

1 Beware Suppliers Bearing Gifts!: Analysing coverage of supply chain  
2 cyber security in critical national infrastructure sectorial and  
3 cross-sectorial frameworks

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7 **Abstract**

Threat actors are increasingly targeting extended supply chains and abusing client-supplier trust to conduct third-party compromise. Governments are concerned about targeted attacks against critical national infrastructures, where compromise can have significant adverse national consequences. In this paper we identify and review advice and guidance offered by authorities in the UK, US, and the EU regarding Cyber Supply Chain Risk Management (C-SCRM). We then conduct a review of sector specific guidance in the three regions for the chemical, energy, and water sectors. We assessed frameworks that each region's sector offered organisations for C-SCRM suitability. Our results found a range of interpretations for "Supply Chain" that resulted in a diversity in the quantity and quality of advice offered by regional authorities, sectors, and their frameworks. This is exacerbated by the lack of a common taxonomy to support supply chain procurement and risk management that has led to limited coverage in most C-SCRM programs. Our results highlight the need for a taxonomy regarding C-SCRM and systematic guidance (both general and sector specific) to enable controls to be deployed to mitigate against supply chain risk. We provide an outline taxonomy based on our data analysis to promote further discussion and research.

8 *Keywords:* cyber security; supply chain; risk management; critical national infrastructure; common  
9 taxonomy

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10 **1. Introduction**

11 The twenty-first century has witnessed an exponential increase in the digitisation and inter-  
12 connectivity of computer networks and software applications that has benefited business, but this  
13 has consequently introduced greater vectors of compromise from threat actors [39]. This threat  
14 extends to a supply chain that may be more difficult to manage due to a lack of clear responsibility,  
15 the international dimension of markets they operate on, and diversity of suppliers. This results in  
16 threat actors probing for weaknesses to exploit client and supplier trust.

17 Concerns surrounding the supply chain have been prominent in several UK Government reports  
18 that identify minimal requirements for suppliers to adhere to cyber security standards [68]. Excellent  
19 cyber security within an organisation cannot guarantee that the same standards are applied by  
20 contractors and third-party suppliers [48], with attackers more likely to target vulnerable entry  
21 points, that include the supply chain. Similarly, the UK's National Cyber Security Centre (NCSC)

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22 Annual Review in 2018 [47] stressed the role played by the supply chain in leaving organisations  
23 vulnerable to compromise.

24 One of the areas of growing concern amongst operators of various Critical National Infrastructure  
25 (CNI)<sup>1</sup> is the increased exposure of Industrial Control Systems (ICS). This is due in part to the  
26 decline in the practice of “air gap” architecture, exposing legacy systems to external influence  
27 through associated benefits of inter-connectivity with the Industrial Internet of Things (IIoT).  
28 This enhanced visibility and integration promotes more efficient and effective business processes by  
29 embracing real-time intelligence from ICS environments for cost improvement. This convergence  
30 between the Internet of Things (IoT) and Operational Technology (OT) used within ICS has blurred  
31 the boundaries between legacy and contemporary environments [21] and can lead to attacks, such  
32 as those on manufacturing plants as shown by the German Steel work attack [41] and against the  
33 Ukrainian Power Grid [70].

34 Supply chains are integral to the operations of CNI despite not being formally regarded as a  
35 component of it. A technical report to the UK parliament [51] focused on the hardware, software,  
36 and services offered by the supply chain, but did also touch upon non-contractual and contractual  
37 steps to manage supplier risk, specifically looking toward the EU Network and Information Systems  
38 (NIS) Directive [31] to assist the cyber supply chain risk management (C-SCRM) for CNI operators.

39 Our review of current academic literature finds that existing research has considered challenges  
40 and means to improve supply chain cyber security. For example, Williams [71] explored the increasing  
41 complexity and global interconnections of the supply chain and the challenges in securing such an  
42 environment. Davis [22] discusses how organisations can adopt an information-centric approach to  
43 deliver more cyber-resilience into supply chains. However, to date, we found no evidence of research  
44 to systematically analyse the coverage of supply chain cyber security advice given by national or  
45 supranational authorities and also sector specific guidance, how the various approaches contrast,  
46 and their strengths and limitations. This paper is the first to address this knowledge gap.

47 We focus on three legal authorities (UK, US, EU) and analyse the guidance offered to organisations  
48 in their CNI sectors; Chemical, Energy, and Water, relating to C-SCRM. This analysis also identifies  
49 the principle guidance, frameworks, regulations, and standards recommended and these too are  
50 analysed against the same criteria to determine whether there is a common approach to ensuring  
51 how supply chain risk management should be applied. We find that despite the abundance of  
52 both cross-sectoral and sector-specific guidance and a variety of frameworks produced over the past  
53 decade, there is significant divergence of exactly what constitutes the supply chain coupled with  
54 a variance in the depth and coverage of the advice to which organisations are exposed. Where  
55 organisations are encouraged to implement a C-SCRM program, the lack of commonality within  
56 the available guidance leads to a lack of clarity on the risks to consider. This may lead to possible  
57 weaknesses during cyber security risk assessment that, in general, follows government and sectoral  
58 guidance.

