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Dear Adam,

Response to NIST Cyber Security Framework

We welcome the opportunity to comment on the Preliminary Cyber Security Framework and the NIST work to help US CNI companies identify the right cyber security standards and guidance. We have undertaken a similar consultation in the UK but with a focus on low level threats and to identify a preferred standard that is applicable to all businesses of all sizes, in the UK and overseas. Further information can be found here: https://www.gov.uk/government/consultations/cyber-security-organisational-standards-call-for-evidence.

UK Government recognised that most vulnerabilities exploited by basic cyber threats could be mitigated by better cyber hygiene, in all businesses of all sizes. However industry in the UK was unclear on which existing standard they should invest in, asking the UK Government for advice.

We want to offer clarity to businesses in what is a complex and confused standards landscape by supporting standards that are accessible and fit-for-purpose, and to help businesses follow best practise in basic cyber hygiene and mitigate cyber risks at the low threat level. The industry feedback received in our consultation was that none of the existing standards are currently fit-for-purpose and that UK Government should back the one that came the closest and work with industry to develop it further.

The greatest volume of industry support was in favour of ISO27000-series standards, which are well established and internationally recognised. Industry was also supportive of two additional publications - the ISF (Information Security Forum) Standard of Good Practice for Information Security and IASME (Information Security for SMEs). We heard that where the former is comprehensive and helps businesses to profile and implement the fundamental controls, the latter is lightweight and accessible.

UK Government will now work with industry to develop an implementation profile which will become the UK Government's preferred standard and will be available online to download free-of-charge. This profile will be based on key ISO27000-series standards and will focus on basic cyber hygiene. Our consultation also highlighted that demand exists in the market for additional cyber security profiles covering areas other than basic cyber hygiene, for example at a higher threat level. It is possible that further profiles could be developed in a partnership between UK Government and industry.

We view the use of a basic cyber hygiene standard as the next stage on from the 10 Steps to Cyber Security guidance, published by the UK Government in Sept 2012 - enabling businesses, and their clients and partners, to have greater confidence in their own cyber risk management, independently tested where necessary. The 10 Steps to Cyber Security guidance can be found here: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/73128/12-1120-10-steps-to-cyber-security-executive.pdf. We plan to work with industry to develop an assurance framework around the basic cyber hygiene standard.

UK businesses were very clear in the consultation that there is both a need and a growing demand for a standard such as this. The consultation has significantly raised awareness of cyber security standards, particularly with businesses outside of the ICT sector.

UK Government is keen to see alignment between this basic cyber hygiene standard, targeting low level cyber threats and applicable to all businesses in all sectors, and the NIST Cyber Security Framework designed for the higher threats faced by the CNI. We are also keen to see continued alignment between this framework and evolving work in the EU on cyber security standards.

Yours sincerely,

Joanne Miller

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