SIS Safety instrumented system(s)
SoA Statement of applicability

SOC Standard operating condition
SOP Standard operating procedure

SP Special Publication (by NIST)

SSL Secure socket layer

TCP Transmission control protocol

TR Technical report

VLAN Virtual local area network
VPN Virtual private network
WAN Wide area network

3.3 Conventions

The elements of a CSMS are the following:

- · the objective of the element,
- a basic description of the element,
- · a rationale to explain why the element is included and
- the requirements for that element.

A tabular presentation is used to provide a description and requirements for each element. The requirements are numbered similar to subclauses (but are not in themselves subclauses), so that the requirements can be referenced individually and selectively.

4 Elements of a cyber security management system

4.1 Overview

This clause presents the elements that constitute a CSMS for IACS. These elements represent what shall and should be included in the CSMS in order to protect IACS against cyber attacks.

The elements are presented in the following three main categories:

- Risk analysis,
- · Addressing risk with the CSMS, and
- · Monitoring and improving the CSMS.

Each of these categories is further divided into element groups and/or elements. Figure 1 depicts the relationship between the categories, element groups and elements.

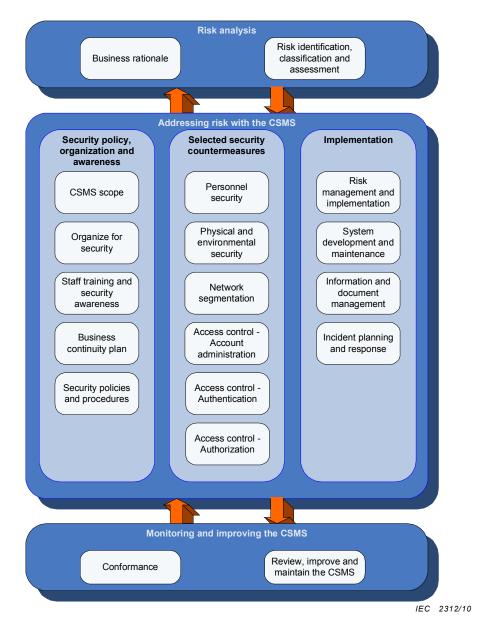


Figure 1 - Graphical view of elements of a cyber security management system

Each element in this clause lists the objective of the element, a basic description of the element, a rationale to explain why the element is included and the requirements for that element.

Annex A follows the same basic structure of this clause with categories, element groups and elements. However, the annex provides guidance on how to develop the elements of the CSMS. The reader should read Annex A in order to understand the special needs and issues involved with developing a CSMS for IACS. The guidance discussed in Annex A should be tailored to the special requirements of each organization.

This standard specifies the elements required for a CSMS. It is not the intent of the standard to specify a particular sequential process for identifying and addressing risk that incorporates these elements. Thus an organization will create such a process in accordance with its culture, organization and the current status of its cyber security activities. To assist organizations with this aspect of applying the standard, A.3.4.2 provides an example of a process for identifying and addressing risk. In addition, Annex B offers insights on effective ordering for activities related to all of the elements discussed in this standard.

While a CSMS is an excellent tool for managing risk within a large company it is equally applicable to small companies as well. The CSMS may be more formalized in a large company so it can be used in many different situations and geographies. In a small company, similar CSMS activities need to be conducted, but they may not be as formal. Clause 4 and Annex A provide guidance to help the user better understand the elements and activities of a CSMS.

4.2 Category: Risk analysis

4.2.1 Description of category

The first main category of the CSMS is Risk analysis. This category discusses much of the background information that feeds into many of the other elements in the CSMS. Figure 2 shows the two elements that are part of the category:

- Business rationale and
- Risk identification, classification and assessment.



Figure 2 - Graphical view of category: Risk analysis

4.2.2 Element: Business rationale

Objective:

Identify and document the unique needs of an organization to address cyber risk for IACS.

Description:

A business rationale is based on the nature and magnitude of financial, HSE, and other potential consequences should IACS cyber incidents occur.

Rationale:

Establishing a business rationale is essential in order for an organization to maintain management buy in to an appropriate level of investment for the IACS cyber security program.

Requirements:

Table 1 – Business rationale: Requirements

Description		Requirement
4.2.2.1	Develop a business rationale	The organization should develop a high-level business rationale, as a basis for its effort to manage IACS cyber security, which addresses the unique dependence of the organization on IACS.

4.2.3 Element: Risk identification, classification and assessment

Objective:

Identify the set of IACS cyber risks that an organization faces and assess the likelihood and severity of these risks.

Description:

Organizations protect their ability to perform their mission by systematically identifying, prioritizing and analyzing potential security threats, vulnerabilities, and consequences using accepted methodologies. The first set of requirements present the actions an organization takes to carry out both a high-level and detailed risk assessment that incorporates vulnerability assessment, in a typical chronological order. Among these requirements, those related to preparing for high-level and detailed risk assessments are 4.2.3.1, 4.2.3.2 and 4.2.3.8 below. The last few requirements (4.2.3.10 to 4.2.3.14) are general requirements that apply to the overall risk assessment process. Subclause 4.3.4.2 covers the process of taking action based upon this assessment.

Rationale:

Since the purpose of investing in cyber security is to lower risk, it is driven by an understanding of level of risk and potential mitigations.

