ICT Shared Capabilities

Infrastructure as a Service (IaaS)

Security Risk Assessment Report

Issued by

Digital Public Service Branch

**Te Tari Taiwhenua
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1.0	24/11/2023	Katrina Banks	Sign off

Document Approval

I approve this Risk Assessment report; it presents the information security risks introduced to Consuming Agencies through the use of generic Infrastructure Managed Services.

I acknowledge that I have been advised of the risks identified in this report. However, it is not a commitment to manage the risks that have been identified.

Name and Role	Signature	Date
Richard Ashworth **General Manager AoG Services Delivery** **Digital Public Service branch** **Department of Internal Affairs**	Signed on Original	6/12/23

I acknowledge that this Risk Assessment has been completed in accordance with the Government Chief Digital Officer's Information Security Risk Assessment process.

Name and Role	Signature	Date
Katrina Banks **Manager Security** **AoG Services Delivery, Digital Public Service branch** **Department of Internal Affairs**	Signed on Original	29 November 2023

Glossary of Terms

Availability	Ensuring that authorised users have timely and reliable access to information.
API	A set of functions and procedures allowing the creation of applications that access the features or data of an operating system, application, or other service.
B2B	Business-to-business (B2B), also called B-to-B, is a form of transaction between businesses
Confidentiality	Ensuring that only authorised users can access information.
Consequence	The outcome of an event. The outcome can be positive or negative. However, in the context of information security it is usually negative.
Control	A risk treatment implemented to reduce the likelihood and/or impact of a risk.
Gross Risk	The risk without any risk treatment applied.
ICT	Information and Communications Technologies
Impact	See Consequence.
Information Security	Ensures that information is protected against unauthorised access or disclosure users (confidentiality), unauthorised or improper modification (integrity) and can be accessed when required (availability).
Integrity	Ensuring the accuracy and completeness of information and information processing methods.
ISPS Panel	The Information Security Professional Services panel are a group of industry experts contracted through the Marketplace agreement to provide government agencies with ICT services and advice on a range of information security and privacy practices.
Likelihood	See Probability.
NIST	The National Institute of Standards and Technology (NIST) is a physical sciences laboratory and a non-regulatory agency of the United States Department of Commerce. Its mission is to promote innovation and industrial competitiveness.
Probability	The chance of an event occurring.
POC	A proof of concept (POC) is a demonstration to verify that certain concepts or theories have the potential for real-world application.
Recovery Point Objective (RPO)	The earliest point time that is acceptable to recover data from. The RPO effectively specifies the amount of data loss that is acceptable to the business.
Recovery Time Objective (RTO)	The amount of time allowed for the recovery of an information system or service after a disaster event has occurred. The RTO effectively specifies the amount of time that is acceptable to the business to be without the system.
Residual Risk	The risk remaining after the risk treatment has been applied.

Risk	The effect of uncertainty on the business objectives. The effect can be positive or negative. However, in the context of information security it is usually negative.
Risk Appetite	The amount of risk that the organisation is willing to accept in pursuit of its objectives.
Risk Owner	A person or entity with the accountability and authority to manage a risk. Usually, the business owner of the information system or service.
Stakeholder	A person or organisation that can affect, be affected by, or perceive themselves to be affected by a risk eventuating.
Threat	A potential cause of a risk.
Vulnerability	A weakness in an information system or service that can be exploited by a threat.

Contents

Executive Summary

Introduction

This report presents the generic findings of an Information Security Risk Assessment[1] for the suppliers of Infrastructure-as-a-Service (IaaS) services and the consumption of these services by New Zealand government agencies. It also includes the IaaS services that are listed under the Infrastructure as a Services catalogue[2] on Marketplace.

The Risk Assessment followed the Government Chief Information Officer's (GCIO) Risk Assessment process, which is based on the AS/NZS ISO 31000:2018 and ISO/IEC 27005:2022 risk management standards.

As this is a high-level Risk Assessment report, the risks identified, and ratings assessed may be different and unique in the context of participating agencies. Therefore, agencies reading this report should review the risks using their own risk management framework. This will ensure that the risks identified are specific to the agency's adoption of the IaaS service, are within their business context, and risk appetite.

This Risk Assessment incorporates the risks identified in the DIA generic cloud services Risk Assessment report[3] which identifies common risks associated with the consumption of cloud services. It is recommended that both reports are consumed together.

The details of the Risk Assessment scope can be found in *Appendix A*. Where **PA** is used in this report, it refers to **Participating Agency**.

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[1] This Risk Assessment report is a refresh & replacement of previous ICT Shared Capabilities IaaS Security Risk Assessment v1.0 2023_031 and combines the risks from previous version.

[2] https://marketplace.govt.nz/about-the-marketplace/whats-open-on-marketplace/

[3] GCIO Cloud Services Risk Assessment Report dated March 2017, version 1.1

[4] DIA Cloud Services Risk Assessment Report dated March 2017, version 1.1

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Gross Risks

Table 1 illustrates the rating of each risk <u>without</u> any controls in place. The table below includes the gross risk positions of both IaaS specific and generic cloud risks.

Table 1 – Gross Risk Ratings

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Gross Risks

Key Recommendations

The Risk Assessment included key controls that if implemented, helps to address the identified risks.

9(2)(k) manage the identified gross risks rated 9(2)(k)

9(2)(k) the following key recommendations should be undertaken:

a) Strong Encryption and Secure Key Management

The use of strong encryption to protect data at rest and in transit is a key control to address confidentiality and integrity risks within the cloud.

Suppliers and PAs should ensure that all requirements for protecting data at rest and in transit are well defined, configured and implemented. This includes the secure management of cryptographic keys used to encrypt agency data.

b) Change, Configuration, and Vulnerability Management

Change, configuration and vulnerability management procedures should be defined and followed by the supplier, to ensure that the risks associated with misconfigurations and vulnerabilities that affect IaaS are mitigated. Ensuring that security design reviews are included in the change management process will minimise the likelihood of vulnerabilities being introduced, such as vulnerabilities that could lead to data belonging to different tenants not being adequately segregated.

A robust vulnerability management process to maintain the status of all components of the underlying infrastructure such as servers, hypervisors, and network devices, should be developed and followed. This includes regular vulnerability assessments, implementing and maintaining specific security features, as well as timely software and firmware patching and updating. The requirements for change and vulnerability management should be included in the contracts or service level agreements with the supplier.

c) Contracts and Service Level Agreements

Contracts and service level agreements with the supplier defines the agency's requirements for the service. They should include elements such as terms of service, associated service levels, key performance indicators and metrics demonstrating service performance.

Agencies must ensure that the supplier is aware of agency information security requirements by formalising contract provisions or service level agreements. In addition, monitoring of performance should be performed on a regular basis to ensure that expectations are met. This includes any third parties that may be contracted by the supplier to provide part of an IaaS service.

d) Risk Management, Supply Chain Assurance and Due Diligence

Before the consumption of any IaaS services, agencies should be informed and aware of the implicating risks associated with using the service. This can be done by performing a comprehensive Risk Assessment to identify the risks and controls associated with the service. All identified risks should be understood and formally accepted with an appropriate risk management plan. The controls identified should be validated or assurance obtained from the Supplier, to ensure that they are operating as designed.

The amount of due diligence should also extend out to any third parties supporting an IaaS supplier. While it may not be possible to audit the third-party supplier directly, agencies may be able to rely on independent third-party audit reports where appropriate.

e) Security Incident Response and Resilience

The ability to respond to a security incident if one was to occur is just as important as the preventative measures, as well as recovering data and infrastructure. Agencies should define and implement steps and procedures to follow in the event a security incident occurs to minimise the impact of the incident. This will also help agencies to learn from these incidents to better prepare themselves if something similar were to happen again.

The robust implementation of backup and restore processes, including documentation, enables agencies to maintain business as usual in the event of a security incident. These include regularly updating and maintaining each procedure, plan, and backups needed to resume services in a timely manner.

f) Secure Facilities, Access Management and Staff Awareness

Supplier and PA staff that require access to the IaaS components should only be provided with permissions that they are authorised to use. A robust process that defines user access management ensures that permissions are appropriately and timely updated, preventing the risk of unauthorised access and internal threats.

Effective physical controls should be implemented at the Supplier's facilities and physical assets to ensure that information is physically protected from unauthorised access by both malicious supplier personnel and third parties.

Supplier and PA users should be made aware of their requirements towards protecting the confidentiality of their credentials, including programmatic API keys. Regular staff awareness and training programs should be developed and made available to users. Topics may include users' information security responsibilities within an organisation and good security practices for storing user credentials.

g) Logging and Auditing

The presence of in-depth logging and regular auditing of the relevant IaaS components can enable the suppliers and PA to detect or investigate security incidents associated with the services, should they occur. Accurate logs provide investigation teams with a precise timeline of events, enabling a faster response.

h) Cloud Security Access Brokerage and Data Leak protection

Human errors are a key security threat to organisations. PA staff uploading classified information or uploading infected files could cause a significant impact to the security of the information. It is highly recommended for PA to implement the controls like CASB and DLP to reduce this risk to an acceptable level.

