# BISM3205: Business Information Security

Week 03: Planning for Security (Ch. 4)

Part 1: Security Governance Frameworks

Part 2: Three Lines of Defense vs. Five Lines of Assurance

Semester 1, 2023



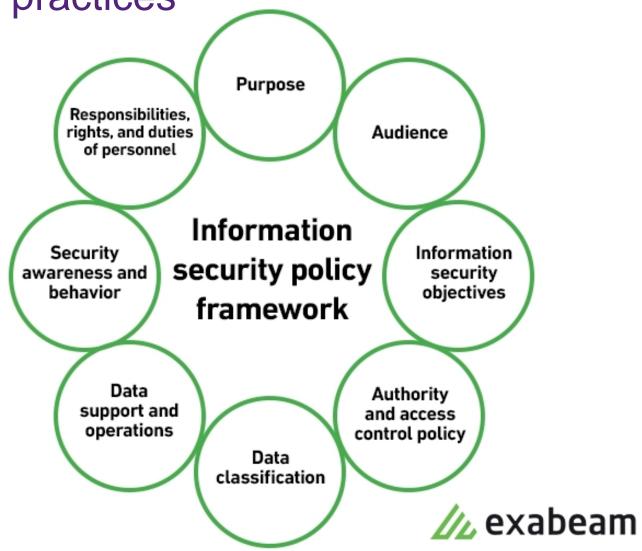
# Part 1: Security Governance Frameworks





Policies produce standards and practices

- Policy is the fundamental start in information security
- It is the domain of senior management
- Senior management obviously has the power within the organisation, the capacity to apply proper resourcing, numbers of people, dollars invested in programmes etc.





#### Information Security Planning and Governance

- Corporate governance is the set of processes, customs, laws and institutions which affect the way an organisation is directed, administered and controlled
- IT Governance is an integral part of CG and ensures the effective and efficient use of IT in enabling an organisation to achieve its goals.
- Security governance is the system by which security-related activities are directed and controlled
- IT governance and security governance are part of the higher corporate governance and security governance is not only part of IT governance but also corporate governance. The reason is that legal/regulatory dimensions also fall into the area of the broader corporate Governance
- Security is not just an IT issue. It affects every aspect of an organisation

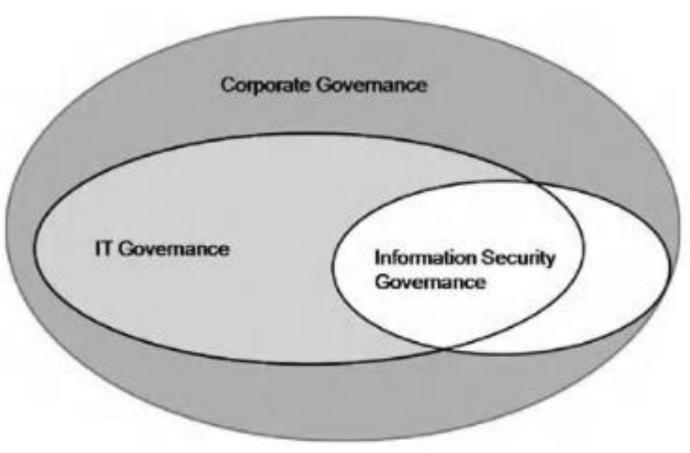


Image: NIST SP 800-100, Information Security Handbook



#### Five goals of Information Security Governance

- Strategic alignment Information Systems Security should coordinate with business strategy, it needts to fit within it and support it
- Risk management manage and mitigate risks (lecture next week)
- Resource management using Information Systems Security knowledge and infrastructure effectively (personnel, time and money)
- **Performance measurement** The enterprise needs metric against which to judge security policy to ensure that organisational objectives are achieved
- Value delivery Resources expended on security should be constrained within overall enterprise resource objectives and security investments need to be managed to achieve optimum value



#### Security governance components (explained in detail on next slides)

- 1. Strategic planning
- 2. Organisational structure
- 3. Establishment of roles and responsibilities
- 4. Integration with the enterprise architecture
- 5. Documentation of security objectives in policies and guidance

NIST SP 800-100



### 1. Strategic planning

#### **Enterprise strategic planning**

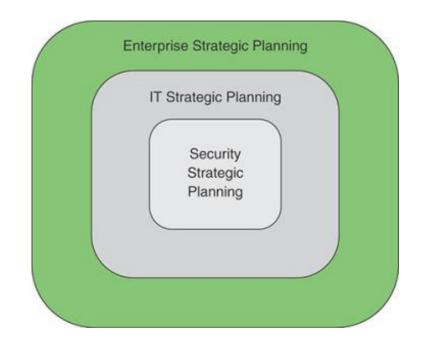
- Defining long-term goals for the organisation
- Development of strategic plan to achieve those goals

#### IT strategic planning

- Alignment of IT management and operation with enterprise strategig planning
- IT management guided by strategic planning to meet challenges (e.g., new technologies introducing new risks)

#### **Security strategic planning**

- Alignment of security management and operation with <u>both</u>
- IT's delivery of value to organisation includes risk mitigation



<u>REMEMBER</u>: security is a concern at all levels of an organisation's governance and decision-making processes, and security strategic planning is an essential component of strategic planning.



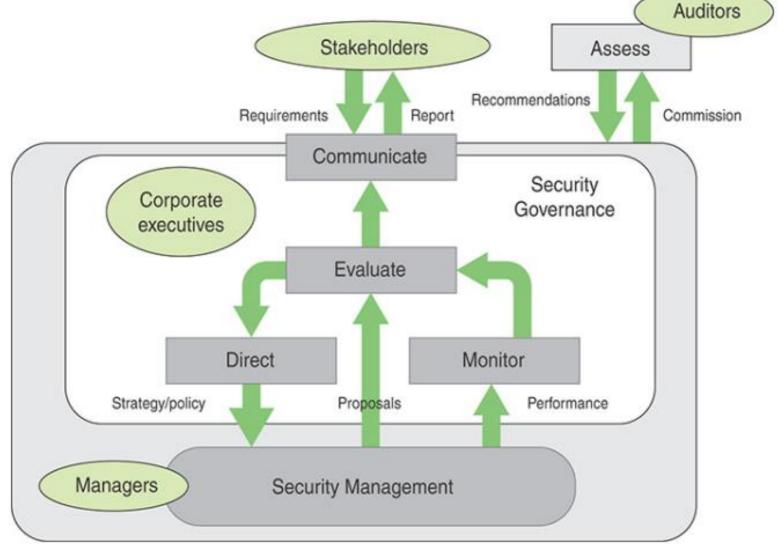
# Example: Elements of a strategic plan document

Section	Description			
Definition				
Mission, vision, and objectives	Defines the strategy for aligning the information security program with organisational goals and objectives, including the role of individual security projects in enabling specific strategic initiatives.			
Priorities	Describes factors that determine strategy and the priorities of objectives.			
Success criteria	Defines success criteria for the information security program. Includes risk management, resilience, and protection against adverse business impacts.			
Integration	Strategy for integrating the security program with the organisation's business and IT strategy.			
Threat defense	Describes how the security program will help the organisation defend against security threats.			
Execution				
Operations plan	An annual plan to achieve agreed objectives that involves agreeing on budgets, resources, tools, policies, and initiatives. This plan (a) can be used for monitoring progress and communicating with stakeholders and (b) ensures that information security is included from the outset in each relevant project.			
Monitoring plan	This plan involves planning and maintaining a stakeholder feedback loop, measuring progress against objectives, and ensuring that strategic objectives remain valid and in line with business needs.			
Adjustment plan	This plan involves ensuring that strategic objectives remain valid and in line with business needs as well as procedures to communicate the value.			
Review				
Review plan	This plan describes procedures and individuals/committees involved in regular review of the information security strategy.			



