

## Continuous Auditing-based Certification

Training & Awareness Slide Set





### Trust in Cloud by Certification The European Security Certification Framework (EU-SEC)



EU-SEC aims to create a framework under which existing certification and assurance approaches can co-exist. It has a goal to improve the business value, effectiveness and efficiency of existing cloud security certification schemes.

- Multiparty Recognition Framework (MPRF) for cloud security certifications,
- Continuous Auditing-based Certification (CAC)
- Privacy Code of Conduct (PLA CoC), and



### Project Set Up and Partners

### A successful cooperation under the hood of a common project



Funded by **EU Horizon 2020**, a funding programme created by the European Union to support and foster research in the European Research Area

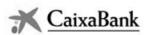
**9 Partners** (including CSPs, Cloud Users, Auditors, Scheme Owners and Researchers)

**Duration**: January 2017 - December 2019

Web: <a href="https://www.sec-cert.eu/">https://www.sec-cert.eu/</a>

**Contact:** <u>contact@sec-cert.eu</u>

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### **EU-SEC Objectives**

### Increasing trust, efficiency and sustainability



- Increase user trust in Cloud Service Providers by
  - defining principles, rules and processes for mutual recognition between different certification schemes indicating security and privacy level.
  - defining an approach for higher frequency security audits for high security applications
- Support EU-SEC's long term sustainability by initiating the process for the trans-European adoption of the EU-SEC framework and of the format used to express security requirements, controls and audit results.



### **EU-SEC Achievements**

### Applicability, flexibility and tool support



- **Cross-industry applicability** of the EU-SEC framework.
- High level of security and privacy assurance and control while the CSP enhances the Cloud Service, continuously.
- Consolidated framework which can be adapted to new technical, compliance and market requirements, easily and promptly.
- Flexible and functional architecture and tools for cloud security governance, risks management and compliance.



### **EU-SEC Activities**

### Define, evaluate, improve and maintain the framework



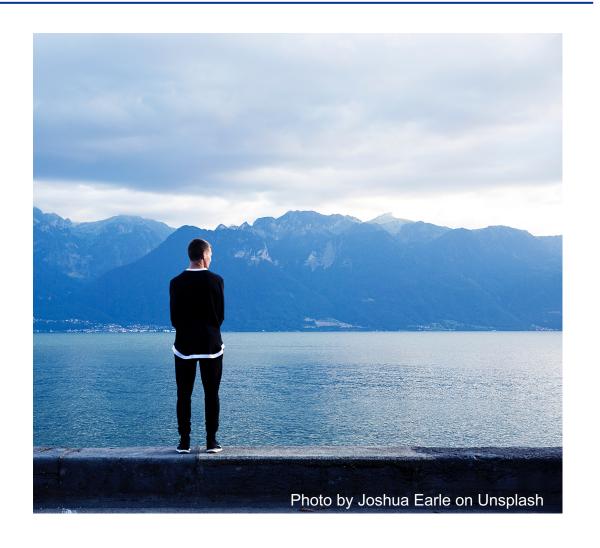
- Collect and maintain security and privacy requirements relevant to the public and private sector.
- Define the continuous auditing and certification framework and enable it for mutual recognition of existing certification and assurance approaches.
- Develop a governance structure to support trans-European EU-SEC framework adoption.
   Provide architecture and adapt existing tools to facilitate continuous auditing and control of security and privacy level service.
- Validate the framework with pilot use cases executed by public and private sector partners to ensure its effectiveness, efficiency and market readiness in large-scale demonstrators.
- Strengthen the value proposition, market uptake and long-term sustainability of EU-SEC framework through commercial exploitation, influencing other standardization initiatives and performing strategic awareness and training activities.

### **EU-SEC Business Drivers**

### Value Proposition for Cloud Service Providers, Auditors and Users



- Saving money: MPRF reduces compliance costs
- Increased efficiency: MPRF streamlines the compliance approach
- Improved security: CACs reduces security risks (higher audit frequency, less auditors approaching your data)
- Transparency and clarity: One standard of reference to enable comparison and integration between many different ones
- Up to date with most recent legislation: EU-SEC addresses the needs of the EU-Cyber Security Act





### EU-SEC Public Materials Information portal at www.wec-cert.eu







· Certification and evaluation activities that can be handled automatically by machines (e.g. collecting

- Deliverables
- Slide Decks
- Whitepapers
- Articles
- News
- Workshops



Workshop & Tutorial on Multi-Party Recognition in Berlin on 9th October 2019! Date: Wed., Oct. 09, 2019 Location: Berlin, Germnay



Workshop & Tutorial on Continuous Auditing Based Certification on 8th October! Date: Tue., Oct. 08, 2019 Location: Berlin, Germany



Workshop on Multi-Party Recognition on 13 May 2019!

Date: Mon., May 13, 2019

Location: Amsterdam, Netherlands



Workshop on Continuous Auditing Based Certification Date: Tue., Apr. 09, 2019 Location: Barcelona









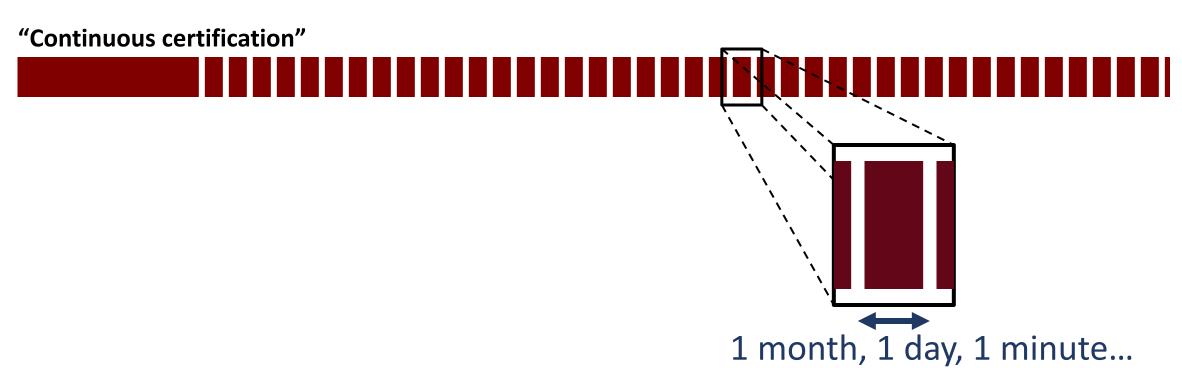
# Introduction to the Continuous Auditing Based Certification scheme for Cloud Services

Alain Pannetrat (CSA)

### EU-SEC introduces: continuous audit-based certification







### "Traditional" vs. "Continuous"



"Traditional" certification

"continuous" audit-based certification

Control objectives

Security Attributes

**Metrics** 

Service Level
Objective
&
Service
Qualitative
Objective

Manual evaluation

Automated evaluation

### A requirement: automate as much as possible



Traditional certification evaluates "control objectives", continuous certification targets "service level objectives" or "service qualitative objective", which can be assessed automatically more easily.