Table 2 - Risk identification, classification and assessment: Requirements

	Description	Requirement
4.2.3.1	Select a risk assessment methodology	The organization shall select a particular risk assessment and analysis approach and methodology that identifies and prioritizes risks based upon security threats, vulnerabilities and consequences related to their IACS assets.
4.2.3.2	Provide risk assessment background information	The organization should provide participants in the risk assessment activity with appropriate information including methodology training, before beginning to identify the risks.
4.2.3.3	Conduct a high-level risk assessment	A high-level system risk assessment shall be performed to understand the financial and HSE consequences in the event that availability, integrity or confidentiality of the IACS is compromised.
4.2.3.4	Identify the IACS	The organization shall identify the various IACS, gather data about the devices to characterize the nature of the security risk and group the devices into logical systems.
4.2.3.5	Develop simple network diagrams	The organization shall develop simple network diagrams for each of the logically integrated systems showing the major devices, network types and general locations of the equipment.
4.2.3.6	Prioritize systems	The organization shall develop the criteria and assign a priority rating for mitigating the risk of each logical control system.
4.2.3.7	Perform a detailed vulnerability assessment	The organization shall perform a detailed vulnerability assessment of its individual logical IACS, which may be scoped based on the high-level risk assessment results and prioritization of IACS subject to these risks.
4.2.3.8	Identify a detailed risk assessment methodology	The organization's risk assessment methodology shall include methods for prioritizing detailed vulnerabilities identified in the detailed vulnerability assessment.
4.2.3.9	Conduct a detailed risk assessment	The organization shall conduct a detailed risk assessment incorporating the vulnerabilities identified in the detailed vulnerability assessment.
4.2.3.10	Identify the reassessment frequency and triggering criteria	The organization shall identify the risk and vulnerability reassessment frequency as well as any reassessment triggering criteria based on technology, organization, or industrial operation changes.

	Description	Requirement
4.2.3.11	Integrate physical, HSE and cyber security risk assessment results	The results of physical, HSE and cyber security risk assessments shall be integrated to understand the assets' overall risk.
4.2.3.12	Conduct risk assessments throughout the lifecycle of the IACS	Risk assessments shall be conducted through all stages of the technology lifecycle including development, implementation, changes and retirement.
4.2.3.13	Document the risk assessment	The risk assessment methodology and the results of the risk assessment shall be documented.
4.2.3.14	Maintain vulnerability assessment records	Up-to-date vulnerability assessment records should be maintained for all assets comprising the IACS.

4.3 Category: Addressing risk with the CSMS

4.3.1 Description of category

The second main category of the CSMS is Addressing risk with the CSMS. This category contains the bulk of the requirements and information contained in the CSMS. It is divided into the following three element groups:

- · Security policy, organization and awareness,
- · Selected security countermeasures and
- Implementation.

4.3.2 Element group: Security policy, organization and awareness

4.3.2.1 Description of element group

The first element group in this category discusses the development of the basic cyber security policies, the organizations responsible for cyber security and the awareness within the organization of cyber security issues. Figure 3 shows a graphical representation of the five elements contained in this element group:

- · CSMS scope,
- · Organizing for security,
- · Staff training and security awareness,
- · Business continuity plan and
- · Security policies and procedures.



IEC 2314/10

Figure 3 – Graphical view of element group: Security policy, organization and awareness

4.3.2.2 Element: CSMS scope

Objective:

Identify, assess and document the systems, processes and organizations to which the CSMS applies.

Description:

The scope includes all aspects of the IACS, integration points with business partners, customers and suppliers.

Rationale:

Management should understand the boundaries where the CSMS applies to the organization as well as establish a direction and focus for the CSMS. By developing a clearly defined scope, it is easier for management to convey its goals and purpose for the CSMS.

Requirements:

Table 3 - CSMS scope: Requirements

	Description	Requirement
4.3.2.2.1	Define the scope of the CSMS	The organization shall develop a formal written scope for the cyber security program.
4.3.2.2.2	Define the scope content	The scope should explain the strategic goals, process, and timing for the CSMS.

4.3.2.3 Element: Organizing for security

Objective:

Establish the entities responsible for managing, conducting and assessing the overall cyber security of the organization's IACS assets.

Description:

Senior leadership establishes an organization, structure or network of people to provide oversight and direction for managing cyber security risks associated with IACS. They also provide the personnel necessary to conduct and assess the cyber security programs throughout the organization over the life of the CSMS. An organization at any level may implement this standard, including a company or other overall enterprise, division, plant or subset of a plant.

Rationale:

Commitment to a security program begins at the top of the organization. Because cyber security of IACS involves several different sets of skills not often found in any one particular section or department of an organization, it is imperative that senior leadership formulate an approach to managing security with clear identification of accountability and responsibility that makes good use of skills and labor resources. This may take several different forms from a single organization to a network of people working together to address different security aspects. The particular approach is highly dependent upon an organization's operational culture.

Requirements:

Table 4 - Organizing for security: Requirements

	Description	Requirement
4.3.2.3.1	Obtain senior management support	The organization shall obtain senior management support for a cyber security program.
4.3.2.3.2	Establish the security organization(s)	There shall be an organization, structure or network of stakeholders established (or chosen) under management leadership, with the responsibility to provide clear direction and oversight for the cyber aspects of the IACS.
4.3.2.3.3	Define the organizational responsibilities	Organizational responsibilities shall be clearly defined for cyber security and related physical security activities.
4.3.2.3.4	Define the stakeholder team makeup	The core team of stakeholders should be cross-functional in nature to bring together the skills necessary to address security in all parts of the IACS.