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2. Organisational Structure



ITU X.1054



#### 3. Establishment of roles and responsibilities



- The responsibility for information security should also be placed at the manager level that is responsible for the business process.
- ❖ The responsibility for information security should not be placed at the Information and Communications Technology (ICT) department as they typically do not know all characteristics of the business processes!
- The security officer is not responsible for information security but making sure that others take on their responsibility

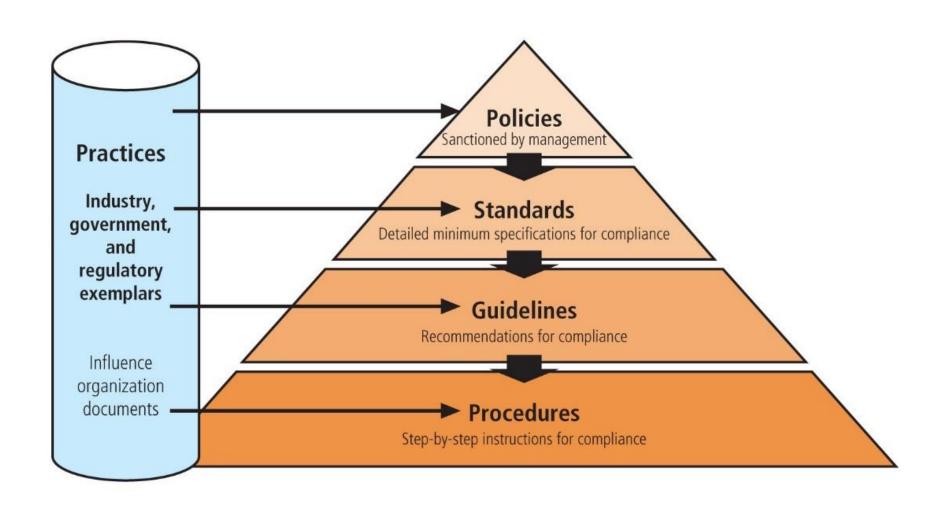


# 4. Integration with the enterprise architecture: Information security policies, standards, and practices

- Communities of interest must consider policies as the basis for all information security efforts
- Policies direct how issues should be addressed and technologies used
- Policies should never contradict law
- Security policies are the least expensive controls to execute but most difficult to implement properly
- Shaping policy is difficult
- <u>Policy</u>: course of action used by organisation to convey instructions from management to those who perform duties
- **Standards**: more detailed statements of what must be done to comply with policy
- Practices, procedures, and guidelines effectively explain how to comply with policy
- For a policy to be effective, it must be properly disseminated, read, understood, and agreed to by all members in the organisation and uniformly enforced



#### Information security policies, standards, guidelines and procedures





#### Information security policies, standards, and practices (examples)

- **Policy**: Employees must use strong passwords on their accounts. Passwords must be changed regularly and protected against disclosure
- **Standard**: (Provides specifics to help employees comply with policy) Password length must include at least 1 lowercase, 1 upper case, one digit, one special character – not written down – changed every 90 days - not held on insecure media.
- <u>Practice</u>: <u>US-CERT\* recommends</u>: 15 characters for admin accounts; use alphanumeric passwords and symbols; cannot reuse previous passwords; no personal information; minimum password length of 8 characters for standard users; - and more
- **Guidelines** (provide examples/recommendations): In order to create strong yet easy-toremember passwords (NIST SP 800-118): Mnemonic Method; altered passphrases



### 5. Documentation of security objectives in policies and guidance

#### **Enterprise Information Security Policy (EISP)**

- Sets strategic direction, scope, and tone for all security efforts within the organisation
- Executive-level document, usually drafted by or with CIO of the organisation
- Typically addresses compliance in two areas:
  - Ensure meeting requirements to establish program and responsibilities assigned therein to various organisational components
  - Use of specified penalties and disciplinary action for non-compliance

#### EISP elements:

- An overview of the corporate philosophy on security
- Information on the structure of the information security organisation and individuals who fulfill the information security role
- Fully articulated responsibilities for security that are shared by all members of the organisation (employees, contractors, consultants, partners, and visitors)
- Fully articulated responsibilities for security that are unique to each role within the organisation



#### Components of the Enterprise Information Security Policy (EISP)

Component	Description		
Purpose	Answers the question, "What is this policy for?" Provides a framework that helps the reader to understand the intent of the document. Can include text such as the following, which is taken from Washington University in St. Louis:		
	This document will:		
	Identify the elements of a good security policy		
	Explain the need for information security		
	Specify the various categories of information security		
	Identify the information security responsibilities and roles		
	Identify appropriate levels of security through standards and guidelines		
	This document establishes an overarching security policy and direction for our company. Individual departments are expected to establish standards, guidelines, and operating procedures that adhere to and reference this policy while addressing their specific and individual needs. <sup>5</sup>		
Elements	Defines the whole topic of information security within the organization as we as its critical components. For example, the policy may state: "Protecting the confidentiality, integrity, and availability of information while in processing, transmission, and storage, through the use of policy, education and training, and technology" and then identify where and how the elements are used. This section can also lay out security definitions or philosophies to clarify the policy.		
Need	Justifies the need for the organization to have a program for information security. This is done by providing information on the importance of InfoSec in the organization and the obligation (legal and ethical) to protect critical information, whether regarding customers, employees, or markets.		
Roles and responsibilities	Defines the staffing structure designed to support InfoSec within the organization. It will likely describe the placement of the governance elements for InfoSec as well as the categories of individuals with responsibility for InfoSec (IT department, management, users) and their InfoSec responsibilities, including maintenance of this document.		
References	Lists other standards that influence and are influenced by this policy document, including relevant federal and state laws and other policies.		

Just an overview!



### Example UQ



Enterprise Information Security Policy (EISP)

Cyber security enables confidentiality, integrity and availability of information by providing protection against malicious and accidental threats. Cyber security threats take advantage of weaknesses in technology, people and processes to harm information. The University of Queensland (UQ or the University) manages cyber security risk to safeguard its mission and protect the interests of the people whose personal information it holds.

This policy establishes UQ's cyber security risk management and responsibilities, and is based on the principle that cyber security is everyone's business. Management of cyber security risk requires a concerted effort across all of UQ and cannot be considered just an aspect of information technology.

UQ's approach to cyber security is informed by the Queensland Government Information Security



### Issue-Specific Security Policy (ISSP) (1/2)

- Addresses specific areas of technology (e.g., e-mail, Internet use, anti-malware configuration of computers)
- Requires frequent updates
- Contains statement on organisation's position on specific issue

Three approaches when creating and managing ISSPs:

- Create a number of independent ISSP documents
- Create a single comprehensive ISSP document
- Create a modular ISSP document



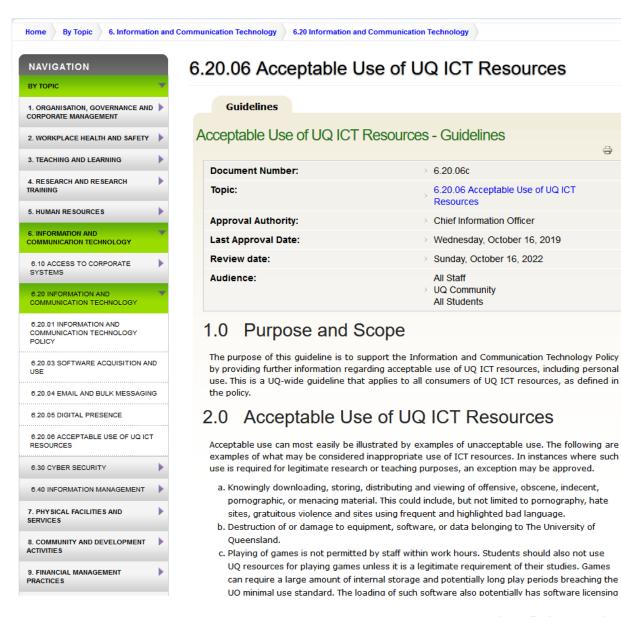
### Issue-Specific Security Policy (ISSP) (2/2)