#### **CONTROL OBJECTIVES**

"Business continuity plans shall be documented and tested regularly"

### **SECURITY ATTRIBUTES**

- Percentage of backup restoration tests per month
- Percentage of backup restoration failures per month
- Maximum recovery time
- Recovery point actual (RPA)

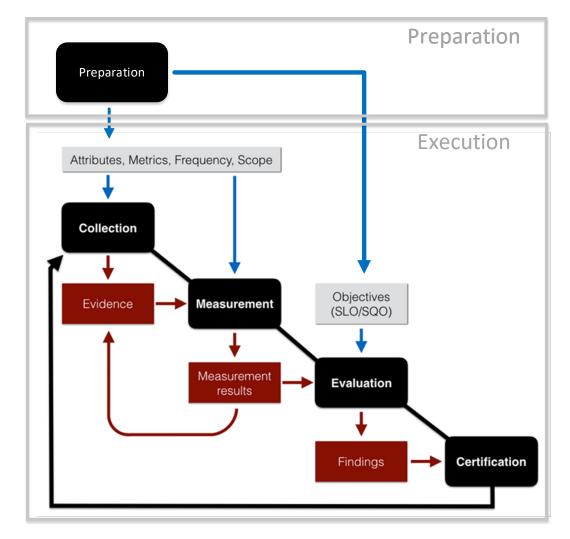
Check: Monthly, daily, hourly...



### Continuous Auditing-based Certification Methodology – phases



- **1. Preparation**: mainly devoted to the operationalisation of the controls
  - This initial setup is performed once
  - SLO's and SQO's are defined to describe controls
  - The output are: scope, SLO/SQO and frequency of assessment.
- **2. Collection**: devoted to the collection of evidence
- **3. Measurement**: the metrics are applied to the collected evidence.
- **4. Evaluation**: it checks if an objective is fulfilled.
- Certification: according to the result of theevaluation, a certificate is granted or not.







### **Continuous Certification**

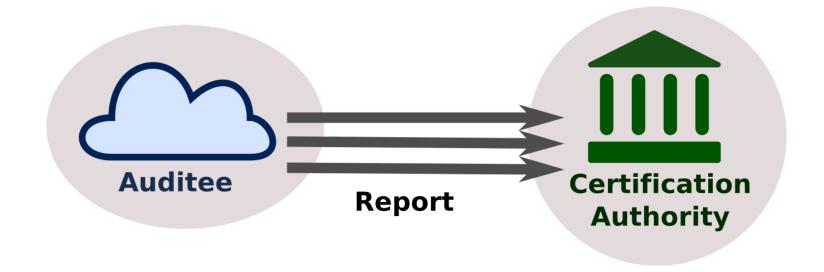
Extended Certification with Continuous Self-assessment

Continuous Self-assessment

# Assurance

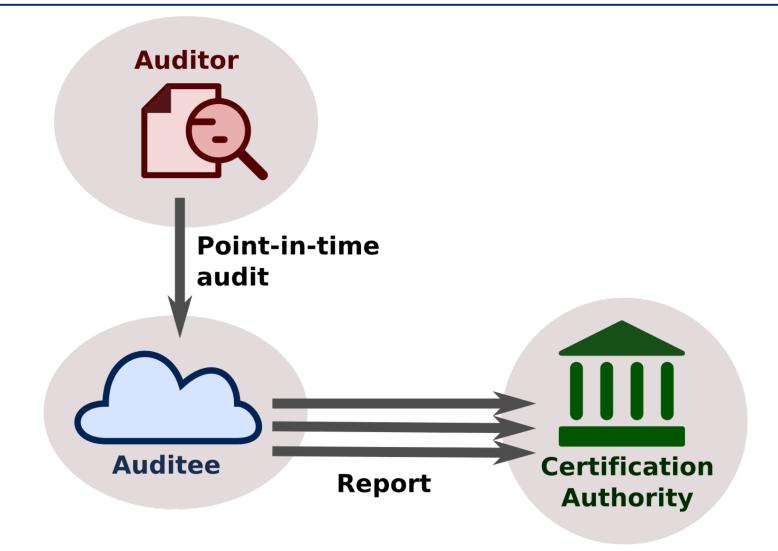
### Level 1: Continuous self-assessment





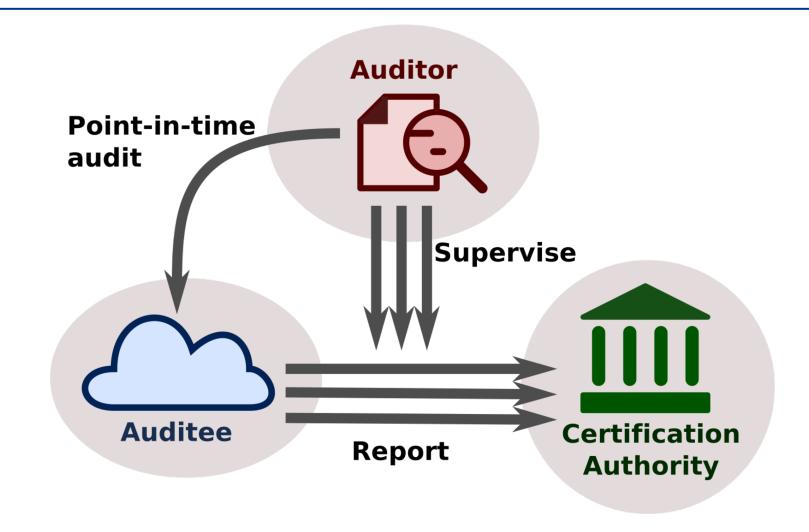
### Level 2: Extended certification with continuous self-assessment





