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DP115

‘Changes to the NCSC Good Practice Guides’

Modification Report

Version 0.2

About this document

This document is a draft Modification Report. It currently sets out the background, issue, and progression timetable for this modification, along with any relevant discussions, views and conclusions. This document will be updated as this modification progresses.

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1. Summary

This proposal has been raised by Gordon Hextall on behalf of the Smart Metering Key Infrastructure (SMKI) Policy Management Authority (PMA).

A Smart Energy Code Administrator and Secretariat (SECAS) review of the SMKI Document Set has found that it contains several references to Good Practice Guides (GPGs) that have been discontinued and will not be replaced. The SMKI PMA wishes to address this by aligning the Smart Energy Code (SEC) with these changes and by making available authorised replacement SMKI PMA guidance.

If this issue is not addressed, the SEC will contain several references to GPGs that are no longer live or are subject to frequent change outside of SMKI PMA control. The latter could require frequent amendment to the SEC and to Data Communications Company (DCC) Work Instructions if these references are left in the SEC. Furthermore, the existing references could be misleading for Parties that wish to access such guidance in the future, since the GPGs will not be available for viewing.

In addition, the Proposer notes that the SEC contains no provisions for updated or replacement standards, procedures and guidelines in relation to the SMKI Document Set. Furthermore, the SEC is silent on the provisions for transitional periods for standards, procedures and guidelines in relation to the SMKI Document Set.

This creates ambiguity and inefficiencies in the SEC as it is not clear who is authorised to manage such standards, procedures and guidelines in relation to the SMKI Document Set.

2. Issue

What are the current arrangements?

Standards, procedures and guidelines

The SEC contains numerous references to standards procedures and guidelines, specifically in relations to security architecture of the End-to-End Smart Metering System¹. These include GPGs, International Organization for Standardization (ISO) standards, Federal Information Processing Standards (FIPS) and Request for Comments (RFCs). These assist the DCC and SEC Parties to achieve consistent standards in the application of security controls and in the understanding of complying with such standards.

What are the GPGs?

GPGs were developed by the then Communications-Electronics Security Group (CESG), now the National Cyber Security Centre (NCSC). These assisted UK industries to achieve consistent standards in the application of security controls and the protection of Critical National Infrastructure (CNI).

The SEC contains references to several NCSC GPGs that are mandated, mainly for compliance by the DCC. The DCC has ensured that the obligation for compliance with the GPGs have been enshrined into the contracts with its Service Providers.

What is the issue?

SECAS review of the SMKI Document Set

GPGs

At the request of the SMKI PMA, SECAS has recently conducted a review of the standards and guidance in the SMKI Document Set and has identified the following:

- GPG 13 'Protective Monitoring for HMG ICT Systems' has been discontinued by the NCSC (although the document is still available on the NCSC website).
- GPG 43 'Secure Design of On-Line Public Services' has been discontinued and has been removed from the NCSC website (although it is still available on the gov.uk website).
- GPG 45 'Identity proofing and verification of an individual' was updated (by the Government Digital Service (GDS) on 15 April 2019 and again on 17 December 2019).
- GPG 46 'Identity assurance: Organisation identity' is no longer on the NCSC website. It is still on the gov.uk website but must be discontinued since it refers to GPG 43 and an old version of GPG 45.

¹ the DCC Total System, all Enrolled Smart Metering Systems, all User Systems and all RDP Systems.

The NCSC response

The NCSC has confirmed that it has discontinued GPGs and has moved to greater use of blogs. It recommends:

- <https://www.ncsc.gov.uk/blog-post/keeping-your-security-monitoring-effective>
- <https://www.ncsc.gov.uk/blog-post/learning-love-logging>
- <https://www.ncsc.gov.uk/blog-post/security-and-usability--you-can-have-it-all->
- <https://www.ncsc.gov.uk/collection/cyber-security-design-principles>

All the NCSC guidance can be found by topic at:

- <https://www.ncsc.gov.uk/section/advice-guidance/all-topics>

The NCSC justified the continued presence of GPG 13 on the NCSC website saying:

*“it is there for historical reference but in line with changes to the Government’s approach to risk management, GPG 13 is mainly replaced with other guidance because of concerns that departments were incorrectly interpreting what was intended to be guidance, as mandatory government policy. **This frequently led to the control framework laid out in GPG 13 being mandated in contracts or being followed literally by systems implementers** without any consideration of the business context in which a particular system was operating.”*

The highlighted section is in fact how it was used (originally with CESG support) in the SEC and the related contracts with the DCC’s Service Providers.