59 This is amplified by the lack of a common taxonomy that would allow governmental and sector-  
60 specific guidance to have the same look and feel to the end user organisation. This is tied to calls  
61 by key stakeholder documents for a harmonisation of standards. The need for the creation of a  
62 common taxonomy regarding C-SCRM to support systematic general and sector specific guidance is

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<sup>1</sup>CNI: National Infrastructure are those facilities, systems, sites, information, people, networks and processes, necessary for a country to function and upon which daily life depends. <https://www.cpni.gov.uk/critical-national-infrastructure-0>. These are referenced as Critical Infrastructure in U.S. and some EU documents.

63 a key finding and one that would benefit both client and supplier stakeholders in working towards a  
64 common objective.

65 This paper *analyses the coverage of supply chain cyber security in both sectorial and cross-sectorial*  
66 *CNI frameworks* to investigate the following research questions:

- 67 1. *What is meant by Supply Chain?* We evidence contrasting interpretations of what constitutes  
68 the supply chain that can lead to gaps in cyber security strategies and may lead to C-SCRM  
69 programs being vulnerable to compromise.
- 70 2. *What guidance do authorities and sectors provide?* We establish that the depth and breadth  
71 of coverage offered by authorities and sectors differs greatly. Recommended frameworks are  
72 often aligned to regional foci or regulatory requirements. This is a concern as the supply chain  
73 becomes more global and interconnected in ensuring that organisations have the optimum  
74 C-SCRM guidance appropriate for their function within a specific sector. Differing approaches  
75 to C-SCRM may require the supply chain to provide inconsistent products or assured levels of  
76 service to different sectors. This, in a global supply chain, may become unnecessarily complex,  
77 resource intensive, costly, and unsustainable.
- 78 3. *Do frameworks provide cohesive coverage?* Global frameworks are sector agnostic, but gov-  
79 ernment, regulatory, sector, and industry specific objectives may influence which framework  
80 organisations adopt. Although supply chain security has been introduced in recent version  
81 releases, the underlying and repeatable need for a common language [6, 31, 50] to help deliver  
82 a common and repeatable approach to C-SCRM is still absent.

## 83 2. Related Work

84 In this section, we review current academic research, which identifies a gap in scholarly attention  
85 regarding the guidance offered to sectors of CNI to ensure due diligence is given to the breadth of  
86 supply chain concerns.

### 87 2.1. Supply Chains and their Security:

88 Bartol [5] points to C-SCRM requiring the coming together of several divergent professional  
89 communities from cyber security, system and software engineering, supply chain, and logistics, which  
90 bring differing experiences, taxonomy, frameworks, and standards. Linton et al. [43] highlight that  
91 this is a complex discipline that straddles both traditional cyber security and the supply chain  
92 management field, mitigating risks to both Information and Communications Technology (ICT)  
93 supply chains and ICT products and services. They believe that these risks traverse the supply  
94 chain and can result in organisations lacking visibility, understanding, and control of the processes  
95 used to manufacture and deliver ICT products.

96 Where practicable, and to remove the typical isolation in the C-SCRM process, Colicchia et  
97 al. [19] recommend that initiatives should be bi-directional to involve supply chain partners. They  
98 believe that this promotes controls beyond technical solutions and maintains engagement throughout  
99 the supply chain. C-SCRM's focus is on gaining visibility and control over an organisation's extended  
100 partners that include suppliers and customers. Boyson [7] argues that this satisfies the need of IT  
101 architects for effective control of the design, build, and deployment of systems whose hardware and  
102 software subsystems and components are increasingly sourced globally and often with an unknown  
103 pedigree. Often critical functionalities are hosted and accessed on network environments of uncertain  
104 integrity.

105 Ghadge et al. [35] highlight that supply chains are the backbone of the evolving technological  
106 ecosystems and there is a need to help innovate relationships between supply chain partners. They  
107 provide a detailed analysis of cyber risk types, propagation, and points of penetration together with  
108 assessing cyber security challenges. However, they do not consider what constitutes the supply  
109 chain against which the risk is being managed, nor point to any specific frameworks to assist in this.  
110 Davis [22] advocates that governance of the supply chain is critical, with organisations encouraged  
111 to map out the supply chain to understand direct and indirect suppliers, build capability aligned to  
112 agreed standards that may include sharing information and expertise to ensure risks are adequately  
113 managed and measured. The construct of a supply chain is not considered, nor is the capability of  
114 the standards referenced in adequately supporting a viable SCRM.

