make incidental and occasional personal use of these facilities when it does not generate any additional costs to WCSU or does not reduce the staff or employee's productivity or student academic performance. With supervisor's and the CIO's written permission, incidental and occasional personal use is permissible if the use meets all of the following conditions:

i) Personal use does not consume or commit resources that could otherwise be used for WCSU academic/ business purposes — such use parallels the generally accepted practice of allowing users to make local telephone calls of a personal nature, as long as the other conditions outlined below are met.

ii) Personal use does not interfere with employee productivity or preempt any WCSU academic activity or violate WCSU's policies and CSCU's policies.

iii) Personal use is not for the purpose of solicitation of a personal business or for personal gain.

iv) Personal use does not involve sending, forwarding, redistributing or replying to communications promoting lotteries, or "pools" based on chance or chain letters.

v) Personal use is not for the purpose of accessing, downloading, storing or otherwise processing information of a non-professional manner, that which is sexually explicit, violent, vulgar, and criminal in nature or otherwise offensive material addressing age, gender, sexual orientation, race, religion, political beliefs, national origin or disability.

vi) Personal use should not be excessive as determined by the supervisor and the CIO.

vii) Student/ patrons of the University may use University resources such as the Internet for WCSU academic purposes as needed to work on a specific assignment.

viii) Each individual of the University Community is responsible for all actions performed on WCSU information resources under their User-ID/password. Disclosure of User-ID/password combinations including under emergency conditions is prohibited. If a User-ID/password is disclosed or compromised, the password should be changed as soon as possible.

ix) Students may not set up servers in their residence hall rooms. Exceptions to this policy must be approved by the CIO, (e.g. computer science majors may be required to do this as part of their academic requirements). Exceptions will be approved on a case-by-case basis.

x) Employees may not use WCSU computer resources to set up services or accounts for the purpose of which is not in accordance with the non-profit, educational mission of the university. Individuals with questions concerning the appropriate use of a university computer should contact the CIO.

5.1 Electronic Communication

See CSCU, IT-002, Electronic Communication Policy (<u>BOR_IT-002</u>) for system-wide policy.

This section provides additional guidelines on the proper use of, access to and disclosure of electronic mail (email) messages sent or received by WCSU Community (students, faculty, staff, authorized contractors and consultants) using the University's electronic mail system.

i) The email system and the contents of all email messages sent, received or stored in the email system are the property of WCSU. The University email is provided and intended to be used for University business only. The service is part of the computer resources of WCSU to conduct the business of WCSU. Electronic mail is intended to be a convenient way for students, faculty and staff to communicate with one another and colleagues at other locations. It is not the practice of WCSU to monitor the contents of electronic mail messages. However, the information in electronic mail files may be subject to disclosure under certain circumstances; for example, during audit or legal investigations. WCSU does not routinely monitor (e.g. via cookies) the Internet browsing habits of its students, faculty and staff.

ii) Users must not send email so that it appears to have come from someone else or anonymous.

iii) Users should not send unsolicited advertising via email.

iv) Users must not use WCSU computer systems to send or reply to "chain letters" or to distribute or obtain offensive or inappropriate material.

v) Users must not use the mail 'forward' command to automatically forward WCSU email to a personal email account.

vi) Users must not access personal email accounts or ISP while simultaneously connected to the WCSU network.

vii) If WCSU information system resources are used to access a personal email account, the guidelines in this security policy also apply to that usage.

viii) WCSU users must be aware that legal restrictions on sending or receiving copyrighted, obscene and/or objectionable material may apply and must use discretion when forwarding messages to others.

ix) WCSU users should not execute email attachments for non-official/non-academic business such as music, video or animation files unless scanned for viruses.

x) WCSU users must not send PII/DCL3 data via e-mail, alternate secure communication methods need to be employed.

5.2 Internet Acceptable Use

WCSU's network has Internet access to assist WCSU community to fulfill their academic and professional requirements and to carry out their job related functions. With the exception of personal incidental use outlined above, Internet access should be used for WCSU business related purposes. The section covers guidelines for Internet usage.

i) University IT will review all WCSU Internet connections (all data communications with remote locations or devices using shared computing resources, e.g. local area network attached PCs, etc.). WCSU community can only access the Internet with connections established by University IT.

ii) When using the Internet from the WCSU network, you are presenting yourself as a WCSU representative and must conduct yourself in accordance with all aspects of this security policy.

iii) Information posted to discussion groups or mailing lists bearing a WCSU address must reflect the official position of the individual and must state that it is not the position of WCSU.

iv) Users must not download material from the Internet that is subject to copyright or other intellectual property right protection unless express permission to do so is granted by the material owner.

v) University IT can disallow the use of harmful software if a user downloads a file that adversely affects their system or other systems in the WCSU network.

vi) All downloaded materials must be scanned for viruses before file execution.