4.3.2.4 Element: Staff training and security awareness

Objective:

Provide all personnel (including employees, contract employees and third-party contractors) with the information necessary to identify, review, address and where appropriate, remediate vulnerabilities and threats to IACS and to help ensure their own work practices are using effective countermeasures.

Description:

All personnel should receive adequate technical training associated with the known threats and vulnerabilities of hardware, software and social engineering.

Rationale:

In the area of IACS, the same emphasis should be placed on cyber security as on safety and operational integrity, because the consequences can be just as severe. Security awareness for all personnel is an essential tool for reducing cyber security risks. Knowledgeable and vigilant staff are one of the most important lines of defense in securing a system. It is therefore important for all personnel to understand the importance of security in maintaining the safe operation of the system.

Table 5 - Staff training and security awareness: Requirements

	Description	Requirement
4.3.2.4.1	Develop a training program	The organization shall design and implement a cyber security training program.
4.3.2.4.2	Provide procedure and facility training	All personnel (including employees, contract employees, and third-party contractors) shall be trained initially and periodically thereafter in the correct security procedures and the correct use of information processing facilities.

	Description	Requirement
4.3.2.4.3	Provide training for support personnel	All personnel that perform risk management, IACS engineering, system administration/maintenance and other tasks that impact the CSMS should be trained on the security objectives and industrial operations for these tasks.
4.3.2.4.4	Validate the training program	The training program should be validated on an on-going basis to ensure that personnel understand the security program and that they are receiving the proper training.
4.3.2.4.5	Revise the training program over time	The cyber security training program shall be revised, as necessary, to account for new or changing threats and vulnerabilities.
4.3.2.4.6	Maintain employee training records	Records of employee training and schedules for training updates should be maintained and reviewed on a regular basis.

4.3.2.5 Element: Business continuity plan

Objective:

Identify procedures for maintaining and/or re-establishing essential business operations while recovering from a significant disruption.

Description:

A business continuity plan should address the recovery objectives for the various systems and subsystems involved based on typical business needs, a list of potential interruptions and the recovery procedures for each, as well as a schedule to test part or all of the recovery procedures. One of the primary recovery objectives should be to maintain maximum availability of the control system.

Rationale:

No set of defenses can prevent all disruptions due to cyber security incidents. A detailed Business Continuity Plan ensures that IACS information can be restored and utilized as soon as possible after the occurrence of a significant disruption.

Table 6 – Business continuity plan: Requirements

	Description	Requirement
4.3.2.5.1	Specify recovery objectives	Prior to creating a business continuity plan, the organization shall specify recovery objectives for the systems involved based on business needs.
4.3.2.5.2	Determine the impact and consequences to each system	The organization should determine the impact to each system due to a significant disruption and the consequences associated with loss of one or more of the systems.
4.3.2.5.3	Develop and implement business continuity plans	Continuity plans shall be developed and implemented to ensure that business processes can be restored in accordance with recovery objectives.
4.3.2.5.4	Form a business continuity team	A business continuity team should be formed including IACS and other process owners. In the event of a significant disruption, this team should determine the priority of critical business and IACS systems to re-establish operations.

	Description	Requirement
4.3.2.5.5	Define and communicate specific roles and responsibilities	The business continuity plan shall define and communicate the specific roles and responsibilities for each part of the plan.
4.3.2.5.6	Create backup procedures that support business continuity plan	The organization shall create backup and restore procedures (see 4.3.4.3.9) that support the business continuity plan.
4.3.2.5.7	Test and update the business continuity plan	The business continuity plan shall be tested on a regular basis and updated as necessary.

4.3.2.6 Element: Security policies and procedures

Objective:

Address how an organization defines security, operates its security program, defines and addresses its tolerance for risk and reviews its program to make further improvements.

Description:

Cyber security policies for the IACS environment should be developed based on existing high-level policies, characterized risks and the risk tolerance levels identified by management. Cyber security procedures are developed from the cyber security policies and identify how the policies are to be implemented.

Rationale:

These written policies and procedures allow employees, contractors, third parties, and the like to clearly understand the company perspective of cyber security and their roles and responsibilities in securing the company's assets.

Table 7 - Security policies and procedures: Requirements

	Description	Requirement
4.3.2.6.1	Develop security policies	The organization shall develop high-level cyber security policies for the IACS environment which are approved by management.
4.3.2.6.2	Develop security procedures	The organization shall develop and approve cyber security procedures, based on the cyber security policies and provide guidance in how to meet the policies.
4.3.2.6.3	Maintain consistency between risk management systems	Cyber security policies and procedures that deal with IACS risks should be consistent with or extensions of policies created by other risk management systems.
4.3.2.6.4	Define cyber security policy and procedure compliance requirements	Cyber security policies and procedures, for the IACS environment, shall include compliance requirements.
4.3.2.6.5	Determine the organization's tolerance for risk	The organization shall determine and document its risk tolerance as a basis for creation of policy and risk management activities.
4.3.2.6.6	Communicate the policies and procedures to the organization	Cyber security policies and procedures, for the IACS environment, shall be communicated to all appropriate personnel.

	Description	Requirement
4.3.2.6.7	Review and update the cyber security policies and procedures	The cyber security policies and procedures shall be reviewed regularly, validated to confirm that they are up-to-date and being followed and updated as required to ensure that they remain appropriate.
4.3.2.6.8	Demonstrate senior leadership support for cyber security	Senior leadership shall demonstrate commitment to cyber security by endorsing the cyber security policies.