115 Young et al. [73] reference that the US Department for Homeland Security (DHS) has developed  
116 and implemented programs to seek to improve the information sharing environment for the private  
117 sector which, it acknowledges, operates the majority of CNI. Rashid et al. [55] highlight that  
118 production and distribution networks are often owned by different organisations, with a larger  
119 number of businesses forming the wider supply chain in their paper that looks at cyber security risks  
120 in CNI. This aligns with the increasingly global and complex supply chain that we also consider in  
121 our analysis.

## 122 *2.2. Risk Management:*

123 The issue of outsourcing CNI to private entities as well as possible ownership and foreign  
124 investment have not been covered in great detail elsewhere in other related work. Sajid et al. [57]  
125 do consider that the use of third-party cloud services within ICS transfers ownership privileges from  
126 the system's organisation and places them under the control of the cloud service provider.

127 C-SCRM is emerging as a new management construct to satisfy a need to adopt a different  
128 approach to embrace the interconnected nature of supply chains to deliver a combination of C-SCRM,  
129 resilience, and information risk management [19]. It is an integrative construct combining elements  
130 of cyber security, supply chain management, and enterprise risk management to assess and mitigate  
131 risks across the end-to-end process that constitute the supply chains for IT networks, hardware, and  
132 software systems. Boyson [7] acknowledges the increasingly global nature of the cyber supply chain,  
133 the threats that this invokes and the challenges in successfully implementing a C-SCRM program.  
134 This US-centric work reviewed current programs and the rationale for a capability/maturity model  
135 for the cyber supply chain.

136 Whilst not considering supply chain as forming part of a risk management approach, Pate-Cornell  
137 et al. [52] conclude that the management of cyber risks for CNI are often based on a top-down  
138 management approach, with the goal of encouraging system designers and operators to adopt best  
139 practices, but often without specific consideration of the system's structure or offering much guidance  
140 on how to do it. The insurance industry relies heavily on actuarial science to develop mathematical  
141 and statistical models that are used for empirically or technically estimating risk, and Young et  
142 al [73] attempt to develop a framework to use such techniques for cyber security CNI owners and  
143 operators, but again do not consider incorporating C-SCRM into their work. Cherdantseva et  
144 al [13] do consider system and component design and equipment supply stages for the six steps that  
145 comprise their cyber security risk assessment and to adapt relevant NIST<sup>2</sup> standards to the specific

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<sup>2</sup>The National Institute of Standards and Technology (NIST) is a non-regulatory federal agency that produces standards and guidelines. It also provides guidance documents through its Special Publications (SP) 800-Series.

146 system being assessed, but they do not suggest that it would provide a C-SCRM solution and the  
147 focus is contained within the business.

### 148 *2.3. Frameworks and Standards:*

149 Davis [22] asserts that standards can be used to provide a common understanding, a starting  
150 point, and terminology on how an organisation approaches its business and cyber security, but this  
151 does not expand to determine whether standards themselves are aligned to a common taxonomy and  
152 approach to support C-SCRM. In the same way that safety regulation in roads, aviation or medicine  
153 enhances their value to the community, Quigley et al. [54] state that cyber security may ultimately  
154 benefit from similar regulation and awareness and look to better understand the weaknesses in the  
155 risk regulation regime that governs cyber security within CNI. They argue that governments should  
156 be more specific in their statements around breaches in cyber security to avoid interested parties  
157 over- or under-playing risks in an attempt to modify behaviour of interested stakeholders.

158 There must be a workable relationship between decision makers, employees, relevant standards,  
159 technical aspects, and policy frameworks as argued by Clark-Ginsberg and Slayton [16]. They  
160 call for collaboration between regulator and system owners and state that regulatory influence is  
161 shaped by three factors - incentives, scope, and adaptability - thereby helping clarify the powers  
162 and limitations that regulations have in affecting change.

163 Carr [11] questions the reluctance of politicians to claim authority for the state to introduce  
164 tougher cyber security measures by law<sup>3</sup>, aligned to the private sector's reluctance to accept respon-  
165 sibility or liability for national security, leaving the partnership without clear lines of responsibility  
166 or accountability. This risk ownership when the private sector delivers CNI services is something  
167 that underpins our research questions 2 and 3.

168 Finally, Bahuguna et al. [3] stated the need for a national cyber security assurance framework  
169 with a dedicated government cyber security bench-marking agency established to validate the cyber  
170 security posture of a specific country and its critical sectors on a continuous basis. It did not consider  
171 C-SCRM as part of this assurance framework, nor did it acknowledge established baseline national  
172 assurance certifications, such as the NCSC UK Cyber Essentials program<sup>4</sup>, or the US NIST Cyber  
173 Security Framework [50], nor the NIS Directive [31] that European member states must adopt for  
174 operators of essential services.

## 175 **3. Method**

176 In order to address how C-SCRM is understood and constructed by various forms of documen-  
177 tation, we use the common technique of snowballing [72] to identify relevant documentation to  
178 subsequently categorise the forms of guidance given.