#### Components of the policy

- Statement of Purpose (scope, technology addressed, responsibilities)
- Authorized Access and Usage of Equipment (user access, fair/responsible use)
- Prohibited Use of Equipment (misuse, criminal, copyright, etc.)
- Systems Management (e.g. monitoring of employees virus protection)
- Violations of Policy (procedures for reporting violations, penalties)
- Policy Review and Modification
- Limitations of Liability (cannot protect employees may assist in prosecution)



### Example UQ



#### Acceptable Use Policy at UQ



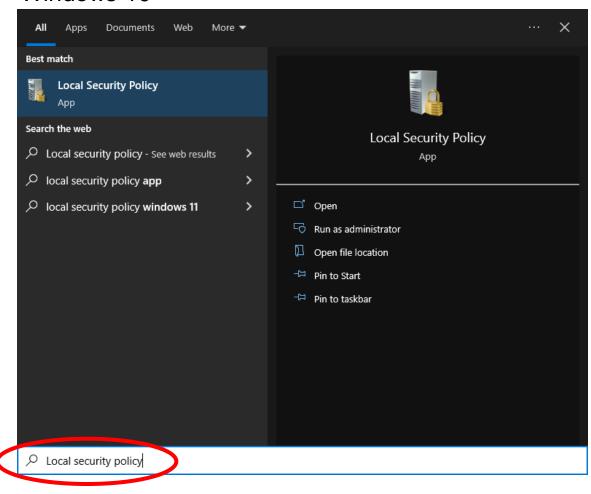
### Systems-Specific Security Policy (SysSP)

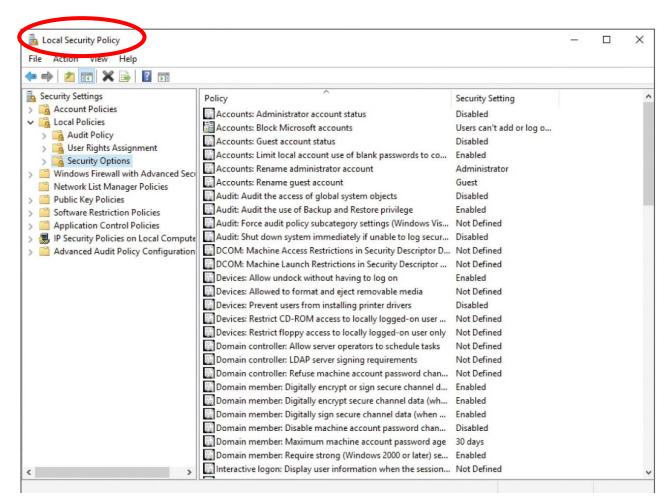
- SysSPs frequently function as standards and procedures used when configuring or maintaining systems
- Systems-specific policies fall into two groups
  - **Managerial** guidance (most often lead to "technical specs")
  - **Technical** specifications
- Example (Access Control Lists or ACLs)
  - ACLs can restrict access for a particular user, computer, time, duration—even a particular file
  - ACLs focus on the organisational asset. Capability tables focus on users
    - Who can access the system (individual identity or group membership)
    - What authorized users can do (Read, Write, Create, Modify, Delete)
    - When authorized users can access the system
    - Where authorized users can access the system from (local/remote)



# Example: Local security policy setting on PC

#### Windows 10







## Policy Management

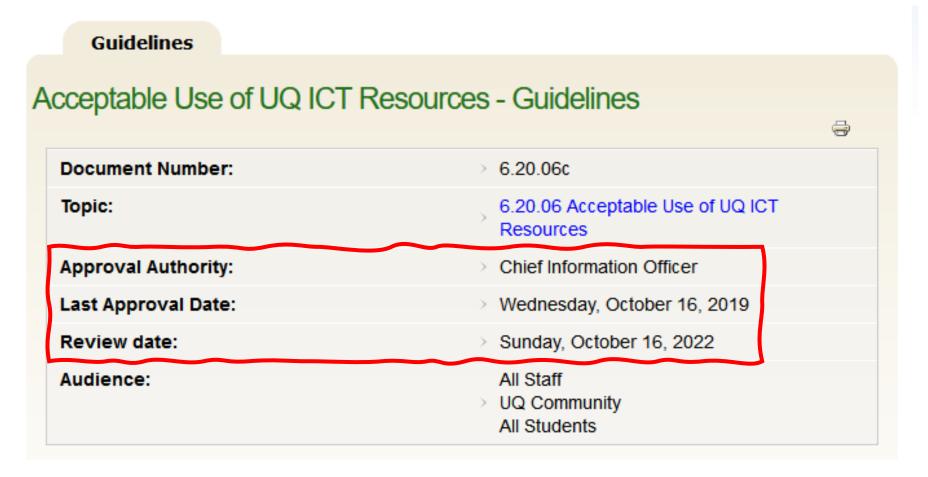
- Policies must be managed as they constantly change
- To remain viable, security policies must have:
  - Individual responsible for the policy (policy administrator)
  - A schedule of reviews
  - Method for making recommendations for reviews
  - Specific policy issuance and revision date

Have a look at one of UQ's policies: can you identify who is responsible? The revision dates?



### Who is responsible? The revision dates?







# Security education, training, and awareness program (SETA)

- Once general security policies exist, implement a security education, training, and awareness (SETA) program.
- SETA is a control measure designed to reduce accidental security breaches.
- Security education and training builds on the general knowledge the employees must possess to do their jobs, familiarizing them with the way to do their jobs securely
- The SETA program consists of: security education; security training; and security awareness



# Comparative Framework of SETA

	Awareness	Training	Education
Attribute	Seeks to teach members of the organisation <u>what</u> security is and what the employee should do in some situations	Seeks to train members of the organisation <u>how</u> they should react and respond when threats are encountered in specified situations	Seeks to educate members of the organisation as to <u>why</u> it has prepared in the way it has and why the organisation reacts in the ways it does
Level	Offers basic <u>information</u> about threats and responses	Offers more detailed <b>knowledge</b> about detecting threats and teaches skills needed for effective reaction	Offers the background and depth of knowledge to gain <i>insight</i> into how processes are developed and enables ongoing Improvement
Objective	Members of the organisation can <u>recognize</u> threats and formulate simple responses	Members of the organisation can mount effective responses using learned <u>skills</u>	Members of the organisation can engage in active defense and use <i>understanding</i> of the organisation's objectives to make continuous improvement
Teaching methods	<ul><li>Media videos</li><li>Newsletters</li><li>Posters</li><li>Informal training</li></ul>	<ul><li>Formal training</li><li>Workshops</li><li>Hands-on practice</li></ul>	<ul><li>Theoretical instruction</li><li>Discussions/seminars</li><li>Background reading</li></ul>
Assessment	True/false or multiple choice (identify learning)	Problem solving (apply learning)	Essay (interpret learning)
Impact time frame	Short-term	Intermediate	Long-term



## The Information Security Blueprint

- After policy/standard development then develop blueprint (what is a 'blueprint' what are we talking about here?)
- Should specify tasks to be accomplished and the order in which they are to be realized
- Should also serve as scalable, upgradeable, and comprehensive plan for information security needs for coming years
- We should look to recognised standards to assist!