6. LOGICAL & PHYSICAL ACCESS CONTROLS

The WCSU network is provided to meet the academic needs of the University. The network connects all information system resources to facilitate communication among them. It is necessary to identify individuals who are permitted to access WCSU information system resources physically and logically connected to the WCSU network. Logical and physical controls prevent or discourage unauthorized access to WCSU information system resources. University IT controls access to the WCSU production network, internal network, systems and applications. Users control access to their individual computer; the files and applications that are installed on their individual computer. All files and applications are "owned" by key users; the owner is responsible for determining who has access to the file application and the appropriate level of access.

6.1 LOGICAL CONTROLS

6.1.1 User ID's and Passwords

All WCSU users, including students, faculty, staff, authorized contractors, consultants and University IT staff, should access WCSU resources with unique IDs to provide the appropriate level of accountability and an adequate audit trail of activity. Generic IDs should not be used, and when used, should be limited to special circumstances

WCSU assigns unique user ID and passwords for each authorized user. Users are responsible for all actions performed on WCSU information system resources under their User ID and password. Disclosure of User ID and passwords under any circumstances is prohibited.

Passwords are the first line of defense for the protection of WCSU information and information system resources. Using good passwords will help reduce the possibility of unauthorized access to the university's network infrastructure.

6.1.1.2 Password Length and Complexity

Access to WCSU information system resources should require the use of unique password consisting of at least eight characters and must include 3 of the 4 following categories:

- Upper case letters
- Lower case letters
- Numbers
- Special characters

6.1.1.3 Password Expiration

WCSU forces password expiration every 60 days on most systems within their network infrastructure. WCSU users must change their password when it expires or cannot proceed with their session. When changing the password, user may no use the same password as the system remembers last 3 passwords and enforces the minimum password age of 1 day.

6.1.1.4 Password Protection

Passwords used to connect to the WCSU network are not to be disclosed to anyone other than the authorized user. IT staff including system administrators and technical support staff will never ask for your password. If a password is disclosed to an individual other than the authorized user, the incident needs to be reported & the password must be promptly changed.

Passwords must be encrypted before being transmitted on the network. Any systems found to violate this requirement must be identified to University IT for mitigation & resolution to correct.

Any shared passwords, i.e. non-user passwords such as device or service passwords; need to be changed when any persons with knowledge of said passwords leave the university. Ie. terminating employment.

Service passwords need to be changed annually, where possible.

6.1.1.5 Passwords Do's and Don'ts

Below are some simple pointers for proper management of passwords:

Do's:

Do use a password with a mixture of alphabetic and non-alphabetic characters, e.g., digits or punctuation.

Do use a password consisting of at least 8 or more characters.

Do use a password that is easy to remember, so you don't have to write it down.

Do use a password that you can type quickly, without having to look at the keyboard. This makes it more difficult for someone to steal your password by watching over your shoulder.

Do change your password on a regular basis, be proactive don't wait for it to expire.

Do change all vendor-supplied or default passwords on a computer prior to connecting to the WCSU network infrastructure.

Do change your password if it has been disclosed or suspected of being disclosed.

Do control all software and files containing formulas and algorithms used for the generation of passwords or Personal Identification Numbers (PINs).

Don'ts:

Don't use your login name in any form (as-is, reversed, capitalized, doubled etc.) as a password.

Don't use your first or last name in any form.

Don't use your spouse or children's names.

Don't use any other personal information that can be easily obtained. This includes license plate numbers, spouse, children or pet names, telephone numbers, social security numbers, the brand of your automobile, zip code, the name of the street you live on, etc.

Don't use a password of all digits or all the same letters. This significantly decreases the search time for an intruder.

Don't use a word contained in (English or foreign language) dictionaries, spelling lists or other lists of words.

Don't use the same password on multiple systems.

Don't write down your password and leave it in a location where other personnel may have access to it.

Don't share your password with anyone, including University IT staff.

Don't reply to an e-mail requesting your username and password under any circumstances. University/CSCU IT staff will never ask you for your username and password. Any requests for such are not legitimate and are classified as phishing scams. These malicious emails can introduce Trojans, worms and computer viruses to your machine and can potentially destroy/expose your data and damage your machine.