### 179 *3.1. Defining the Scope*

180 Before identifying relevant documentation, a criteria for inclusion is developed, as below:

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<sup>3</sup>Carr's paper focused on the US and UK and predates the introduction of either GDPR or the NIS Directive by the EU. GDPR regulates personal data protection and is unrelated to C-SCRM for CNI, whilst the NIS Directive is highly applicable.

<sup>4</sup>Cyber Essentials is a UK Government-backed, industry-supported scheme to help organisations protect themselves against common online threats: <https://www.ncsc.gov.uk/cyberessentials/overview>.

- 181 1. Authority regions: In order to compare and contrast with other literature and to more easily  
182 identify material on C-SCRM, we restrict our document to the UK, the US, and the EU.
- 183 2. Time: In order to understand contemporary C-SCRM governance, we only identify papers  
184 published since 2010. This aligns with Hemsley and Fisher’s [36] timeline for the increased  
185 growth and complexity of ICS cyber security incidents.
- 186 3. CNI Sectors: We include three sectors that qualified in the three authority regions. The  
187 sectors, *Chemical*, *Energy*, and *Water and Wastewater* all satisfy this requirement [45], as  
188 well as representing both consumer and supplier components of the supply chain.

189 We seek to define what determined a threat or risk criteria, and the governance models  
190 considered, as detailed below:

- 191 4. Defining Risk and Threat: Our approach is to identify risk as being the potential compromise  
192 to the traditional cyber security triad of *confidentiality*, *integrity*, and *availability* due to  
193 underlying vulnerabilities. The category of *compromise to safety* is also included due to  
194 the association with the CNI Sector where it is often seen as the highest priority [37]. We  
195 define “threats” as actors that take advantage of such vulnerabilities pertinent to the trust  
196 in the supply chain. This includes the attack surface being extended beyond the traditional  
197 boundaries of a business enterprise [42], and the exploitation of trust that an organisation may  
198 have with a third-party supplier.
- 199 5. Defining Governance models: Once documents that aligned with the defined scope had been  
200 identified, each was analysed for governance models [9] that align to either guidance, standards,  
201 frameworks or regulations<sup>5</sup>. Organisations often adopt control frameworks that map to national  
202 or international standards, or detail legislative and regulatory compliance.

### 203 3.2. Document Sampling

- 204 1. Google was the principle search engine to identify the seed documents that primarily resided  
205 on government and authority websites. These websites are then used to expand the search to  
206 identify relevant documentation through a combination of search terms pertaining to *Cyber  
207 Supply Chain Risk Management*. Search strings are constructed from the key words “cyber”,  
208 “supply chain” and “risk”. A second criteria is added with “CNI” and “Critical National  
209 Infrastructure”. This was conducted in late 2019 and 27 November 2019 forms the cut-off  
210 date.
- 211 2. Bibliographies of the documents identified in the previous step are analysed to identify further  
212 relevant literature. As some documents do not contain a bibliography, the texts are also  
213 analysed for references to other documents. This therefore follows a “backwards” snowball.  
214 Authority and sector documents are referenced within the related work, forming an avenue  
215 to identify appropriate publications for analysis, whilst the snowball method [72] also proves  
216 effective at identifying further sources for sampling.
- 217 3. Steps 1 and 2 identified 61 documents that are considered against the specific objectives of this  
218 paper of understanding the levels of guidance that authorities and sectors are issuing regarding  
219 C-SCRM. The criteria for governance models are applied and, focusing on this criteria, allows  
220 the data set to be reduced as follows:

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<sup>5</sup>For the remainder of this paper we will use Frameworks to act as a catch all for Guidance, Standards, Frameworks, and Regulations

221 **Authority:** 31 documents down to 11  
222 **Chemical:** 6 to 6  
223 **Energy:** 14 to 7  
224 **Water:** 10 to 4

225 14 frameworks were identified during the coding of the authority and sector documents.  
226 Qualitative coding in this context is the capture of a word or short phrase to symbolically  
227 identify themes in data [58] and explained further in 3.3.2. The 5 most referenced framework  
228 documents are selected for detailed coding review and covered international, European, and US  
229 products. International documents such as the International Organization for Standardization  
230 (ISO) 27000 series and the International Society of Automation (ISA) 62443 series of documents  
231 arrived for consideration via the snowballing process.

### 232 3.3. Content Analysis

#### 233 3.3.1. Reflexive Thematic Analysis:

234 In order to analyse the documentation, a reflexive thematic analysis is conducted [8]. This  
235 enables a bottom-up, inductive approach that leads the analysis. This is twinned with a reflection  
236 on prior assumptions by reassessing the coding process and to ensure interpretations of the textual  
237 data produce codes that are arrived at from the material as much as possible. Throughout the  
238 drafting of the paper, other authors feed into the analysis and collaborated to achieve agreement.

