Slough and East Berkshire CofE Multi-Academy Trust

SEBMAT Cyber Incident Response Plan

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Introduction:

The SEBMAT Cyber/IT Incident Management Plan has been developed to provide direction and focus to the handling of information security incidents that adversely affect any of the Trust schools. This plan applies to any person or entity charged by the Trust Incident Response Commander with a response to information security related incidents at the Trust or its schools.

The purpose of this document is to allow SEBMAT schools to respond quickly and appropriately to information security incidents.

Definitions

Event Definition

Any observable or reported occurrence in system, network, environment, process, workflow or personnel. Events may not be negative in nature.

Adverse Events Definition

Events with a negative consequence: this plan only applies to adverse events that are computer security related, and not those caused by natural disaster, power failures etc.

Incident Definition

A violation or imminent threat of violation of computer security policies, acceptable use policies, or standard security practices that jeopardizes the confidentiality, integrity, or availability of information resources or operations. A security incident may have one or more of the following characteristics:

- Violation of an explicit or implied security policy
- Attempts to gain unauthorized access to an Information Resource
- Denial of service to an Information Resource
- Unauthorized use of Information Resources
- Unauthorized modification of information
- Loss of Confidential or Protected information

Severity Guide

The table below provides a short guide to aid in the immediate classification when a threat or active attack is identified.

In conjunction with the quick summaries below, the rest of this plan should be then followed in accordance with the phases and by the specific roles in place.

All alerts must be considered, reviewed and cleared or escalated as appropriate. Most attacks begin at low levels with alerts providing early warning to an active threat, which must always be recognised to aid in containing an event.

Severity Class	Short Description
P1	Immediate threat identified to data security and integrity; breach identified and underway; credible threats made to network security; verified loss of physical media that could enable additional threat vectors; escalations from P2.
P2	Where the scope and extent of an attack have been realised and further resource or direction is required. Active data breaches within the network e.g., loss of integrity due to compromised credentials; advanced threat notifications; escalations from P3.
P3	Routine monitoring alerts for individual devices; advanced phishing or scamming attempts; low level concern raised directly to IT of potentially malicious activity internally to the organisation. Review, investigate and clear or escalate as required.

Roles & Responsibilities:

Position	Name	Role	Contact Information	Escalation (1- 3)*
Director of IT	Mr Ian Trevena	Incident Response Leader	Ian.trevena@sebmat.com 07854 157 504	1
Network Manager	Mr Steve Hillier	Deputy Incident Response Leader	s.hillier@lhea.org.uk 07496 201 910	1
Network Manager at site	In Appendix A	Technical Lead	In Appendix A	1
Data Protection Manager (Virtual DPM)	Ms Jo Holloway \ Azteq	Data Protection Manager	joholloway@azteq.com 07501 535950	3
Headteacher of school affected	In Appendix A	Local Incident Advisor	In Appendix A	3
School Technician	In Appendix A	On Site Technician	In Appendix A	3
IT Tech Team		Support and assist	helpdesk@sebmat.com	3
SEBMAT Clerk	Ms Clare McAleer	Press & PR \ CEO contact	clare.mcaleer@sebmat.com	3
Sophos Rapid Response Team	N/A	Outsourced Forensic & Security Experts		1&2

SEBMAT Sophos Account Details
Sophos Central Account ID: 79bf586-d892-42ab-8311-13f89af8b0b2

*Escalation level determines order in which notification should occur:
Notify first, required on all incidents (1, 2, 3)
Required on all moderate or high-severity incidents
Involve as needed (3)

Cyber Security Incident Handling Team (IHT)

- Consists of Trust Executive Team, IT Director and Site Lead if required, Trust Business Manager, Data Protection Manager, and appropriate key external support providers.
- Advise on incident response activities relevant to their area of expertise.
- Maintain a general understanding of the plan and policies of the organization.
- Ensure incident response activities are in accordance with legal, contractual, and regulatory requirements.
- Participate in tests of the incident response plan and procedures.

Responsible for internal and external communications pertaining to cyber security incidents.

