

Chapter 6

Data security in Financial Services (2008)



6.1 Introduction

- 6.1.1
- Who should read this chapter?** This chapter is relevant, and its statements of good and poor practice apply, to **all firms** subject to the financial crime rules in ■ SYSC 3.2.6R or ■ SYSC 6.1.1R and to **e-money institutions** and **payment institutions** within our supervisory scope.
- 6.1.2
- In April 2008 the *FSA* published the findings of our thematic review on how financial services firms in the UK were addressing the risk that customer data may be lost or stolen and used to commit fraud or other financial crime. The *FSA* visited 39 firms, including retail and wholesale banks, investment firms, insurance companies, financial advisers and credit unions. The *FSA* also took into account our experience of data loss incidents dealt with by our Financial Crime Operations Team: during 2007, the team dealt with 56 cases of lost or stolen data from financial services firms.
- 6.1.3
- The *FSA* found a wide variation between good practices demonstrated by firms that were committed to ensuring data security and weakness in firms that were not taking adequate steps. Overall, the *FSA* found that data security in financial services firms needed to be improved significantly.
- 6.1.4
- The report concluded that poor data security was a serious, widespread and high-impact risk, and that firms were often failing to consider the wider risks of identity fraud which could occur from cases of significant data loss and the impact of this on consumers. The *FSA* found that firms lacked a clear understanding of these risks and were therefore failing properly to inform customers, resulting in a lack of transparency.
- 6.1.5
- The contents of this report are reflected in ■ FCG 2 (Financial crime systems and controls) and ■ FCG 5 (Data security).



6.2 The FSA's findings

6.2.1

You can read the findings of the *FSA's* thematic review here: https://webarchive.nationalarchives.gov.uk/ukgwa/20090804190740mp_/http://www.fsa.gov.uk/pubs/other/data_security.pdf

6.3.1



6.3 Consolidated examples of good and poor practice

Governance

Examples of good practice	Examples of poor practice
<ul style="list-style-type: none">• Identification of data security as a key specific risk, subject to its own governance, policies and procedures and risk assessment.• A senior manager with overall responsibility for data security, specifically mandated to manage data security risk assessment and communication between the key stakeholders within the firm such as: senior management, information security, Human Resources, financial crime, security, IT, compliance and internal audit.• A specific committee with representation from relevant business areas to assess, monitor and control data security risk, which reports to the firm's Board. As well as ensuring coordinated risk management, this structure sends a clear message to all staff about the importance of data security.• Written data security policies and procedures that are proportionate, accurate and relevant to staff's day-to-day work.• An open and honest culture of communication with pre-determined reporting mechanisms that make it easy for all staff and third parties to report data security concerns and data loss without fear of blame or recrimination.	<ul style="list-style-type: none">• Treating data security as an IT issue and failing to involve other key staff from across the business in the risk assessment process.• No written policies and procedures on data security.• Firms do not understand the need for knowledge-sharing on data security.• Failing to take opportunities to share information with, and learn from, peers and others about data security risk and not recognising the need to do so.• A 'blame culture' that discourages staff from reporting data security concerns and data losses.

<ul style="list-style-type: none">Firms seeking external assistance if they feel they do not have the necessary expertise to complete a data security risk assessment themselves.Firms liaising with peers and others to increase their awareness of data security risk and the implementation of good systems and controls.Detailed plans for reacting to a data loss including when and how to communicate with affected customers.Firms writing to affected customers promptly after a data loss, telling them what has been lost and how it was lost.Firms offering advice on protective measures against identity fraud to consumers affected by data loss and, where appropriate, paying for such services to be put in place.	<ul style="list-style-type: none">Failure to notify customers affected by data loss in case the details are picked up by the media
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6.3.2

Training and awareness

Examples of good practice	Examples of poor practice
<ul style="list-style-type: none">Innovative training and awareness campaigns that focus on the financial crime risks arising from poor data security, as well as the legal and regulatory requirements to protect customer data.Clear understanding among staff about why data security is relevant to their work and what they must do to comply with relevant policies and procedures.Simple, memorable and easily digestible guidance for staff on good data security practice.Testing of staff understanding of data security policies on induction and once a year after that.Competitions, posters, screensavers and group discussion to raise interest in the subject.	<ul style="list-style-type: none">No training to communicate policies and procedures.Managers assuming that employees understand data security risk without any training.Data security policies which are very lengthy, complicated and difficult to read.Reliance on staff signing an annual declaration stating that they have read policy documents without any further testing.Staff being given no incentive to learn about data security.