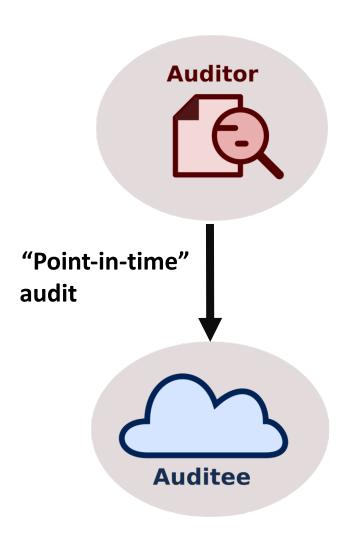
### Level 3: Continuous certification





### Continuous certification: preparation



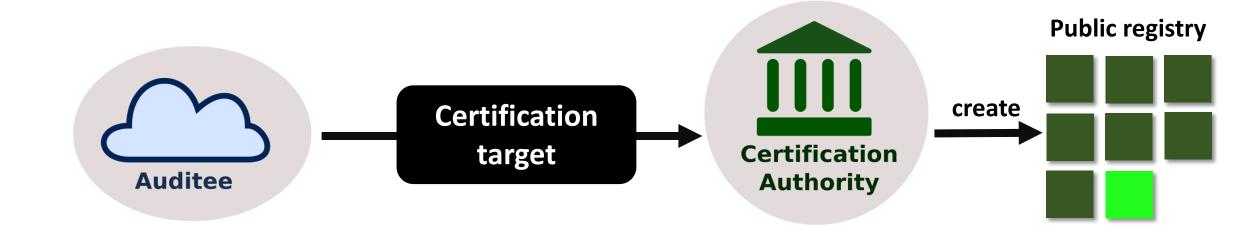


### **Output:**

- A traditional certificate
- A continuous certification target
  - Scope
  - SLO & SQO
  - Frequencies of assessment
- Audit tool validation

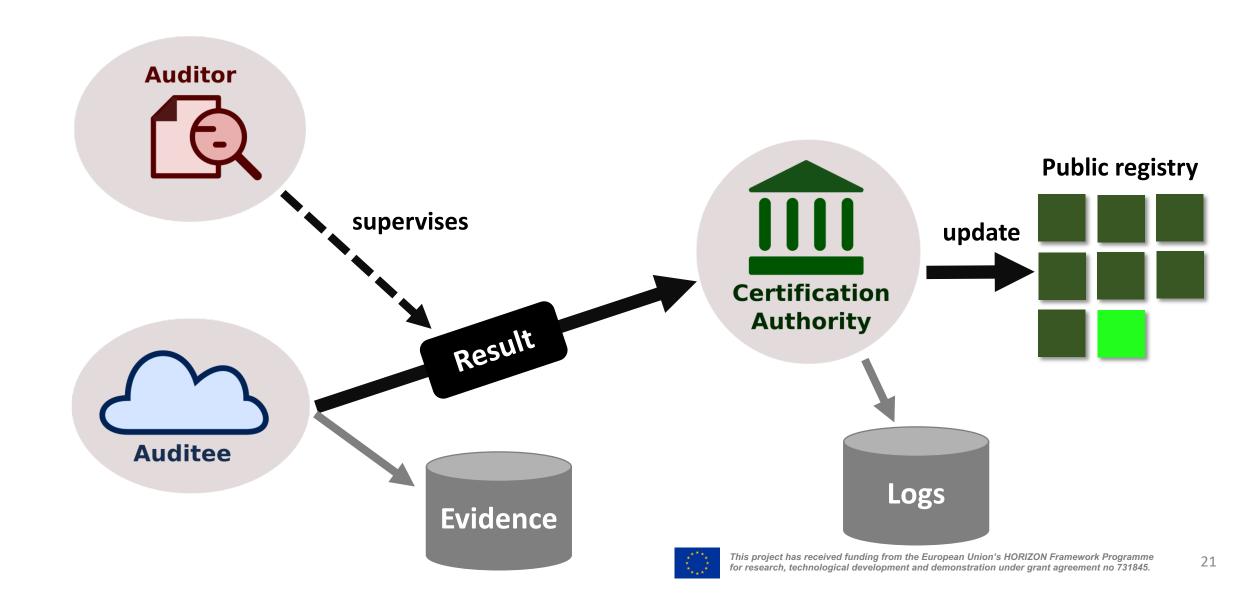
### Continuous certification: initialization





### Continuous certification: continuous assessment







## The EU-SEC Continuous Auditing Based Certification pilot

Ramon Martín de Pozuelo (CAIXABANK)



### Description of the Pilot Introduction



Trusted information sharing

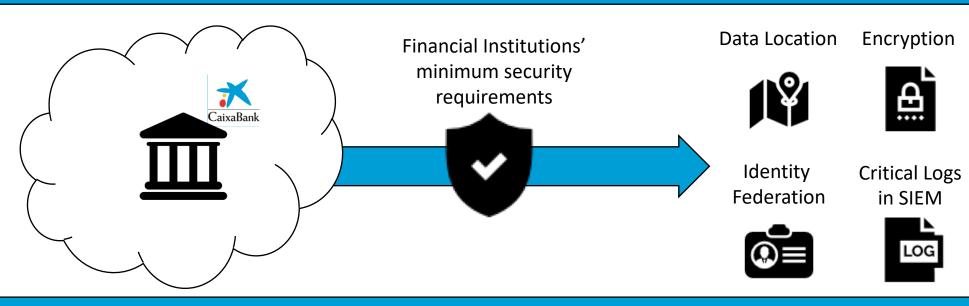
Financial institutions need to report sensible information to the regulators in a reliable and trusted way.



Collaboration

In some cases, this exchange of information can involve multiple entities and organisations.

Industrial gap motivation: Lack of a continuous auditing service that verifies that the cloud provider running the information sharing service actually complies with Financial Institutions' requirements.



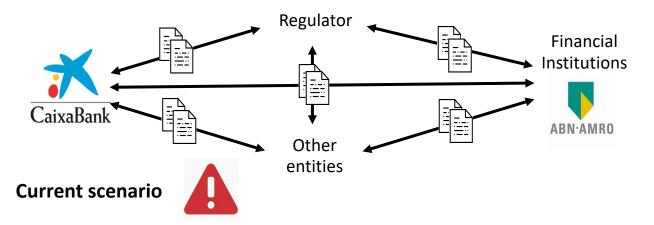
Goal: Continuous auditing of security requirements in a Financial Information SHaring (FISH) application with EU-SEC platform.

### Description of the Pilot Introduction



#### **Current scenario and problem statement**:

- Regulatory entities require banks to share information.
- Regulators may ask CaixaBank for confidential information of accounts:
  - **Incident reporting** with information of mule accounts for fraud and money laundering, terrorism, etc.
  - Periodic reports about security and privacy projects and procedures.
- Information is shared across groups of regulators/banks:
  - A simple repository hosted by a bank cannot be trusted by others.
- This may lead to bad practices and/or onerous document management:
  - Report sensitive information via mail, physical sharing of information,...



FISH: Neutral European service used by both financial entities and regulators.

#### Pilot 2 different approaches:

- Custom-tailored FISH over commercial cloud provider (laaS).
- Fabasoft as a cloud platform for information sharing (SaaS).



