

ONLINE TRUST COALITION MANIFESTO

connect to cloud



ONLINE TRUST
COALITION



Leidschendam, September 2020

More than twenty organisations from government, industry and science have united in the Online Trust Coalition. This coalition is an initiative of the Ministry of Economic Affairs and Climate and the public-private partnership project Partnering Trust¹.

The Online Trust Coalition notices that cloud and online services (hereafter: cloud services) are part of almost all digital innovations. Artificial Intelligence (AI) and the Internet of Things (IoT) are now booming precisely because of the availability in the cloud of storage, computing power and smart algorithms. Cloud services are essential to solve current challenges in society. Cloud services are therefore crucial in the ambitions set out in the Dutch Digitalisation Strategy².

The Online Trust Coalition notices that it is quite difficult for the customer and other parties concerned (think of consumers, citizens, financiers, shareholders, auditors and supervisors) to obtain certainty about the reliability of cloud services based on the accountability information given by providers. Cloud service providers face the challenge that stakeholders often request different kind of evidence to demonstrate that all legal and reliability requirements are met.

Such lack of certainty is an obstacle for the use of cloud services and thereby hampers innovation. It also creates an uneven playing field: it is difficult for smaller European providers and innovative newcomers to demonstrate their reliability, which may sometimes be prejudicial to their competitiveness compared to large, established parties.

Government, business and science work together in the Online Trust Coalition to change this. European developments reinforce the urgent need to cooperate. In February 2020, the European Commission announced a strategy for data and AI³, with cloud services as a core issue. Given the Dutch ambition to be a frontrunner in Europe in the field of digitisation, and given the fact that the Netherlands already has a strong position in this area, a proactive and intensive involvement in the implementation of this European strategy is obvious.

This manifesto discusses the purpose of the Online Trust Coalition, the participants, the basic principles and the issues that the coalition wants to tackle.

1 Partnering Trust is a public-private partnership program purporting to ensure that customers and other stakeholders of cloud services can easily ascertain the reliability of such cloud services. In recent years, Partnering Trust established European cooperation and developed and implemented solutions together with cloud service providers and auditors. The Partnering Trust program is included in the Roadmap to Safe Hardware and Software of the Ministry of Economic Affairs and Climate.

2 <https://www.rijksoverheid.nl/documenten/rapporten/2018/06/01/nederlandse-digitaliseringsstrategie>

3 https://ec.europa.eu/commission/presscorner/detail/en/IP_20_273



PURPOSE OF THE COALITION

The purpose of the Online Trust Coalition (OTC) is to provide an unambiguous, efficient method for cloud service providers to demonstrate that their services are reliable and secure. And by doing so, to help to implement the relevant laws and regulations.

Security, availability and privacy are important points of attention, but not the only ones. Issues such as being able to restart a service rapidly after an incident and the transparent allocation of responsibilities when multiple providers are involved in a service also play a role.

Not only the customer, but also other stakeholders need certainty about the reliability of a cloud service. Think of consumers, citizens, financiers, shareholders, auditors and also supervisors⁴.

WHO ARE PARTNERS IN THE COALITION

OTC is a collaboration of leading national and international parties, both providers and customers of cloud services, involved governments and experts, who are actively engaged in cybersecurity, compliance, conformity and assurance.

The coalition has an open character: we call on organisations to participate and to strengthen the digital economy of the Netherlands in the international context.

You can register at info@onlinetrustcoalitie.nl.

⁴ Supervisors are parties such as the Dutch Data Protection Authority, ACM, AFM, the Tax Authorities, De Nederlandsche Bank, etc.



PRINCIPLES

The OTC works on the basis of the following principles:

- Cloud services are essential building blocks for digital innovations and contribute to solutions to social challenges. Innovations such as Artificial Intelligence (AI) and the Internet of Things (IoT) are almost only possible through the use of cloud services.
- According to the common definition of the National Institute of Standards and Technology, Cloud services include infrastructure-as-a-service, platform-as-a-service and software-as-a-service (IaaS, PaaS, SaaS).
- Cloud services usually involve several service providers, each providing parts of the service. Customers and users of cloud services can also be providers themselves, for example if (cloud) services are aggregated for new services.
- The customers of online and cloud services demand certainty and the providers want to provide that. Customers have a responsibility when it comes to using an online service correctly and safely.
- Not only customers of cloud services, but also other stakeholders need such certainties: think of shareholders, auditors, supervisors - and in a sense, the entire society.
- The reliability of the cloud service must be assured. However, many existing certifications focus rather on the quality of the service than on the quality of the provider's organisation.
- Providing certainty and being able to assess such certainty is strongly connected to accountability information. This means that such information must be uniform and standardised.
- The cloud service provider must give the customer certainty about the reliability of the service. Subsequently, that customer can offer a cloud service: in that role, that provider must also give certainty to their customers. The OTC's vision is therefore that it must be possible to cascade certainties down the chain.
- The OTC's vision is in line with developments within the EU in the field of certification. The OTC contributes to these developments by organising cooperation and creating support, both in the Netherlands and in other European member states. Guided by their own principles and objectives, the OTC fleshes out European developments, in the aim to incorporate these developments in a Dutch context.



