



Strategic Policing and Crime Board

Tuesday 17th July 2018

Police and Crime Plan Priority: Building trust and confidence in our police

Title: Secure handling of security marked documents

Presented by: Deputy Chief Constable Louisa Rolfe

Purpose of paper

1. The purpose of this paper is to provide reassurance to the communities of the West Midlands regarding the handling, control and dissemination of information by West Midlands Police (WMP). The paper will explain West Midlands Police information management security policies and practices which are based on government legislation and guidance. It will aim to provide reassurance in how West Midlands Police personnel handle security classified information both inside and outside of police buildings. The paper will cover information management and security training, and the use of secure items to transport government security marked documents. Finally, it will explain the response of West Midlands Police to lessons learnt following the loss of documents leading to the dismissal of a senior police officer.

Background

2. Between 10 May and 15 May 2017 a secure metal briefcase containing security marked documentation was stolen from a police vehicle.
3. The theft was reported and an investigation launched to find those responsible and recover the stolen items. The Directorate of Professional Standards from the Metropolitan Police were asked to investigate the circumstances of the theft and identify any learning.

4. The investigation has not identified those responsible for stealing the items from the police vehicle. None of the items stolen have been recovered to date.
5. The Metropolitan Police investigation found there was sufficient evidence to charge the officer with offences under the Official Secrets Act in addition to misconduct matters.
6. The officer was charged and pleaded guilty at Westminster Magistrates Court, to offences under the Official Secrets Act. He was sentenced to a fine of £3,500.
7. Chief Constable David Thompson of West Midlands Police later dismissed the officer, following a misconduct hearing.

West Midlands Police Information Security Policy

8. West Midlands Police has an Information Security Classification Policy which covers Government Security Classification (GSC) as required from 2014. The police service across England and Wales adopted the Government Security Classifications as of late 2015. Local Policy covers the following areas:
 - i. Explanation of government security classifications OFFICIAL, OFFICIAL-SENSITIVE, and SECRET
 - ii. The overriding principle of 'need to know' in respect of all information regardless of security classification or rank
 - iii. Handling Instructions implemented to safeguard and handle information at OFFICIAL, OFFICIAL-SENSITIVE, SECRET and TOP SECRET government security classifications
 - iv. Information Asset Control Measures utilised for information with a government security classification of OFFICIAL, SECRET AND TOP SECRET
9. To ensure compliance with the policy, West Midlands Police has an Information Management department responsible for the review and implementation of any new and existing information security protocols. For instance, the Information Management team has led the introduction of and force compliance with the new General Data Protection Regulations (GDPR) which came into effect on 25 May 2018.

10. The majority of information held by West Midlands Police is classified as OFFICIAL or OFFICIAL-SENSITIVE. The exceptions to this are the Regional Organised Crime Unit, the Counter Terrorism Unit, and the Counter-Corruption Unit within Professional Standards where information with a security classification of SECRET and/or TOP SECRET is handled as part of daily business. Officers and Staff working within those units are required to hold higher levels of vetting as part of a layered approach to information management and security.

Need to Know Protocol

11. Access to physical locations where SECRET and TOP SECRET classified information is handled and secured is kept discreet and on a 'need to know' basis. Only officers and staff with an operational requirement to access secure environments are afforded access to such areas. Senior police officer rank or equivalent police staff position does not enable access to such areas without the appropriate level of vetting and a specific operational requirement.

Infrastructure

12. West Midlands Police uses individually issued smart-cards with user-defined access codes to control access to police buildings. Shared Services authorise access and restrictions, dependent upon role, with the appropriate managerial authority. The entry and exit times of smart-cards is recorded on a secure central database, offering an audit trail of movement if necessary. As noted above, even with access to police buildings, secure environments are smart-card controlled to individual users. In the most sensitive environments, an additional electronic pass is required to those persons with an essential requirement to access that area. Access is granted through two factor authentication where the employee's identification card has to be close to the proximity of the card reader and the user inputs a unique PIN.

WMCTU and WMROCU

13. Security management within the West Midlands Counter Terrorism Unit (WMCTU) and Regional Organised Crime Unit (ROCU) is supported by two Operational Security Advisors. The Security Advisors ensure practical compliance with government guidelines and support a testing regime of physical infrastructure and security protocols. In addition, they provide training to staff in the use of metal briefcases and secure storage.

Implementation of Security Recommendations

14. As part of the investigation completed by the Metropolitan Police, an assessment was completed of the working environment provided to the officer. The assessment focused on two physical locations including WMCTU and the Force Executive Team office at West Midlands Police Headquarters.
15. The Metropolitan Police reported that the officer had the ability to store SECRET material at West Midlands Police HQ, but not TOP SECRET material. At WMCTU, the Metropolitan Police reported that the officer was provided with an appropriate working environment to handle and store SECRET and TOP SECRET material as required.
16. As a result of the investigation, the Metropolitan Police provided three recommendations to West Midlands Police to prevent the reoccurrence of such events in the future. The recommendations were:
 - A. WMCTU to review the process and handling of sensitive documents as outlined in GSC 2014 and consider wider organisational learning for the CT network.
 - B. Review of secure metal briefcase practice, how they are secured to cater for all reasonably foreseeable contingencies that may occur during transit.
 - C. Review if CT staff are sufficiently aware of the GSC 2014 handling instructions through a process of regular organisational learning updates.