#### The ISO 27000 Series

- 1. One of the most widely referenced and often discussed security models
- 2. **ISO27002** provides a common basis for developing organisational security:
  - Via a list of 14 control areas, addresses 39 control objectives and more than 110 individual controls
- 3. ISO27002 is a (long) list of IS controls experience shows that 'just' implementing controls is not enough we need very good 'security management'
- 4. Therefore, the ISO27002 is complemented with <a href="ISO27001">ISO27001</a> which describes 'security management'.
  - It is fundamental that ISO27001 considers that IS Security is seen as a continual improvement process and not as implementing a security product.
- 5. ISO 27001/27002 together function as a framework for information security:
  - Organisational security policy is needed to provide management direction and support its purpose
    is to give <u>recommendations</u> for IS security management.

<u>REMEMBER</u>: ISO 27001 provides information on how to implement ISO 27002 and how to set up an information security management system (ISMS).



- Based on the ideas of quality management systems (ISO 9001).
  - ISO 9001 has become the most widely used and implemented quality management system in the world.
- Many such management systems exist, e.g.:
  - Information Security management (ISO 27001)
  - Digital certificate management (ETSITS 101 456)
  - Environment management (ISO 14001)
  - Occupational Health & Safety management (BSI OHSAS 18001)
- As with all management systems also an organisation's ISO 27001 implementation can be formally certified.

REMEMBER: The key purpose of the ISO 27000 series is to give recommendations for IS management with the goal of **certification**.

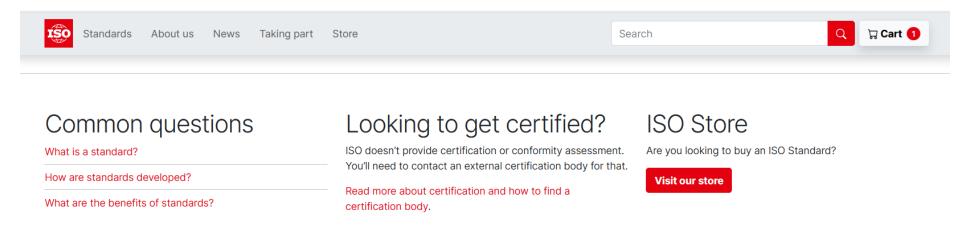


- ISO/IEC 27000 Information security management systems; overview and vocabulary
- <u>ISO/IEC 27001</u> Information technology; security techniques; information security management systems **27001 focuses on processes for security**!
- <u>ISO/IEC 27002</u> Code of practice (controls) for information security management 27002 focuses on the controls for security!
- ISO/IEC 27003 Information security management system implementation guidance
- ISO/IEC 27004—Information security management; measurement
- ISO/IEC 27005—Information security risk management
- ISO/IEC 27006—Requirements for bodies providing audit and certification of information security management systems
- ISO/IEC 27007—Guidelines for information security management systems auditing (focused on the management system)

... and many more standards for IS security!



https://www.iso.org/home.html (is on landing page!)



# Some of our most popular standards

Discover them all

#### ISO 9001 and related standards — Quality management

The ISO 9000 family contains the world's best-known quality management standard for companies and organizations of any size.

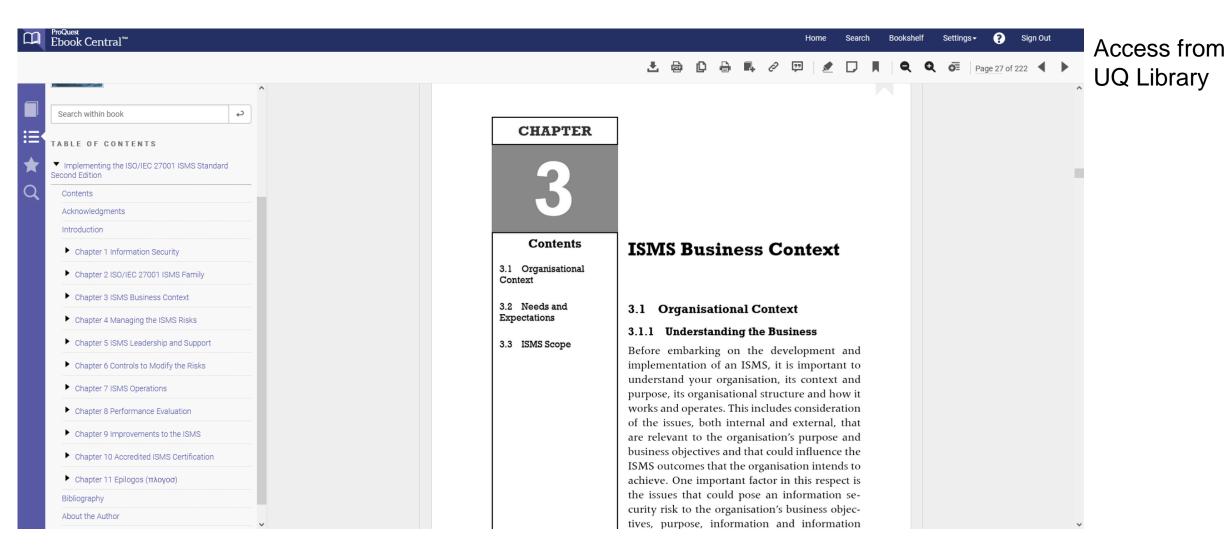
#### ISO 14001 and related standards — Environmental management

Improve your environmental performance with this family of standards.

#### ISO/IEC 27001 and related standards — Information security management

IT security, cybersecurity and privacy protection are vital for companies and organizations today. The ISO/IEC 27000 family of standards keeps them safe.







#### The ISO 27001 & 27002 – a *framework*

The 27001 & 27002 combine to function as a framework – not as 'project-based point solutions.

In the later parts of the seminar we consider a standard for information security for any business processing MasterCard, Visa Card etc. And this standard is termed PCI-DSS.

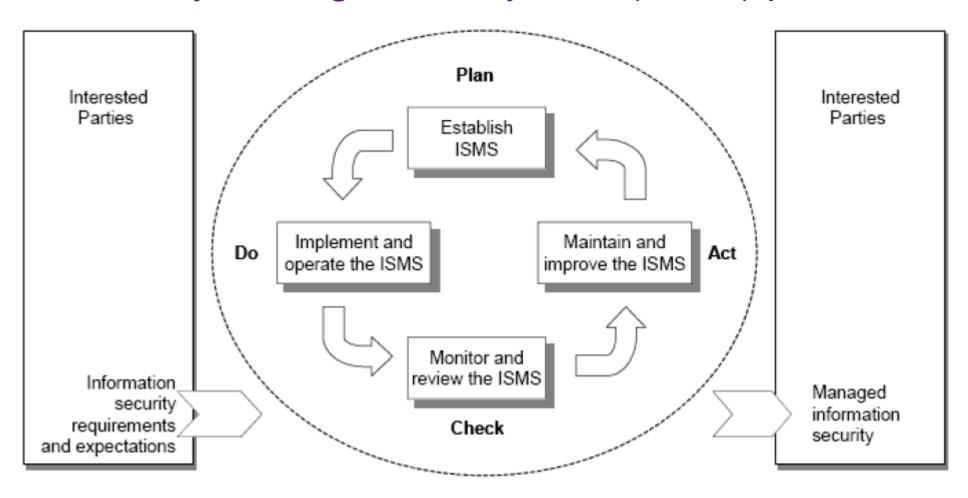
If a business is going to do credit card transactions, debit cart transactions with Visa MasterCard and the like, they must comply with the PCI-DSS.