Residual Risks

The tables below illustrates the expected residual rating of each of the risks if all the recommended controls are implemented and appropriately configured and managed, with respectively only the IaaS supplier controls, and all controls including Participating Agency controls.

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Business Context

This section provides an overview of the business context for the ICT Shared Capabilities IaaS services that are in scope of this generic Information Security Risk Assessment. The IaaS services in scope of this Risk Assessment as well as their suppliers are listed under the Infrastructure as a Services catalogue[5] on the Marketplace. Please refer to appendix B for more details on Marketplace.

The following business context assumptions have been made for the Risk Assessment:

- Shared security responsibility model when consuming the IaaS service;
- Key stakeholders involved when consuming the IaaS service;
- Classification of the information stored, processed, and transmitted by the IaaS service;
- Different types of users with access to the IaaS service;
- Information Security requirements for the IaaS service in terms of confidentiality, integrity, availability, privacy, and any other relevant legislation; and
- Information protection priorities when consuming the IaaS service.

PAs consuming this Risk Assessment must ensure that they:

- Review the business context assumptions made during the Risk Assessment and ensure that they accurately reflect the agency's own context;
- Define the business process that will be supported by the IaaS service;
- Identify and document the business impact should an Information Security or privacy incident occur; and
- Consider the agency's use context and risk appetite, and evaluate assigned risk ratings.

Table 4 summarises the responsibility boundary for the IaaS cloud service:

Table 4 – Shared Responsibility Model for Security in the Cloud

Cloud Service	Supplier Responsibility	PA Responsibility
Infrastructure as a Service (IaaS)	Implement, manage, and maintain the Information Security controls up to, and including, the virtualisation hypervisor layer (i.e., the underlying infrastructure).	Implement, manage, and maintain the Information Security controls on the guest operating system, application services and applications, and network connectivity to service.

The IaaS services currently available in the Marketplace can be defined as follows:

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[5] https://marketplace.govt.nz/about-the-marketplace/whats-open-on-marketplace/

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To deliver the services listed above. The suppliers will utilise capabilities from the following deployment layers. These layers will inform the applicability of controls for the certification audits.

Table 6 – IaaS Deployment Models

Deployment Layer	Description
Physical Infrastructure (PI)	The physical infrastructure layer refers to the areas surrounding the hosting of any components required to deliver IaaS services. This includes but is not limited to, the data centre services such as rack space, network cabling to the racks, power supply, and physical data centre security.
Infrastructure Deployment and Software (ID&S)	The infrastructure deployment and software layer refers to the physical components and associated software which establish a functional system / platform. This includes components such as CPU, SSD, RAM, as well as certain low-level software such as hypervisors.

Deployment Layer	Description
Management Platform (MP)	The management platform layer refers to the services which provide monitoring and administration of IaaS resources. This includes but is not limited to the Suppliers service portal and resource monitoring.
Service Establishment (SE)	The service establishment layer refers to the services which are used to deploy and integrate IaaS services into PA environments and applications that are used to deliver business outcomes for PAs. This can include the configuration of network or storage resources consumed by a PA, the deployment of a specific OS onto a guest virtual machine and further installation of applications and software to achieve PA business outcomes.

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Stakeholders

The key stakeholders for generic IaaS services:

- PA;

- IaaS Supplier; and

- Third parties contracted by agencies.

Information Classification

Based on the New Zealand Government Security Classification System[6], the information that will be stored, processed or transmitted by the IaaS service has been classified Classification Removed and below. The compromise of information classified as Classification Removed can:

- Adversely affect diplomatic relations;

- Hinder the operational effectiveness or security of New Zealand or friendly forces; and

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[6] https://protectivesecurity.govt.nz/classification-system/how-to-classify/

- Adversely affect the internal stability or economic wellbeing of New Zealand or friendly countries.

Business Processes Supported

Each PA will be using the IaaS service to support different types of business processes. Therefore, it is important for each agency to understand what business processes will be supported and define the security requirements for the service. This will ensure that agencies understand the security requirements that the service needs to meet.

Business Impact

Each PA will be using the IaaS service to transmit, store or process different types of information, in addition to providing access to different information systems and services. Therefore, it is important for each agency to identify and document the types of information that will be transmitted, stored, or processed in the Supplier cloud infrastructure. This will ensure that agencies understand the business impact if the confidentiality, integrity, and availability of the information was compromised.

Security Requirements

The Confidentiality, Integrity, and Availability requirements for the consumption of the IaaS service have been defined as:

Confidentiality

The confidentiality of the information transmitted, stored, or processed by the IaaS service is assumed as critical for PAs. This is driven by the classification of information that will be transmitted, stored, or processed by the service. The information processed in the cloud must be protected from unauthorised access and disclosure.

If the confidentiality of Classification Removed information was compromised, the following impacts are expected:

- Disclosure of Classification Removed information to unauthorised personnel;
- Loss of key stakeholder confidence in the IaaS service;
- Reputation damage for the affected PA; and
- Further investigation where required by law.

Integrity

The integrity of the information transmitted, stored, or processed by the IaaS service is assumed as critical for PAs. It is assumed that PAs will be using the service to store and process information that business processes rely on for decision-making. Inaccurate or corrupted information can cause PAs to lose their data source of truth and affect business outcomes.

If the integrity of Classification Removed information was compromised, the following impacts are expected:

- Modification of Classification Removed information by unauthorised personnel leading to inaccurate or corrupted data;
- Loss of key stakeholder confidence in the IaaS service;
- Reputation damage for the affected PA; and
- Further investigation where required by law.

Availability

The availability of the information transmitted, stored, or processed by the IaaS service is assumed as critical for PAs. It is assumed that PAs will be using the service to store and process information that business processes rely on. Prolonged service outages can have an adverse impact on business processes reliant on the service, affecting business outcomes.

If the availability of Classification Removed information was compromised, the following impacts are expected:

- Loss of productivity that affects the PA's service delivery;

- Loss of key stakeholder confidence in the IaaS service;

- Reputation damage for the affected PA; and

- Further investigation where required by law.

Privacy

Personal identifiable information may be transmitted, stored, or processed by the IaaS service. Therefore, it is important that PAs identify and document the types of personal identifiable information that will be transmitted, stored, or processed in the Suppliers cloud infrastructure.

If personal information will be transmitted, stored, or processed by the IaaS service, PAs must ensure that the privacy of the information is protected from unauthorised access, disclosure, or modification during storage and in transit. PAs should also ensure that the service is configured and operating to help agencies meet the requirements from the Privacy Act 2020.

Users

The users and security roles for the IaaS service have been defined as:

Table 8 – User Groups & Descriptions

User Group	Description
PA Administrators	Agency staff with privileged access to the IaaS service. Responsible for managing and configuring the agency's resources, user accounts, groups, and permissions.
PA Users	Agency users with role-based access to the IaaS service. Responsible for using the service to deliver and meet its associated agency business outcomes.
IaaS Administrators	IaaS staff with access to the information systems supporting the IaaS service. Response for managing the supporting infrastructure and systems that support the IaaS service.

Legislation, Policy, and Guidelines

Government Agencies must ensure that they can demonstrate compliance with applicable legislation, policies, guidelines, and any other external requirements when using the IaaS service.

For purposes of completing this Risk Assessment, the following legislation, policy, and guidelines were identified to be applicable:

- Official Information Act 1982;

- Privacy Act 2020;

- Public Records Act 2005;

- Protective Security Requirements (PSR); and

- New Zealand Information Security Manual (NZISM) version 3.6.

Information Protection Priorities

For purposes of completing this Risk Assessment, the following represents the information protection priorities when consuming the IaaS service:

Table 9 – Information Protection Priorities

Attribute	Priority Rating
Confidentiality	5
Integrity	5
Availability	5
Privacy	5

Table 10 represents the scale used to define the information protection priorities shown in For purposes of completing this Risk Assessment, the following represents the information protection priorities when consuming the IaaS service:

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Table 10 – Information Protection Priority Scale

Priority Rating	Scoring
Critical	5
Highly Important	4
Important	3
Some Importance	2
Unimportant	1
Not Applicable	0

Detailed Risks

The following table presents the risks associated with the use of IaaS. The risks have been prefixed into 2 categories, namely *IaaS-Rxx* and *GC-Rxx*. The *GC-Rxx* risks stem from the Cloud Services Risk Assessment report[7], which highlights the common risks associated with the use of a Generic Cloud Service. The *IaaS-Rxx* risks have been developed to highlight additional risks applicable to IaaS and incorporate specific scenarios / drivers associated with these risks. **All risks should be consumed together when conducting a Risk Assessment.** For each risk, the key controls that have the most risk reduction benefit are <u>highlighted</u>.