Cyber Security Incident Response Team (CSIRT)

The CSIRT is composed of SEBMAT IT staff, IT School Lead & School Management and co-opted experienced personnel. The role of the CSIRT is to promptly handle an incident so that containment, investigation and recovery can occur quickly. Where third-party services are leveraged, ensure they are engaged as necessary. Roles within the CSIRT include:

IT Service Lead & Chief Executive Officer (CEO)

The CEO & SEBMAT IT Director, or in their absence, a nominated individual by the IHT takes the role of the incident response managers – and oversees and prioritises actions during the detection, analysis, and containment of an incident. They are also responsible for conveying the special requirements of high severity incidents to the rest of the organisation as well as communicating potential impact to the Trustees of SEBMAT. Additionally, they are responsible for understanding the SLAs in place with third parties, and the role third parties may play in specific response scenarios.

- Co-ordinate response activities within the Trust and external resources as needed to minimise damage to information resources.
- Provide updates on response activities to Trust and School Leadership Team
- Ensure service level agreements with service providers clearly define expectations of the organisation and the service provider in relation to incident response.
- Review the Cyber Security Incident Response Plan ("the Plan") to ensure that it meets policy objectives and accurately reflects the goals of the Trust. Seek Plan approval from IHT.
- Approve close of moderate or critical-severity incidents.
- Ensure lessons learned are applied/weighed based on risk for Severity 1 incidents.

Further responsibilities:

- Act as a liaison for all communications to and from the Data Protection Manager.
- Assemble a Cyber Security Incident Response Team (CSIRT).
- Ensure personnel tasked with incident response responsibilities are trained and knowledgeable on how to respond to incidents.

- Update Plan and procedures as needed based on results from testing, incident response lessons learned, industry developments and best practice.
- Review the Plan and procedures at least annually.
- Initiate tests of the Plan and procedures at least annually.
- Ensure team activities comply with legal and industry requirements for incident response procedures.
- Act as the primary Incident Response Manager, responsible for declaring a cyber security incident, managing team response activities, and approving close of Severity 2 and 3 incidents.

Incident Response Team Members

The Incident Response Manager is supported by a team of technical staff who work directly with the affected information systems to research the time, location, and details of an incident. Team members are typically subject matter experts (SMEs), senior level IT staff, third parties outsourced security or forensic partners. (Sophos Rapid Response Team).

Further responsibilities:

- Assist in incident response as requested. CSIRT responsibilities should take priority over normal duties.
- Understand incident response plan and procedures to appropriately respond to an incident.
- Continue to develop skills for incident response management.
- Ensure tools are properly configured and managed to alert on security incidents/events.
- Analyse network traffic for signs of denial of service, distributed denial of service, or other external attacks.
- Review log files of critical systems for unusual activity.
- Monitor business applications and services for signs of attack.
- Collect pertinent information regarding incidents at the request of the IR Commander.
- Consult with qualified information security staff for advice when needed.
- Ensure evidence gathering, chain of custody and preservation is appropriate.
- Participate in tests of the incident response plan and procedures.
- Be knowledgeable of service level agreements with service providers in relation to incident response.

Incident Response Framework:

SEBMAT recognises that, despite reasonable and competent efforts to protect **Information Resources**, a breach or other loss of information is possible. The Trust and its schools must make reasonable efforts and act competently to respond to a potential incident in a way that reduces the loss of information and potential harm to staff, students, parents, partners and the organisation itself.

The incident response framework is composed of six phases that ensure a consistent and systematic approach.

Phase I – Preparation

It is essential to establish a **C**yber **S**ecurity **I**ncident **R**esponse **T**eam (CSIRT), to define appropriate lines of communication, articulate services necessary to support response activities, and procure the necessary tools.

The members of the **CSIRT** should meet regularly throughout the year, a schedule of once per term should be maintained. During the meeting, the **CSIRT** should be presented with an overview of the Trust's current risk analysis and any works required or have taken place that may affect (negatively or positively) the readiness of the Trust's IT systems.