4.3.3 Element group: Selected security countermeasures

4.3.3.1 Description of element group

The second element group within this category is Selected security countermeasures. The elements within this group discuss some of the main types of security controls that are part of a well designed CSMS. This document does not attempt to describe the full implementation of any of these selected security countermeasures. It discusses many of the policy, procedure and practice issues related to these particular security countermeasures. Figure 4 shows a graphical representation of the six elements in the element group:

- · Personnel security,
- · Physical and environmental security,
- Network segmentation,
- Access control Account administration,
- · Access control Authentication and
- Access control Authorization.

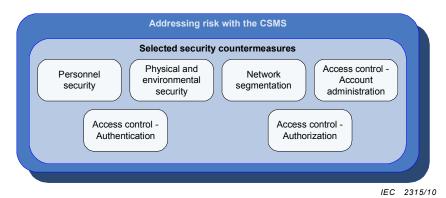


Figure 4 – Graphical view of element group: Selected security countermeasures

These particular countermeasures were selected for inclusion because their broad impact on policy and architecture makes it essential to consider them up front when constructing any CSMS. It is not the intent of this standard to specify a complete and sufficient list of countermeasures, since completeness is determined through the process of risk assessment and management described in the standard.

4.3.3.2 Element: Personnel security

Objective:

Establish the policies and procedures to determine whether personnel will maintain the IACS security of the organization throughout the lifecycle of their employment.

Description:

Personnel security involves looking at new and current personnel to determine if they will maintain the IACS security for the organization. For new personnel, it evaluates them prior to their entry into the organization making sure they demonstrate behaviors consistent with their future security responsibility. For current personnel, it establishes that they continue to demonstrate behavior consistent with their current security responsibilities.

Rationale:

In many organizations, personnel security requirements are driven by concerns about insider threats and the possibility of accidents caused by inattention to detail or by personnel unfit for a job due to lack of proper background or the use of substances that might cloud judgment. By implementing personnel security policies it may be possible to reduce these types of problems.

Requirements:

Table 8 - Personnel security: Requirements

	Description	Requirement
4.3.3.2.1	Establish a personnel security policy	There shall be a personnel security policy established, clearly stating the organization's commitment to security and the security responsibilities of personnel. (Personnel include employees, prospective employees, contract employees, and third-party contractors.)
4.3.3.2.2	Screen personnel initially	Unless government regulation prohibits it, all personnel with access to the IACS (both physical and cyber), including new hires and internal transfers to sensitive positions shall be screened, including validation of their identity and background checks, during the job application process.
4.3.3.2.3	Screen personnel on an ongoing basis	Personnel should also be subject to ongoing scrutiny for changes that might indicate a conflict of interest or concern for performing the job in an appropriate manner.
4.3.3.2.4	Address security responsibilities	The personnel security policy should address security responsibilities from recruitment through the end of employment, especially for sensitive positions.
4.3.3.2.5	Document and communicate security expectations and responsibilities	Security expectations and responsibilities shall be clearly documented and regularly communicated to personnel.
4.3.3.2.6	State cyber security terms and conditions of employment clearly	Terms and conditions of employment shall clearly state the personnel's responsibility for cyber security. These responsibilities shall extend for a reasonable period of time after employment ceases.
4.3.3.2.7	Segregate duties to maintain appropriate checks and balances	Duties should be segregated amongst personnel to maintain appropriate checks and balances, so that no single individual has total control over actions that change the functional operation of the IACS.

4.3.3.3 Element: Physical and environmental security

Objective:

Create a secure environment for the protection of IACS assets. An asset is any physical or logical object owned by, or under the custodial duties of, an organization, having either a perceived or actual value to the organization (see IEC/TS 62443-1-1). IACS assets are those

assets that are a part of the IACS, either physical or cyber or that can affect the operation of the IACS. Physical security measures ensure that all assets, specifically those related to the IACS of an organization, are protected physically from unauthorized access, loss, damage, misuse, and the like. Environmental security measures ensure that the assets of an organization are protected against environmental conditions that would make them unusable or damage the information they contain.

Description:

Physical and environmental security measures should be designed to complement the cyber security measures taken to protect assets that are part of the IACS and coordinated with the physical security of the remainder of the plant. When developing a program for physical security of assets, it is important to include all systems in the scope and not just limit the effort to traditional computer room facilities. Practical engineering judgment should be used to balance the risks when determining physical security procedures. Physical segmentation is a key security countermeasure designed to compartmentalize devices into security zones where identified security practices are employed to achieve the desired target security level.

Rationale:

Physical assets are a means to an end as well as the end itself. In modern control systems the physical assets provide the means by which the cyber system operates. Therefore, the asset has value in itself but also has value as an integral part of the control system. Since both the asset and the control system require each other, both shall be protected in order for the system to be secure. The overriding security premise is that the use of security countermeasures should be commensurate with the level of risk. While physical segmentation is an important security countermeasure employed in conjunction with other layers of defense to reduce the risk that may be associated with IACS, it may not be necessary if the security risks are within accepted limits.

Table 9 - Physical and environmental security: Requirements

	Description	Requirement
4.3.3.3.1	Establish complementary physical and cyber security policies	Security policies and procedures that address both physical and cyber security in the protection of assets shall be established.
4.3.3.3.2	Establish physical security perimeter(s)	One or more physical security perimeters shall be established to provide barriers to unauthorized access to protected assets.
4.3.3.3.3	Provide entry controls	Appropriate entry controls shall be provided at each barrier or boundary.
4.3.3.3.4	Protect assets against environmental damage	Assets shall be protected against environmental damage from threats such as fire, water, smoke, dust, radiation, corrosion and impact.
4.3.3.3.5	Require employees to follow security procedures	Employees shall be required to follow and enforce the physical security procedures that have been established.
4.3.3.3.6	Protect connections	All connections under the control of the organization shall be adequately protected from tampering or damage.
4.3.3.3.7	Maintain equipment assets	All equipment assets, including auxiliary environmental equipment, shall be properly maintained to ensure proper operation.
4.3.3.3.8	Establish procedures for monitoring and alarming	Procedures shall be established for monitoring and alarming when physical or environmental security is compromised.