Table 11 – Generic IaaS Risk Assessment

Risk ID	Risk Description	9(2)(k)
IaaS-R01	Information Disclosure or Modification due to Inadequate Protection of Data at Rest	9(2)(k)
IaaS-R02	Information Disclosure, Modification, Loss or Data Lock Out due to Insecure Key Management	9(2)(k)

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[7] DIA Cloud Services Risk Assessment Report dated March 2017, version 1.1

9(2)(k)   9(2)(k)

IaaS-R03 | **Information Disclosure or Modification due to Inadequate Protection of Data in Transit Across Untrusted Networks**

9(2)(k)

IaaS-R04 | **Information Disclosure, Modification or Loss due to Technical Attacks**

9(2)(k)

IaaS-R05 | **Information Disclosure, Modification or Loss due to Ineffective User Access Management**

9(2)(k)

9(2)(k)

9(2)(k)

IaaS-R06 | **Information Disclosure, Modification or Loss due to Compromised User Credentials**

9(2)(k)

IaaS-R07 | **Information Disclosure, Modification or Loss due to Insecure Supplier Programmatic Access Credentials**

9(2)(k)

9(2)(k)

IaaS-R08	Information Disclosure, Modification or Loss due to Known Software Vulnerabilities

9(2)(k)

IaaS-R09	Foreign Interference due to Unfriendly Relations Between Countries

9(2)(k)

9(2)(k)   9(2)(k)

IaaS-R10	Information Disclosure, Modification or Loss due to Malware

9(2)(k)

IaaS-R11	Information Disclosure, Modification or Loss due to Misconfigurations

9(2)(k)

	9(2)(k)	9(2)(k)
IaaS-R12	**Ineffective Security Incident Management due to Inadequate Logging and Monitoring**	
	9(2)(k)	
IaaS-R13		

	Loss of Service due to Incompatible Service Environment	9(2)(k)
	9(2)(k)	
IaaS-R14	**Loss of IaaS Service Delivery due to Inadequate Maintenance**	
	9(2)(k)	
IaaS-R15	**Loss of Service due to Distributed Denial of Service Attack**	
	9(2)(k)	

9(2)(k)

9(2)(k)

IaaS-R16 | **Information Disclosure, Modification or Loss due to Supply Chain Compromise**

9(2)(k)

GC-R01 | **Information Disclosure, Modification or Loss due to Poorly Defined Service Agreements**

9(2)(k)

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GC-R02	Information Disclosure or Loss due to Legal Jurisdictional Rules

9(2)(k)

GC-R03	Information Disclosure, Modification or Loss due to Data Distribution

9(2)(k)

GC-R04	Information Disclosure, Modification or Loss due to Data Lock In

9(2)(k)

9(2)(k)

9(2)(k)

GC-R05	Information Disclosure, Modification or Loss due to Insider Threats

9(2)(k)

GC-R06	Information Disclosure, Modification or Loss due to Ineffective Security Incident Response and Management

9(2)(k)

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GC-R07 | **Information Disclosure, Modification or Loss due to Inappropriate Use of Cloud Service**

9(2)(k)

GC-R08 | **Information Disclosure, Modification or Loss due to Incomplete Segregation of Suppliers Tenant Data**

9(2)(k)

GC-R09 | **Information Disclosure, Modification or Loss due to Virtualisation Technology Vulnerabilities**

9(2)(k)

	9(2)(k)
GC-R10	**Information Disclosure, Modification or Loss due to Insecure Facilities**
	9(2)(k)
GC-R11	**Information Disclosure due to Incomplete Data Deletion**
	9(2)(k)

9(2)(k)

	9(2)(k)
GC-R12	*Information Disclosure, Modification or Loss due to Malware*
	9(2)(k)
GC-R13	**Cloud Services Outages due to Inadequate Service Backup and Recovery Procedures**
	9(2)(k)

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9(2)(k)

GC-R14 | **Cloud Service Degradation or Outage due to Inadequate Network and Server Capacity Management**

9(2)(k)

GC-R15 | **Information Disclosure, Modification or Loss due to Social Engineering Attacks**

9(2)(k)

GC-R16 | **Information Disclosure due to Incomplete Segregation of Suppliers Management Networks**

9(2)(k)

9(2)(k)

9(2)(k)

GC-R17	*Information Disclosure, Modification or Loss due to Inappropriate Supplier User Access Management*

9(2)(k)

GC-R18.	*Information Disclosure, Modification or Loss due to Compromised Supplier User Credentials*

9(2)(k)

GC-R19	Information Disclosure, Modification or Loss due to Supplier System Misconfiguration
	9(2)(k)

9(2)(k)

GC-R20	Ineffective Security Incident Management due to Inadequate Logging and Monitoring
	9(2)(k)

GC-R21	Information Disclosure, Modification or Loss due to Poorly Defined Roles and Responsibilities
	9(2)(k)

9(2)(k)

9(2)(k)

GC-R22	Information Disclosure, Modification or Loss due to Insecure Data Migration

9(2)(k)

Controls Catalogue

Table 12 presents the recommended controls to effectively manage the risks recorded in Table 11. These controls align with the controls catalogue of the Telecommunications-as-a-Service (TaaS) Control Objectives version 2.3 (dated 29 June 2021).

Table 12 – Recommended Controls

Control Number	Control Title	Description	Reduces	NZISM Reference (V3.6, Sept 2022)

C01.	Information Security Governance	• Information Security Policies form part of an information security framework that establishes the baseline set of policies, standards and guidelines that are required for the organisation to effectively manage its security risks, in line with its business requirements. The framework is designed to be flexible and extensible to:
		  o Enable development of new policy artefacts whilst minimising the need to revise or redevelop the security policy.
		  o Establish a structured, consistent and robust approach to the development, implementation and review of the policy artefacts.
		  o Ensure that staff are provided with access to information that is relevant to their roles.
		• Establishing an information security management framework to implement, manage, control and regulate the organisation's security activities and initiatives will help protect information to enable the organisation to achieve its business objectives. This should include, but is not limited to, the following:
		  o Information security roles and responsibilities are defined and allocated.
		  o How information security fits into the organisation's IT governance and enterprise risk management structure.
		  o How the security objectives should align with the organisation's business objectives.
		  o How security requirements are incorporated with the business requirements.
		  o Legal, regulatory and contractual obligations and other compliance demands and requirements.
		  o Ensuring project management methods incorporate information security and ensure they are addressed as part of the project.
			Likelihood, Impact	GOV1
				GOV2
				GOV3
				GOV4
				GOV5
				GOV8
				GOV9
				GOV10
				INFOSEC1
				INFOSEC2
				INFOSEC3
				PERSEC1
				PHYSEC2
				PHYSEC4
				3
				5.1
				5.2
				23.2.21

C02.	Segregation of Duties	Ensure that all critical tasks that may be disrupted by human error or through malicious intent are designed in such a way that a single individual is unable to perform an action that results in such a disruption.	Likelihood, Impact	16.2.6

C03.	Human Resource Security	• Ensure that all employees and contractors understand their responsibilities and are suitable for the roles, which they are employed, including:
		  o Security vetting all new staff before beginning employment and on a regular basis thereafter.
		  o Undertaking an induction process that covers their responsibilities for information security.
		  o Acknowledging the Code of Conduct and information security policy.
		  o Acknowledging the employee's Terms and Conditions of Employment.
		  o Receiving regular security awareness training.
		  o Monitoring and management of changes in employee circumstances and behaviour.
		  o Removing access rights when their employment or contract ceases.
		• Ensure that organisation and third-party staff that are users or administrators receive formal training on how to perform the tasks that are relevant to their role before they are granted access to the information services.
		• Ensure that authorised users of a system or service are vetted by an approved vetting service such as that provided by the Ministry of Justice. Only appropriately, authorised, cleared and briefed personnel are allowed access to the systems.
		• Ensure that all employees and contractors are provided with ongoing security / privacy awareness training. Topics such as information security responsibilities, legislation and regulation, consequences of non-compliance with information security policies and procedures and potential security risks and counter measures should be covered.
		• Subscribing Agencies should ensure that all users of their systems are provided with, and acknowledge, the Terms of Use. These should outline the acceptable use of the service. These terms of use can either be in the form of a banner produced when the user logs on, or a hard copy document provided to a staff member.
			Likelihood	3.5
				9.1
				9.2
				9.4
				19.1.18

Control Number	Control Title	Description	Reduces	NZISM Reference (V3.6, Sept 2022)