6.3.3	Staff recruitment and vetting				
	<table><tr><th>Examples of good practice</th><th>Examples of poor practice</th></tr><tr><td><ul style="list-style-type: none">• Vetting staff on a risk-based approach, taking into account data security and other fraud risk.• Enhanced vetting – including checks of credit records, criminal records, financial sanctions lists and the CIFAS Staff Fraud Database – for staff in roles with access to large amounts of customer data.• Liaison between HR and Financial Crime to ensure that financial crime risk indicators are considered during the vetting process.• A good understanding of vetting conducted by employment agencies for temporary and contract staff.• Formalised procedures to assess regularly whether staff in higher-risk positions are becoming vulnerable to committing fraud or being coerced by criminals.</td><td><ul style="list-style-type: none">• Allowing new recruits to access customer data before vetting has been completed.• Temporary staff receiving less rigorous vetting than permanently employed colleagues carrying out similar roles.• Failing to consider continually whether staff in higher-risk positions are becoming vulnerable to committing fraud or being coerced by criminals.</td></tr></table>	Examples of good practice	Examples of poor practice	<ul style="list-style-type: none">• Vetting staff on a risk-based approach, taking into account data security and other fraud risk.• Enhanced vetting – including checks of credit records, criminal records, financial sanctions lists and the CIFAS Staff Fraud Database – for staff in roles with access to large amounts of customer data.• Liaison between HR and Financial Crime to ensure that financial crime risk indicators are considered during the vetting process.• A good understanding of vetting conducted by employment agencies for temporary and contract staff.• Formalised procedures to assess regularly whether staff in higher-risk positions are becoming vulnerable to committing fraud or being coerced by criminals.	<ul style="list-style-type: none">• Allowing new recruits to access customer data before vetting has been completed.• Temporary staff receiving less rigorous vetting than permanently employed colleagues carrying out similar roles.• Failing to consider continually whether staff in higher-risk positions are becoming vulnerable to committing fraud or being coerced by criminals.
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	manently disabled or deleted on a timely and accurate basis.		fraud or being coerced by criminals.
•	Regular reviews of staff IT access rights to ensure that there are no anomalies.	•	User accounts being left 'live' or only suspended (i.e. not permanently disabled) when a staff member leaves.
•	Least privilege' access to call recordings and copies of scanned documents obtained for 'know your customer' purposes.	•	A lack of independent check of changes effected at any stage in the joiners, movers and leavers process.
•	Authentication of customers' identities using, for example, touch-tone telephone before a conversation with a call centre adviser takes place. This limits the amount of personal information and/or passwords contained in call recordings.		
•	Masking credit card, bank account details and other sensitive data like customer passwords where this would not affect employees' ability to do their job.		

6.3.5

Controls – passwords and user accounts

Examples of good practice	Examples of poor practice
• Individual user accounts – requiring passwords – in place for all systems containing customer data.	• The same user account and password used by multiple users to access particular systems.
• Password standards at least equivalent to those recommended by Get Safe Online – a government-backed campaign group. In July 2011, their recommended standard for passwords was a combination of letters, numbers and keyboard symbols at least eight characters in length and changed regularly.	• Names and dictionary words used as passwords.
• Measures to ensure passwords are robust. These might include controls to ensure that passwords can only be set in accordance with policy and the use of password-cracking software on a risk-based approach.	• Systems that allow passwords to be set which do not comply with password policy.

6.3.6

Controls – monitoring access to customer data

Examples of good practice	Examples of poor practice
<ul style="list-style-type: none">• ‘Straight-through processing’, but only if complemented by accurate role-based access profiles and strong passwords.	<ul style="list-style-type: none">• Individuals share passwords.
<ul style="list-style-type: none">• Risk-based, proactive monitoring of staff’s access to customer data to ensure it is being accessed and/or updated for a genuine business reason.• The use of software designed to spot suspicious activity by employees with access to customer data. Such software may not be useful in its ‘off- the-shelf’ format so it is good practice for firms to ensure that it is tailored to their business profile.• Strict controls over superusers’ access to customer data and independent checks of their work to ensure they have not accessed, manipulated or extracted data that was not required for a particular task.	<ul style="list-style-type: none">• Assuming that vetted staff with appropriate access rights will always act appropriately. Staff can breach procedures, for example by looking at account information relating to celebrities, be tempted to commit fraud themselves or be bribed or threatened to give customer data to criminals.• Names and dictionary words used as passwords.• Failing to monitor superusers or other employees with access to large amounts of customer data.