Incident Type	Reporting Method	Available To
Website defacement, data modification or exposure	SEBMAT IT Status Page Social Media Text message and E-mail alerts Paper comms	Internal and external (to be decided by CSIRT)
Impact on SEBMAT IT Support functionality	SEBMAT IT Status Page Social Media Text message and E-mail alerts Paper comms	Internal and external (to be decided by CSIRT)
Impact on T&L	SEBMAT IT Status Page Social Media Text message and E-mail alerts Paper comms	Internal and external (to be decided by CSIRT)
Impact on business continuity	SEBMAT IT Status Page Social Media Text message and E-mail alerts Paper comms	Internal and external (to be decided by CSIRT)

Phase II – Identification and Assessment

Identifying an event and conducting an assessment should be performed to confirm the existence of an incident. The assessment should include determining the scope, impact, and extent of the damage caused by the incident. In the event of possible legal action, digital evidence will be preserved, and forensic analysis may be conducted consistent with legislative and legal requirements.

Events versus Incidents

Events are observed changes in normal behaviour of the system, environment, process, workflow or personnel. Incidents are events that indicate a possible compromise of security or non-compliance with policy that negatively impacts (or may negatively impact) the organisation.

To facilitate the task of identification of an incident, the following is a list of typical symptoms of security incidents, which may include any or all the following:

- E-mail or phone notification from an intrusion detection tool;
- suspicious entries in system or network accounting, or logs;
- discrepancies between logs;
- repetitive unsuccessful logon attempts within a short time interval;
- unexplained new user accounts;
- unexplained new files or unfamiliar file names;
- unexplained modifications to file lengths and/or dates, especially in system files;
- unexplained attempts to write to system files or changes in system files;
- unexplained modification or deletion of data;
- denial/disruption of service or inability of one or more users to login to an account;
- system crashes;
- poor system performance of dedicated servers;
- operation of a program or sniffer device used to capture network traffic;
- unusual time of usage (e.g. users login during unusual times);
- unusual system resource consumption (High CPU usage);
- last logon (or usage) for a user account does not correspond to the actual last time the user used the account;
- unusual usage patterns (e.g. a user account associated with a user in finance is being used to login to an HR database);
- unauthorized changes to user permission or access.

NOTE**: Compromised systems should be disconnected from the network rather than powered off. Powering off a compromised system could lead to loss of data, information or evidence required for a forensic investigation later.* ***Only power off the system if it cannot be disconnected from the wired and wireless networks completely.

Reporting an Event or Incident

On the discovery of a potential event – the discover of the issue (or the IT Support Team member who has actioned a query which has identified an event) must immediately make the SEBMAT IT Director aware of the discovered incident. The Data Protection Manager should also consider if the incident should be reported to the Information Commissioner's Office (ICO.)

Incident Scope

Determining the scope will help the IT Service Lead understand the potential business impact of the incident. The following are some of the factors to consider when determining the scope:

- How many systems are affected by this incident?
- Is confidential or protected information involved?
- what is/was the entry point for the incident (e.g. internet, network, physical)?
- What is the potential damage caused by the incident?
- What is the estimated time to recover from the incident?
- What resources are required to manage the situation?
- How could the assessment be performed most effectively?

Incident Impact

Once the categorisation and scope of an incident has been determined, the potential impact of the incident must be agreed upon. The severity of the incident will dictate the course of action to be taken to provide a resolution; however, in all instances an incident report must be completed and reviewed by the Incident Response Commander.

Functional and informational impacts are defined with initial response activity below:

Functional Impact	Definition	CSIRT Response
None	No effect to the organisation's ability to provide all services to all users.	Create ticket and assign for remediation.
Limited	Minimal effect: the organization can still provide all critical services to all users but has lost efficiency.	Create ticket and assign for remediation, notify the DPM and IHT.
Moderate	The organization has lost the ability to provide a critical service to a subset of system users.	Initiate full CSIRT, involve the DPM and IHT.
Critical	The organisation is no longer able to provide some critical services to any user.	Initiate full CSIRT, DPM, and IHT. Consider activation of the Disaster Recovery Plan.

Once a potential incident has been identified, part or all of the CSIRT will be activated by the IT Service Lead to investigate the situation. The assessment will determine the category, scope, and potential impact of the incident. The CSIRT should work quickly to

analyse and validate each incident, following the process outlined below, and documenting each step taken.