C04.	Asset & Information Lifecycle Management	• A defined and implemented Asset Lifecycle Management process will ensure that all software and hardware components are upgraded or replaced in a timely manner, when the cessation of support is announced, extended support options would incur excessive costs, or the vendor no longer intends to support the product.
		• This may incorporate an inventory of assets and cover ownership, reissue, return, recycling, decommissioning and destruction of organisation-owned hardware, software, mobile devices and any other removable media.
		• Ensure that IT systems and Agency information are safely decommissioned and that software, system logic and data are properly transitioned into new systems or archived in accordance with the organisation, legal and statutory requirements. IT systems no longer required should be sanitised and disposed of in an approved manner that reduces the likelihood of data recovered by an unauthorised party.
		• Manage and protect information as an asset, in any format, throughout its lifecycle through the implementation of Information Lifecycle Management policies and procedures.
		• Include procedures for the labelling, categorisation and/or classification of information, as well as identifying, implementing and maintaining controls to effectively protect information during the various stages of its existence, including:
		   ○ Creation and receipt.
		   ○ Use.
		   ○ Distribution.
		   ○ Maintenance.
		   ○ Storage and archive.
		   ○ Disposal.
		• Ensure that media containing information are protected against unauthorised access, misuse or corruption. This includes classifying, labelling and registering the media and clearly indicate the required handling instructions and level of protection to be applied.
		• Classifying information in terms of legal requirements, value, criticality and sensitivity to unauthorised disclosure or modification will ensure it is handled and protected correctly, and advise employees on the correct procedures for creation, duplication, destruction and disposal. The Protective Security Requirements provide clear instruction on how to classify official information, as well as how it should be subsequently handled.
		• Ensure that import, export, copying of information are hygiene checked, protected in transit and at rest (securely transfer) from one system to another for the purpose of testing, migration transition or archival with their appropriate classification.
			Likelihood	1.1.11
				12.3
				12.4.7
				12.6
				13.1
				13.2
				13.3
				13.4
				13.5
				13.6
				20.2
				20.3
				22.1.26
				23.4.13

C05.	Documentation	Ensure that information security documentation is produced for systems, to support and demonstrate good governance. The following documents should be documented: • Sufficient design and technical documentation supports the rebuilding of information services and systems. • Security Risk Management Plans – identifying security risks and appropriate treatment measures for systems. • System Security Plans – specifying the information security measures for systems. • Standard Operating Procedures – ensuring security procedures are followed in an appropriate and repeatable manner. • Emergency Procedures – ensuring classified information and systems are secured before personnel evacuate a facility in the event of an emergency.	Likelihood, Impact	5.1 5.2 5.3 5.4 5.5 5.6 5.7

C06.	Access, Authentication & Authorisation	• Identify management and authentication is the identification and authentication processes that verify the identity of a user or device. Secure authentication controls are implemented as physical or logical controls, and reduce the likelihood of unauthorised access to information, services or systems in accordance with an access control policy.
		• Ensure that users are only provided with access to the service that have been specifically authorised to use, including:
		   ○ Documenting of an access control policy that defines business requirements for access, principles for access (e.g. need to know, role based) and access control rules that will ensure these requirements are met.
		   ○ Implementing specific policies for access control based on business functions, processes or user roles and responsibilities, such as administrator access, user access, system access, remote access, network access, and discretionary and mandatory access.
		• Ensure that access to the service is controlled based on the roles of the individuals requiring access. Role based access controls allows access to be quickly, easily and uniformly granted, changed or removed for groups of users, without having to update the privileges for each user.
		• Ensure that user accounts are managed through their lifecycle process, including:
		   ○ Assigning access rights aligned with the defined access control policy.
		   ○ Reviewing access rights on a regular basis.
		   ○ Disable accounts when a user leaves an organisation.
		   ○ Disable accounts when a user no longer requires access.
		   ○ Remove or update access rights (e.g. when a user changes role within an organisation).
		• Ensure that only the minimum required access rights are granted to a user or system when accessing a system, preventing the assignment of excessive user permissions. Privileged access rights are controlled through formal authorisation process and implemented in accordance with the defined access control policy.
		• Ensure that user passwords should be protected against unauthorised access when distributed initially. Distribution methods may include:
		   ○ Encrypted email .
		   ○ A secure password reset mechanism that positively authenticates the user (such as a challenge question or multifactor authentication).
		   ○ A text message to a verified mobile number.
		   ○ A telephone call.
			Likelihood, Impact	5.5.5
				9.2.6
				9.2.7
				16.1
				16.2
				16.3
				16.4
				16.5
				18.1.14
				19.1
				22.1
				22.2.16
				23.4.10

Control Number	Control Title	Description	Reduces	NZISM Reference (V3.6, Sept 2022)

		• Ensure that servers and information systems are administered and managed securely from a suitably hardened and configured central point such as a jump server. Access to the central point should be [Classification Removed] with access and activities logged. Administrators should be issued with unique accounts that are different to the account used for daily activities such as email or web browsing.
		• A dedicated management network isolated from production networks should also be deployed to reduce the likelihood of management data being intercepted and disclosed, and to reduce the attack surface area of information systems.
		• User and Device Access Management ensures information, services and systems are only accessed by users and devices who are explicitly authorised. Access management reduces the likelihood of unauthorised access to information, services and systems through formalised and controlled procedures including:
		   o The registering of users and devices (so that they are uniquely identifiable, accountable for their actions, and be assigned access rights).
		   o Provisioning of access rights for users and devices, in line with the access control policy.
		   o Restricting and controlling of privileged access rights, in line with the access control policy.
		   o Securely allocating user and device credential information (e.g. unique identifiers, secret authentication information).
		   o Reviewing user and device access rights on a regular basis.
		   o Removing or adjusting access rights of users and devices (e.g. change of a user's role or responsibilities).
		   o De-registering or removing access rights of users and devices (e.g. upon termination or a change of their responsibilities or relationship).
		• Ensure that any services that provide identity federation functionality is securely configured. These services need to ensure that any client accessing a service is properly authenticated, and authorised, and that appropriate trust is established between two different organisations.
		• Web-standards based protocols should be used for exchanging authentication and authorisation data between organisations (e.g. SAML 2.0, OAuth 2.0, OpenID).		

C07.	Multi-Factor Authentication	• Secure authentication is the identification and authentication processes that verify the identity of a user or device. Secure authentication controls are implemented as physical or logical controls, and reduce the likelihood of unauthorised access to information, services or systems in accordance with an access control policy.
		• Where strong authentication and identity verification is required (e.g. privileged users, administrators) additional forms of authentication can be used (e.g. tokens, digital certificates, biometrics). Multi-factor authentication provides the strongest level of authentication, as it requires a combination of at least two of the following forms of identification:
		   o Something you know (e.g. username and password).
		   o Something you have (e.g. hardware or software token, digital certificate).
		   o Something you are (e.g. biometric fingerprint).
		• The identity and authentication information of users and devices need to be kept confidential, ensuring that it is not disclosed to other parties and securely stored (e.g. locked in a safe, password vault).
			Likelihood, Impact	16.7
				23.3.19
				23.3.21

C08.	Cryptographic Policy & Encryption	• Ensure that cryptographic keys are managed according to defined standards and procedures and protected against unauthorised access or destruction during their lifecycle, including creation, storage and protection, distribution, use, renewal, recovery, revocation, destruction. • Ensuring business [Classification Removed] private, or otherwise classified information that flows over the public or untrusted network such as the Internet or internal networks is protected using approved cryptographic protocols, reduces the likelihood of information being disclosed to, or captured by, an unauthorised person. • Ensuring business [Classification Removed] private, or otherwise classified information stored on media is encrypted using approved encryption algorithms and protocols, reduces the likelihood of unauthorised disclosure.	Likelihood, Impact	16.1.35 16.1.36 17.1 17.2 17.3 17.4 23.4

C09.	Physical & Environmental Security	• Ensure that all critical facilities such as data centres, communication rooms, servers, networks, telecommunication equipment and other important assets are physically protected against accident, natural disaster, attacks and unauthorised physical access.
		• Ensure that equipment or assets supporting the service are protected against loss, damage, theft and unauthorised access. The considerations for equipment security includes:
		   o Ensuring IT equipment always reside in an appropriate class of secure room
		   o Storing IT equipment during non-operational hours in an appropriate class of security container or lockable commercial cabinet.
		   o Using IT equipment with removable non-volatile media which is stored during non-operational hours in an appropriate class of security container or lockable commercial cabinet as well as securing its volatile media.
		   o Using IT equipment without non-volatile media as well as securing its volatile media.
		   o Using an encryption product to reduce the physical storage requirements of the non-volatile media as well as securing its volatile media.
		   o Configuring IT equipment to prevent the storage of classified information on the non-volatile media when in use and enforcing scrubbing of temporary data at logoff or shutdown as well as securing its volatile media.
			Likelihood, Impact	8.1
				8.2
				8.3
				8.4
				9.4
				10
				11.7.32
				23.1.33