#### 239 3.3.2. Coding

240 An inductive coding approach [58] is undertaken by the lead author to develop the themes of the  
241 analysis. QSR International's NVivo 11 qualitative data analysis software is used to create the code  
242 book using this bottom-up approach that consists of 10 categories and an initial 45 sub-categories  
243 were produced on the first round of coding. A full understanding of the diversity in the documents is  
244 developed after two further iterations of re-coding. These are refined and condensed to 7 categories  
245 and 20 sub-categories (Figure: 1), some are merged, whilst others cover themes that are outside of  
246 the defined scope of this paper. This bottom-up approach aimed to ensure that nothing is missed.

247 The second author validated the coding of the lead author, using the code book. The reviewer  
248 coded 11 of the documents, which was over 20% of the documents within each sub-folder. Documents  
249 are allocated a number in each folder and Excel used to produce a random number generator for  
250 selection to be independently coded. Validation of the inter-coder agreement is undertaken using  
251 *Cohen's  $\kappa$  coefficient*, which is a common quantitative measure of reliability of qualitative data [18].  
252 We measure a  $\kappa$  of 0.58, which indicates a moderate level of agreement [40].

#### 253 3.4. Taxonomy Outline

254 Following the data analysis activity in section 4.1, further research is undertaken of that output  
255 to determine the requirement for a common taxonomy, which is addressed in section 5.1. This  
256 bottom-up approach aligns with the reflexive thematic analysis approach and ensures that the  
257 output is reflective of the raw data. The resulting initial taxonomy that comprises of 4 categories  
258 and underlying sub-categories and attributes is used to map against two applicable documents [20,  
259 15] in section 5.3.

Documents	
	Authority Documents
EU	EU Cyber - Protection measures for ICT on CNI [27]
EU	EU Rules for the protection of infrastructure relevant for security of supply [29]
EU	ENISA - EU Cyber Security Act [32]
UK	CPNI - Cyber Security Risks in the Supply Chain [12]
UK	NCSC - Supply Chain Security Collection [20]
UK	HSE Cyber Security for IACS edn 2 [37]
UK	NCSC Annual Review 2018 [47]
UK	NCSC NCA Cyber Threat to Business 2018 [48]
UK	UK Public Summary of Sector Security and Resilience Plans [10]
US	Secure Technology Act [67]
US	Worldwide Threat Assessment [17]
	CNI Sector Documents
	Chemical
EU	None
UK	NE Chemical Processing Industries Report - Cyber Security of IACS (2018) [34]
US	DHS CFATS Risk Based Performance Standards - 8 Cyber (2009) [63]
US	DHS Chemical Sector Specific Plan (2015) [62]
US	DHS Chemical CSF Implementation Guidance (2015) [61]
US	Protecting and Securing Chemical Facilities from Terrorist Attacks Act (2014) [66]
US	RCSC NIST Framework Guidance (2016) [1]
	Energy
EU	EU Policy on Critical Energy Infrastructure Protection (2012) [28]
EU	ETSI Smart Grid Information Security (2012) [27]
UK	BEIS ENA Cyber Security Procurement Language Guidance (2016) [6]
US	FERC CIP-013-1 – Cyber Security - Supply Chain Risk Management (2018) [49]
US	FERC Revised Critical Infrastructure Protection Reliability Standards (2016) [33]
US	NATF Cyber Security Supply Chain Risk Management Guidance (2018)[46]
US	DOE Cyber Security Procurement Language for Energy Delivery Systems (2014) [26]
	Water and Wastewater
EU	None
UK	DWI NIS Directive Cyber Assessment Framework Guidance (2018) [24]
UK	Water UK Cyber Security Principles (2017) [69]
UK	DEFRA Water Sector Cyber Security Strategy (2017)[23]
US	DHS Water and Wastewater Systems Sector-Specific Plan (2015) [64]
	Standards and Frameworks
EU	NIS Directive (2016) [31] <sup>8</sup>
US	NIST Cyber Security Framework (CSF) Version 1.1 (2018) [50]
US	NIST SP 800-82 Rev2 (2015) [60]
Int	ISA 62443-2-1 (2009) [2]
Int	ISO 27001 (2013) [38]

Table 1: Documents selected for coding and analysis

260 *3.5. Limitations*

261 During the review of available regional literature for the individual sectors, it is noticeable that  
262 although they provide authority guidelines, the EU is underrepresented at a sector level. This is  
263 likely due to the European Parliament creating directives, regulations, and standards, but deferring  
264 down to the individual member states on how they are implemented and the specific guidance  
265 offered [44].

266 The decision to limit the sample search to the year 2010 and beyond has the drawback of  
267 limiting any historical references, although the advancement in technology and the exposure of ICS  
268 environments in recent years validates this approach [36].

269 The number of CNI sectors to focus on is a consideration. Our research design is to assess the  
270 depth of the available guidance rather than the breadth of sectoral guidance. Therefore we contrast  
271 three sectors, appreciating that this subsequently means that only a subset of the CNI sectors is  
272 researched.