	Description	Requirement
4.3.3.3.9	Establish procedures for the addition, removal, and disposal of assets	Procedures should be established and audited with respect to the addition, removal and disposal of all assets.
4.3.3.3.10	Establish procedures for the interim protection of critical assets	Procedures shall be established to ensure the protection of critical components during the interruption of operations, for example, due to fire, water ingress, security breach, interruption, natural or any other type of disaster.

4.3.3.4 Element: Network segmentation

Objective:

Group and separate key IACS devices into zones with common security levels in order to manage security risks and to achieve a desired target security level for each zone.

Description:

Network segmentation is a key security countermeasure designed to compartmentalize devices into security zones where identified security practices are employed to achieve the desired target security level. The zone may be an isolated standalone network segment or a network segment separated from the organization's network by some sort of network barrier device. IACS should be designed in a manner that filters/prevents nonessential communication packets from reaching the IACS devices.

For Transmission Control Protocol / Internet Protocol (TCP/IP) based networks, the most common barrier devices in use are firewalls, routers and layer 3 switches. For non-TCP/IP type networks, the barrier devices may be standalone gateways or integrated into the network interface module of an IACS device.

Rationale:

The overriding security premise is that the use of security countermeasures should be commensurate with the level of risk. While network segmentation is an important security countermeasure employed in conjunction with other layers of defense to reduce the risk that may be associated with IACS, it may not be necessary if the security risks are low.

Table 10 - Network segmentation: Requirements

	Description	Requirement
4.3.3.4.1	Develop the network segmentation architecture	A network segmentation countermeasure strategy employing security zones shall be developed for IACS devices based upon the risk level of the IACS.
4.3.3.4.2	Employ isolation or segmentation on high- risk IACS	High-risk IACS shall be isolated from or employ a barrier device to separate it from other zones with different security levels or risks.
4.3.3.4.3	Block non-essential communications with barrier devices	Barrier devices shall block all non-essential communications in and out of the security zone containing critical control equipment.

4.3.3.5 Element: Access control – Account administration

Objective:

Ensure, on an ongoing basis, that only appropriate entities have accounts that allow access and that these accounts provide appropriate access privileges.

Description:

Access control is the method of controlling who or what entities can access premises and systems and what type of access is permitted. There are three key aspects associated with access control: account administration, authentication and authorization. All three aspects shall work together to establish a sound and secure access control strategy.

Account administration is the method associated with granting and revoking access accounts and maintaining the permissions and privileges provided under these accounts to access specific resources and functions on the physical premises, network or system. Access accounts should be function or role-based and may be defined for individuals, groups of individuals functioning as a crew or for devices providing a function.

Rationale:

The misuse of data and systems may have serious consequences, including harm to human life, environmental damage, financial loss and damaged corporate reputation. These risks are increased when employees, contractors or temporary personnel have unnecessary access to data and systems.

Table 11 - Access control - Account administration: Requirements

	Description	Requirement
4.3.3.5.1	Access accounts implement authorization security policy	Access privileges implemented for access accounts shall be established in accordance with the organization's authorization security policy (see 4.3.3.7.1).
4.3.3.5.2	Identify individuals	As for all cyber security controls, the choice of access accounts for individuals versus access accounts for a crew shall be determined by considering threats, risks and vulnerabilities. In this case, considerations include HSE risks of individual controls, mitigation using complementary physical security controls, requirement for accountability and administrative/operational need.
4.3.3.5.3	Authorize account access	Access shall be granted, changed, or terminated on the authority of an appropriate manager.
4.3.3.5.4	Record access accounts	A record shall be maintained of all access accounts, including details of the individual(s) and devices authorized to use the account, their permissions and the authorizing manager.
4.3.3.5.5	Suspend or remove unneeded accounts	Access accounts shall be suspended or removed as soon as they are no longer needed (for example, job change).
4.3.3.5.6	Review account permissions	All established access accounts shall be reviewed regularly to ensure that the individual(s) and devices have only the minimum required permissions.
4.3.3.5.7	Change default passwords	Default passwords for access accounts shall be changed before the IACS is put into service.
4.3.3.5.8	Audit account administration	Periodic reviews of compliance to the account administration policy should be performed.

4.3.3.6 Element: Access control – Authentication

Objective:

Positively identify network users, hosts, applications, services and resources for computerized transaction so that they can be given the rights and responsibilities associated with the accounts they have been granted under account administration.

Description:

Access control is the method of controlling who or what resources can access premises and systems and what type of access is permitted. There are three key aspects associated with access control: account administration, authentication and authorization. All three aspects shall work together to establish a sound and secure access control strategy.

There are several types of authentication strategies and each has varying degrees of strength. Strong authentication methods are ones that are quite accurate in positively identifying the user. Weak authentication methods are ones that can be easily defeated to provide unwanted access to information. Physical location of the user may have a significant impact on the risk of accessing the IACS.