ISSUES

The OTC wants to work on the following issues to strengthen confidence in the digital economy and in cloud services:

Risk assessment and standardisation of risk profiles

- One of the issues that the OTC aims to solve is the current reality that customers assess risks on their own. This means that they each base their risk assessment on their own wishes and requirements regarding certainties for cybersecurity, availability, privacy, etc.. In addition, customers often are not aware of the risks they run, they are not sure which assets they want to protect, which questions they have to ask and which legal obligations they have to meet. It is unclear to them which forms of certainty suit their specific risks. Because each customer and other stakeholder is different when it comes to the willingness to accept risks and to determine the effectiveness of risk management measures.
- On the other hand, it is difficult for cloud service providers to implement more than one set of requirements. That may clash. That is why there is a need for standardisation of risk profiles, based on the idea that these profiles are risk-based.

Distribution of liability

Contracts in this area often involve inequality of power. The digital playing field of large and small providers and customers creates opportunities to transfer liability. Therefore, a standardised solution is needed, assuring a fair division of responsibilities and associated liabilities.

Right to audit

Some laws give customers the right or obligation to audit the provider. Sometimes, customers also enforce by contract the right to audit. Solutions should be developed for the efficient and cost-effective fulfilment of those rights and obligations, so that repeated, almost identical audit activities at the provider become unnecessary.

Certification and harmonisation

It must be clear which certainty a customer can derive from the various quality marks, standards and declarations. Which certainty is geared to which risk? This includes the ways in which the information about the certainties, the information about accountability, is available to customers and other stakeholders.

Best practices

An exploration of existing and workable best practices is needed, with examples of how certain standards work in practice. These may offer solutions that can be incorporated in a certification system. Think of Zeker-OnLine, Data Pro Code, but also of NEN-CEN-ISO and other systems.

IT reality

Taking the assessment of the reliability of cloud services from the perspective of the customer as a starting point has consequences for the IT audit methodology. It is important to consider what this entails for the work and skills of the IT auditor.

Supervisors

Supervisors will never blindly rely on labels or certifications. However, their work can be made easier and more effective. How do we ensure that supervisors can also rely on certainties? This issue is comprehensive and is gradually being put on the agenda in Europe. This concerns, for example, accreditation of auditors, governance of audits, expertise and training of auditors, and the method of supervision and enforcement.



ROUTE TOWARDS SOLUTIONS

Milestone 1:

Working group for European input – April 2020: The aim of the working group is to monitor and where necessary to support the Dutch contribution to European initiatives in the field of certification, such as the European representation of the Ministry of Economic Affairs and Climate, the NISA Ad Hoc Working Group on cloud services, the European Cyber Security Certification Group (ECCG), the Stakeholder Cybersecurity Certification Group (SCCG), the European Data Protection Board and the GAIA X initiative.

Milestone 2:

Manifesto of the Online Trust Coalition – September 2020: Description of the issues that the coalition wants to address. What is the scope, what are the principles, what are the milestones and what is the timetable?

Milestone 3:

Whitepaper – October 2020: How can we address the issues mentioned in the manifesto, what is needed and what is the role of the participants in the coalition?

Milestone 4:

Action Plan of the Online Trust Coalition – March 2021: The white paper from milestone 3 is the basis for an action plan that puts the aforementioned issues and solutions into practice.



COALITION PARTICIPANTS:

The Online Trust Coalition is a public-private partnership. It is an initiative of the Ministry of Economic Affairs and Climate Policy. The coalition office, with broad market representation, is coordinated by ECPI Platform for the Information Society: an independent and neutral platform where government, businesses, social organizations and science collaborate and exchange knowledge about impact and responsible application of new technologies in society.

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MANIFESTO

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