6.3.7

Controls – data back-up

Examples of good practice	Examples of poor practice
<ul style="list-style-type: none">• Firms conducting a proper risk assessment of threats to data security arising from the data back-up process – from the point that back-up tapes are produced, through the transit process to the ultimate place of storage.• Firms encrypting backed-up data that is held off-	<ul style="list-style-type: none">• Firms failing to consider data security risk arising from the backing up of customer data.• A lack of clear and consistent procedures for backing

site, including while in transit.		up data, resulting in data being backed up in several different ways at different times. This makes it difficult for firms to keep track of copies of their data.	
•	Regular reviews of the level of encryption to ensure it remains appropriate to the current risk environment.	•	Unrestricted access to back-up tapes for large numbers of staff at third party firms.
•	Back-up data being transferred by secure Internet links.	•	Back-up tapes being held insecurely by firm's employees; for example, being left in their cars or at home on the kitchen table.
•	Due diligence on third parties that handle backed-up customer data so the firm has a good understanding of how it is secured, exactly who has access to it and how staff with access to it are vetted.		
•	Staff with responsibility for holding backed-up data off-site being given assistance to do so securely. For example, firms could offer to pay for a safe to be installed at the staff member's home.		
•	Firms conducting spot checks to ensure that data held off-site is held in accordance with accepted policies and procedures.		

6.3.8

Controls – access to the internet and email

Examples of good practice		Examples of poor practice	
•	Giving internet and email access only to staff with a genuine business need.	•	Allowing staff who handle customer data to have access to the internet and email if there is no business reason for this.
•	Considering the risk of data compromise when monitoring external email traffic, for example by looking for strings of num-	•	Allowing access to web-based communication Internet sites. This content includes web-based email, messaging facilities on so-

bers that might be credit card details.

cial networking sites, external instant messaging and 'peer-to-peer' file-sharing software.

- Where proportionate, using specialist IT software to detect data leakage via email.
- Completely blocking access to all internet content which allows web-based communication. This content includes web-based email, messaging facilities on social networking sites, external instant messaging and 'peer-to-peer' file-sharing software.
- Firms that provide cyber-cafes for staff to use during breaks ensuring that web-based communications are blocked or that data cannot be transferred into the cyber-cafe, either in electronic or paper format.

6.3.9

Controls – key-logging devices

Examples of good practice

- Regular sweeping for key-logging devices in parts of the firm where employees have access to large amounts of, or sensitive, customer data. (Firms will also wish to conduct sweeps in other sensitive areas. For example, where money can be transferred.)
- Use of software to determine whether unusual or prohibited types of hardware have been attached to employees' computers.
- Raising awareness of the risk of key-logging devices. The vigilance of staff is a useful method of defence.
- Anti-spyware software and firewalls etc in place and kept up to date.

6.3.10

Controls – laptop

Examples of good practice

Examples of poor practice

<ul style="list-style-type: none">• The encryption of laptops and other portable devices containing customer data.• Controls that mitigate the risk of employees failing to follow policies and procedures. The FSA has dealt with several cases of lost or stolen laptops that arose from firms' staff not doing what they should.• Maintaining an accurate register of laptops issued to staff.• Regular audits of the contents of laptops to ensure that only staff who are authorised to hold customer data on their laptops are doing so and that this is for genuine business reasons.• The wiping of shared laptops' hard drives between uses.	<ul style="list-style-type: none">• Unencrypted customer data on laptops.• A poor understanding of which employees have been issued or are using laptops to hold customer data.• Shared laptops used by staff without being signed out or wiped between uses.
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6.3.11

Controls – portable media including USB devices and CDs

Examples of good practice	Examples of poor practice
<ul style="list-style-type: none">• Ensuring that only staff with a genuine business need can download customer data to portable media such as USB devices and CDs.• Ensuring that staff authorised to hold customer data on portable media can only do so if it is encrypted.• Maintaining an accurate register of staff allowed to use USB devices and staff who have been issued USB devices.• The use of software to prevent and/or detect individuals using personal USB devices.• Firms reviewing regularly and on a risk-based approach the copying of customer data to portable media to ensure there is a	<ul style="list-style-type: none">• Allowing staff with access to bulk customer data – for example, superusers – to download to unencrypted portable media.• Failing to review regularly threats posed by increasingly sophisticated and quickly evolving personal technology such as mobile phones.