6.1.2 Access Requests

User access should be requested by the Departmental Head and reviewed by the CIO or IT designee. WCSU departmental heads will determine the access required for each individual and request appropriate access for those individuals. Department managers must ensure that their representatives maintain only those access privileges required to perform their academic/ official job functions. The principle of least privilege should be employed to minimize organizational risk.

6.1.3 Access Termination

- In general, when an employee terminates employment, and a future contract has not been issued, their access to computer resources will be terminated.
 - Retired employees may be permitted access to electronic mail systems.
 - Adjuncts who are not teaching for two consecutive semesters will have their access terminated but may be permitted access between those semesters.
- Similarly, students who are not enrolled for two consecutive semesters will have their access to computer resources terminated except those which they are entitled to for life (ie. Office365).
- Department heads and Human Resources (HR) must ensure access to information systems is removed for terminated employees. University IT is responsible for performing access termination when notified by HR.

6.2 PHYSICAL CONTROLS

Physical controls are often viewed as involving only physical access to a facility. However, physical controls actually include facility access, access to controlled areas within a facility, access to computers or systems, handling of laptops and location and handling of printers. This policy addresses the protection of and physical access to WCSU facilities, computer equipped rooms, computer labs, network equipment, PCs and other related equipment. All WCSU facilities will also adhere to all local, state and national electrical, fire and other appropriate codes and insurance requirements.

6.2.1 Facility Access

Access to WCSU facilities must be controlled in a manner that provides security to the WCSU community and assets. Access must also provide for the detection of perimeter breaches. Recognizing that no physical security measure will withstand all intrusions, WCSU facilities should always be provided with a degree of physical protection commensurate with the value of the assets in, around or accessible from that facility.

6.2.2 Workstations

WCSU users must protect their workstations in a manner that precludes unauthorized access to WCSU information and information system resources. This would include logging out of workstations or mobile devices when left unattended or invoking a password protected screen saver to deter unauthorized users.

6.2.3 Laptop Systems

In addition to those concerns regarding workstations addressed above, the following should also be considered regarding the use of laptop systems:

- i. It is the responsibility of the individual to update and maintain accurate information on CSU-1079 Record of Equipment on Loan Form on www.wcsu.edu.
- ii. When not in use, the laptop should be stored in a locked cabinet or desk drawer or with some type of physical locking device.
- iii. When traveling, the traveler must maintain physical control of the system at all times. Never leave your laptop in your unlocked car or in visible site.
- iv. Consider the use of removable media for storage of protected information while on travel.

7. COMPLIANCE WITH LEGAL & CONTRACTUAL REQUIREMENTS

No Expectation of Privacy

There is no expectation of privacy in the use of CSCU IT resources. CSCU reserves the right to inspect, monitor and disclose all IT resources including files, data, programs and electronic communications records without the consent of the holder of such records. Please see the <u>State of CT Electronic</u> <u>Monitoring Notice</u>.

7.1 Authorized Use

WCSU computing facilities must only be used for authorized purposes. The University may from time to time monitor or investigate usage of computing facilities. Any person found using computing facilities or systems for unauthorized purposes or without authorized access, may be subject to disciplinary and where appropriate, legal proceedings.

7.2 Monitoring of Operational Logs

The University shall only permit the inspection and monitoring of operational logs by appropriate IT staff and system administrators. Disclosure of information from such logs, to officers of the law or to support disciplinary proceedings, shall only occur:

i) when required by and consistent with law;

ii) when there is reason to believe that a violation of law or of a University policy has taken place;

iii) when there are compelling circumstances.

7.3 Access to University Records

In general, the privacy of users' files will be respected but the University reserves the right to examine systems, directories, files and their contents to ensure compliance with the law and with University policies and regulations and to determine which records are essential for the University to function administratively or to meet its teaching obligations. Except in emergency circumstances, authorization for access must be obtained from the CIO, the Director of Infrastructure, or designee, and shall be limited to the least perusal of contents and the least action necessary to resolve the situation.

7.4 Protection of Software

Software installed on any of the WCSU systems must be legally licensed. To ensure that all software and licensed products used within the University comply with the Copyright, Designs and Patents Act 1988, Digital Millennium Copyright Act and subsequent Acts, the University will carry out checks from time to time to ensure that only authorized products are being used and will keep a record of the results of those audits. Unauthorized copying of software or use of unauthorized products by students, faculty or staff may be grounds for disciplinary and where

appropriate, legal proceedings. This includes illegally downloading software from the Internet. Users should not copy software applications from one computer to another computer. WCSU departmental heads are responsible for ensuring that no software license usage in their department exceeds purchased levels and arrange for additional licensed copies when needed to support academic activities. University IT will install all software and maintain an inventory of all applications.