Control Number	Control Title	Description	Reduces	NZISM Reference (V3.6, Sept 2022)
C10.	System & Service Change Management	• Ensure that information security is an integral part of the change management process and incorporated into the organisation's IT governance and management activities. All changes to the configuration of a system should be documented and approved through a formal change control process. All changes should be reviewed, whether successful or not. Examples of a system change includes: 　o An upgrade to, or introduction of, IT equipment. 　o An upgrade to, or introduction of, software. 　o Environment or infrastructure change. 　o Major changes to access controls. • To prevent unauthorised access or changes to the operational environment, non-operational environments such as development, test and training environments must be separated from operational ones. Consider the following to ensure effective separation of environments: 　o All changes must be tested in a non-operational environment before being transferred into the operational environment. 　o Testing must not be done in operational environments. 　o Rules for the transfer or installation of software into operational environments from non-operational environments 　o Users must have different accounts for operational and non-operational environments. 　o Operational or production data must not be used in non-operational environments, unless the same security controls are in place in the non-operational environment. • A defined and implemented Release Management process will ensure software and firmware updates (including new releases) and configuration changes are deployed in a non-operational (e.g. development or test) environment prior to being deployed into production. It will also ensure that use cases, regression testing and user acceptance testing is performed in line with the scope of the changes to the system. • Provide a Service Roadmap plan that outlines short and long-term service upgrades and updates. This ensures that service users and integrating vendors are aware of planned improvements and/or changes to the service. This facilitates the adoption of updated service features and provides an opportunity to address any integration issues before a service upgrade or update occurs.	Likelihood, Impact	12.7.19 14.1 14.4
C11.	Host Protection	• The installation of malware protection software on all applicable systems, endpoints and devices will reduce the likelihood of malicious code infecting the service. Configuring the protection to perform real-time checks for malware, automatically update its definition database, quarantine any infected files and automatically alert System Administrator(s) will ensure any infection is managed. Additional controls that detect and/or prevent the use of known malicious websites may also be considered. • Ensure standard operating environments (SOE) are hardened in order to minimise known vulnerabilities and attack vectors. Aligning with hardening standards (e.g. vendor guidelines or Centre for Internet Security [CIS] benchmark) limits the opportunity for a vulnerability in the service to be exploited. • Host-Based Intrusion Prevention System (HIPS): an installed software package which monitors a single host for suspicious activity by analysing events occurring within that host. • Access to Web content is implemented in a secure and accountable manner via web Proxy for and content filtering. • Only approved applications are used on agency-controlled systems via application white listing. • Endpoint/hosts are regularly monitored and maintained for the up-to-date Patches and regular vulnerability scans. • Use of Data loss protection clients on the endpoint where appropriate. • Mobile telephone systems and devices are prevented from communicating unauthorised classified information via MDM. • Wearable devices are prevented from unauthorised communication or from compromising secure areas. • Devices and systems are protected from unauthorised external media connectivity and usage. • Strong identity access and authentication methods are enforced on the endpoints/hosts via centrally managed directory service. • The development of a Mobile Device Policy will ensure those staff members that are provided with a mobile device (or those who utilise BYOD) for the organisation's purpose, are provided with clear direction on correct use of the device and reminded of the need to comply with the policy. It will ensure that appropriate precautions are taken to protect against theft, damage and accidental disclosure of information.	Likelihood, Impact	7.1 7.3 9.3 11.4 11.5 12.1 13.3.6 14.1 14.2 14.3 16 20.1 21 GOV04 23.2.19 23.5.12
C12.	Backup & Restore	• Ensure that backups of business-critical information, configurations, logs etc. are recoverable to assist in meeting the defined Recovery Point Objective (RPO), Recovery Time Objective (RTO) and the Maximum Tolerable Downtime (MTD). The data backup process may include appropriate controls required to protect the highest classification of information included in the back up as well as regular restoration tests to confirm its effectiveness. • An offline encrypted copy of all back-up may be required and maintained in a location that meets the physical and environmental security requirements for back-up media. Consideration should be given to ensuring a local copy of backup data is held to support business continuity in case of failure of the service.	Impact	6.4 13.3 16.3 16.5 17.1 22.1.26 22.2 23.4.12
C13.	Logging & Incident Monitoring (SIEM)	• Ensure that information systems are configured with adequate logging, archived and retained for a defined appropriate period. Events to be logged includes: 　o User login. 　o All privileged operations. 　o Failed attempts to elevate privileges.	Likelihood, Impact	3.4 4.4 7.1 7.3

Control Number	Control Title	Description	Reduces	NZISM Reference (V3.6, Sept 2022)
		o Security related system alerts and failures. o System user and group additions, deletions and modification to permissions. o Unauthorised or failed access attempts to systems and files identified as critical to the agency. o Date and time of the event. o Relevant system user(s) or processes. o Event description. o Success or failure of the event. o Event source (e.g. application name). o IT equipment location/identification. • Ensure that security related event logs are analysed regularly using automated security information and event management (SIEM) tools or equivalent to help identify anomalies. • Clock/Time synchronisation across all connecting services will ensure a definitive time source is used, which will aid any information security investigation.		12.4 14.1 14.2 14.3 15.2 16.5 16.6.11 18.1.19 19.2 20 22.2 23.5

C14.	Configuration Management	• Configuration management is the process of controlling the configuration of the service's components to provide assurance that they have been deployed in accordance with the approved configuration and remain so throughout their lifecycle. It is used for establishing and maintaining consistency of a product's performance, functional and physical attributes with its requirements, design and operational information throughout its life. Any changes to the system are proposed, evaluated, implemented and documented using a standardized, systematic approach that ensures consistency, and proposed changes are evaluated in terms of their anticipated impact on the entire system.
		• Automate and orchestrate operational tasks and processes to increase the speed and accuracy of the deployment and maintenance of information services. Examples of Automation and Orchestration include:
		  o Automated tasks (scripts, workflows, processes).
		  o Orchestrated deployments (deployment scripts, build images, application packages).
			Likelihood, Impact	5.5
				12.2
				14.1
				18.1
				22.2.14

C15.	Patch & Vulnerability Management	• Ensure that security patches are applied in a timely fashion to manage software and firmware corrections, vulnerabilities and performance risks.	Likelihood	12.4 23.2.19

C16.	Network Security	• Ensure that network services (including those outsourced) are protected against malicious and accidental compromise by identifying and implementing appropriate security mechanisms and management processes. Means of securing network services include:
		  o Using structured Internet and network addressing and naming schemas (e.g. IPv4/6, DNS).
		  o Identifying and creating network trust domains based on business security requirements (e.g. Guest networks, user networks, etc.).
		  o Limiting access to network services and security domains (e.g. Management zones).
		  o Protecting network records using secure protocols and cryptographic technologies (e.g. DNSSEC, secure routing).
		• Intrusion Detection and Prevention monitors network and/or system activities for malicious activity. The main functions are to identify malicious activity, log information about this activity, attempt to block/stop it, and report it. They can be deployed in four ways:
		  o Network-Based Intrusion Prevention System (NIPS): monitors the entire network for suspicious traffic by analysing protocol activity.
		  o Wireless Intrusion Prevention Systems (WIPS): monitor a wireless network for suspicious traffic by analysing wireless networking protocols.
		  o Network Behaviour Analysis (NBA): examines network traffic to identify threats that generate unusual traffic flows, such as distributed denial of service (DDoS) attacks, certain forms of malware and policy violations.
		• Ensure that the network is separated adequately, including the incorporation of security domains (Demilitarised zones and virtual local area networks) to segregate information systems with specific security requirements or different levels of trust. Where appropriate, isolation controls such as switch port isolation and private VLANs are used to isolate hosts within the same security domain. Separation and Segregation principles are also applied to SDNs.
		• Separate networks that connect to Baseboard Management Controllers (BMC) from higher level management networks and customer accessible networks. Ensure BMCs cannot directly connect to internet and that BMCs are only accessible from a defined set of management dedicated devices such as jump hosts.
		• Firewalls are deployed to monitor and control connections and information flows between security domains. For ▓▓▓▓▓▓▓ environments, consideration should be made to treat all wireless access as external connections and to segregate this access from internal networks until the access has passed through a firewall before granting access to internal systems.
		• Configure the firewall rule-base to limit the inbound and outbound (ingress and egress) connections, protocols and ports required to support the service.
		• Clock/Time synchronisation across all connecting services will ensure a definitive time source is used, which will aid any information security investigation.
		• The application of defence-in-depth to the protection of systems and infrastructure is enhanced using successive layers of security controls. All layers are designed to control and limit access to those with the appropriate authorisation for the site, infrastructure and system.
		• Additionally, the use of different brands or technologies to achieve the same control objective (e.g. use different firewall vendors for internet and backend firewalls), reduces the possibility of an attacker circumventing all controls by circumventing one vendor or type of technology.
			Likelihood, Impact	7.1.7
				10.8
				14.1
				14.4
				14.5
				16.6.11
				18.1
				18.3
				18.4
				19.1
				19.3
				22.3
				23.4.9
				23.5.12
				
				NSA guidance "Harden Basedboard Management Controllers"[8]

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[8] National Security Agency (NSA) – Harden Baseboard Management Controllers v1.0 dated June 2023 (https://media.defense.gov/2023/Jun/14/2003241405/-1/-1/0/CSI_HARDEN_BMCS.PDF)

