Proposal for Updating the OAD Security Provisions

Background

Since implementation in 2005, the OAD framework has not been updated following key changes that have impacted the industry. One such area that has been identified where amendments are essential concerns the enhanced protection and security of the UK energy networks.

As part of the current review, the requirements for those sites that have been supported by BEIS for inclusion under the Physical Security Upgrade Programme now need the appropriate provisions to be incorporated into the existing OAD framework.

Objectives

To update OAD with fit for purpose requirements covering the necessary aspects for sites where an Integrated Security Solution has been implemented as agreed via BEIS.

The key changes are envisaged to cover:

- Roles and Responsibilities

    o Access and Access Rights

        - Linkage to the Modification requirements under Sections A & B

        - Linkage to Access Rights under Clauses B3.7 and B6

        - Issuing of Cards

            - When - During ISS deployment and BAU thereafter

            - Who - Direct Staff only or contractors, sub-contractors etc

            - What requirements are needed to support card requests

            - Processing Timescales

            - Rejections and appeals

        - Responsibilities and the use of issued cards

        - Termination of Cards

            - Conditions for the Site Owner (i.e. breaches in use etc)

            - Requirements for the Site User (i.e. rescind cards no longer required)

        - Vetting Procedures or other Requirements

    o Roles and Responsibilities where the Site User has been confirmed as providing security

    o Roles and Responsibilities between operators where the ARC is provided by another operator or third party

- Co-ordination and engagement between parties due to a cyber incident or event

Business Rules

The business rules will need to be developed and agreed between the operators.   A workshop will be required between the respective Security Managers to determine what needs to be incorporated into OAD and what needs to be agreed outside the framework.   The content as shown in Objectives section above will be used as an initial starting position to aid the necessary dialogue and seek the way forward.

Outstanding Issues

■ Site Security is already covered by OAD under section B3.8.   The initial view is to enhance this section of the framework with the agreed additional requirements.

■ As CNI (Critical National Infrastructure) is a sensitive subject/acronym, and that OAD is already in the public domain, the group will need to agree and alternative term that is to be used within the framework instead.

   o   Suggested Examples:

      ▪ ISS (Integrated Security Solution)

      ▪ ESS (Enhanced Security Solution)

      ▪ PSUP (Physical Security Upgrade Programme)

      ▪ BEIS Site

■ Section B6 will need to be reviewed considering any changes.

■ The Cyber Emergency Process is envisaged to be a subsidiary document, and the requirements under Section C of OAD need to be expanded to cover both "gas" as well as "cyber" emergencies as a similar process will be used.

■ For completeness, OAD Sections E (Telemetry Facilities), M (Information Flows) and N (General) may also be impacted by any proposed amendments.

■ The requirements will not cover any site not covered by OAD i.e. downstream >7bar PRS installations.