Personnel Security

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PURPOSE

This standard is intended to ensure security controls and related procedures are implemented to protect the privacy, security and integrity of VCCS information technology resources against unauthorized or improper use, and to prevent and detect attempts to compromise information technology resources for any employee who is separated, transferred, or promoted.

SCOPE

In accordance with the Commonwealth of Virginia (COV) Information Technology Resource Management Standard (ITRM), COV ITRM Standard SEC501-01, Information Technology Security, personnel security must be an integral part of a VCCS information technology security plan. Personnel security reduces the risk that key information technology assets will be compromised by securing all VCCS systems and related data for access by authorized personnel only.

APPLICABILITY

This standard is applicable to the System Office and all colleges.

DEFINITION
**Personnel Security** refers to those practices, technologies and/or services used to ensure that personnel security safeguards are applied. Personnel security safeguards take into account 1) granting or withdrawing physical and system access privileges upon: hiring an employee, transferring an employee to another VCCS Entity or state Agency, terminating an employee, or when an employee resigns or changes job duties within a VCCS Entity; 2) system access will be granted, modified and revoked via a formal and auditable process, 3) security training to reinforce this standard will be conducted within 30 days of a new hire, 4) Non-Disclosure Agreements will be signed by all individuals who need access to "sensitive/confidential" information, prior to granting access to that information, 5) Background checks of personnel may be required consistent with VCCS Entity policy and depending on the sensitivity/confidentiality of information accessible to that position.

**Auditable Process** refers to specific documentation which can be a manual or an automated process that provides sufficient evidence that will allow one to trace the events of an action that has taken place.

**Sensitive Data/Information** refers to critical information for which the unauthorized access, loss, misuse, modification, or improper disclosure could negatively impact the ability of the VCCS Entity to provide services and benefits to its students.

**Confidential Data/Information** refers to information that involves the privacy to which individuals are entitled by law. This information may only be disclosed to those individuals that are authorized and have a need to review the data or information.

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**STANDARD**

Personnel security begins during the staffing process. Best practices suggest that two general principles should be followed in defining a position: **separation of duties** and **least privilege**.

Separation of duties (SoD) is an important concept in developing the required internal controls for an organization. As a security principle, it has as its primary objective the prevention of fraud and errors. Separation of duties refers to dividing roles and responsibilities so that a single individual cannot subvert a critical process. In information technology, separation of duties helps to reduce or minimize the potential damage from the action(s) of one individual. This standard recognizes that staffing limitations often impact the degree to which an organization can implement the desired level of SoD. Therefore, every reasonable effort should be made to implement SoD where necessary. In cases where SoD cannot be achieved then there must be documented controls for mitigating the potential exposure. As an example, a documented supervisory review of the employee’s activities that is commensurate with the frequency of the tasks performed.

The concept of limiting access, or "least privilege," is simply to provide no more authorizations than necessary to perform required functions. This is perhaps most often applied in the administration of the IT system or service. Its goal is to reduce risk by limiting the number of
individual with access to critical system security controls; i.e., controlling who is allowed to enable or disable system security features or change the privileges of users or programs. Best practice suggests it is better to have several administrators with limited access to security resources rather than one person with “super user” permissions.

Least Privileges requires that each user account in a system be granted the most restrictive set of privileges needed to perform authorized tasks. Ensuring least privilege requires identifying what the user’s job responsibilities are, determining the minimum set of privileges to perform the job, and restricting the user’s access to those privileges necessary to perform their specific job duties as documented in the employee’s position description.

The System Office and all colleges must establish and document the process which directs the steps and the timing required to grant and withdraw physical and system access privileges to personnel for the following events: new hire, employee transfer to another VCCS office or location, employee separation, employee resignation, employee change of job duties, and documented disgruntled employee behavior. See related links below for additional guidance.

RELATED LINKS

Access Control and Determination
IT Security Awareness Training
Acceptable Use

Return to Standards