Control Number	Control Title	Description	Reduces	NZISM Reference (V3.6, Sept 2022)
C17.	DoS Protection	• Implement a solution to detect and prevent Denial of Service (DoS) and distributed denial of service (DDoS) attacks. These solutions need to work in conjunction with upstream network providers to be truly effective. • Services must be designed to protect against non-technical Denial of Service attacks that target business processes (e.g. submitting a large amount of false contact requests).	Likelihood	18.3 19.5
C18.	Tenant Segregation	• Tenant Segregation is achieved through the implementation of the appropriate multi-layered controls that considers the deployment (e.g. private, hybrid, public, etc.) and service model (SaaS, PaaS, and IaaS). • Segregation (separation) between tenants' domains ensures that tenant information and services are isolated within enforced boundaries. Proper segregation also provides assurance that incidents are contained and only affect the affected tenant and do not extend to co-tenants. Effective tenant segregation ensures that one tenant cannot deliberately or inadvertently interfere with the security of the other tenants.	Likelihood, Impact	20.1 22.1 22.2 22.3 23.2.20
C19.	Application Security	• Establishing rules for the development of software and systems will ensure that the developers use secure development practices such as those defined and documented by Microsoft and the Open Web Application Security Project (OWASP). • Functional testing is primarily used to verify that a service or a piece of software is providing the functionality required by the business. Typically, functional testing involves evaluating and comparing each service or software function with the business requirements (including security). • By implementing an application proxy at web-based interfaces, the service will be protected against a wide range of Layer 3 – 7 attacks including DoS (e.g., SYN Flooding, Smurf, ICMP Ping Flood, Fraggle attacks), SQL Injection and Cross Site Scripting (XSS). • Inspecting external traffic (inbound and out-bound), messages and attachments for malicious content at the gateway will reduce the likelihood of malicious code entering the service. The content filter can be configured to quarantine any suspicious files and automatically alert the System Administrator(s) when malicious content is detected. It may also be configured to restrict the file types that can be transferred into and out of the Organisation's environment to only those that are required by the business.	Likelihood, Impact	12.2 12.7.19 12.7.20 14.3 14.4 14.5 19.0 20.3 23.2.18
C20.	Message Integrity	• Message Integrity is used to provide recipients with a method of authenticating the source of a message, the ability to verify the integrity of a message and non-repudiation by the sender or recipient (i.e., the sender cannot claim that they did not send the message, or, the sender can gain assurance that the recipient has received the message). • Message Integrity can be implemented as formal transfer policies, procedures and/or technical controls to ensure the integrity of information when being transferred. • Email messages have appropriate protective markings to facilitate the application of handling instructions.	Likelihood, Impact	15 17.6.7 17.7

C21.	Due Diligence	• Ensure that contracts and associated Service Level Agreements (SLAs):
		  o Clearly define the legal jurisdiction for contractual disputes relating to the use and function of the service.
		  o Clearly define the ownership of the data stored, processed and/or transmitted by the service.
		  o Define in which jurisdiction official information can and will be stored, processed and/or transmitted by the service.
		  o Ensure that official and/or private information is appropriately protected to accepted information security standards in SP's environment, including backups and other environmental copies.
		  o Ensure that the time to return to full service after a failure or outage, including data restoration, meets the organisation's business continuity requirements.
		  o Require that all access to the organisation's information and systems be monitored.
		  o Require and specify means to notify to the organisation of any actual or possible unauthorised access.
		  o Require engagement with the organisation in resolution of any information access incidents or issues
		  o Require regular reports be delivered from SP on their performance against the SLA's.
		  o Require the organisation to be allowed to carry out regular audits to ensure compliance with its requirements or provide a full copy of all relevant independent third-party audit reports.
		  o Require sufficient resiliency from SP in its own and its network provider's infrastructures to minimise the impact of infrastructure failures, denial of service and other Internet based attacks.
		  o Ensure the contract with SP outlines clearly the services in scope and that the organisation are alerted when requiring services that are not within the scope.
		• Ensure that adequate due diligence is undertaken across the service, specifically:
		  o Defining the information security requirements of the service.
		  o Assessing whether the defined information security requirements are met by the service.
		  o Identifying and assessing any third-party dependencies that the service provider may have.
		• Identifying, articulating and regularly reviewing the organisation's requirements for confidentiality or non-disclosure agreements reflects the organisation's needs for the protection of its information. Ensuring contracts with SPs, Vendors and authorised third parties incorporate appropriate non-disclosure and confidentiality agreement provides the organisation with the assurance that its information will be safe from disclosure.
		• An exit strategy outlines the processes for leaving a current situation, either after a predetermined objective has been achieved or as a strategy to mitigate failure. At worst, an exit strategy will save face. At best, an exit strategy will peg a withdrawal to the achievement of an objective worth more than the cost of continued involvement. Exit strategies typically include the means to extract the organisation's settings, configurations and information from the Service Provider in a format that can be used by the organisation, to stand up the Service or use the information in a different setup.
			Likelihood, Impact	2.2
				2.3.16
				2.3.23
				3.2
				3.3
				4.4.8
				22.1
				23.4
				23.2.9

C22.	ICT Supply Chain & Vendor Management	• Being aware of any reliance the Service Provider has on any third party, will allow the organisation to ensure these are identified and addressed in the contracts between them and the Service Provider. This ensures that the Service Provider can provide assurance and be held accountable that these third parties meet the organisation's security requirements.	Likelihood	12.7

Control Number	Control Title	Description	Reduces	NZISM Reference (V3.6, Sept 2022)
		• To support contractual agreements, the implementation of a communication channel in the form of Vendor Management will allow the organisation to monitor the Service Provider's performance against the contract and SLAs.		
C23.	Information Security Incident Management	• Ensure than an incident response plan is develop and defines what constitutes an incident, and to outline the systematic process that is to be followed should an incident occur. A communication plan should also be developed to provide guidance on how and when to share information relating to a security incident with outside parties such as customers, vendors and the media. The incident response and management plan should include: o Detecting security incidents to minimise impacts. o Reporting security incidents, assisting in documenting and understanding the risks and impacts. o Managing security incidents by identifying and implementing processes for incident analysis and selection of appropriate remediation. • Manage and respond to service management events that falls under the definition of an Information Technology Infrastructure Library (ITIL) incident, Specifically, any unplanned interruptions or reductions in quality of IT services. Having an effective ITIL Incident Management process ensures IT services are restored in a timely manner to minimise impact to the business and should be appropriately integrated with an Information Security Incident Management process to effectively respond to and manage security-related events.	Impact	5.1.11 5.1.12 5.6 7 22.1.25 23.5.12
C24.	Business Continuity	• Ensure that business continuity plans are established to assist in meeting business requirements, minimise disruption to the availability of information and systems and assist recoverability. By defining the Recovery Point Objective (RPO) and Recovery Time Objective (RTO) for the Service, business owners can ensure that continuity objectives are able to be achieved. Developing and testing a plan confirms that appropriate measures to ensure the continuity of critical business services are identified and implemented. • Information Security Continuity is an integral component of disaster recovery and business continuity plans. Establishing, documenting, implementing and maintaining processes, procedures and controls ensures the required level of information security is achieved. This includes adequate management structure with the necessary authority and incident response teams to act in case of disasters, as well as all the necessary controls required. As with all information security documentation, these processes need to be periodically verified, reviewed, tested and evaluated to make sure it meets the outlined requirements.	Impact	6.4
C25.	Disaster Recovery & Fault Tolerance	• Ensure that disaster recovery processes are established to assist in meeting business requirements, minimise disruption to the availability of information and systems and assist recoverability. Defining, implementing and testing a Disaster Recovery Plan supports the Recovery Point Objective (RPO) and Recovery Time Objective (RTO) requirements defined in the Business Continuity Plan. • Ensure that sufficient redundancy exists within the system to protect against system outages. This can be done by including the following controls in system designs: o Clustering. o Load balancing. o Network redundancy. o System redundancy.	Impact	6.4 23.4.12
C26.	Information Security Review & Audit	• Ensure that system undertakes risk identification and assessment, selection and implementation of baseline and other appropriate controls and the recognition and acceptance of residual risks relating to the operation of the system. Systems should be accredited before they are used operationally. • Ensure information security reviews are conducted to maintain the security of systems and detect gaps and deficiencies, including: o Identifying any changes to the business requirements or concept of operation for the subject of the review. o Identifying and changes to the security risks faced by the subject of the review. o Assessing the effectiveness of the existing counter-measures. o Validating the implementation of controls and counter-measures. o Reporting on any changes necessary to maintain an effective security posture. • Reviewing the architecture and design of the service ensures that it meets the functional and non-functional business requirements including adequate controls to protect the confidentiality, integrity and availability of information stored, processed or transmitted by the service. • An Architecture and Design review will also assess the organisation's adoption of, and integration with, the service to ensure that the organisation's own security controls will meet the businesses requirements. • Ensure that information assurance activities such as controls audit and technical security assessments are conducted against systems to demonstrate that due consideration has been paid to risk, security, functionality, business requirements and as a fundamental part of information systems governance and assurance. The assurance activities should focus on validating whether: o Security posture of the organisation has been incorporate into its system security design. o Controls are correctly implemented and are performing as intended. o Changes and modifications are reviewed for any impact or implications. o Effectiveness of information security measures for systems is periodically reviewed and validated. • Penetration tests (when allowed), also provide assurance that exploitable information system weaknesses are identified, controls are configured and enforced to protect against real world attack scenarios.	Likelihood, Impact	4.1 4.2 4.3 4.4 4.5 6.1 6.2 10.8 14.2 14.4 14.5 16.5 18.1 19.1 19.3 21.4 22.1.21 22.2.13 23.2