Rationale:

Authentication requirements are more stringent for administration/configuration users and remote users, than for other users. This is because administration/configuration users have broader privileges and their actions have potentially more impact than other users; and remote users are typically not subject to complementary physical access controls. Automatic account lockout due to failed logins or periods of inactivity increases authentication strength, but is considered carefully in the IACS environment, since failure to authenticate a valid user could have HSE implications if the user is not able to perform tasks in a critical situation. In the IACS environment, there is a great emphasis on combining physical authentication measures with electronic authentication practices.

Table 12 - Access control - Authentication: Requirements

	Description	Requirement
4.3.3.6.1	Develop an authentication strategy	Companies shall have an authentication strategy or approach that defines the method(s) of authentication to be used.
4.3.3.6.2	Authenticate all users before system use	All users shall be authenticated before using the requested application, unless there are compensating combinations of entrance control technologies and administrative practices.
4.3.3.6.3	Require strong authentication methods for system administration and application configuration	Strong authentication practices (such as requiring strong passwords) shall be used on all system administrator access accounts and application configuration access accounts.
4.3.3.6.4	Log and review all access attempts to critical systems	Log files should record all access attempts to critical systems and should be reviewed for successful and failed access attempts.
4.3.3.6.5	Authenticate all remote users at the appropriate level	The organization shall employ an authentication scheme with an appropriate level of strength to positively identify a remote interactive user.
4.3.3.6.6	Develop a policy for remote login and connections	The organization shall develop a policy addressing remote login by a user and/or remote connections (for example, task-to-task connections) to the control system which defines appropriate system responses to failed login attempts and periods of inactivity.

	Description	Requirement
4.3.3.6.7	Disable access account after failed remote login attempts	After some number of failed login attempts by a remote user, the system should disable the access account for a certain amount of time.
4.3.3.6.8	Require re-authentication after remote system inactivity	After a defined period of inactivity, a remote user should be required to re-authenticate before the remote user can re-access the system.
4.3.3.6.9	Employ authentication for task-to-task communication	Systems should employ appropriate authentication schemes for task-to-task communication between applications and devices.

4.3.3.7 Element: Access control – Authorization

Objective:

Grant access privileges to resources upon successful authentication of the user and identification of their associated access account. The privileges granted are determined by the account configuration set up during the account administration step in the business process.

Description:

Access control is the method of controlling who or what resources can access premises and systems and what type of access is permitted. There are three key aspects associated with access control: account administration, authentication and authorization. All three aspects shall work together to establish a sound and secure access control strategy.

Authorization explores the controls aimed at protecting information and assets from deliberate and inadvertent destruction, change or disclosure. It focuses specifically on measures designed to ensure that the authenticated agents have access to required information assets. As with authentication, authorization is dependent upon the location of the user.

Rationale:

It is important in the IACS environment to make sure that the right people have access to the correct information and systems and are not prevented from doing their job due to lack of authorization. Authorization to perform specific job functions is provided by the application. There is a need to consider safety implications when developing the authorization strategy.

Table 13 - Access control - Authorization: Requirements

	Description	Requirement
4.3.3.7.1	Define an authorization security policy	Rules that define the privileges authorized under access accounts for personnel in various job roles shall be defined in an authorization security policy that is clearly documented and applied to all personnel upon authentication.
4.3.3.7.2	Establish appropriate logical and physical permission methods to access IACS devices	The permission to access IACS devices shall be logical (rules that grant or deny access to known users based on their roles), physical (locks, cameras, and other controls that restrict access to an active computer console), or both.
4.3.3.7.3	Control access to information or systems via role-based access accounts	Access accounts should be role based to manage access to appropriate information or systems for that user's role. Safety implications shall be considered when defining roles.

	Description	Requirement
4.3.3.7.4	Employ multiple authorization methods for critical IACS	In critical control environments, multiple authorization methods should be employed to limit access to the IACS.

4.3.4 Element group: Implementation

4.3.4.1 Description of element group

The third element group in this category is Implementation. This element within this group discusses issues related to implementing the CSMS. Figure 5 shows a graphical representation of the four elements in the element group:

- · Risk management and implementation,
- System development and maintenance,
- Information and document management and
- · Incident planning and response.

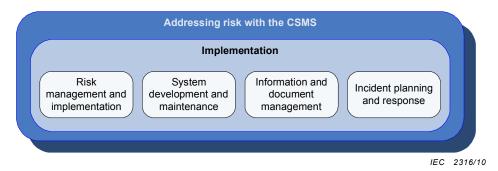


Figure 5 - Graphical view of element group: Implementation

4.3.4.2 Element: Risk management and implementation

Objective:

Reduce risk to and maintain risk at an acceptable level in the IACS based upon the organization's tolerance for risk.

Description:

Risk management and implementation addresses the selection, development and implementation of countermeasures that are commensurate with risks. The countermeasures may take into account the use of products with strong inherent security capabilities, manual and procedural security controls and technology based controls to prevent or reduce security incidents.

Rationale:

The risk management and implementation element is used to turn the results from the risk identification classification and assessment element of this standard into effective and concrete actions. Although it can never be eliminated totally, risk can be managed in a manner that balances the cost of risk avoidance against the potential cost of the incident.

Requirements:

Table 14 - Risk management and implementation: Requirements

	Description	Requirement
4.3.4.2.1	Manage IACS risk on an ongoing basis	The organization shall adopt a risk management framework that includes selection and implementation of IACS devices and countermeasures to manage risk to an acceptable level over the life of the facility.
4.3.4.2.2	Employ a common set of countermeasures	A common defined set of countermeasures (technical and administrative) to address both physical and cyber security risks should be defined and applied across the organization wherever a specific risk is identified.