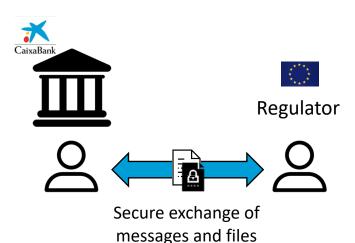


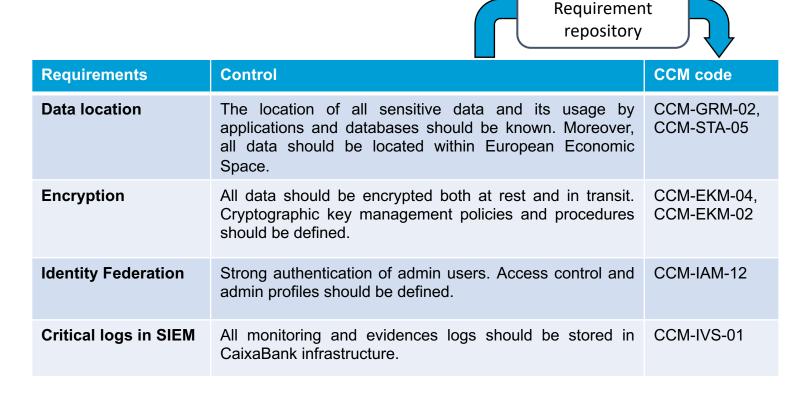
### **Description of the Pilot**Definition



**EU-SEC** 



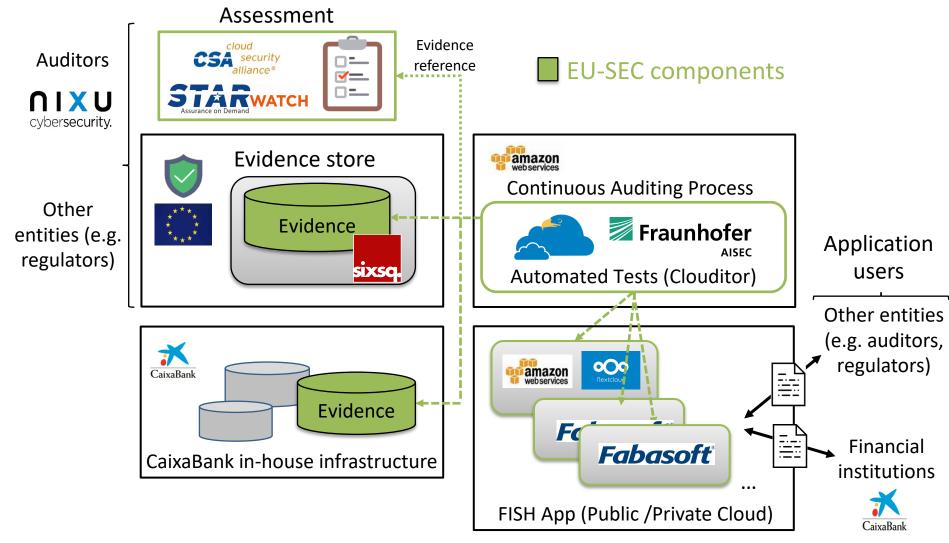




### Description of the Pilot

### Architecture





### Description of the Pilot

### Continuous Auditing API and pilot approaches



#### **Continuous Audit API**

CaApiDataLocation

GET /{scope}/datalocation/{objectId}/storage/

CaApiEncryption

GET /{scope}/encryption/{objectId}/

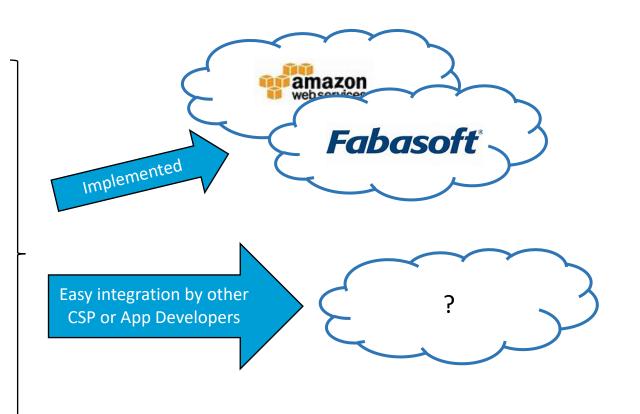
CaApilam

GET /{scope}/identityfederation/admins/ POST /{scope}/identityfederation/data/access GET /{scope}/identityfederation/{userId}/logins GET /{scope}/identityfederation/{userId}/auth GET /{scope}/identityfederation/{userId}/groups

CaApiScope

GET /scope/

...



