SSC Survey on whether the NCSC CPA Scheme is ‘Fit for Purpose’

***Purpose***

The SEC Security Sub-Committee (SSC) has a SEC obligation In SEC Section G7.20 (d) to:

“G7.20(d) keep under review the NCSC CPA Certificate scheme in order to assess whether it continues to be fit for purpose in so far as it is relevant to the Code, and suggest modifications to the Scheme Provider to the extent to which it considers them appropriate;”

The SSC recognises that BEIS, as the Policy Department for smart metering, selected the CPA Scheme to provide assurance that Devices with the capability to affect energy supply and that form part of the Critical National Infrastructure (CNI) meet specific Security Characteristics (SCs). Compliance with these Security Characteristics is essential to protect consumers and CNI.

The purpose of this survey is to enable the SSC to engage directly with smart metering Industry participants with experience of the CPA Scheme including energy Suppliers with SEC obligations for Device security, manufacturers of smart metering Devices, MAPS as investors in Devices and Other SEC Parties with an interest in assuring Devices for smart metering operations to assess whether the existing arrangements continue to be fit for purpose.

This questionnaire is being issued to those invited to SSC CPA Industry Days.

***Outcome***

The findings from this survey will be shared with the SSC, the SEC Panel and BEIS to inform decision making on whether the NCSC CPA Scheme continues to be fit for purpose in so far as it is relevant to the Code and to consider any modifications necessary to provide security assurance of smart metering Devices.

***Questionnaire***

There are several aspects to the CPA Scheme and it is important to clarify which aspects, if any, cause problems for industry. The questionnaire has therefore been segmented to identify issues with any specific aspects.

One questionnaire response is requested per organisation. Each response should

include feedback from the organisation’s own experience of the CPA Scheme.

The questionnaire is open for responses for two weeks from it being issued and will close on 16 July 2021. It should take approximately 15 minutes to complete.

This document is classified as **Amber**. Limited disclosure and restricted to SSC Members and those who have a need to know to take action. This includes Government and energy industry parties on a ‘need-to-know’ basis to assist in security risk assessment and in designing and implementing security controls for smart metering.

**Confidentiality**

**Organisation details**

It is recognised that any information you provide may have commercial sensitivity and will be treated in confidence for analysis.

The survey is being undertaken by SECAS on behalf of the SSC. All SSC members have signed Non-Disclosure Agreements and all information will be treated in confidence.

However, if a respondent identifies a specific problem, it might be necessary for the SSC to obtain further details for clarification. For this reason, the Questionnaire asks for the name of your Organisation and Contact details (for any necessary follow-up).

Responses authorised by:

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| --- | --- |
| Full name: |       |
| Company: |       |
| Email: |       |
| Telephone Number: |       |
| Nature of experience of the CPA Scheme |  |

# Section 1: CPA Security Characteristics

The CPA Security Characteristics (SCs) are developed jointly with industry, the SSC and NCSC. The SSC has provided a methodology for introducing any changes that is available on the SEC website.

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| How satisfied are you overall that the Security Characteristics (SCs) developed as part of the CPA Scheme ensure security assurance of Devices used for smart metering? 1 = Very Dissatisfied; 10 = Very Satisfied. |  |

Has the evaluation of Devices against the Security Characteristics (SCs) caused any problems for your organisation? A score of 1 = Agree, 2 = Partly Agree and 3 = Disagree, or N/A if the issue did not affect your organisation.

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| **Problem statement:** | **Impact** |
| Certain security standards required by the SCs are not the most appropriate for smart metering (Please specify any more appropriate standards) |  |
| Certain security controls required in the SCs are considered to be unnecessary (Please specify) |  |
| Certain security controls appear to be absent from the SCs (please specify) |  |
| SCs lack clarity on certain aspects which has caused delays |  |
| SCs require additional guidance for clarification |  |
| Test Lab application of the SCs has caused problems |  |
| Test Lab communication / interpretation in respect of SC evaluations has caused problems |  |
| NCSC application / interpretation of the SCs has caused problems |  |
| NCSC communication in respect of SC evaluations has caused problems |  |
| The SSC arrangements for amending the SCs is unclear |  |
| The three months SSC has allowed before new minor versions become mandatory is inadequate (Please clarify what is desirable) |  |
| The consultation process for SC amendments is unsatisfactory (Please specify what is needed) |  |

Please describe the nature and extent of the problems:

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Have you identified any other problem areas associated with the development and / or application of the SCs or any aspects that require improvement? If so, please specify below:

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# Section 2: CPA Scheme Management and Administration

The CPA Scheme is administered by NCSC, part of GCHQ. NCSC is the Authority for CPA Certification.

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| How satisfied are you overall with the performance of NCSC in the management and administration of the CPA Scheme?1 = Very Dissatisfied; 10 = Very Satisfied. |  |

Have your business operations been adversely affected by the management and administration of the CPA Scheme? If so, please answer the questions in this section, where an impact score of 1 = Low, 2 = Medium and 3 = High or leave blank if the issue did not affect your organisation.

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| **If the adverse impacts have arisen from the below, please indicate the severity of the impact:**  | **Impact** |
| Clarity of NCSC issue management and communication with manufacturers during the evaluation of Devices |  |
| Clarity of NCSC issue management and communication with wider industry during the evaluation of Devices |  |
| Ability of NCSC to deal promptly with issues during the evaluation of Devices |  |
| Ability of NCSC to deal promptly with wider issues affecting the CPA Scheme |  |
| Ability to contact a responsible NCSC technical expert to progress issues  |  |
| Clarity of communications between NCSC and Test Labs have caused delays for manufacturers |  |
| Clarity of Test Lab issue management and communication with manufacturers during the evaluation of Devices  |  |
| Ability of Test Labs to deal promptly with issues during the evaluation of Devices |  |
| Ability to contact a responsible Test Lab technical expert to progress issues  |  |
| Problems arising from evaluations against the SCs |  |
| Problems arising from evaluations against Use Case Guidance / Agreed Interpretations |  |
| Problems with SCs that have caused Devices to be materially changed or withdrawn from evaluations |  |
| Problems with Use cases that have caused Devices to be materially changed or withdrawn from evaluations |  |
| Problems have caused financial / commercial penalties for manufacturers |  |
| Problems have caused financial / commercial penalties for wider industry |  |

Please describe the nature and extent of these or any other problems:

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If you have identified any other problem areas associated with the management and administration of the CPA Scheme, please specify below:

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# Section 3: CPA Guidance

NCSC have issued individual Guidance Notes to Test Labs over the years but these are not available to manufacturers. SSC Industry days have indicated that there would be value in publishing the NCSC guidance and supplementing this with additional ‘Agreed Interpretations’ where there has been a lack of clarity to enable Test Labs and manufacturers to have a shared and consistent understanding of aspects of CPA evaluation.

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| Do you support the need for shared guidance to be available to Test Labs and manufacturers to clarify interpretations of certain aspects of SCs e.g. fuzz testing / triage and refurbishment?1 = Do not support; 10 = Strongly support. |  |

Section 4: Any Other Issues

If you have any other issues relating to whether the CPA Scheme continues to be fit for purpose that you would like to bring to the attention of the Security Sub-Committee (SSC), please specify and indicate how you expect them to be progressed:

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