Informational Impact	Definition	CSIRT Response
None	No information was accessed, exfiltrated, changed, deleted, or otherwise compromised.	No action required.
Limited	Public or non-sensitive data was accessed, exfiltrated, changed, deleted, or otherwise compromised.	Notify the data owners to determine the appropriate course of action.
Moderate	Internal information was accessed, exfiltrated, changed, deleted, or otherwise compromised.	Notify the DPM and IHT. DPM will work with management, legal, and data owners to determine appropriate course of action.
Critical	Protected data was accessed, exfiltrated, changed, deleted, or otherwise compromised.	Notify the DPM and IHT. DPM will work with legal to determine whether reportable, and the appropriate notification requirements.

The Incident Handling Log and Assessment Tool and Response Level table below will help determine the severity of the incident and urgency of response activities.

Response Level Classification		**Informational Impact**			
		None	**Limited**	**Moderate**	**Critical**
Functional Impact	**None**	N/A	P. 3	P. 2	P. 1
	Limited	P. 3	P. 3	P. 2	P. 1
	Moderate	P. 2	P. 2	P. 2	P. 1
	Critical	P. 1	P. 1	P. 1	P. 1

Phase III – Containment and Intelligence

Containment of the incident is necessary to minimise and isolate the damage caused. Steps must be taken to ensure that the scope of the incident does not spread to include other systems and information resources. Root cause analysis is required prior to moving beyond the Containment phase and may require expertise from outside parties.

Containment Strategies

Use the list of strategies below to choose the procedure(s) most appropriate for the situation.

- stolen credentials – disable account credentials, reset all active connections, review user activity, reverse changes, increase alerting, harden from future attacks;
- ransomware – isolate the impacted system, validate the ransomware claim, contact insurance carrier, identify whether additional systems have been impacted and isolate as needed;
- if DOS/DDOS - control WAN/ISP;
- virus outbreak – contain LAN/system;
- data loss – review user activity, implement data breach response procedures;
- website defacement – repair site, harden from future attacks;
- compromised API – review changes made, repair API, harden from future attacks.

Common Containment Steps

Containment requires critical decision making related to the nature of the incident. The IT Director and other members of Executive Management should review all the containment steps listed below to formulate a strategy to contain and limit damages resulting from the incident.

All attempts to contain the threat must consider every effort to minimise the impact to the business operations. Third-party resources or interested parties may need to be notified. Where law enforcement may become involved, efforts must be made to preserve the integrity of relevant forensic or log data and maintain a clear chain-of-custody. Where evidence cannot be properly maintained due to containment efforts, the introduced discrepancy must be documented.

When evaluating containment steps, consider the following:

- Enable disposable administrative accounts for use during the investigation and reset associated passwords if believed to have been at risk of compromise while being used.
- Will the ability to provide critical services be impacted? How? For how long?
- Is a legal investigation or other action likely? Does evidence need to be preserved?
- How likely is the containment step to succeed? What is the result, full containment or partial?
- What resources are required to support the containment activity?
- What is the potential damage to equipment and other resources?
- What is the expected duration of the solution? (temporary, short-term, long-term, or permanent).

- Should IR team members act discretely to attempt to hide their activities from the attacker?
- Is the assistance of a third party required? What is the expected response time?
- Do interested parties (parents, staff, students) need to be notified? If so, when?
- Does the impact to equipment, network, or facilities necessitate the activation of the Disaster Recovery Plan?

Engage Resources

The CSIRT should select the option based on the severity of the incident, the damage incurred by and legal considerations.