Response to Recommendation A

17. WMCTU ensure that every member of staff starting work within WMCTU or in partnership with them completes a CT Induction Course. The course is delivered in-person by a training officer (supported by subject matter experts including the Operational Security Officer) where processes for handling and securing sensitive documents are outlined.
18. Whilst security incidents/breaches are extremely rare occurrences, all staff within WMCTU were required to attend departmental security briefings in November 2017 where the requirements of Government Security Classifications 2014 and other security policies were reinforced. The internal WMCTU intranet site is regularly refreshed and updated to ensure all staff have ready access to all security policies and advice documents.
19. As part of WMCTU internal communications strategy, a newsletter titled 'Team Talk' is produced for WMCTU staff containing a dedicated section on security matters. The purpose is to ensure that security is a continual and central aspect of staff professional practice.

Response to Recommendation B

20. WMCTU completed a full review of all metal secure cases. A security standards compliance check was completed on all secure cases with those not conforming to security standards withdrawn from use. All metal secure cases are now personally allocated to individual officers with a unique reference number and appropriate 'tethering cabling' to secure the case during transit. The criteria for the appropriate use of secure cases forms part of the induction course for all new staff working with the WMCTU and was re-iterated to all staff during the departmental security briefings delivered in November 2017.
21. For due diligence purposes, a reminder notice with six bullet points outlining user responsibilities is placed within each briefcase and secure boxes. A periodical piece on the topic of secure briefcases is scheduled for publication every six months in the CTU 'Team Talk' newsletter.

Response to Recommendation C

22. Through the CT Induction Course all new staff have been informed on the handling and storage of sensitive documents in accordance with Government Security Classification 2014. WMCTU also required all staff to attend departmental security briefings throughout November 2017 where GSC 2014 and other security policies were reinforced.
23. WMCTU, in line with wider West Midlands Police expectations, delivered a GSC 2014 electronic learning package to all staff within the department. An audit of compliance rates has been completed and line managers have been notified where the e-learning package has not been completed by staff who report to them. The purpose of this approach is to foster an organisational culture where information security is at the forefront of managers' and practitioners' minds.
24. All of the above recommendations were signed off as completed by the WMCTU Security Board.

Culture and Transparency

25. After the theft of the documents, WMP referred the matter to the Information Commissioner's Office (ICO).
26. An investigation by the Information Commissioner's Office concluded that the officer was aware of the obligations in handling and securing information with a security classification. Moreover, the officer was afforded a secure environment in which to handle information with higher security classifications, negating the requirement for information to be removed from secure sites.
27. The report acknowledged that West Midlands Police has implemented measures to reduce the likelihood of a reoccurrence of a similar event. The final outcome of the report was that no formal enforcement action would be taken against West Midlands Police owing to the remedial work undertaken. However, the report did strongly recommend West Midlands Police to continue with their work to raise staff awareness and training.

Creation of Hard Copy Documents

28. West Midlands Police Counter Terrorism Unit use an agreed protocol with partner agencies on a national level regarding the creation of hard copies of documents with higher government security classifications. The accepted protocol is that if a SECRET or TOP SECRET document is required in hard copy format, the document must be printed in the line of sight of the person producing the item. Once printed, a register is kept with the document to show who has handled it, ensuring a complete audit trail of the document from creation to destruction. Monthly audits and dip sampling processes are conducted to monitor compliance with the printing protocols.

Employee Training

29. Information Management have delivered a comprehensive training programme over the past eight months. A total of thirty, one-hour briefings have been delivered across all Neighbourhood Policing Units, with further briefings delivered to key staff in Intelligence, with training slide packs provided for internal use within the department as well. Training slide packs have been provided to the Professional Standards Department. Five presentations have been delivered to Force Contact, with a further three scheduled for autumn 2018. Information Management are working with ROCU to schedule future briefings across the unit to ensure all corporate departments and units are captured.
30. Government Security Classification information is available on the Information Security intranet homepage, which consists of a training pack, descriptions of what information falls into each classification, a written guide to apply GSC, and a copy of the Handling Instructions from OFFICIAL to SECRET. As part of GDPR all staff must complete a mandatory NCALT "Managing Information" package upon joining, and on an annual basis. This includes reference to the GSC NCALT and our local Handling Instructions.
31. All new staff joining West Midlands Police whether as police officers, police staff or volunteers are required to undergo security classification training as a requirement prior to access to police systems.

Summary

32. West Midlands Police has an information security policy which covers physical infrastructure, and the required behaviours of staff who handle all levels of information with a government security classification. The policy is supported by national guidance and enables West Midlands Police to share information with partner agencies to protect local communities and the UK as a whole.
33. The theft of documents from a police vehicle has brought further scrutiny to the information management and security practices adopted by West Midlands Police. Independent scrutiny from the Information Commissioner's Office reflects the mature and learning-based approach to information security across West Midlands Police. The ICO reported confidence in the remedial action taken as a result of the incident, whilst the Metropolitan Police found assurance in the structures in place prior to the incident.
34. Information management is at the forefront of our agenda through regular profiles in internal organisational newsletters. New staff must complete mandatory information security training in order to receive access to systems and regular periodic training highlights its continual importance to all staff.
35. West Midlands Police has a positive working, and information sharing relationship with local and national partner agencies which is essential to the force's vision of protecting the public.

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