If a security breach occurs and the auditors find the business was not in compliance with the standard, the credit card companies will sue that business, and they will sue the business very savagely. So this would be a standard. You sign a contract, if you breach the contract, you pay the penalty for non-compliance.

The approach of the ISO is a framework. There is no signing up to it. There's no penalties for non-compliance. They are literally issued to try and help improve information security.



# The ISO <u>27001</u>: The Plan Do Check Act (PDCA) model applied to Information Security Management System (ISMS) processes





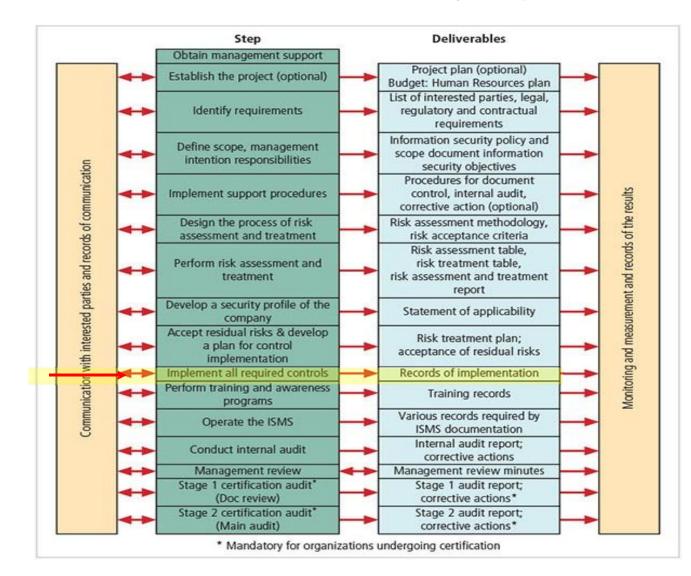
# The ISO <u>27001</u>: 2013 (more detailed view)

- Plan:
  - define ISMS
    - Information security policy
    - Scope
    - Determine assets ('anything that has value to the organization')
    - Approach to risk assessment
    - Management processes
  - select controls using <u>risk assessment</u> [←ISO 27002]
  - decide how to 'measure' effectiveness of selected controls
- Do:
  - Implement management processes
  - Implement selected controls
- Check:
  - Internal review of management processes
  - Internal review of selected controls
- Act:
  - Perform management review (e.g. based on security incidents, 'effective measurements')
  - Adjust ISMS





## The ISO 27001: 2013 – major process steps



This is project management 101.

- 1. We establish the project, we identify the requirements, we define the scope.
- 2. We design the process of risk assessment and treatment.
- 3. We implement all required controls that come from that (this is the part where 27001 links across to 27002)

This links with 27002



# The ISO <u>27002</u>: 2013 – content (1)

The ISO 27002 has five introductory chapters – followed by 14 main control clauses that then describe general controls. The numbering below reflects the numbering of control clauses in the standard.

- A.5: Information security policies
- A.6: How information security is organised
- A.7: Human resources security controls that are applied before, during, or after employment.
- A.8: Asset management
- A.9: Access controls and managing user access
- A.10: Cryptographic technology

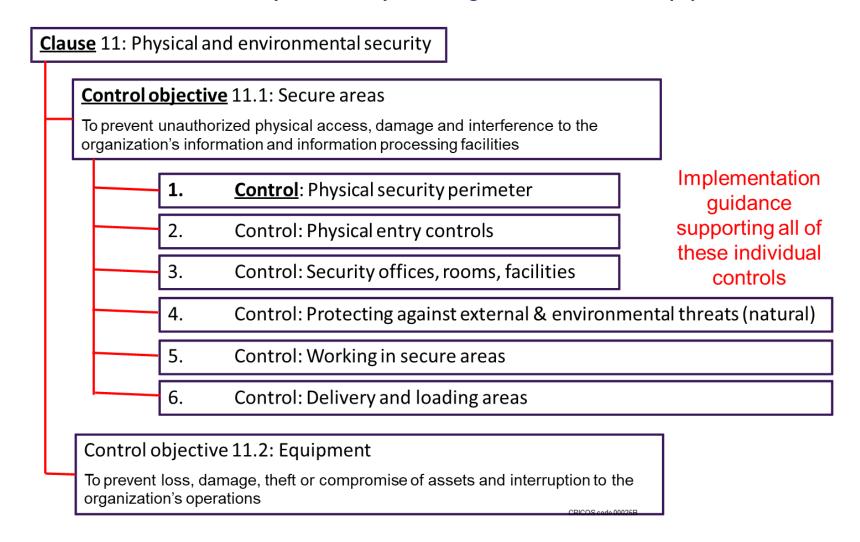
Look at this 'clause' on next slide

- A.11: Physical security of the organisation's sites and equipment
- A.12: Operational security procedures and responsibilities (malware, backup, logging, audit)
- A.13: Secure communications and data transfer
- A.14:, development, and support of information systems A.15: Security for suppliers an Secure (system) acquisitiond third parties
- A.16: Incident management
- A.17: Business continuity/disaster recovery (to the extent that it affects information security)
- A.18: Compliance with internal requirements, such as policies, and with external requirements, such as laws



### Example

#### ISO27002 A.11: Physical security of the organisation's sites and equipment





# Variations on ISO2700x for the medical sector (IS)

- There is also an ISO standard (27799) <u>variant on the ISO 27002</u> for the medical sector 'Health informatics Information security management in health using ISO/IEC 27002 (<a href="https://www.iso.org/standard/62777.html">https://www.iso.org/standard/62777.html</a>)
- It applies to <u>health information in all its aspects</u>, whatever form the information takes (words and numbers, sound recordings, drawings, video, and medical images), whatever means are used to store it (printing or writing on paper or storage electronically), and whatever means are used to transmit it (by hand, through fax, over computer networks, or by post), as the information is always appropriately protected.
- By implementing ISO 27799:2016, healthcare organisations and other custodians of health information will be able to ensure a minimum requisite level of security that is appropriate to their organisation's circumstances and that will maintain the confidentiality, integrity and availability of personal health information in their care.



### NIST security models (very important also)

- Documents available from Computer Security Resource Center of the National Institute of Standards and Technology (NIST)
  - SP 800-12, The Computer Security Handbook
  - SP 800-14, Generally Accepted Principles and Practices for Securing IT Systems
  - SP 800-18, The Guide for Developing Security Plans for IT Systems
  - SP 800-26, Security Self-Assessment Guide for Information Technology Systems
  - SP 800-30 (Revision 1), Risk Management Guide for Information Technology Systems
- All these standards are freely available (in PDF) from <a href="https://www.nist.gov/">https://www.nist.gov/</a>

... and there are many more standards for IS security (<a href="https://csrc.nist.gov">https://csrc.nist.gov</a>)!