7.5 Virus Control

Computers infected with viruses or malicious code could jeopardize information security by contaminating, damaging and destroying data. This policy provides controls to protect against such attacks.

The University will maintain detection and prevention controls to protect against malicious software and unauthorized external access to networks and systems. All users of University computers, including laptops, shall comply with best practice, when defined by University IT, in order to ensure that up-to-date virus protection is maintained on their machines.

Users must be alert to and report any abnormal behavior exhibited by their computers or software applications since this may indicate the existence of a virus or other malicious logic undetected by resident anti-virus software.

It is the responsibility of University IT personnel to ensure that current anti-virus software is installed on servers and all other applicable equipment within the network.

7.5.1 Virus Containment and Removal

Resident anti-virus software will be used to remove a virus from an infected file or program. If anti-virus software fails to remove the virus or discovers a zero day exploit, the system must be disconnected from the network.

University IT staff will follow the WCSU Malware Threat Assessment procedures in support of the CSCU Information Security Incident Response Procedures (V1 3/20/2012) to refer the drive for a forensic analysis if needed by the BOR.

Any system drives returned after the investigation has completed must be DOD wiped before being re-imaged & deployed back into service to remove all remaining traces of the threat.

7.6 Host and Network Security

Hosts and Network must be protected by available tools and security measures. These include use of special software such as Firewalls, Intrusion Detection Systems, Network Scanners and Network Monitors. All network firewall policies and rules must be documented and must adhere to the University Security Policy.

8. INCIDENT DETECTION & REPORTING

Properly and efficiently detecting and responding to suspicious network activities and unauthorized system use requires that users report unusual and suspicious activity surrounding the use of information system resources. Users should report possible incidents to University IT by email or phone.

8.1 SECURITY BREACH NOTIFICATION & REPORTING

8.1.1 Security Breaches

A security breach is defined as any action or event in contravention to the provisions of this Information Security Policy; and/or actions or events deemed a security breach by State or Federal law enforcement organizations.

8.1.2 Notification of a Security Breach

Refer to CSCU Information Security Incident Response Procedures (V1 3/20/2012) for full details.

Summary information is provided below to help facilitate quick notifications.

Notification to <u>security@ct.edu</u>, occurs **immediately** upon discovery for:

- a. Incidents that seriously affect data center operation resulting in partial or complete shutdown of the data center.
- b. Incidents that affect network closets.
- c. Any security incidents that involve administrative departments with access to personal, financial, or FERPA data:
 - i. HR
 - ii. Registrar
 - iii. Admission
 - iv. Finance
 - v. Financial Aid
 - vi. Bursar
 - vii. Police
 - viii. Athletics
 - ix. Health Services
 - x. Institutional Research
 - xi. other departments that may meet the criteria.

The CSCU Security & Policy Program Office will direct notification to senior administration, Office of the Attorney General, and other parties as appropriate.

The BOR Chief Information Officer shall oversee all investigations and responses related to unauthorized access and/or disclosure of sensitive information as well as all computer security incidents to minimize risk to BOR and its institutions

8.1.3 Reporting a Security Breach

Notification of potential Security Breaches must be reported to the University Information Security Team (wcsu_uc_security_team@wcsu.edu).

The IT leaders will follow the CSCU Information Security Incident Response Procedures (V1 3/20/2012) to notify the CSCU Security & Policy Program Office (S&PPO).

WCSU has appointed primary and secondary security coordinators to act as points of contact for the reporting of information security incidents and coordinating incident responses with BOR Information Security Office.

The primary security coordinator is the ISO or designee. The secondary or backup coordinator is the CIO or designee.

All CSCU employees and students are expected to cooperate with any security incident investigation.

8.1.4 Unauthorized Access Attempts

This includes anything from harmless exploration to hacking in order to gain access to information. Unauthorized access also includes gaining access to computer systems for future use (e.g. extortion).

All unauthorized access attempts must be noted and logged. The Audit Trail/System Access Log must be reviewed regularly, exception reports generated and inspected by the System Administrator and appropriate action taken. A copy of the report of unauthorized access attempts must be produced and kept for future reference.

8.1.5 Enforcement

The University considers any breach of security to be a serious offense and reserves the right to copy and examine files or information resident on or transmitted via the University's information technology resources. Students deemed to be in breach of security are subject to disciplinary action. Faculty, staff, & contractors deemed to be in breach of security are subject to disciplinary action available under legal & contractual provisions. Offenders may also be prosecuted under State, Federal and International laws.