Control Number	Control Title	Description	Reduces	NZISM Reference (V3.6, Sept 2022)

C27.	Cardholder Data Policy	• Keep cardholder data storage to a minimum by implementing data retention and disposal policies, procedures and processes. This policy should include at least the following:
		   ○ Limiting data storage amount and retention time to that which is required for legal, regulatory, and business requirements;
		   ○ Processes for secure sanitisation and deletion of data when no longer needed; and
		   ○ Specify and document information retention requirements for cardholder data.
		• A process for identifying and securely deleting stored cardholder data that exceeds defined retention.
			Likelihood	13.1.12 - Archiving
				
				PCI DSS v3.1 - Requirement 3.1: Protect stored cardholder data

C28.	Database Security	Ensure classified database content is protected from personnel without a need-to-know. System user access to the database is ░░░░░░░ and logged for:
		   ○ Attempted access that is denied.
		   ○ Changes to system user roles or database rights.
		   ○ Addition of new system users, especially privileged users.
		   ○ Modifications to the data.
		   ○ Modifications to the format or structure of the database.
			Likelihood, Impact	16.6.10
				17.7.30.C.01
				20.4

C29.	Communications Security	• Video & Telephony Conferencing (VTC), Internet Protocol Telephony (IPT) and Voice over Internet Protocol (VoIP) systems are implemented in a secure manner that does not compromise security, information or systems and that they operate securely.
		• Ensure the use of Session Border Controllers (SBCs) is integrated with the agency's security architecture and that use is consistent with other requirements for gateway security especially for the products like unified communications and contact centre. Ensure that communication media (Voice/Video/Chat) are protected by the gateways (SBCs) to:
		   ○ Encrypt the media in transit/rest to maintain the confidentiality and integrity of an information while maintaining quality and performance of a service.
		   ○ Ensure that service is protected from external attacks and threats to maintain confidentiality, integrity and availability.
		   ○ Ensure strong client access mechanisms to securely communicate via devices (Desk phones, soft clients on the mobile, desktop, laptop, tablets).
		   ○ Secure the connectivity between PSTN and IP telephony.
		   ○ Use video and voice aware firewall mechanisms to allow ░░░░░░░ traffic.
		• Ensure the communications (Voice/Video over IP, instant messages) are protected from common risk and threats such as:
		   ○ Reconnaissance scan.
		   ○ Man in the middle attacks.
		   ○ Eavesdropping.
		   ○ Session hijack.
		   ○ Session overload.
		   ○ Protocol fuzzing.
		   ○ Media injection.
		   ○ Toll Fraud.
			Likelihood, Impact	11
				18.3
				19.5

C30.	Information Spill Protection	• Depending on the SaaS solution and the risk posture of information leakage, Data Loss Prevention (DLP) or Cloud Access Security Broker (CASB) technologies or and techniques are implemented to safeguard ░░░░░░░ or critical information from leaving the organisation. They operate by identifying unauthorised use and data exfiltration and take remedial action by monitoring, detecting and blocking unauthorised attempts to exfiltrate data. For DLP to be effective, all data states (processing, transmission and storage) are monitored. • Agency managed and/or unmanaged devices with an ability of information upload in the cloud storage are proactively monitored to avoid accidental information disclosure in the cloud instance or on their personal cloud drives • Tools like DLP and CASB are installed on the endpoints and enabled with logging/monitoring to protect from security incidents of information disclosure.	Likelihood, Impact	14.1.13.C.03 21.4.5 21.1.24 23.5.12
C31.	Performance and Capacity Management	• A performance and capacity plan ensure that the service has adequate resources available to meet the agreed SLAs. It includes monitoring of the service and defining and implementing expected thresholds with automated alerts being generated when they are exceeded. Performance and capacity monitoring may also include periodic reports to ensure that SLAs and contractual agreements are being met. In addition, monitoring the performance and capacity of services and systems can provide early warning for potential security threats, as well as triggers when additional resources should be allocated to meet increased demands.	Likelihood, Impact	10.1 22.1 23.2.17
C32.	Management of Privileged Access	• Controlling the allocation, maintenance and removal of privileged access rights will ensure that the use of administrative privileges is ░░░░░░░ to only those activities that require them, and not for business as usual or day-to-day activities. • Privileged access rights are controlled through formal authorisation processes and implemented in accordance with an access control policy.	Likelihood	PERSEC1 16.3 22.1
C33.	Out-of-Band Administration	• Administration of the servers has to be done through a dedicated network to prevent management data being intercepted and the network capacity being saturated by the users' activity or DoS attacks. This could be implemented by either a dedicated hardware network interface, dedicated VPN or by implementing traffic throttling at all the required stages to ensure enough network capacity is available for the administration access. (See C18) • Access to console information like system logs, system command line and the ability to restart systems that are unresponsive should also be available independently of the ability.	Likelihood, Impact	18.6 22.3
C34.	Protective Security Governance	• Providers must establish a security governance structure that aligns with PSR. It must clearly appoint Chief Information Security Officer (CISO) and IT Security Manager (ITSM) roles to individuals in the New Zealand based entity. The individuals must be able to obtain TOP-SECRET national security clearance. They are the main points of contact with regard to the Service Provider's obligation regarding security, risk management and incident reporting.	Likelihood, Impact	3 5.1 5.2

Control Number	Control Title	Description	Reduces	NZISM Reference (V3.6, Sept 2022)
				23.2.21
C35.	Media and Equipment Handling, Secure Decommissioning and Disposal	• Ensure that media containing information are protected against unauthorised access, misuse or corruption. This includes classifying, labelling and registering the media and clearly indicate the required handling instructions and level of protection to be applied. Storage media should be sanitised or destroyed when longer required as per NZISM and PSR requirements. GCSB approved destruction facilities should be used as appropriate. • Ensure that IT systems are safely decommissioned and that software, system logic and data are properly transitioned into new systems or archived in accordance with the organisation, legal and statutory requirements. IT systems no longer required should be sanitised and disposed of in an approved manner that reduces the likelihood of data recovered by an unauthorised party. GCSB approved destruction facilities should be used as appropriate.	Likelihood	12.6 13.1 13.2 13.3 13.4 13.5 13.6 22.1.26 23.4.13

Table 13 – Controls to Risk Mapping

9(2)(k)

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Appendix A – Project Overview

Scope

The Digital Public Service branch (DPS) as the Government Chief Digital Officer (GCDO) function for the Department of Internal Affairs (DIA) has produced this Security Risk Assessment report.

The objective was to create a generic Risk Assessment to be used by the suppliers of IaaS services and use of IaaS by Consuming Agencies when completing the security certification of these services. The assessment can then be used to frame and provide a basis for future Risk Assessments and control audits of IaaS.

This IaaS Risk Assessment focused on identifying common risks for IaaS service suppliers and agencies consuming the IaaS services through ICT Shared Capabilities such as Infrastructure as a Service (IaaS) or Marketplace.

Infrastructure as a Service (IaaS) is a managed and hosted computing solution for government agencies containing 4 core services: data centre services, utility compute services, storage and back-up services. In April 2023, the AoG agreement for Infrastructure as a Service (IaaS) stopped being required for government organisations. For more information please visit Infrastructure as a Service | NZ Digital government.

Marketplace is an All-of-Government (AoG) initiative that enables New Zealand and international businesses offer their products and services directly to New Zealand government agencies. Marketplace links business with government, making the procurement process easier for all. For more details, please visit https://marketplace.govt.nz

Marketplace has a list of IaaS products and suppliers that are categorised in Tier 1, Tier 2 and Tier 3. The Tier 3 a is lower entry bar for small products and suppliers where, Tier 1 is for enterprise grade products and suppliers that require the highest assurance.

Minimum tier requirement for the scope of this Risk Assessment varies between Tiers 3, 2 and 1 depending on:

• Risk profile of the service;

• Use / delivery of cloud-based tools to deliver these services;

• Reliance on Agency controls, particularly for people and process controls; and

• Claims made by the Supplier in the service description.

Tier 3: Baseline Index — Suppliers respond to security questions which can include the Cloud Risk Assessment Tool (GCIO105). Assessment is based on self-assertions and not independent reviews. IaaS go through a Confidence and Risk Index (CRI) rating by McAfee MVision.

Tier 2: Design and Control Analysis — Suppliers have to provide independent security assurance information that Consuming Agencies will be able to review. This can include ISO27001 or SOC2 Type 2 audit reports, and penetration testing reports. This information will be reviewed and confirmed appropriate by the GCDO before Tier-2 endorsement.