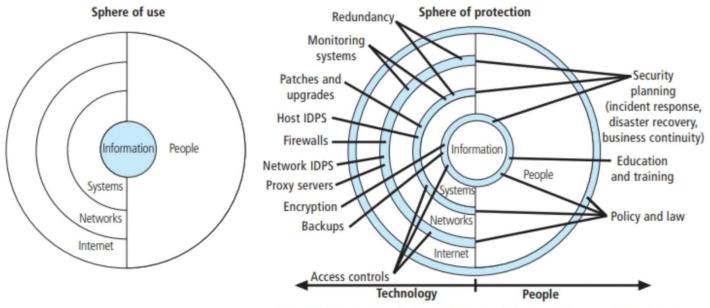


### Design of security architecture

Once we have decided to use a particular standard, we have to set the **foundation of the security framework** 

#### **Levels of controls**

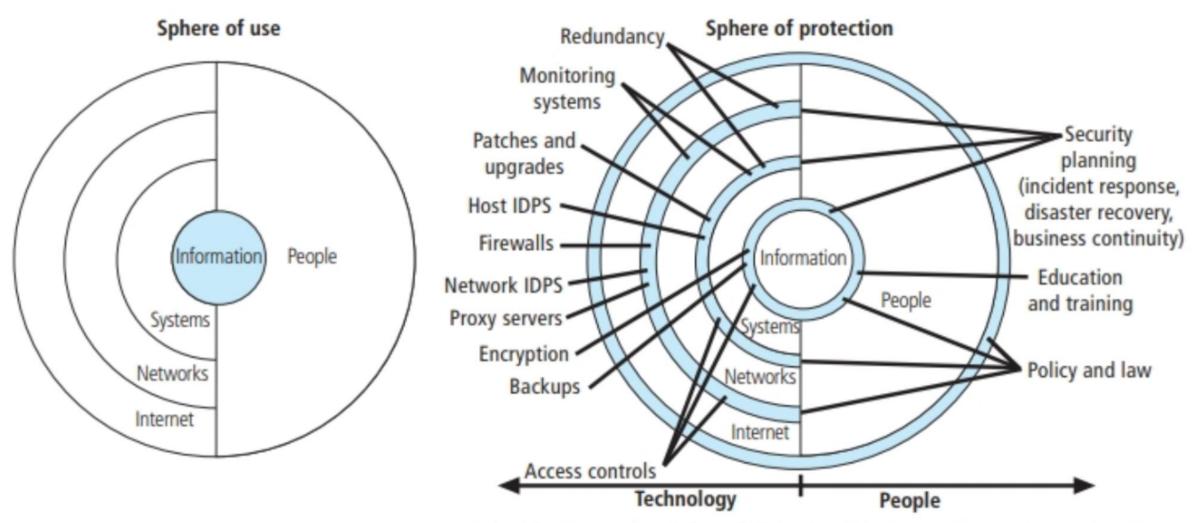
- Management controls cover security processes designed by strategic planners and performed by security administration
- Operational controls deal with operational functionality of security in organisation (personnel/physical security, education, equipment maintenance)
- Technical controls address technical implementations related to designing and implementing security



Note: IDPS is an abbreviation of "intrusion detection and prevention systems".



### Different kind of controls that relate to the areas



Note: IDPS is an abbreviation of "intrusion detection and prevention systems".



# Design of security architecture (continued)

#### Defense in depth

- Implementation of security in layers
- Requires that organisations establish multiple layers of security controls and safeguards

#### Security perimeter

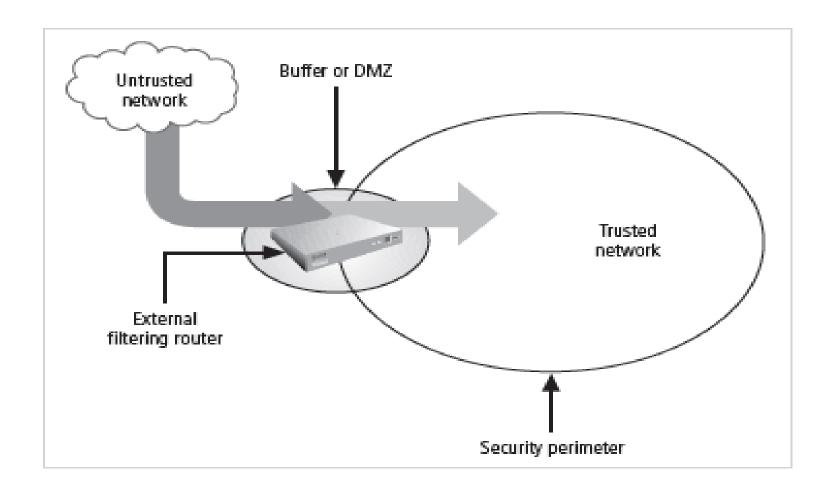
- Border of security protecting internal systems from outside threats
- Does not protect against internal attacks from employee threats or on-site physical threats

#### <u>Diagrams and concepts explored later in course – introduced here</u>

- Firewall: device that selectively discriminates against information flowing in or out of organisation
- DMZs: no-man's land between inside and outside networks where some place Web servers
- Proxy servers: performs actions on behalf of another system
- Intrusion detection systems (IDSs): An effort to detect unauthorized activity within inner network, or on individual machines, organisation may wish to implement an IDS

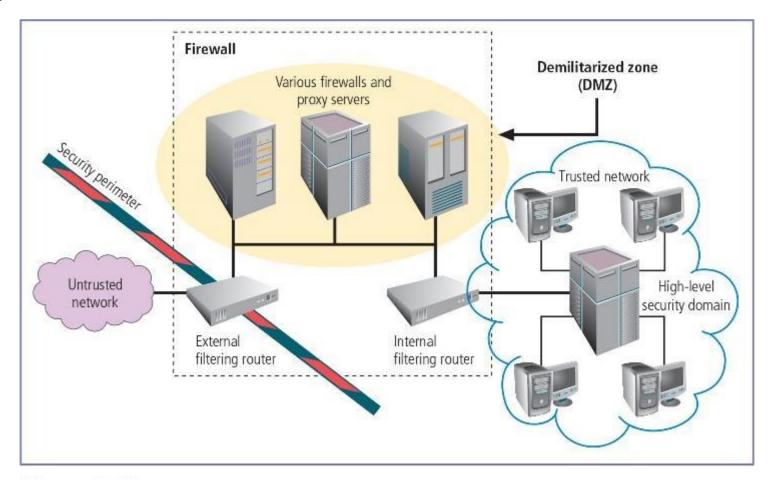


# Security perimeters





# Security perimeters



We shall consider these in more detail in future weeks



### **Summary of Part 1**

- InfoSec governance: the application of corporate governance principles to InfoSec
- Management must use <u>policies as the basis</u> for all InfoSec planning, design, and deployment
- Three types of ISP: enterprise, issue-specific, systems-specific security policies
- ISP is best disseminated in a comprehensive security education, training, awareness (SETA) program
- InfoSec frameworks (ISO27000 series, NIST) are published to be used as best practices
- Defense in depth: One foundation of security architectures is the <u>layered</u> implementation of security



Part 2: Three Lines of Defense vs. Five Lines of Assurance





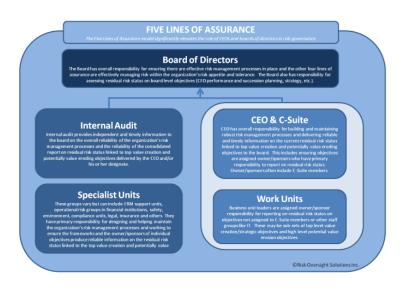
# Why care about governance frameworks?