4.3.4.3 Element: System development and maintenance

Objective:

Ensure that the organization's desired risk tolerance level is maintained as its IACS assets evolve through the maintenance of existing systems as well as development and procurement of new systems.

Description:

This element addresses designing cyber security into systems from the earliest development stages. It also involves the maintenance of those cyber security policies and procedures as the system changes throughout its lifecycle.

Rationale:

Organizations have found that maintenance of the CSMS is more challenging than establishing it. For this reason, procedures that proactively address cyber security as part of the natural evolution of the IACS systems are critical.

Table 15 – System development and maintenance: Requirements

Description		Requirement
4.3.4.3.1	Define and test security functions and capabilities	The security functions and capabilities of each new component of the IACS shall be defined up front, developed or achieved via procurement, and tested together with other components so that the entire system meets the desired security profile.
4.3.4.3.2	Develop and implement a change management system	A change management system for the IACS environment shall be developed and implemented. The change management process shall follow separation of duty principles to avoid conflicts of interest.
4.3.4.3.3	Assess all the risks of changing the IACS	Using clearly defined criteria, proposed changes to IACS shall be reviewed for their potential impact to HSE risks and cyber security risks by individuals technically knowledgeable about the industrial operation and the IACS system.
4.3.4.3.4	Require security policies for system development or maintenance changes	The security requirements of a new system being installed in the IACS environment in an existing zone shall meet the security policies and procedures required for that zone/environment. Similarly, maintenance upgrades or changes shall meet the security requirements for the zone.

	Description	Requirement
4.3.4.3.5	Integrate cyber security and process safety management (PSM) change management procedures	Cyber security change management procedures should be integrated with existing PSM procedures.
4.3.4.3.6	Review and maintain policies and procedures	The operations and change management policies and procedures shall be reviewed and kept current to ensure that security changes do not increase risks to safety or business continuity.
4.3.4.3.7	Establish and document a patch management procedure	A procedure for patch management shall be established, documented, and followed.
4.3.4.3.8	Establish and document antivirus/malware management procedure	A procedure for antivirus/malware management shall be established, documented, and followed.
4.3.4.3.9	Establish backup and restoration procedure	A procedure for backing up and restoring computer systems and protecting backup copies shall be established, used, and verified by appropriate testing.

4.3.4.4 Element: Information and document management

Objective:

Classify, manage, safeguard and present the information associated with the IACS and CSMS at the appropriate time to authorized personnel.

Description:

Organizations should employ comprehensive information and document management policies for information assets within the scope of their IACS and CSMS. Care should be given to protect this information and verify that the appropriate versions are retained. Information classification systems that allow information assets to receive the appropriate level of protection are the key to meeting this objective.

Rationale:

Much of the information about the IACS may be stored electronically or in hardcopy outside the IACS and is not protected by IACS authorization controls. Unauthorized access and use of this information is a threat to IACS security. This information needs to be appropriately controlled and managed.

Table 16 – Information and document management: Requirements

	Description	Requirement
4.3.4.4.1	Develop lifecycle management processes for IACS information	A lifecycle document management process shall be developed and maintained for IACS information.
4.3.4.4.2	Define information classification levels	Information classification levels (for example, company confidential, restricted and public) shall be defined for access and control, including sharing, copying, transmitting, and distributing appropriate for the level of protection required.

	Description	Requirement	
4.3.4.4.3	Classify all CSMS information assets	All logical assets within the scope of the CSMS (that is, control system design information, vulnerability assessments, network diagrams and industrial operations programs) shall be classified to indicate the protection required commensurate with the consequence of its unauthorized disclosure or modification.	
4.3.4.4.4	Ensure appropriate records control	Policies and procedures should be developed detailing retention, physical and integrity protection, destruction, and disposal of all assets based on their classification, including written and electronic records, equipment and other media containing information, with consideration for legal or regulatory requirements.	
4.3.4.4.5	Ensure long-term records retrieval	Appropriate measures should be employed to ensure long-term records can be retrieved (that is, converting the data to a newer format or retaining older equipment that can read the data).	
4.3.4.4.6	Maintain information classifications	Information that requires special control or handling should be reviewed on a periodic basis to validate that special handling is still required.	
4.3.4.4.7	Audit the information and document management process	Periodic reviews of compliance to the information and document management policy should be performed.	

4.3.4.5 Element: Incident planning and response

Objective:

Predefine how the organization will detect and react to cyber security incidents.

Description:

When developing a program for incident planning and response, it is important to include all systems in scope and not just limit the effort to traditional computer room facilities. Part of the incident response plan should include procedures for how the organization will respond to incidents, including notification and documentation methods, investigations, recoveries and subsequent follow-up practices.

Rationale:

Identifying an incident early and responding appropriately can limit the consequences of the event. Incident planning and response provides the organization the opportunity to plan for security incidents and then to respond according to the established company practices. No matter how much care is taken in protecting a system, it is always possible that unwanted intrusions might compromise the system. Technology vulnerabilities continue to exist and external threats are increasing in number and sophistication, therefore requiring a robust strategy for determining the appropriate planning and response. Insight gained from actual incidents is captured because it is critical for evaluating and improving the CSMS.

Table 17 - Incident planning and response: Requirements

	Description	Requirement
4.3.4.5.1	Implement an incident response plan	The organization shall implement an incident response plan that identifies responsible personnel and defines actions to be performed by designated individuals.