### Continuous Auditing Technical Architecture Use case specification

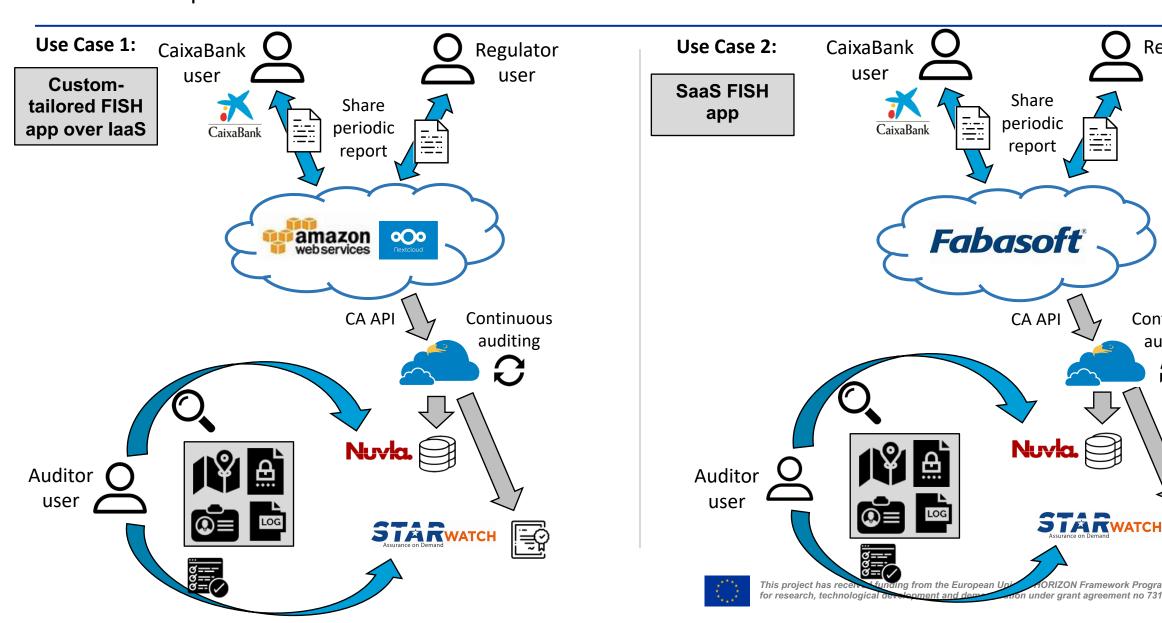


Regulator

user

Continuous

auditing



### Continuous Auditing-based Certification Pilot Conclusions



- All tools are correctly integrated and work as expected.
- Enabled a continuous audit of 15 SLO/SQOs.
- The pilot was demoed multiple times to various stakeholder, testing both success and failures for each SLO/SQO.
- The pilot shows that the tools adequate for the task.
  - The tools were reviewed and concluded that they are adequate for the purpose of the pilot.
  - External stakeholders were also able to use the tools and see how they reported compliance in real-time.
- Internal and external stakeholders were able to witness the practicality of continuous audit-based certification.
  - The feedback provided by internal stakeholders and the External Advisory Board is generally positive.

### Continuous Auditing-based Certification Pilot Conclusions



- First step towards the Continuous Auditing based Certification.
  - Framework & governance model defined.
  - · Reference architecture and modules implemented and deployed.
  - FISH use case tested within EU-SEC partners and external stakeholders.



Flexibility to define the audit controls and the way to store evidence records.



- It does not completely substitute point-in-time auditing.
- Still needs some trust on the CSP and the contract with the customer.



### Continuous Auditing-based Certification Pilot Conclusions



### Value proposition & benefits:

#### **Different actors and perspectives**

#### **Certification Authority**



**Assurance and transparency** 

**Continuous certification framework** 

Methodology

Implementation guidance

- Free material
- Paid training

**Public registry of excellence** 

#### **Auditor**



Computer-assisted, automated auditing

Increase productivity

**Extend the auditing services** 

Guidance

Support

Training

#### **Cloud Service Provider**



Real-time & automated security control checking

Save money (on the long run)

Competitive advantage from "big players"

#### **Proof of Trustworthiness**

Quality / Professionalism label Easier cooperation / partnerships **Cloud Customer** 



Certification

Compliance to regulators

**Easier Cloud Service adoption** 

**Cost reduction** 

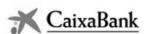
**Demonstrate trustworthiness** to own customers



### Continuous Auditing-based Certification Pilot Strong partners allow for commercial kick off



- CSA: Long term provision and maintenance of the Continuous Auditing-based Certification scheme
- NIXU, PWC: Provision of consultancy and audit services dedicated to Continuous Auditing-based Certification
- Fraunhofer, SIXSQ and CSA: Provision of tool to drive the operationalization
  - StarRegistry: Mean to publish and maintain Certificates from Continuous Auditing-based Certifications.
  - Clouditor: Cloud Compliance Tool to automatically check the compliance status of a cloud service.
  - Nuvla: Portal for the management and analysis of evidence records, both for supporting the continuous auditing process and for rapid visual assessment of compliance.
  - Continuous Auditing API: Standardized access to Cloud Service Provider security controls information
- Fabasoft, CAIXA: Initial adopters of the Continuous Auditing-based Certification

















### Continuous Auditing-based Certification Pilot References



#### Deliverables

- EU-SEC D2.2 Continuous Auditing Certification Scheme
- EU-SEC D5.1 Pilot Definition
- EU-SEC D5.2 Pilot Implementation and Testing of Continuous Auditing
- EU-SEC D5.3 Analysis of Pilot Results

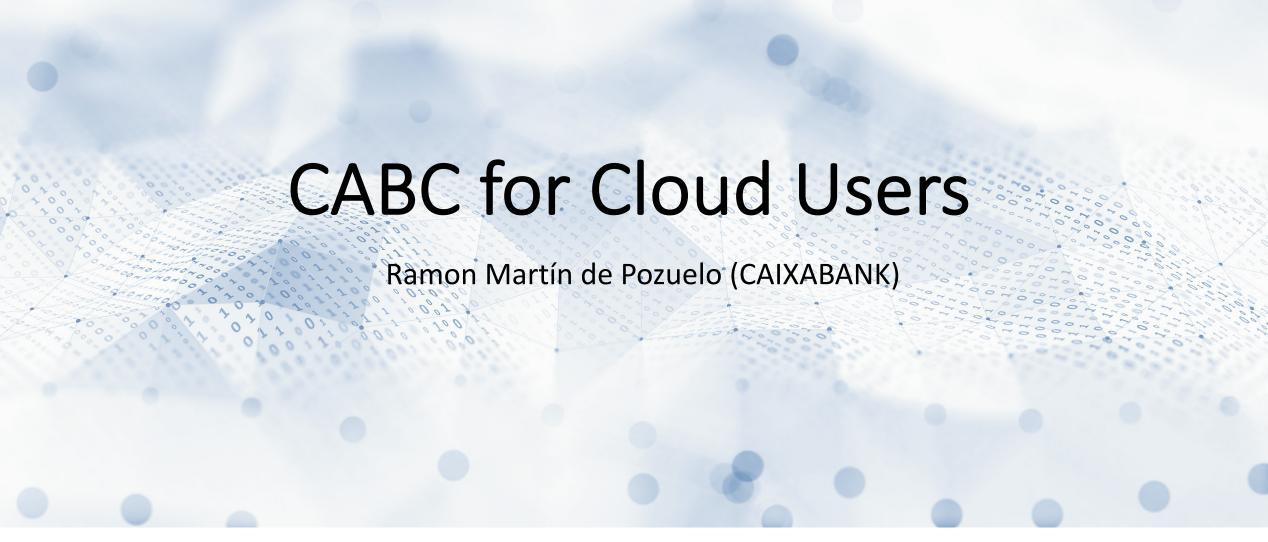
### White Paper

Continuous Auditing based Certification white paper

### Scientific Papers

- Continuous Location Validation of Cloud Service Components
- A Process Model to Support Continuous Certification of Cloud Services
- Towards Continuous Security Certification of SaaS Applications Using Web Application Testing Techniques
- Evaluating the Performance of Continuous Test-based Cloud Service Certification





### **CABC** for Cloud Users



- Cloud users should be the main promoters of CABC
  - Do all cloud users need CABC?
  - Customers of sectors that deal with sensitive critical information (Financial, Health, Public Adm., etc.)



- Certification and compliance
  - Demonstrating cloud security control enhancement to regulators.
  - · Aligned with CSP CERT WG recommendations for the implementation of the CSP certification scheme.