University IT may temporarily remove material from websites or close any account that is endangering the running of the system or that is being reviewed for inappropriate or illegal use.

9. AWARENESS & COMMUNICATION

It is essential that all aspects of information security, including confidentiality, privacy and procedures relating to system access, should be incorporated into formal student, faculty and staff induction procedures and conveyed to existing university community on a regular basis.

Each employee, on commencement of employment, should be made aware that they must not divulge any information that they may have access to in the normal course of their employment. Staff must also be made aware that they should not seek access to data that is not required as part of their normal duties. Students must be made aware that they should not attempt unauthorized access to grades, course material and other information intended to be private and confidential.

System Administrators should be properly trained in all aspects of system security prior to supporting these systems.

9.1 DISASTER RECOVERY

9.1.1 Data Backup

Production servers and computers offering network share resources are backed up regularly to provide protection against hardware failures and other disasters. Backups are also rotated off-site regularly.

9.1.2 Individual Data Backup

Individual computers are not backed up by University IT. Furthermore, backups for shared departmental servers may not be frequent enough to satisfy all users' requirements. It is strongly recommended that users place all data on network share resources.

9.1.3 Contingency Planning

Contingency plans specify procedures designed to:

- i) Identify and respond to disasters
- ii) Protect personnel, systems and data

iii) Provide critical services with all or portions of the computing facility unavailable to recover full service capability

A contingency plan based on risk analysis shall be added to this policy document when available. This plan is being developed as a CSCU System-wide effort.

9.2 SECURITY AWARENESS & TRAINING

Regular meetings at various management and user levels are held at which current and pending security issues such as internal security bulletins, recently discovered exploits and measures, CERT incident reports are discussed and reviewed and new potential risks are identified and planned for.

Users are required to follow security publications and to make use of all security resources (such as mailing list subscriptions and notification services) in order to keep abreast of pertinent security issues in their areas of expertise. University IT will host a dedicated security website containing valuable information on Information and System Security. The website is updated frequently. <u>http://wcsu.edu/technology/security/</u>

As part of CSCU's Data Management Program, Users with access to DCL3 data are required to complete the Information Security Education and Awareness Training program annually. (http://supportcenter.ct.edu/Service/securityeducation.asp)

In addition to the SANS STH training, SANS offers free Security resources that apply to all users in general and can be found at:

- Monthly Awareness Video: <u>http://www.securingthehuman.org/resources/ncsam</u>
- OUCH! Newsletter: <u>http://www.securingthehuman.org/resources/newsletters/ouch/</u>

10. ASSURANCE

The BOR Chief Information Officer is responsible for developing a mechanism to continuously assess and improve the quality and effectiveness of the CSCU Information Security Program.

- The BOR Information Security Program Office is responsible for reviewing relevant statutory, regulatory, and contractual requirements and developing the organization's approach for documenting and verifying the requirements are meet.
- The BOR Information Security Office shall cooperate with internal and external audit in areas of security reviews, inspections, and assessments.
- In accordance with BOR Resolution dated 10/17/2013 (<u>BOR_Security_Resolution_10-17-</u> <u>2013</u>), WCSU shall annually provide the BOR Program Office a report detailing the security programs effectiveness by November 1 for consolidation to the BOR by November 15.

11. EXCEPTION PROCESS

WCSU/CSCU recognizes that some portions of the Security Policy may have to be adjusted from time-to-time because of technical or business reasons.

Accordingly, exceptions may be made provided:

- 1. The need for the exception is legitimate and approved by the WCSU President or designee.
- 2. The exception does not disrupt or compromise other portions of the WCSU/CSCU service delivery capability.
- 3. The implementation of the exception is vetted through the Change Management Process.
- 4. WCSU IT in conjunction with BOR Information Security Program Office, is able to establish a monitoring function to assess the operations of the implementation exception.
- 5. The exception has a defined lifecycle, in that the "retirement" of the exception is scheduled (e.g., "when Release 4.9 is implemented," "at contract termination," etc.)

Exception Request

To request an exception, please submit the Information Security Exception request to <u>SecProg@ct.edu</u>

The requestor and BOR Information Security Program Office will define the approved alternative configuration if different than the original proposal of the requestor.

The exception process is NOT an alternative to the Change Control Management process.

12. POLICY MANAGEMENT & REVISION

Formulation and maintenance of the security policy is the responsibility of the CIO and the ISO or designee.

This policy will be reviewed every 3 years by the CIO, ISO and senior management in consultation with the Information Technology Committee, and revised if necessary.