Recently updated GPG 45 is on the gov.uk website but is now under the ownership of the GDS, which is responsible for the Government Gateway and the ‘GOV.UK Verify’ service.

The NCSC has stated that blogs can be kept up to date more easily. Unfortunately, these are inappropriate to use as SEC references.

SMKI PMA consideration of the way forward

Following on from the NCSC’s response, the SMKI PMA agreed that the GPG references in the SEC should be updated.

The SMKI PMA agreed to adopt bespoke guidance based on the GPGs and other available guidance, but focussed on the smart metering context. It acknowledged that a modification would be needed to amend all the GPG references to e.g. “SMKI PMA Good Practice Guidance that is published on the SEC website”. This approach would minimise the potential for confusion. Furthermore, this would give clarity, including for GPG 13, that no further Draft Proposal is required if the SMKI PMA need to change the guidance in the future. Therefore, as part of this modification, SECAS and the SMKI Specialist will develop SMKI PMA guidance documents to publish and replace the individual GPGs for SMKI PMA review and approval. These guidance documents will be maintained and updated as necessary by the SMKI PMA without being subject to the Modifications Process, as they will not sit within the SEC.

Updated or replacement standards, procedures and guidelines

SEC Section L ‘Smart Metering Key Infrastructure and DCC Key Infrastructure’ does not contain any provisions for updated or replacement standards, procedures and guidelines in relation to the SMKI

SEC Documents. Therefore, it is not explicitly clear who could define and provide a transitional period for Parties to move to a new or updated standard. Furthermore, when such standards, procedures and guidelines are updated, it is not clear who would update SEC related guidance to such documents.

Section G 'Security', specifically Sections G1.1-G1.4, does include provisions for updated or replacement standards, procedures and guidelines in relation to the security of the End-to-End Smart Metering System. These make it explicitly clear that the Security Sub-Committee (SSC), now delegated by the SEC Panel, is authorised to update any SEC related guidelines to these standards, as well as grant transitional periods when these standards are updated. This creates inconsistencies between Section G and Sections L as there are no such provisions for the SMKI PMA.

What is the impact this is having?

GPGs

If this issue is not addressed, the SEC will contain several references to GPGs that are no longer live or are subject to frequent change outside of SMKI PMA control. The latter could require frequent amendment to the SEC and to DCC Work Instructions if these references are left in the SEC. Furthermore, the existing references could be misleading for Parties that wish to access such guidance in the future.

To implement the SMKI PMA's new approach, changes to the SEC are required.

SMKI PMA provisions for Updated or replacement standards, procedures and guidelines

If this issue is not addressed, the SEC will contain ambiguity and inefficiencies for the SMKI PMA. Currently, it is not explicitly clear who is authorised to manage such standards, procedures and guidelines in relation to the SMKI Document Set. Also, the lack in provisions for transitional periods in relation to the SMKI SEC Documents could place unnecessary constraints on Parties trying to comply with these documents, since the GPGs will not be available for viewing.

Appendix 1: Progression timetable

The Change Sub-Committee (CSC) will review this proposal on 25 February 2020. If it believes the issue set out is clear, it will recommend to the Panel that this Draft Proposal be converted into a Modification Proposal.

Timetable	
Action	Date
CSC recommendation that Panel converts into a Modification Proposal	25 Feb 2020
Panel converts Draft Proposal to a Modification Proposal	13 Mar 2020
Modification Report Consultation	16 Mar – 6 Apr 2020

Appendix 2: Glossary

This table lists all the acronyms used in this document and the full term they are an abbreviation for.

Glossary	
Acronym	Full term
CESG	Communications-Electronics Security Group
CNI	Critical National Infrastructure
DCC	Data Communications Company
FIPS	Federal Information Processing Standards
GDS	Government Digital Service
GPG	Good Practice Guide
ISO	International Organization for Standardization
ISO/IEC	International Electrotechnical Commission
NCSC	National Cyber Security Centre
NIST	National Institute of Standards and Technology
RFC	Request for Comments
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SMKI PMA	Smart Metering Key Infrastructure Policy Management Authority
SSC	Security Sub-Committee