	In-house investigation	Law enforcement	Private forensic specialist
Time Response	Quick response	Varies by area and agency	Quick response
Competency	Skills vary	Depends on local law enforcement	Highly skilled, often with law enforcement background
Preservation of evidence	Does not ensure evidence integrity	Preserve evidence integrity and present evidence in court	Preserve evidence integrity and present evidence in court
Reputation impact	Minimal effect	Potential loss of reputation if certain incidents reach public	Potential loss of reputation if certain incidents reach public

Reduce Impact

Depending on the type of incident, the team must act quickly to reduce the impact to affected systems and/or reduce the reach of the attacker. Actions may include, but are not limited to the following:

- stop the attacker using access controls (disabling accounts, re-setting active connections, changing passwords, implementing router ACLs or firewall rules, etc.);
- isolate compromised systems from the network;
- avoid changing volatile state data or system state data early on;
- identify critical external systems that must remain operational (e.g. e-mail, client application, DNS) and deny all other activity;

- maintain a low profile, if possible, to avoid alerting an attacker that you are aware of their presence or giving them an opportunity to learn the CSIRT's tactics, techniques, or procedures;
- to the extent possible, consider preservation of system state for further investigation or use as evidence.

Collect Data and Increase Activity Logging

Increase monitoring and packet capture on affected systems while the CSIRT investigates the scope and impact of the incident. Continue increased logging and monitoring as you move onto the Eradication and Recovery phases.

- enable full packet capture;
- collect and review system, network, and other relevant logs;
- create a memory image of impacted systems;
- take a forensic image of affected systems;
- monitor possible attacker communication channels.

Conduct Research

Performing an internet search, consulting third party resources, and/or consulting IT using the apparent symptoms and other information related to the incident you are experiencing may lead to more information on the attack.

Notify Interested Parties

Once an incident has been identified, determine if there are others who need to be notified, both internal (Directors, school leadership etc) and external (e.g. service providers, government, public affairs, media relations, parents and students, staff, general public, etc.). Always follow the "need to know" principle in all communications. Most importantly, remain factual and avoid speculation.

Depending on the degree of sensitivity of the incident, it may be necessary for Legal/Management to require employees to sign NDAs or issue gag orders to employees who need to be involved.

Investigation

As the CSIRT works to contain, eradicate, and recover from the incident, the investigation will be on-going. As the investigation proceeds, you may find that the incident is not fully contained, eradicated, or recovered. If that is the situation, additionally it may be necessary to revisit earlier phases. The Containment, Eradication, and Recovery phases are frequently cyclical.

Phase IV – Eradication

Eradication requires removal or addressing of all components and symptoms of the incident. Further validation must be performed to ensure the incident does not reoccur.

Steps to eradicate components of the incident may include:

- disable breached user accounts;
- reset any active sessions for breached accounts;
- identify and mitigate vulnerabilities leveraged by the attacker;
- close unnecessary open ports;
- increase authentication security measures (implement MFA, add geolocation restrictions);
- increase security logging, alerting and monitoring;
- clean installation of affected operating systems and applications.

All re-installed operating systems and applications must be installed according to system build standards, including but not limited to:

- applying all the latest security patches;
- disabling all unnecessary services;
- installing anti-virus software;
- applying hardened system configuration baselines;
- changing all account passwords (including domain, user and service accounts).

NOTE: It may be possible to restore the system without the need to perform a full clean installation. IT personnel, at the direction of the CSIRT, will make this determination.

Phase V – Recovery

Recovery involves the steps required to restore data and systems to a healthy working state allowing business operations to be returned.

Prior to restoring systems to normal operation, it is critical that the CSIRT validate the system(s) to determine that eradication was successful, and the network is secure. Once the organisation has been attacked successfully, the same attackers will often attack again using the same tools and techniques leveraged in the initial attack. Having gained access to the compromised system(s) or network once, the attacker has more information at their disposal to leverage in future attacks.

If feasible, the system should be installed in a test environment to determine functionality prior to re-introduction into a production environment.

Furthermore, network monitoring should be implemented for as long as necessary to detect any unauthorised access attempts.

Recovery steps may include:

- restoring systems from a clean backup;
- replacing corrupted data from a clean backup;
- restoring network connections and access rules;
- communicating with interested parties about changes related to increased security;
- increasing network and system monitoring activities (short or long-term);
- increasing internal communication/reporting related to monitoring;
- engaging a third party for support in detecting or preventing future attacks.

Phase VI – Lessons Learned

The 'Lessons Learned' phase includes post-incident analysis on the system(s) that were impacted by the incident and other potentially vulnerable systems. Lessons learned from the incident are communicated to executive management and action plans developed to improve future incident management practices and reduce risk exposure.

