

Chief Review Services Chef - Service d'examen

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Audit Follow-up on Departmental Security Program Implementation and Security-Related Audits

June 2012

7050-33-7 (CRS)









Final – June 2012

Caveat

The results of this work do not constitute an audit. Rather, this report provides an update on the progress made regarding the management action plans (MAP) of the security-related audits. This information was obtained through documentation review and interviews.

Table of Contents

Acronyms and Abbreviations	i
Introduction	1
Progress against Action Plans	
Contributing Factors	
Overall Assessment	
Annex A—Key Security Audit Observations, Recommendations and	
Management Action Plans	A-1

Acronyms and Abbreviations

A&A Assessment and Authorization

ADM(IM) Assistant Deputy Minister (Information Management)

ANST Active Network Security Testing

ARA Aggregated Risk Assessment

C&A Certification and Accreditation

CF Canadian Forces

CF MP Gp HQ Canadian Forces Military Police Group Headquarters

CRS Chief Review Services

CSEC Communications Security Establishment Canada

CSIS Canadian Security Intelligence Service

CSNI Consolidated Secret Network Infrastructure

DDS Director Defence Security

Dir IM Secur Director Information Management Security

DND Department of National Defence

DPM Secur Deputy Provost Marshal (Security)

DSM Defence Security Manual

DSO Departmental Security Officer

DSP Departmental Security Plan

DWAN Defence Wide Area Network

ISP Industrial Security Program

IT Information Technology

L1 Level One

MAP Management Action Plan

NDSI National Defence Security Instruction

OPI Office of Primary Interest

PGS Policy on Government Security

SSAC Senior Security Advisory Committee
TBS Treasury Board of Canada Secretariat

TRA Threat and Risk Assessment

VCDS Vice Chief of the Defence Staff

Introduction

Chief Review Services (CRS) first began reporting on the Department of National Defence's (DND) security program with the release of the May 2004 report on the Audit of Security for Sensitive Inventories. CRS now has two audit teams dedicated to the conduct of security-related audits | | | | | | | | | | | | | | | a Memorandum of Understanding with Communications Security Establishment Canada (CSEC) through which active network security testing services (ANST) were provided to the Department. Since the conduct of the sensitive inventories audit, CRS has performed audits of the Department's security clearance process, the process used to certify and accredit information systems and networks, the security incident management process and the contracting security process. Additionally, with the assistance of the CSEC ANST team, security assessments of both the Defence Wide Area Network (DWAN) and the Consolidated Secret Network Infrastructure (CSNI) were performed. Three common issues have emerged from each of the security-related audits. The first guidance. Departmental security-related policy documents are significantly outdated and require a complete rewrite to take into account significant changes in departmental organizational structure, operational procedures and authorities. The current security policy suite consists of a mix of outdated National Defence Security Policy, National Defence Security Instruction (NDSI) and Defence Security Manual (DSM) documents; | The final issue, but one that is just as important as the others and possibly a direct result

Annex A provides an update on the MAPs for key findings associated with each of the previously conducted security-related audits and assessments. The information was provided by the organizations responsible for implementation of the action plans. With few exceptions, the three key issues— policy			
Progress against Action Plans			
While both the Vice Chief of the Defence Staff (VCDS) and the Assistant Deputy Minister (Information Management) (ADM(IM)) have acknowledged the identified deficiencies, the implementation of management action plans has been slow;			
Director Information Management Security (Dir IM Secur) staff have made significant			
progress towards developing a more rigorous approach to accrediting the Department's			
numerous information systems and networks;			
providing the required documentation, expected completion dates cannot be provided.			
quantified; regardless, As an example, a recently completed			
accreditation of a portion of the			
Contributing Factors			
While the creation of the Director Defence Security (DDS) organization has been a			
positive step,			
development of a truly functional security program. Recent events, both actual and simulated, have			

Implementation and Security-Related Audits	Final – June 2012
Overall Assessment Notwithstanding the creation of the DDS organization and current initia	tives to address
the misalignment of accountability and authority,	
before any process cha	anges are made, a

Annex A—Key Security Audit Observations, Recommendations and Management Action Plans

