

**ISLAND SECURITY POLICY INSTITUTE**

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**POLICY BRIEF**

# The Digital Insider Threat

## *Cybersecurity Risks in Island-State Organizations Where IT and Security Functions Overlap*

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**RESEARCH INDEPENDENCE STATEMENT**

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**EXECUTIVE SUMMARY**

- **Standard digital insider threat frameworks assume segregation of duties that is structurally impossible in small island-state organizations where IT staff cannot distribute privileged access functions across multiple personnel.**
- **Cloud adoption in small island government and private sector organizations has outpaced access governance frameworks — creating a specific digital insider risk category that continental frameworks do not address.**
- **The social dynamics that suppress behavioral reporting in small island organizations apply equally to digital anomaly reporting.**

In 2023, a Pacific Island territory health department discovered that a network administrator had been copying patient records to a personal cloud storage account for fourteen months. One person was simultaneously the network administrator, the backup administrator, and the access auditor.<sup>1</sup> Segregation of duties — the foundational control in enterprise cybersecurity — was structurally impossible.

## The Segregation of Duties Problem

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In a small Pacific Island government agency or island-state private organization, the IT workforce may consist of two to five individuals responsible for all network administration, system administration, application support, and security monitoring functions. ISPI's analysis suggests that policy frameworks must treat the segregation of duties gap as a design constraint to be addressed through alternative controls — managed security service providers, third-party access auditing, and cloud governance frameworks that provide compensating controls without requiring large internal IT workforces.<sup>2</sup>

## Policy Recommendations

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1. Develop island-specific digital insider threat guidance prescribing alternative controls for organizations that cannot implement segregation of duties.
2. Mandate third-party access auditing for critical island government systems as a compensating control for segregation of duties gaps.
3. Commission CISA to develop small organization digital insider threat guidance calibrated for Pacific Island territory and small island government environments.
4. Establish shared managed security service arrangements for Pacific Island territory governments providing enterprise-grade access governance at appropriate costs.

## NOTES AND REFERENCES

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### ABOUT THE ISLAND SECURITY POLICY INSTITUTE

The Island Security Policy Institute (ISPI) is a nonprofit, nonpartisan research organization based in Honolulu, Hawaii. ISPI produces practitioner-led research, policy analysis, training programs, and commissioned research on public safety, emergency preparedness, insider threat, and security policy for island and coastal communities worldwide. ISPI is registered as a federal contractor on SAM.gov under NAICS 541720. Warren Pulley, Founder & Executive Director.

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