273 A similar consideration is given to the frameworks selected. Focusing on a single document will  
274 create limitations as there is not a directly comparable document that is adopted by all sectors.  
275 Therefore a subset of documents is selected, although this list is not exhaustive and those discounted  
276 may enrich the research. Coding of selected guidance documents allows all framework instances to  
277 be captured. This systematic approach allows deeper analysis of frequently referenced frameworks,  
278 rather than reviewing the breadth of framework coverage.

279 Using the three authority areas opens up the research options beyond a single nation state, but  
280 focus remains aligned to an Anglo-centric understanding of CNI due, in part, by the location of the  
281 authors. It does however focus on key players in both technical and regulatory advancement in the  
282 sectors whilst being cognisant that the UK has since exited the EU, but continues to comply with  
283 GDPR and the NIS Directive.

284 Finally, it must be acknowledged that the US established the Cybersecurity and Infrastructure  
285 Security Agency (CISA) in November 2018 and it is now providing similar content to that of the  
286 NCSC. Had we run the document sampling 12 months later, there would likely have been a greater  
287 level of coverage for the US Authority following the release of relevant documents throughout 2020.  
288 We include the CISA ICT SCRM Essentials [15] document to review the C-SCRM alignment in  
289 section 5.3. It was released after the cut off date for data sampling, but is viewed as relevant to the  
290 outline taxonomy discussion.

291 **4. Results**

292 *4.1. Data Analysis*

293 Once the coding is completed, the data is subdivided into the following subject Areas of Interest  
294 (AOI):

- 295 1. Authorities (UK, US, EU)
- 296 2. CNI Sectors (Chemical, Energy, Water)
- 297 3. Frameworks (Standards, Guidance, Frameworks, and Regulations)

298 The coded data is analysed and assessed for quality of advice and guidance given by the AOIs  
299 pertinent to the specific coded category. This is depicted by coloured cells in Figure 1. The categories  
300 are represented along the Y axis and the AOI along the X axis.

301 Figure 1 uses a Red, Amber, Green (RAG) traffic light assessment heuristic. This is commonly  
302 used in many areas, such as within industry for program management [4], for assessing risk in the



303 health sector [59], and for labelling foods against the guideline daily allowance [56]. In this instance,  
304 it is used to provide a visual representation of the level of detail attributed to each AOI relating to  
305 each category. The colours are then assigned a numerical reference to allow each row and column to  
306 be given a numerical assessment in line with the colour representation. Both the colour and number  
307 provide a simple presentation of the qualitative analysis undertaken of the data and do not depict  
308 any quantitative narrative.

- 309 • Blank cell: (No coverage). No reference to the category is found in any documents.
- 310 • Red/1: (Poor coverage). Although the category is referenced, there is no detail or definition.  
311 *Example: For information sharing category Energy-US requires the timely notification of*  
312 *vulnerabilities to create defences of zero-day exploits, but fails to explore the wider subject*  
313 *within the category.*
- 314 • Amber/2: (Moderate coverage). The category is referenced and contains elements of a term  
315 or a definition. *Example: Water-UK promotes the sharing of information amongst sector*  
316 *stakeholders, but doesn't consider whether this extends to the supply chain.*
- 317 • Green/3: (Good coverage). A clear level of detail with defined guidance or reference to  
318 applicable third-party documentation. *Example: Chemical-US has developed this at both*  
319 *classified and unclassified levels whilst collaboratively developing a new information sharing*  
320 *and analysis centre for public and private sectors.*

321 The visual and numerical representation allows for a very high-level assessment of the categories  
322 and where the AOIs concentrate their advice and guidance.

#### 323 4.2. Analysing coverage of supply chain cyber security in critical national infrastructure sectorial 324 and cross-sectorial frameworks

325 To approach the principle aim of the title, we focus on the three supplementary questions listed  
326 in the Introduction, namely:

- 327 1. What is meant by Supply Chain?
- 328 2. What are the contrasting views and guidance of the authorities and sectors?
- 329 3. Do standards provide cohesive coverage?

330 These supplementary questions introduce subordinate questions during analysis and an interde-  
331 pendence becomes apparent as categories and relationships developed.

332 Table 2 represents the supply category coverage of the 15 AIOs represented in the RAG table in  
333 Figure 1 and also identifies those sectors that provide good (Green) or medium (Amber) levels of  
334 detail.

335 4.3. What is meant by Supply Chain?

**Diverse Interpretations of supply chain can undermine risk management programs**

Analysis demonstrates contrasting perspectives of what constitutes the supply chain beyond the generally accepted norm of products and services. There are multiple interpretations of the term “Supply Chain” and this divergence of understanding can lead to gaps in cyber security strategies appreciating potential risks and thereby excluding the opportunity to mitigate them. Risk Management received good coverage, but that can only manage acknowledged areas of risk. Organisations are encouraged to implement a C-SCRM program, but may be unsighted to certain elements that constitute the wider supply chain categories. They may have a competent program that only covers a subset of the overall supply chain and these gaps in awareness and subsequent lack of risk management introduce vulnerabilities that threat actors can exploit to circumvent the controls in place.