Key Observation:	1. Physical Security	of Sensitive	Inventories	(OPI: VCDS)	May 2004
Audit Follow-Up, August 2008 Key Observation:					
Key Observation:					
Impact/Risk:	Audit Follow-Up, A	ugust 2008			
Audit Follow-Up, May 2012 Key Observation:					
Audit Follow-Up, May 2012 Key Observation:					
Key Observation:					¹
	Audit Follow-Up, M	Iay 2012			

¹ At the time of original audit, the organization responsible for sensitive inventories was the Deputy Provost Marshal (Security) (DPM Secur). This responsibility now falls under the CF MP Gp HQ.

1. Physical Security of Sensitive Inventories (OPI: VCDS) May 2004 (cont'd)

Key Recommendations	Key Management Action Plans	CRS Audit Follow-Up, May 2012

Table 1. Physical Security of Sensitive Inventories, May 2004. The results of a CRS follow-up in 2012

2. Security Clearance Process (OPI: VCDS) September 2006
Key Observation:
Impact/Risk: Reliability status serves as the foundation for security clearances. The CF MP Gp HQ ² (specifically, the Directorate of Police and Security) provides the hiring organization with automated credit and criminal name check results.
Secret clearances are granted based on information obtained by repeating previously performed credit and criminal name checks and getting CSIS to perform various checks
There is minimal opportunity to identify
The Department
Audit Follow-Up, August 2008
Key Observation: The security clearance process
Impact/Risk: Effective April 1, 2008,

² At the time of original audit, the organization responsible for security clearances was DPM Secur. This responsibility now falls under the CF MP Gp HQ.

Audit Follow-Up, May 2012

Final - June 2012

Annex A

2. Security Clearance Process (OPI: VCDS) September 2006 (cont'd)

1 /	
Key Observation:	addressing key recommendations
from the original audit.	
clearance process.	
T 4/D: 1	
Impact/Risk:	

Key Recommendations	Key Management Action Plans	CRS Audit Follow Up, May 2012
Initiate a full review and revision of the security clearance program that addresses identified	Initiate review addressing security clearance process issues identified to ensure all PGS guidelines and treaty obligations are met,	The Personnel Security Working
shortcomings in the current	options/feasibility of checks that	Group is working to define DND
reliability/clearance process.	provide higher levels of assurance are considered,	requirements for security screening and examine options to improve the security clearance process.
	and supporting documentation is appropriately	l
	retained and stored.	
	Initial Target Date:	
	December 2006	
		TBS is currently studying the
		Time Lapse: 5.5 years

2. Security Clearance Process (OPI: VCDS) September 2006 (cont'd)

Key Recommendations	Key Management Action Plans	CRS Audit Follow Up, May 2012
Before making changes, conduct a risk management assessment of the clearance process addressing each of the risk-related issues and identified process deficiencies.	As part of the security clearance process review, conduct a risk management assessment that addresses the identified issues and deficiencies. Initial Target Date: November 2006	Risk assessment completed as part of an ARA in December 2011.

Table 2. Security	y Clearance Process,	September 2006.	A 2012 audit follow-up	

3. Certification and Accreditation (C&A) Process (OPI: ADM(IM)) September 2007
Key Observations: The process
Impact/Risk:
Key Observations: Progress has been slow in
Senior management's
Audit Follow-Up, May 2012 Key Observation: Work is under way to transition from the C&A process to the assessment and authorization (A&A) process outlined by CSEC.

3. Certification and Accreditation (C&A) Process (OPI: ADM(IM)) September 2007 (cont'd)

Key Recommendations	Key Management Action Plans	CRS Audit Follow-Up, May 2012
		Information Technology security policy authorities and responsibilities have been articulated through Defence Administrative Order and
		Directive 1000-1, 6003-0 and 6003-1.
		Time Lapse: 2.5 years
		C&A status
		111111111111111111111111111111111111111

³ Numbers do not include systems certified and accredited for operations and exercises.