Tier 1: Design and Control Effectiveness— To obtain this rating, suppliers have to provide additional information and receive Certification from the GCDO. Certification is based on Risk Assessment and demonstration of controls effectiveness can be supported from an organisation having ISO 27001 or SOC2 Certification or going through an certification audit by an independent auditor from the Information Security Professional Services (ISPS) panel.

Approach

The Risk Assessment followed the GCDO risk framework based on the AS/NZS ISO 31000:2018 and ISO/IEC 27005:2022 risk management standards. The assessment was conducted as a series of workshops and document reviews, including:

- Consumption of documentation provided by DIA;

- Identification of risks and controls associated with the use of generic cloud services;

- Development of a Risk Assessment report in draft; and

- Issuance of a final Risk Assessment report.

Documents Referenced

The following documentation was referenced and used to inform the Risk Assessment:

- Guidance – risk discovery tool for public cloud (link as consulted on the 07/09/2023)

Appendix B – Risk Assessment Guidelines

Rating Risk

The likelihood and impacts of the risks have been rated using the simple qualitative scales documented below. The identified risks were assessed with **no** controls in place. This provided the gross risk rating and enabled the effectiveness of the proposed controls to be assessed.

Likelihood (Probability) Assessment

The qualitative scale used to assign a likelihood rating is presented in Table 14 below. Where information is available about the frequency of an incident in the past it should be used to determine the likelihood of the risk eventuating. However, where such information does not exist it does not necessarily mean that the likelihood of the risk eventuating is low. It may merely indicate that there are no controls in place to detect it or that the agency has not previously been exposed to the particular risk.

Table 14 – DIA Risk Likelihood Scale

Rating	Description	Meaning
5	Almost Certain	It is easy for the threat to exploit the vulnerability without any specialist skills or resources or it is expected to occur within 1 – 6 months.
4	Highly Probable	It is feasible for the threat to exploit the vulnerability with minimal skills or resources or it is expected to occur within 6 – 12 months.
3	Possible	It is feasible for the threat to exploit the vulnerability with moderate skills or resources or it is expected to occur within 12 – 36 months.
2	Possible but Unlikely	It is feasible but would require significant skills or resources for the threat to exploit the vulnerability or it is expected to occur within 3 – 5 years.
1	Almost Never	It is difficult for the threat to exploit the vulnerability or it is not expected to occur within 5 years.

Impact (Consequences) Assessment

The qualitative scale used to assign an impact rating is presented in Table 14. All impacts were analysed in a business context. The impact of risks includes a consideration of any possible knock-on effects of the consequences of the identified risks, including cascade and cumulative effects.

Table 15 – AoG DIA All-of Government Risk Consequence Guide (choose the scale that best applies to you)

Rating	Description	Reputation	Health and Safety	Service Delivery	Financial
5	Severe	• The agency suffers severe political and/or reputational damage that is cannot easily recover from. • The Government suffers severe negative reputational impact, and the Prime Minister loses confidence in the Minister and/or the agency's senior management. • Minister and Chief Executive need to be briefed and regularly updated. • Media interest is sustained for a prolonged period (i.e., over a week) with major criticism levelled at the Minister and/or the agency. • The agency breaches multiple laws, which leads to legal action by affected stakeholders. • External/independent investigation is commissioned by the SSC, GCIO or OPC. • The SSC and GCIO manage the communications and recovery.	• Loss of life. • Major health and safety incident involving members of staff and/or members of the public. • The injured party or parties suffer major injuries with long-term effects that leave them permanently affected. • An external authority investigates the agency's safety practices and the agency is found to be negligent.	• Severe compromise of the strategic objectives and goals of the agency. • Severe compromise of the strategic objectives of the NZ Government or other agencies. • Severe on-going impact on service delivery across NZ Government or multiple agencies. • Skills shortages severely affect the ability of the agency to meet its objectives and goals. • Staff work hours are increased by more than 50% (20 hours per week) for more than 30 days. • Between a 10% or more increase in staff turnover in a six-month period that can be directly attributed to the risk eventuating	• Impact cannot be managed without additional funding from government. • Impact cannot be managed without significant extra human resources. • Yearly operating costs increase by more than 12%. • One-time financial cost greater than $100,000.
4	Significant	• The agency suffers significant political and/or reputational damage. • Minister suffers reputational damage and loses confidence in the agency's senior management. • Minister and Chief Executive need to be briefed and regularly updated. • Media interest is sustained for up to a week with minor criticism levelled at the agency. • Key stakeholders need to be informed and kept up to date with any developments that affect them. • The agency breaches the law, which leads to legal action by affected stakeholders. • External/independent investigation is commissioned by the SSC, GCIO or OPC. • Communications and recovery can be managed internally with strong guidance from the SSC and GCIO.	• A significant health and safety incident involving multiple members of staff and/or members of the public. • The injured party or parties suffer significant injuries with long-term effects that leave them permanently affected. • An external authority investigates the agency's safety practices and the agency is found to be inadequate.	• Significant compromise of the strategic objectives and goals of the agency. • Compromise of the strategic objectives of the NZ Government or other agencies • Significant on-going impact on service delivery across one or more business unit or multiple agencies. • Skills shortages affect the ability of the agency to meet its objectives and goals. • Staff work hours are increased by more than 38% (10 – 15 hours per week) for 30 days. • Between a 3% and 10% increase in staff turnover in a six-month period that can be directly attributed to the risk eventuating.	• Impact cannot be managed without re-prioritisation of work programmes. • Impact cannot be managed without extra financial and human resources. • Yearly operating costs increase by 10% to 12%. • One-time financial cost between $50,000 and $100,000.
3	Moderate	• Agency suffers limited political and/or reputation damage. • Minister is informed and may request to be briefed. • The Chief Executive and senior management need to be briefed and regularly updated. • The agency breaches its compliance obligations. • Media interest is sustained for less than a week with minor criticism levelled at the agency. • Key stakeholders need to be informed and kept up to date with any developments that affect them. • External/independent investigation is commissioned by the agency. • Most communications and recovery can be managed internally with some guidance from the GCIO.	• Health and safety incident involving multiple members of staff or one or more members of the public. • The injured party or parties suffer injuries with long-term effects and are not permanently affected. • The agency's safety practices are questioned and found to be inadequate.	• Compromise of the strategic objectives and goals of the agency. • Moderate impact on service delivery across one or more business unit due to prolonged service failure. • Staff work hours are increased by less than 25% (8 – 10 hours per week) for a two to four week period. • Between a 1% and 3% increase in staff turnover in a six-month period that can be directly attributed to the risk eventuating.	• Impact can be managed with some re-planning and modest extra financial or human resources. • Yearly operating costs increase by 7% to 10%. • One-time financial cost of $20,000 to $50,000.
2	Minor	• Senior management and/or key stakeholders believe that the agencies reputation has been damaged. • The Chief Executive needs to be advised. • Senior management needs to be briefed. • Media interest is short-lived (i.e., a couple of days) and no blame is directed at the agency. • Key stakeholders need to be informed. • Communications and recovery can be managed internally.	• Minor health and safety incident involving multiple members of staff or a member of the public. • The injured party or parties suffers minor injuries with only short-term effects and are not permanently affected.	• Minor impact on service delivery across one or more branch due to brief service failure. • Limited effect on the outcomes and/or objectives of more than one business unit. • Staff work hours are increased by less than 15% (6 hours per week) for less than two weeks. • Less than a 1% increase in staff turnover in a six-month period that can be directly attributed to the risk eventuating.	• Impact can be managed within current resources, with some re-planning. • Increase of between 5% and 7% in yearly operating costs. • One time financial cost between $10,000 and $20,000.
1	Minimal	• Reputation is not affected. • No questions from the Minister. • No media attention. • All communications and recovery can be managed internally.	• No loss or significant threat to health or life. • The agency's safety practices are questioned but are found to be appropriate.	• Limited effect on the outcomes and/or objectives of a business unit. • Staff work hours are increased by less than 5% (1 - 2 hours per week) for less than seven days. • No increase in staff turnover as a result of the risk eventuating.	• Impact can be managed within current resources, with no re-planning. • Increase of less than 5% in yearly operating costs. • One time financial cost of less than $10,000.

Table 16 presents a 5x5 matrix for assigning a risk rating to a risk. It is used by mapping the likelihood and impact ratings. The rating being the point where the likelihood and impact ratings intersect.

Table 16 – Risk Matrix

Impact \ Likelihood	Almost Never	Possible but Unlikely	Possible	Highly Probable	Almost Certain
Severe	15	19	22	24	25
Significant	10	14	18	21	23
Moderate	6	9	13	17	20
Minor	3	5	8	12	16
Minimal	1	2	4	7	11

Escalation of Risk

Table 17 below provides an example of risk escalation and reporting table. It defines who must be informed and has authority to accept risk based on its magnitude.

Table 17 – Risk Escalation and Reporting

	Risk Escalation and Reporting levels for each level of risk
Zone 4	Chief Executive
Zone 3	Senior Leadership Team
Zone 2	Business Owner
Zone 1	Service Manager or Project Manager