- Security as a business value
  - Demonstrate trustworthiness to own customers



- Easier Cloud Service adoption
  - Access to real-time assurance of CSPs
  - Streamline the CSP validation
  - Cost reduction

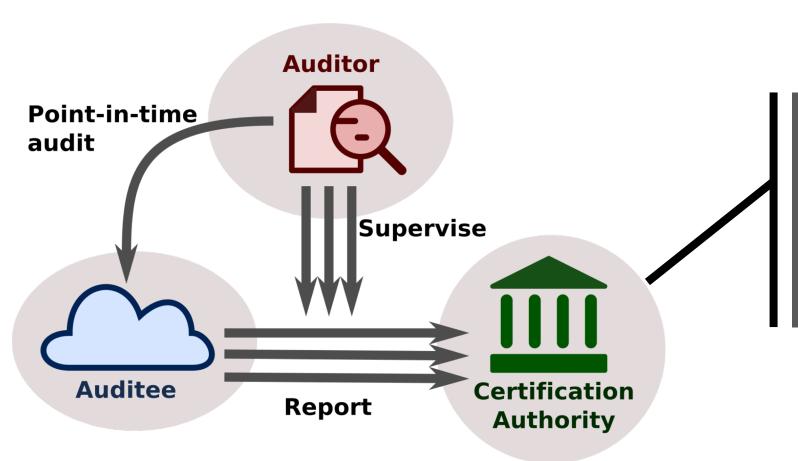




# CABC for Certification Authorities

Alain Pannetrat (CSA)





- Accreditation of CBs
- Certification registry
- Complaints
- Standardisation

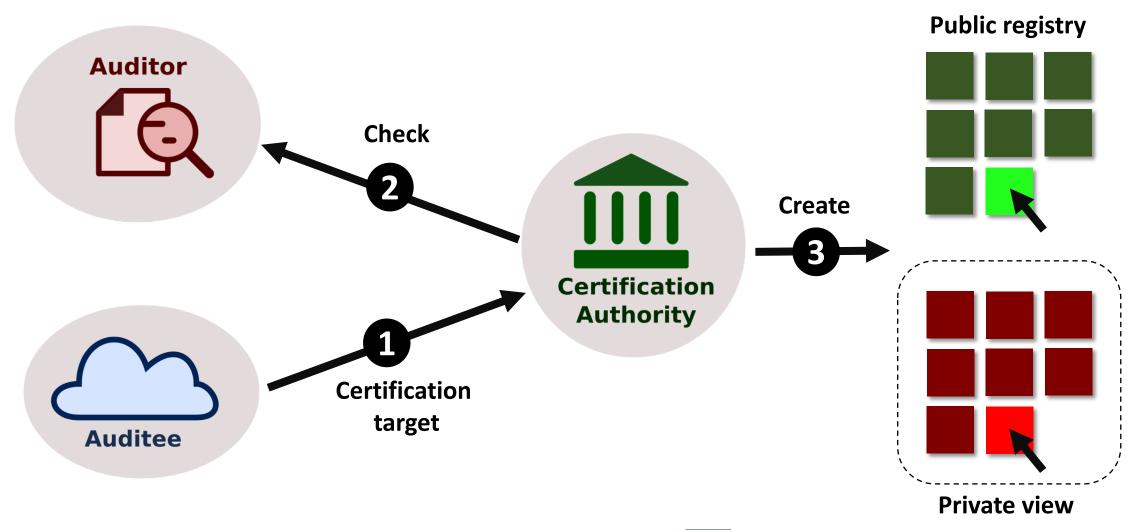
#### Accreditation of certification bodies



- Auditors will need extended skills
  - Tool validation
  - Monitoring
- CA to maintain a public registry will list accredited certification bodies.

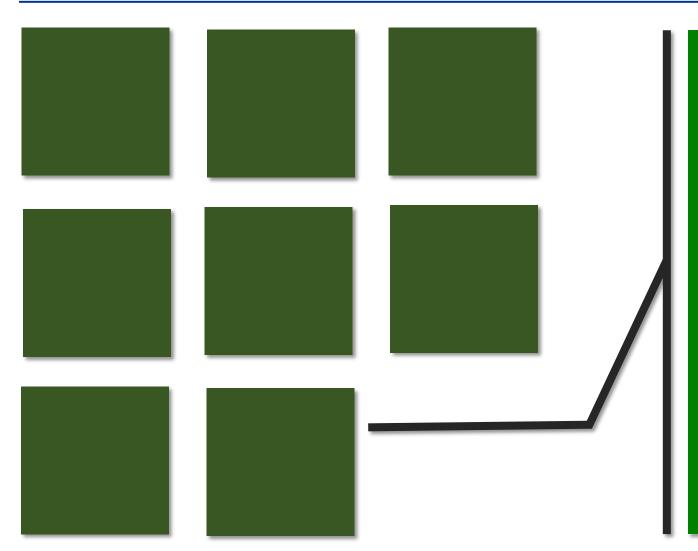
#### Certification registry: initialization





## Public registry



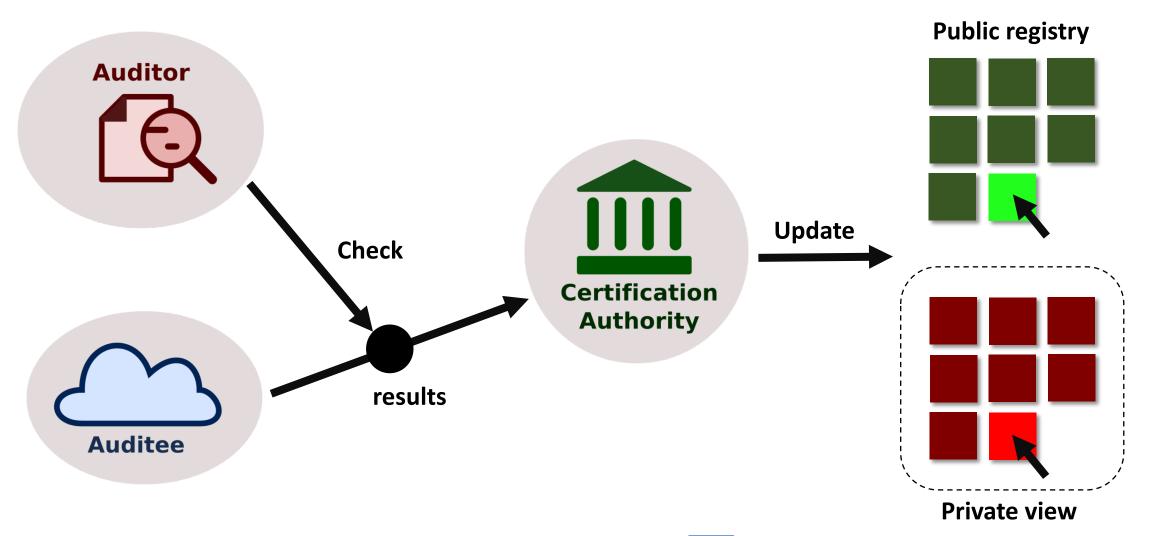


- Identity of CSP and scope
- The start and end date
- The last verification date
- The state of the assessment:
  - Pending
  - Ended
  - Running/Valid