Appendix A

School Name	Headteacher	Network Manager	IT Technician
Colnbrook C of E Primary School	Tom Brunson tom.brunson@colnbrookprimary.com 01753 683 661	Andrew Cornell aco@slougheton.com 07834 600 413	N\A
Eton Porny C of E First School	Emma Stanford-Smith emma.stanford-smith@etonporny.com 01753 861 995	Andrew Cornell aco@slougheton.com 07834 600 413	N\A
Lynch Hill School Primary Academy	Lindsey Tomlinson l.tomlinson@lhspa.org.uk 01753 524 170	Tyrone Bowen t.bowen@lhspa.org.uk 01753 524 170	Andrew Cornell aco@slougheton.com 07834 600 413
Woodlands Park Primary & Nursery School	Jamie Miles jamiemiles@woodlandsparkschool.org 01628 822 350	Andrew Cornell aco@slougheton.com 07834 600 413	N\A
Grove Academy	(Principal) Natalie Wismayer nwismayer@groveacademy.co.uk 01753 517 359	Kieran Sutton KST@groveacademy.co.uk 01753 517 359	Currently vacant
Slough & Eton Business and Enterprise College	Peter Collins pco@slougheton.com 01753 520 824	Matt Ketteley mke@slougheton.com 07866 551 761	Ahmad Odeh aod@slougheton.com 07447 909 050
Lynch Hill Enterprise Academy	Chris Thomas c.thomas@lhea.org.uk 01753 691 583	Steve Hillier s.hillier@lhea.org.uk 07496 201 910	Currently vacant

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SEBMAT Cyber Incident Response Quick Guide

Where to go if something goes wrong:

If you notice an issue, are experiencing unusual activity or pop-ups and warnings, or see a ransomware pop-up, please contact your sites IT support person as listed below:

Slough and Eton: Matt Ketteley – mke@slougheton.com – extension 2301
Lynch Hill Enterprise: Steve Hillier – s.hillier@lhea.org.uk – extension 5001
Grove Academy: Ian Trevena – ian.trevena@sebmat.com (until staff in place) – extension 2300/6006
Lynch Hill Primary: Tyrone Bowen – t.bowen@lhspa.org.uk – extension 2307
All other primary schools: Andrew Cornell – aco@slougheton.com – extension 2305

If those people are unavailable, contact Ian Trevena directly on 07854 157504

It is vital that you stop what you are doing, and do not press any buttons either on the keyboard or the screen. Do NOT switch off the machine.

What will happen:

Someone from the above list will be onsite (or remote in if appropriate), and examine logs to see what is happening. Our Sophos cover will most likely already have prevented network access from\to any infected machine, which would stop any spreading. We will ensure that this is the case, and disconnect any infected devices, wipe and rebuild them, and make sure they are properly protected again. Any data lost should be retrievable from local backups, and best endeavours will be made for that. If data loss has occurred (sensitive information has been stolen, for example), we will inform the Information Commissioners Office.

What we do if we discover something has gone wrong:

Your direct IT support person will contact you, or arrive at the site to action the above works in much the same way. It is likely that you will notice a lack of connectivity on your device first, as the Sophos solution takes the preventative action it can, as it notifies us of the issue at the same time. In the event of a serious issue (an entire school being affected), we would call in the relevant service provider to assist with recovery and cleaning of data.

What we are doing to stop anything going wrong in the first place:

All schools are firewalled with Sophos XG devices, which scan incoming and outgoing traffic for issues. Anything malicious detected is dropped at the perimeter of the network, so does not reach any internal devices. In addition, Sophos web filters prevent access to any malicious or suspicious sites - these are in a constantly updated list, but are also assessed on access and categorised as appropriate for new and unlisted sites.

On the servers, desktops and laptops, we run the Sophos Intercept-X client which is updated daily and also linked with the firewalls and web filters. This gives us a comprehensive defence against malicious software and cyber threats.

Backups of all site data are made several times a day, so we should always be able to retrieve any lost data – the only exception being files created in the previous 4 hours (backup is not a continuous process unfortunately). With all data moving in to OneDrive, this should present less of an issue.