337 4.3.1. Service

338 The interpretation of the supply chain at its more obvious levels is captured under “Service”  
339 and incorporates the **Vendor**, which corresponds to how we label the material components within  
340 the supply chain. This encapsulates the physical *Hardware*, but also the *Firmware* and *Software*  
341 that resides within it. This category receives wide and detailed framework coverage, with good  
342 sector coverage that varied in the level of detail offered. There is a general acceptance that the  
343 hardware asset is normally supplied and not built in-house. Consequently there is a reliance on the  
344 third-party for the provision of this. This brings in the **Service Provider** or **Service Integrator**  
345 as a key component of the supply chain, receiving similar levels of framework and sector coverage,  
346 with Energy-UK/US being consistently strong for both, and the other sectors less so. **Contractor**  
347 and **Sub-contractor** receive less coverage, but potentially play an important role within C-SCRM.  
348 This is especially relevant when considering whether to allow suppliers to sub-contract services and  
349 the controls required to manage any subsequent risk.

350 What is apparent in this whole category is the limited coverage from the EU (Vendor was the  
351 only category noted) and from the US documents assessed, which provided no reference to any of  
352 the categories. We observe the same practice in the Energy-EU sector.

353 4.3.2. End-to-End

354 Whether to allow sub-contracting would be covered during the **Contracts and Procurement**  
355 process and although not supply chain per se, it is an important aspect towards understanding  
356 and managing C-SCRM that is well considered by the UK authority and, again, by the Energy-  
357 UK/US sectors. **Supply Chain Lifecycle** represents the process of commissioning, through-life  
358 management, and decommissioning of the products and services. What coverage it does receive  
359 largely offered little detail or definition, with the exception of Energy-US that provides a clear level  
360 of detail of baking cyber security into implementation and onward support phases of the product  
361 lifecycle. Closely aligned to decommissioning is the **Exclusion or Removal of Suppliers** which,  
362 like the Supply Chain Lifecycle, receives little coverage but does receive detailed attention with the  
363 US Secure Technology Act [67].

364 4.3.3. Ownership

365 **Foreign Investment or Ownership** receives the most detailed authority coverage of all the  
366 categories, but is largely ignored by the sectors and frameworks. Conversely, **Private Entity of**

367 **CNI Provision** receives better representation by the Water-UK/US sectors and by the most current  
368 frameworks, but is ignored at authority level and by the other sectors. Every region and every sector  
369 has an increasing reliance on the **Global Supply Chain** which is only recognised to any level of  
370 detail by the Chemical-US and Energy-US sectors and by the UK authority.

#### 371 4.3.4. Risk

372 Given that the principle question focuses on C-SCRM, we also consider the **Attack Surface** to  
373 find guidance on the threat vectors that attackers may adopt to comprise an organisation via the trust  
374 in the supply chain. This is well represented by UK authorities (which delivers detailed coverage in  
375 all the Risk sub-categories) and Energy-US documents analysed, and also receives a good level of  
376 coverage by the available Chemical sectors. The increasingly **Complex or Large Supply Chain**  
377 only receives sector coverage from the Chemical-US and Energy-UK sector (Energy-US touched  
378 upon it), whilst consideration of whether the **Weakest Link is the Supplier** is only considered  
379 by the UK Authority. **Information Sharing** is widely represented, with all authorities and most  
380 sectors covering it to some degree and, again, by the most current frameworks. Unsurprisingly,  
381 **Risk Management** receives the widest coverage of all the categories although the level of detail  
382 varies amongst sectors with Energy-UK/US standing out for the quality of their documents. The  
383 US authority documents analysed does not cover this specific to the supply chain, although the  
384 NIST CSF does provide detailed coverage.

#### 385 4.4. What are the contrasting views and guidance of the sectors and authorities?

##### **A lack of common guidance negatively impacts clients and suppliers alike**

386 Comparing the guidance of the national authorities and the individual CNI sectors, it is apparent  
that there is more variance than commonality. The level of detail and coverage of advice offered by  
sectors varies and, although the UK and US offer similar guidance within the Energy sector, the  
differences within the other two sectors analysed supports the conclusion that common guidance is  
limited across the sectors or similarly offered centrally by the authorities.  
This variation provides challenges to sectors where advice may be lacking, whilst the supply chain and  
vendors are impacted if their global customer base receives conflicting advice that has implications  
of the type and level of service or product they supply.

#### 387 4.4.1. Authority guidance

388 At a higher authority level, the **UK** covers most of the categories with a good level of detail,  
389 whilst both the **US** and the **EU** provide less coverage. The EU does cover *Foreign Investment*  
390 *and Ownership* and *Risk Management* to a good level of detail, as well as covering *Vendor* to a  
391 moderate level of detail, whilst the US gives a lot of detail in the removal or exclusion of suppliers,  
392 and also covers off *Foreign Investment and Ownership* and *Information Sharing* to a moderate level  
393 of detail. This is likely due to the different purposes and governance models of the two countries and  
394 of international organisations. The EU and US drive legislative requirements as GDPR [30] and the  
395 NIS Directive [31] can testify for the EU and the Security Technology Act [67] for the US. The EU  
396 defers adoption and guidance down to the member states (including the UK when it was a member  
397 state), whilst the US may defer to state and sector level or rely on NIST for delivery of frameworks<sup>6</sup>.