#### Certification registry: updates





# Public registry: temporary non-compliance

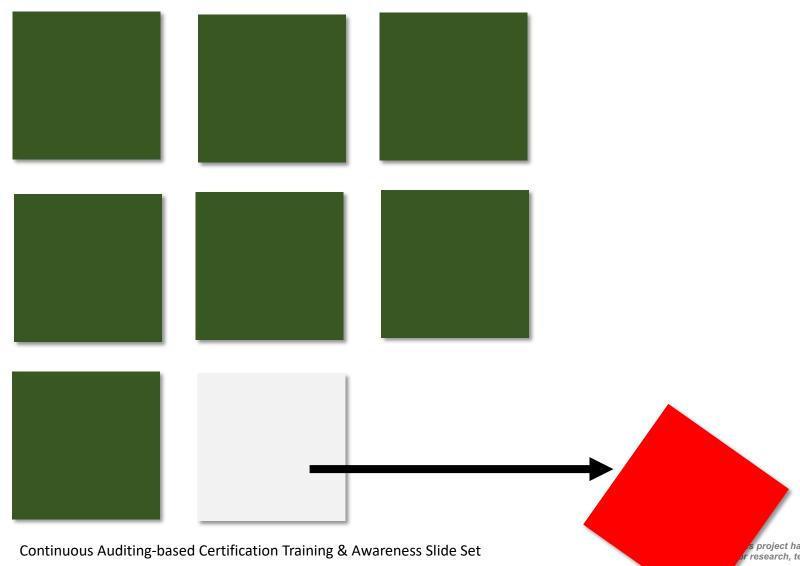




- Verification date < now</li>
- The state of the assessment:
  - Running/Valid

# Public registry: revoked certificates are removed





#### Complaints & Standardization



- Possible complaints
  - Non-compliance detected by end-users
  - Unfair revocation

- Standardization and best practices
  - Measuring security
  - A catalogue of industry-agreed security and privacy attributes/metrics.

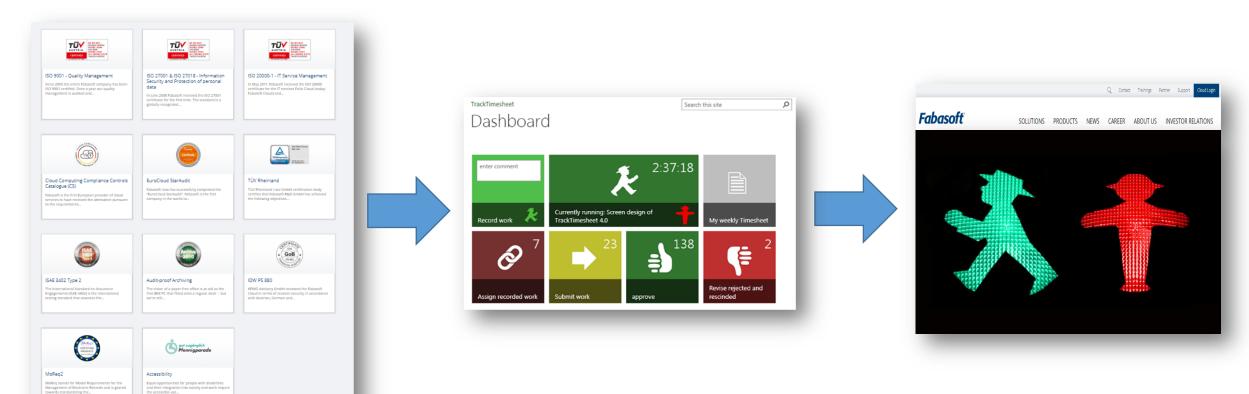




## The "Why?"



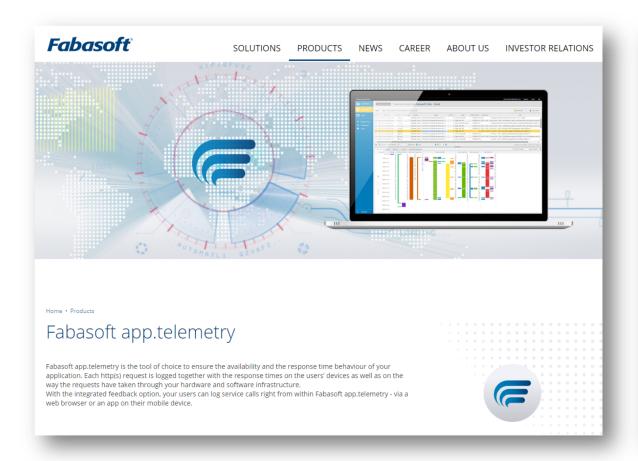
 Our goal of approaching CABC is to enhance the overall visibility of the organization and its security measurements / precautions as well as the effective use of technology