6.3.12

- genuine business reason for it.
- The automatic encryption of portable media attached to firms' computers.
- Providing lockers for higher-risk staff such as call centre staff and superusers and restricting them from taking personal effects to their desks.

Controls – Physical security

Examples of good practice	Examples of poor practice
<ul style="list-style-type: none">• Appropriately restricted access to areas where large amounts of customer data are accessible, such as server rooms, call centres and filing areas.• Using robust intruder deterrents such as keypad entry doors, alarm systems, grilles or barred windows, and closed circuit television (CCTV).• Robust procedures for logging visitors and ensuring adequate supervision of them while on-site.• Training and awareness programmes for staff to ensure they are fully aware of more basic risks to customer data arising from poor physical security.• Employing security guards, cleaners etc directly to ensure an appropriate level of vetting and reduce risks that can arise through third party sup-	<ul style="list-style-type: none">• Allowing staff or other persons with no genuine business need to access areas where customer data is held.• Failure to check electronic records showing who has accessed sensitive areas of the office.• Failure to lock away customer records and files when the office is left unattended.

- pliers accessing customer data.
- Using electronic swipe card records to spot unusual behaviour or access to high risk areas.
- Keeping filing cabinets locked during the day and leaving the key with a trusted member of staff.
- An enforced clear-desk policy.

6.3.13

Controls – Disposal of customer data

Examples of good practice	Examples of poor practice
<ul style="list-style-type: none">• Procedures that result in the production of as little paper-based customer data as possible.• Treating all paper as ‘confidential waste’ to eliminate confusion among employees about which type of bin to use.• All customer data disposed of by employees securely, for example by using shredders (preferably cross-cut rather than straight-line shredders) or confidential waste bins.• Checking general waste bins for the accidental disposal of customer data.• Using a third party supplier, preferably one with BSIA (British Security Industry Association) accreditation, which provides a certificate of secure destruction, to shred or incinerate paper-based customer data. It is important for firms to have a good understanding of the supplier’s process for destroying customer data and their employee vetting standards.• Providing guidance for travelling or home-based	<ul style="list-style-type: none">• Poor awareness among staff about how to dispose of customer data securely.• Slack procedures that present opportunities for fraudsters, for instance when confidential waste is left unguarded on the premises before it is destroyed.• Staff working remotely failing to dispose of customer data securely.• Firms failing to provide guidance or assistance to remote workers who need to dispose of an obsolete home computer.• Firms stockpiling obsolete computers and other portable media for too long and in insecure environments.• Firms relying on others to erase or destroy their hard

6.3.14

Managing third-party suppliers

Examples of good practice	Examples of poor practice
<ul style="list-style-type: none">• Conducting due diligence of data security standards at third-party suppliers before contracts are agreed.• Regular reviews of third-party suppliers' data security systems and controls, with the frequency of review dependent on data security risks identified.• Ensuring third-party suppliers' vetting standards are adequate by testing the checks performed on a sample of staff with access to customer data.• Only allowing third-party IT suppliers access to customer databases for specific tasks on a case-by-case basis.• Third-party suppliers being subject to procedures for reporting data security breaches within an agreed timeframe.• The use of secure internet links to transfer data to third parties.	<ul style="list-style-type: none">• Allowing third-party suppliers to access customer data when no due diligence of data security arrangements has been performed.• Firms not knowing exactly which third-party staff have access to their customer data.• Firms not knowing how third-party suppliers' staff have been vetted.• Allowing third-party staff unsupervised access to areas where customer data is held when they have not been vetted to the same standards as employees.• Allowing IT suppliers unrestricted or unmonitored access to customer data.• A lack of awareness of when/how third-party suppliers can access customer data and failure to monitor such access.• Unencrypted customer data being sent to third parties using unregistered post.

6.3.15

Internal audit and compliance monitoring

Examples of good practice	Examples of poor practice
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|---|---|
| <ul style="list-style-type: none"> • Firms seeking external assistance where they do not have the necessary in-house expertise or resources. | <ul style="list-style-type: none"> • Compliance focusing only on compliance with data protection legislation and failing to consider adherence to data security policies and procedures. |
| <ul style="list-style-type: none"> • Compliance and internal audit conducting specific reviews of data security which cover all relevant areas of the business including IT, security, HR, training and awareness, governance and third-party suppliers. | <ul style="list-style-type: none"> • Compliance consultants adopting a 'one size fits all' approach to different clients' businesses. |
| <ul style="list-style-type: none"> • Firms using expertise from across the business to help with the more technical aspects of data security audits and compliance monitoring. | |