### The Three Lines of Defense Model



Adapted from ECIIA/FERMA Guidance on the 8th EU Company Law Directive, article 41





#### Principles for Effective Internal Control



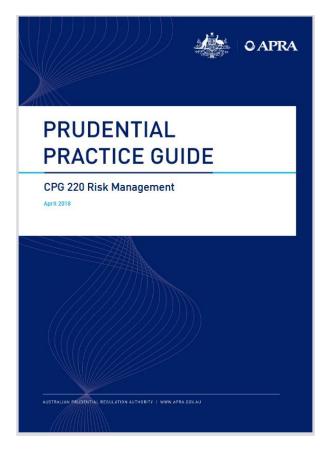


# Why care about governance frameworks?

#### SOMETIMES THEY ARE LEGISLATED



Subjec	t: Operat	tional Risk Management	
Catego	ory: Sound	Business and Financial Practices	
Nec	E-21	Date: August 2015	
1. Pur	pose and Scope	of the Guideline	
applicat	sie to all federall	at OSFI's expectations for the management of op by-regulated financial institutions (FRFIs) other the else and foreign insurance companies.	
depend		FRFIs may have different operational risk man se, ownership structure; nature, scope and con d risk profile.	
people, includes people i fraud, n broadly.	legal risk but e neludes, for eva on-adherence to While the defin	iiled internal processes and systems, or from exter sociodes strategic and reputational risk. The risk of mple, operational risk events relating specifically internal procedures/values/objectives, or unethic nition of external fraud should be interpreted broa-	of loss resulting from to internal or external al behaviour more adly, the definition ma
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Australian < Prudential Regulation Authority



Company



#### apra.gov.au

The Australian Prudential Regulation Authority is a statutory authority of the Australian Government and the prudential regulator of the Australian financial services industry. APRA was established on 1 July 1998 in response to the recommendations of the Wallis Inquiry. Wikipedia

Jurisdiction: Australia

Headquarters: Sydney

Founded: 1 July 1998

Parent organization: Department of the Treasury

Preceding agencies: Insurance and

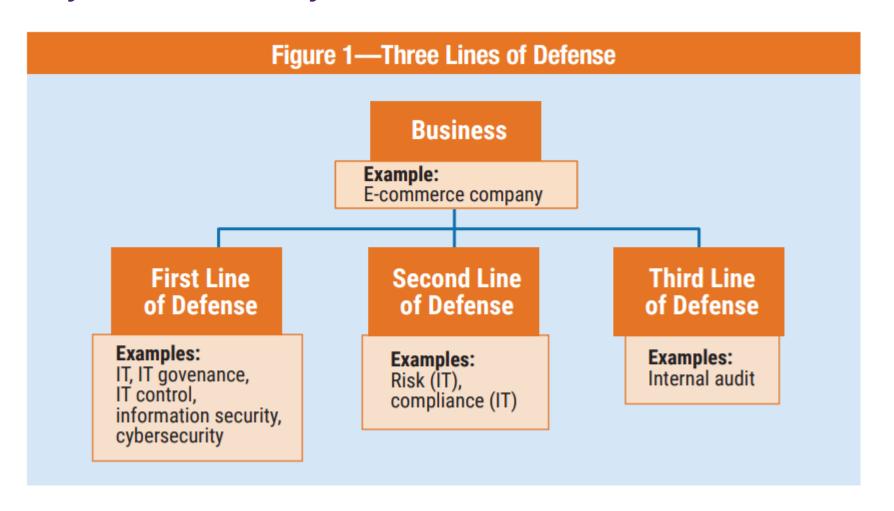
Superannuation Commission; Reserve Bank of

Australia; Australian Financial Institutions

Commission

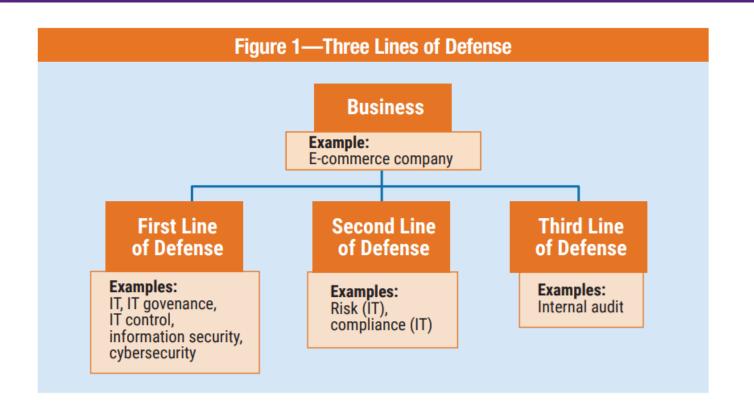


### 3LoD for Cyber Security



Ho (2018), https://www.isaca.org/resources/isaca-journal/issues/2018/volume-4/roles-of-three-lines-of-defense-for-information-security-and-governance





First LoD is the function that **owns** and **manages** risk. Within the first LoD, businesses can set up control functions (e.g., IT control, which reports to the IT department) to faciliate the management of risk.

Second LoD is the independent control function (e.g., IT risk, IT compliance) that oversees risk and monitors the first LoD controls.

They can challenge the effectiveness of controls and management of risk across the organisation.

Third LoD is **internal audit**, which **provides independent assurance**. It provides the *well-informed sense of assurance* that the risks and controls are in balance. It provides evidence, that risks and controls are in balance. They evaluate how effective the other two lines of defense are. How effective are our controls, how effective is our risk management.



### Owners and Key Activities of the First Line of Defense

- Operational managers that own and manage risks and controls
- Implement corrective actions to address process and control deficiencies

#### Common first line of defense activities:

- Administer security procedures, training, and testing
- Maintain secure device configurations, up-to-date software, and security patches
- Deploy intrusion detection systems and conduct penetration testing
- Securely configure the **network** to adequately manage and protect network traffic flow
- Inventory information assets, technology devices, and related software
- Deploy data protection and loss prevention programs with related monitoring
- Restrict least-privilege access roles
- Encrypt data where feasible
- Implement vulnerability management with internal and external scans
- Recruit and retain certified IT, IT risk, and information security talent



### Owners and Key Activities of the Second Line of Defense

- IT risk management and IT compliance functions
- Play key role in an organisation's security posture and program design
- Responsible for:
  - Cybersecurity-related risk assessment and alignment with organisation's risk appetite
  - Monitoring risks and changes to laws and regulations
  - Collaborating with the first-line functions to ensure appropriate control design



### Owners and Key Activities of the Second Line of Defense

#### Common Second Line of Defense Activities:

- Design cybersecurity policies, training, and testing
- Conduct cyber risk assessments
- Gather cyber threat intelligence
- Classify data and design least-privilege access roles
- Monitor incidents, key risk indicators, and remediation
- Recruit and retain certified IT risk talent
- Assess relationships with third parties, suppliers, and service providers
- Plan/test business continuity and participate in disaster recovery exercises



### Owners and Key Activities of the Third Line of Defense

- Internal audit function assesses whether IT governance supports organisation's strategies and objectives
- Coordinates with second LoD, particularly cybersecurity function
- Can be consulted regarding:
  - The relationship between cybersecurity and organisational risk
  - Prioritizing responses and control activities
  - Auditing for cybersecurity risk mitigation across all relevant facets (e.g., privileged access)
  - Assurance in remediation activities
  - Raising risk awareness and coordinating with cybersecurity risk management
  - Validating that cybersecurity provisions are included in the organisation's business continuity plans



### Owners and Key Activities of the Third Line of Defense

#### Common Third Line of Defense Activities

- Provide independent ongoing evaluations of preventive/detective measures related to cybersecurity
- Evaluate IT assets of users with privileged access for standard security configurations
- Track diligence of remediation
- Conduct cyber risk assessments of service organisations, third parties, and suppliers



### **General 3LoD**

Problem: Senior management and board of directors are not considered to be a part of a defense line!