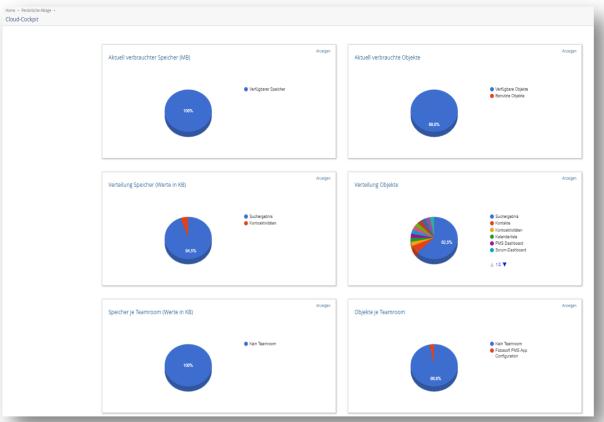


# "Under the Hood"



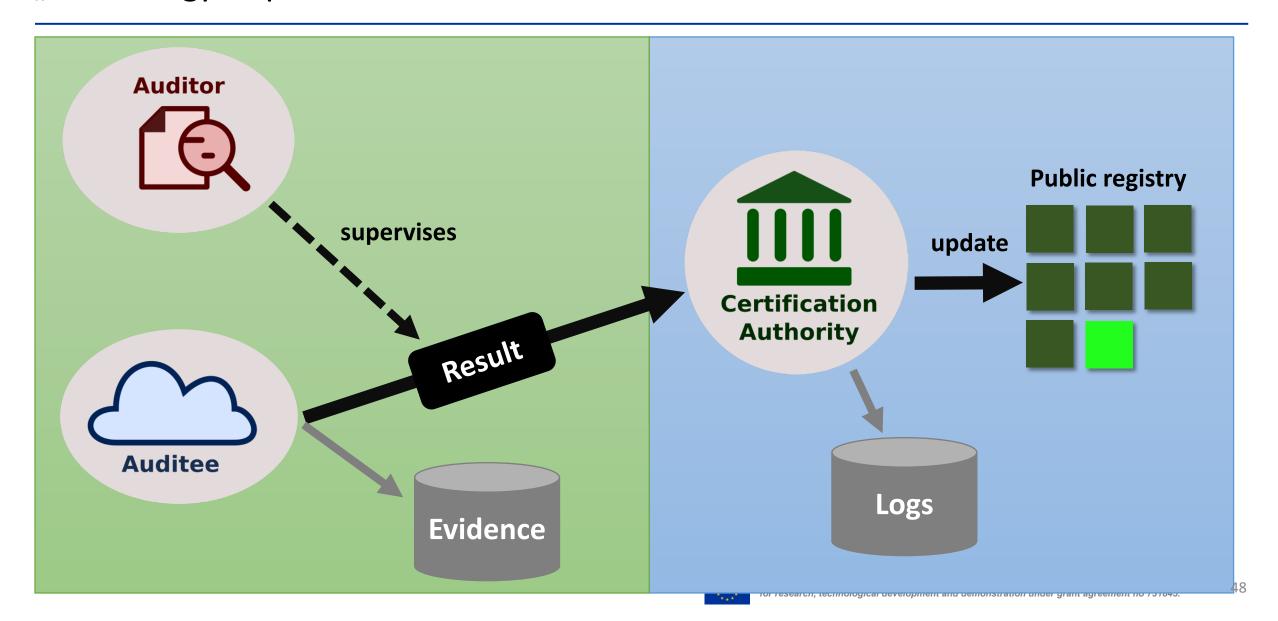
• A key element is to understand the technical implementation for a set of requirements





# "Technology Gap"





#### The "How?"



- With our own controls, we can derive a formalization for certain sets of requirements
  - in line with the proof of concept, provided by the EU-SEC Framework
- We can then decide on continuously monitored evidence collection and connect to tools like "Clouditor"
- Resulting in:
  - Greater audit efficiency and effectiveness
  - A long-term reduction of complexity
  - Enhanced internal controls and improved performance
  - More timely information to expedite response and reduce cost
  - Greater transparency for us and our customers



# CABC for Technology Providers

Christian Banse (FRAUNHOFER AISEC)

# Continuous Auditing Based Certification for Technology Providers



- Tools that support Continuous Auditing are the glue between Service Providers and Auditors
- Tools need to potentially address different stake holders
  - Auditors
  - Security Officers
  - Internal Compliance Officers
- Tools need to interface with different components in the certification scenario
  - Service Providers (to audit)
  - Storage / Databases / Evidence systems (to store and possibly retrieve digital evidences)
  - Certification Bodies / Scheme holders (to update the compliance status)

#### Continuous Auditing Based Certification for Technology Providers



- The world of service providers is constantly evolving and growing
  - EU-SEC efforts to harmonize and standardize interfaces to retrieve auditing information from Cloud services (<a href="https://github.com/eu-sec/continuous-auditing-api-spec">https://github.com/eu-sec/continuous-auditing-api-spec</a>)
  - Deliverable 3.5 offers a standardized format for the transmission of compliance status to certification bodies (currently implemented in CSA StarWatch)
- Clouditor as reference implementation for a continuous auditing tool
  - Community edition Available as Open Source implementation from Fraunhofer AISEC on GitHub
  - https://github.com/clouditor/clouditor





#### CABC - What's the interest for auditors?



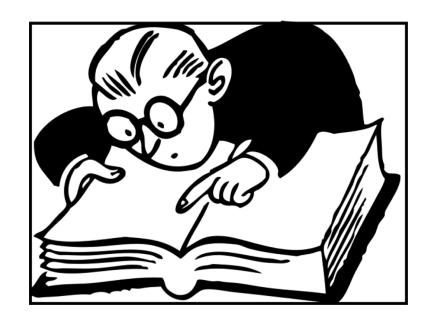
- Traditional approach has its limitations
  - Audits are project-like point-in-time audits
  - Passive monitoring
    - Auditee's notification of significant change
    - Complaints
    - Special audits
  - Period of uncertainty between audits
- Continuous auditing as a solution for better assurance
  - From passive to active monitoring
    - Ability to actively conduct surveillance activities
    - Auditor is less dependent of information from external sources
  - Frequency of checks is shorter for automated controls
    - Control is in place with higher probability in next audits as well



#### CABC — Point-in-time audits



- Traditional audits still play a key role
  - Possibility to have a more in-depth analysis of the environment
    - Automated controls follow a predefined ruleset to collect and analyze evidence
    - Point-in-time audits allow to have a closer look into security controls if needed
  - Some controls require human intervention
    - Written security policies, physical security etc.
  - Multiple channels of verification
    - Automated controls can use multiple channels of verification
    - Humans can be more creative (observation, document review, interview, technical tests etc.)
  - Certification life-cycle needs to be followed
    - Yearly surveillance/recertification audits are necessary to maintain certification



#### Continuous audit monitoring



#### Auditor has the responsibility for continuous monitoring and status of certification

- The auditor is provided with access to the monitoring tools
  - ability to verify the monitoring tools' evaluation results as well as the configuration of the monitoring tools
- Trust towards the monitoring tools is required
  - Quality definition of SLO's and SQO's is essential to ensure that right things are monitored
    - Link between security controls and the evidence collection results must be trustworthy
  - Evaluation of tool configuration
  - Evaluation of measurement processes to ensure evidence suitability
    - · Right things are measured
    - Correct evidence is used
- Use of validated products is highly recommended as auditor's trust is required
  - If measurement results can't be trusted, a certificate can't be granted.

#### CABC - What's the interest for auditors?



#### New business opportunities

- CABC as a service is new
- Possibility to extend service portfolio from project assignments towards continuous services
- Competitive advantage



#### Conduct yearly surveillance/recertification audits with less effort

- Auditee preparation: continuous security instead of last-minute preparation
- Continuous auditing ensures less time spent on remediation activities
- Time & effort saved, audits finish on time





# Thank you for your attention!

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