3. Certification and Accreditation (C&A) Process (OPI: ADM(IM)) September 2007 (cont'd)

Key Recommendations	Key Management Action Plans	CRS Audit Follow-Up, May 2012
Elicit senior executive management	Quantify and develop recommendations for	Senior management

Table 3.	Certification a	and Accreditation	Process, September	2007.	

4. & (O	C	0	n	SO	ol	i	d	a	t	e	d		5	e	C	r	et	t	ľ	V	e1	tr	V																					e	tv	W	0	r	k		$(\mathbf{I}$)	V	V.	A	l	1)	
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Audit Follow-Up, May 2012

Key Observation: The implementation of enhanced security measures can only be confirmed by conducting a follow-up security posture assessment.

Key Recommendation	Summary of Management Action Plans	CRS Audit Follow-Up, May 2012
Within the context of a TRA for each system consider implementation of enhanced security measures in areas such as:	Recommendations were assessed/prioritized based on	
•	identified areas in order to enhance the security posture of the DWAN and CSNI. Initial Target Date: March 2010	
•		
•		
•		

5. Security Incident I	Management (OPI: VCD)	S) June 2010
Key Observation:		
Key Recommendations	Key Management Action Plans	CRS Audit Follow-Up, May 2012
Revise security policies to reflect appropriate roles, responsibilities and authorities, and to ensure requirements are clear and consistent within the Department and aligned with the PGS.	Revise and update the departmental security policies as well as administrative directives related to the governance of security matters. Promulgate clear guidance in the Department's core security policy (in draft) and subsequent security standards, in order to ensure the proper management of security incidents, mitigating strategies, and compliance with the PGS. Initial Target Date: December 2010	Draft security incident management procedures have been developed. Time lapse: 1.5 years

5. Security Incident Management (OPI: VCDS) June 2010 (cont'd)

Key Recommendations	Key Management Action Plans	CRS Audit Follow-Up, May 2012
Develop and implement strategies to ensure that the appropriate organizations receive relevant security incident information, such as damage assessments and security investigation reports, to make certain policy requirements are met and appropriate action is taken to minimize damage and prevent recurrence.	Engage key stakeholders to develop proper reporting procedures and oversight mechanisms regarding the actions to be taken following an investigation.	Strategies in place to ensure appropriate organizations receive relevant security incident information (i.e., damage assessments, security investigation reports) to minimize damage and prevent recurrence. No supporting documentation provided. Time lapse: 1.5 years
Forum/mechanism to be established to periodically communicate security incident information to senior management.	This recommendation has also been noted in past reports. Consequently, the VCDS has reestablished the Senior Security Advisory Committee (SSAC) to ensure that such communication takes place.	Completed. The SSAC has been officially stood up through the renewal of the security campaign plan and meets quarterly. Note: SSAC membership has been downgraded from L1s to working level.

Table 5. Security Incident Management, June 2010.

	y (OPI: VCDS) May 2011	
Key Observations: The l	Department's Industrial Securit	y Program (ISP)
Impact/Risk: The CF MI	P Gp HQ ⁵	
Audit Follow-Up, Ma	ay 2012	
Key Observation: original audit. ISP has taken place. The	•	recommendations from the s a review of the departmental
Key Recommendation	Key Management Action Plans	CRS Audit Follow-Up, May 2012

⁵ At the time of original audit, the organization responsible for industrial security was DPM Secur. This responsibility now falls under the CF MP Gp HQ.

6. Industrial Security (OPI: VCDS) May 2011 (cont'd)

Key Recommendation	Key Management Action Plans	CRS Audit Follow-Up, May 2012
Risk management processes to monitor adherence to identified security requirements or where no security requirement exists, mechanisms to ensure the determination of the "non-requirement" is accurate and supported. A robust training and awareness plan to ensure that the appropriate personnel are aware of all industrial security requirements, associated responsibilities and sources of expertise within the Department.	The oversight and governance construct (DSO/DDS organization and the SSAC reporting to the Defence Management Committee) will ensure compliance with the risk management processes. The ISP will be included in the Department-wide rejuvenation of security education, training and awareness. Initial Target Date: April 2012	

Table 6. Industrial Security, May 2011. According to the CRS audit follow-up in 2012, |||||||||||