	Description	Requirement	
4.3.4.5.2	Communicate the incident response plan	The incident response plan shall be communicated to all appropriate organizations.	
4.3.4.5.3	Establish a reporting procedure for unusual activities and events	The organization should establish a reporting procedure to communicate unusual activities and events that may actually be cyber security incidents.	
4.3.4.5.4	Educate employees on reporting cyber security incidents	Employees should be educated on their responsibility to report cyber security incidents and the methods of reporting these incidents.	
4.3.4.5.5	Report cyber security incidents in a timely manner	The organization should report cyber security incidents in a timely manner.	
4.3.4.5.6	Identify and respond to incidents	If an incident is identified, the organization shall promptly respond in accordance with the established procedures.	
4.3.4.5.7	Identify failed and successful cyber security breaches	The organization should have procedures in place to identify failed and successful cyber security breaches.	
4.3.4.5.8	Document the details of incidents	The details of an identified incident shall be documented to record the incident, the response, the lessons learned, and any actions taken to modify the CSMS in light of this incident.	
4.3.4.5.9	Communicate the incident details	The documented details of an incident shall be communicated to all appropriate organizations (that is, management, IT, process safety, automation and control engineering security and manufacturing) in a timely manner.	
4.3.4.5.10	Address and correct issues discovered	The organization shall have a business methodology in place to address issues discovered and ensure they are corrected.	
4.3.4.5.11	Conduct drills	Drills should be conducted to test the incident response program on a routine basis.	

4.4 Category: Monitoring and improving the CSMS

4.4.1 Description of category

The third main category of the CSMS is titled Monitoring and Improving the CSMS. It involves both ensuring that the CSMS is being used and also reviewing the CSMS itself for effectiveness. Figure 6 shows a graphical representation of the two elements in the category:

- Conformance and
- Review, improve and maintain the CSMS.



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Figure 6 - Graphical view of category: Monitoring and improving the CSMS

4.4.2 Element: Conformance

Objective:

Ensure that the CSMS developed for an organization is followed.

Description:

Conformance with a CSMS means the organization is adhering to its stated policies, executing the procedures at the correct time and producing the appropriate reports to allow for future review.

Rationale:

Irrespective of the quality of a CSMS, if it is not used, then it does not add any value to the organization and does not help reduce risk.

Requirements:

Table 18 - Conformance: Requirements

Description		Requirement	
4.4.2.1	Specify the methodology of the audit process	The audit program shall specify the methodology of the audit process.	
4.4.2.2	Conduct periodic IACS audits	Validate that the IACS conforms to the CSMS. The CSMS shall include periodic audits of the IACS, to validate that the security policies and procedures are performing as intended and meet the security objectives for the zone.	
4.4.2.3	Establish conformance metrics	The organization should define performance indicators and success criteria, which are used to monitor conformance to the CSMS. The results from each periodic audit should be expressed in the form of performance against these metrics to display security performance and security trends.	
4.4.2.4	Establish a document audit trail	A list of documents and reports required to establish an audit trail shall be developed.	
4.4.2.5	Define punitive measures for non-conformance	The organization shall state what non-conformance with the CSMS means, and any related punitive measures shall also be defined.	
4.4.2.6	Ensure auditors' competence	The required competency for auditing the specific systems that are in scope should be specified. The level of independence required should be determined as part of the governance.	

4.4.3 Element: Review, improve and maintain the CSMS

Objective:

Ensure that the CSMS continues to meet its goals over time.

Description:

Reviewing, improving and maintaining the CSMS establishes a continuing oversight of the CSMS to check that it functions effectively and to manage required changes to the CSMS over time.

Rationale:

Review and monitoring are required for the CSMS to remain effective, since the CSMS shall respond to changes in internal and external threats, vulnerabilities and consequences, as well as changes in risk tolerance, legal requirements and evolving technical and non-technical approaches to risk mitigation.

Table 19 - Review, improve and maintain the CSMS: Requirements

	Description	Requirement
4.4.3.1	Assign an organization to manage and implement changes to the CSMS	An organization shall be assigned to manage and coordinate the refinement and implementation of the CSMS changes and use a defined method in making and implementing changes.
4.4.3.2	Evaluate the CSMS periodically	The managing organization shall periodically evaluate the overall CSMS to ensure the security objectives are being met.
4.4.3.3	Establish triggers to evaluate CSMS	The organization should establish a list of triggers with set thresholds, which would result in a review of related elements of the CSMS and perhaps a change. These triggers include at a minimum: occurrence of serious security incidents, legal and regulatory changes, changes in risk and major changes to the IACS. The thresholds should be based on the organization's risk tolerance.
4.4.3.4	Identify and implement corrective and preventive actions	The organization shall identify and implement appropriate corrective and preventive actions that modify the CSMS to meet security objectives.
4.4.3.5	Review risk tolerance	A review of the organization's tolerance for risk should be initiated when there are major changes to the organization, technology, business objectives, internal business and external events including identified threats and changes in social climate.
4.4.3.6	Monitor and evaluate industry CSMS strategies	Management system owners should monitor the industry for CSMS best practices for risk assessment and risk mitigation and evaluate their applicability.
4.4.3.7	Monitor and evaluate applicable legislation relevant to cyber security	The organization shall identify applicable and changing legislation relevant to cyber security.
4.4.3.8	Request and report employee feedback on security suggestions	Employee feedback on security suggestions should be actively sought and reported back to senior management as appropriate on performance shortcomings and opportunities.