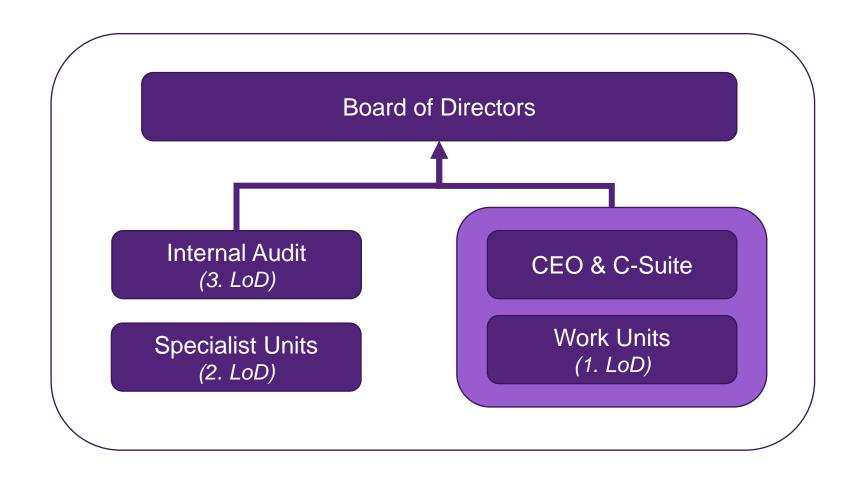
#### The Three Lines of Defense Model



Adapted from ECIIA/FERMA Guidance on the 8th EU Company Law Directive, article 41



# Overview of Five Lines of Assurance Model (5LoA)





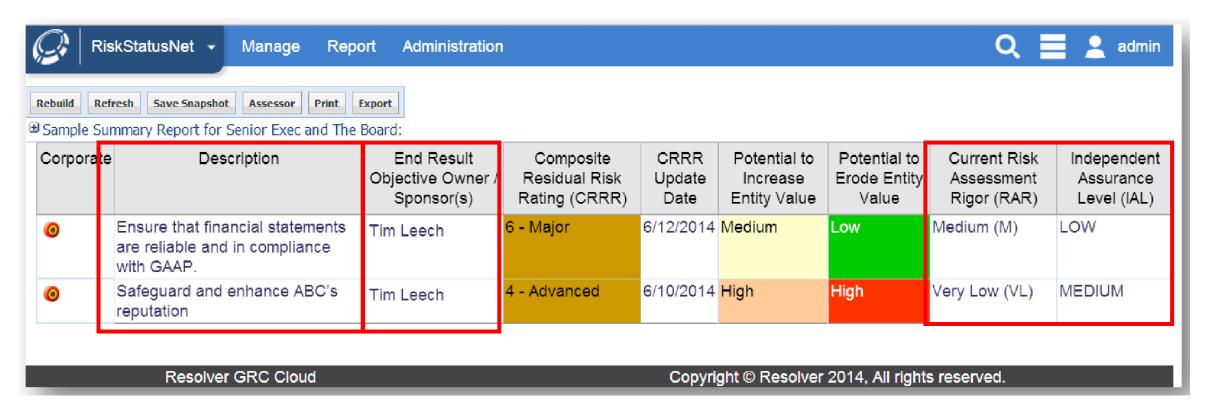
# Overview of Five Lines of Assurance Model (5LoA)

- The word "defense" has a sort of negative feel to it. Risk managers are often seen as the "office of no" but risk avoidance as we will see is only one form of treating risk
- So moving away from this negative stereotype the people who promoted this model, wanted the risk
  management unit to be seen as a function that has potential to help management to increase the
  certainty that key objectives in an organisations will be obtained, while still operating within an
  acceptable level of risk. So here it is about assurance, about value-creation objectives rather than
  preventing value erosion
- How to make sure value is created with appropriate risk levels rather than focusing on avoiding risks at all costs

So, the 5LoA model significantly elevates two roles. The role of CEOs and the role of the Boards of Directors in risk governance - the C-Suite (everyone with a C or Chief in the title, e.g. CIO, CISO, CRO etc.

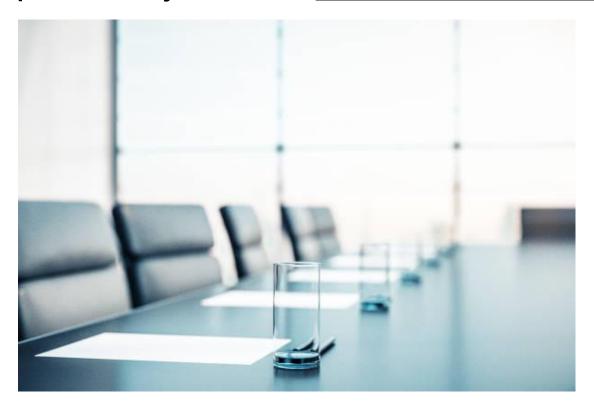


- Uses an "objectives register" as a foundation (see figure below)
- Clear accountability on who is responsible for reporting on residual risk status
- Risk assessment rigour and independent assurance requirements defined by C-suite and the board





Active board/senior management involvement and clarity around their responsibility as the "ultimate line of defence"





# Requires the full range of risk treatments\* be identified and assessed not just "internal controls"

### 3.8.1 - risk treatment - process to modify risk (1.1)

#### **NOTE 1** Risk treatment can involve:

- avoiding the risk by deciding not to start or continue with the activity that gives rise to the risk;
- · taking or increasing risk in order to pursue an opportunity;
- removing the risk source (3.5.1.2);
- changing the likelihood (3.6.1.1);
- changing the consequences (3.6.1.3);
- sharing the risk with another party or parties [including contracts and risk financing (3.8.1.4)]; and
- · retaining the risk by informed decision.

**NOTE 2** Risk treatments that deal with negative consequences are sometimes referred to as "risk mitigation", "risk elimination", "risk prevention" and "risk reduction".

NOTE 3 Risk treatment can create new risks or modify existing risks

© Risk Oversight Inc.

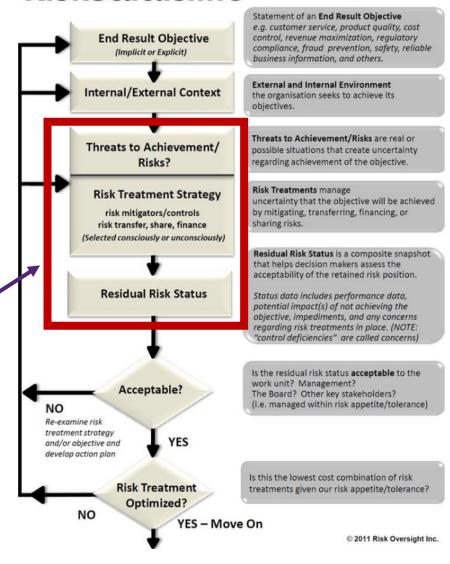
<sup>\*</sup> More on risk treatment in our risk management (part 2) module

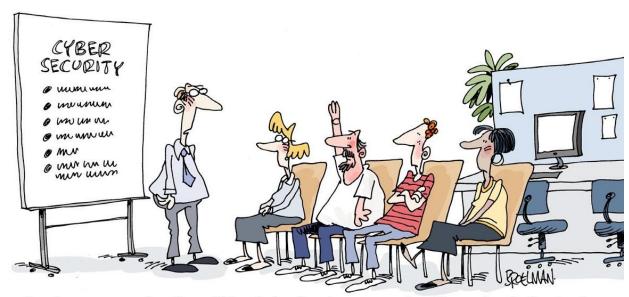


- Primary focus is on the acceptability of residual risk status
- Specific consideration whether risk treatments are optimized

Risk Assessment and Risk Treatment will be our focus in the next two weeks.

#### RiskStatusline™





And no, you don't self-isolate for two weeks if you're infected.

```
end;
   write(Endtext);
end.
CREATE TABLE product(
   class MultinomialNB(object):
def __init__(self):
2})
        self.X = None
        self.y = None
    def __loading(sel
    auto it = operands.begin();
    int result = func(*
    if (operands.size()
        for (++it; it!=operands.end
            result = func(result,
    return result;
                      CDog& operator=(C
               Thank you
```