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<sup>6</sup>The creation of CISA in November 2018 and the product they deliver will likely improve the US Authority coverage and depth of guidance and is noted within section 3.4 Limitations

398 4.4.2. Sector Guidance

399 The guidance offered at a sector level is also variable. The Energy sector performs well with  
400 **Energy-US** providing the greatest level of output both in terms of coverage and the quality of  
401 information, whilst **Energy-UK** is similarly covered in both criteria. They both provide good  
402 detailed coverage around *Governance, Contracts and Procurement, Risk Management, Service*  
403 *Provider or Integrator, and Vendor*, as well as an appreciation of the *Global Supply Chain*. The  
404 **Energy-EU** sector fairs less well and although *Governance* is covered to the same level of detail,  
405 there is little other commonality. It does however address *Foreign Investment or Ownership*, which  
406 the other two fail to cover, and also provides better coverage of *Information Sharing*. While the UK  
407 and the US are closely aligned for Energy, there was a marked difference in the other two sectors.  
408 In the Chemical sector **Chemical-US** performs well against **Chemical-UK** when it comes to the  
409 sector specific advice provided by the respective government and other authorities, whereas the  
410 converse is found with the Water sector, which sees little coverage provided for **Water-US** when  
411 compared with the advice available to its sector peer **Water-UK**.

412 4.5. Do frameworks provide cohesive coverage?

**C-SCRM is included in recent releases, but a common taxonomy is still absent**

Government, regulatory, sector, or industry specific objectives or guidance may influence which  
frameworks are adopted within specific CNI Sectors. Frameworks analysed continue to demonstrate  
a disconnect when it comes to the management of cyber risk of the supply chain. The disparity in  
coverage and detail of the supply chain categories identified in our research suggests that there is  
413 currently no single framework that would support a detailed C-SCRM program.

Recent frameworks such as the NIS Directive and the most recent version of the NIST CSF do  
introduce cyber security of the supply chain, but are not aligned and cover different categories to  
various levels of detail. This observation underlines the risk that organisations may be ignorant  
of risks that are not explicitly considered within specific frameworks. This is born from a lack of  
harmonisation of frameworks, that would be complemented with an agreed common taxonomy.

414 Having established that there is little commonality amongst either the authorities or the sectors  
415 in what and how they promote cyber security and risk management of the supply chain, we look  
416 to the frameworks that are commonly referenced to establish whether there is a synergy in any of  
417 these. Our high-level analysis establishes that the category **Framework** is widely referenced, with  
418 Chemical-UK the only AOI to not consider it. This is an important observation as it evidences that  
419 sectorial guidance often involves the adoption of frameworks, validating this analysis. The **NIS**  
420 **Directive** [31] is often referenced by UK and EU organisations, whilst **NIST CSF** [50] is the “go  
421 to” reference for many US organisations and appears to offer a better level of coverage and detail of  
422 the categories. **NIST 800-82** [60] is specific to Industrial Control Systems (ICS) and is referenced  
423 by a smaller subset of US organisations, whereas ISA 62443 is another standard specific to ICS,  
424 but is more widely referenced on both sides of the Atlantic, with **ISA 62443-2-1** [2] repeatedly  
425 mentioned and, although it is a much older document, has wider coverage of the categories than  
426 the newer NIS Directive. Finally, **ISO 27001** [38] is a document that is frequently stated as the  
427 required standard to attain for both IT and OT environments, but this isn’t reflected when looking  
428 to deliver a C-SCRM program<sup>7</sup>.

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<sup>7</sup>ISO 27001 only really offers any meaningful guidance for *Risk Management*

Supply Category	Coverage/15	Green/3	Amber/2
Contract/Procurement	9	Energy-UK, Energy-US, UK	Water-UK, 62443-2-1
Exclude/Remove Supplier	4	US	
Supply Chain Lifecycle	6	Energy-US	62443-2-1
Foreign Investment/Owner	4	UK, EU	Energy-EU, US
Global Supply Chain	5		Chemical- US, Energy- US, UK
Private Entity of CNI	6	Water-UK	Water-US, NIST CSF, NIS D
Attack Surface	8	Energy-US, UK	Chemical- UK, Chemical- US
Complex Supply Chain	5	Chemical- US, UK,	Energy-UK
Information Sharing	11	Chemical- UK, Chemical- US, UK, NIST CSF	Energy-EU, Water-UK, Water-US, US, NIS D
Risk Management	13	Energy-UK, Energy-US, UK, EU, NIST CSF	Water-UK, 62443-2-1, ISO 27001
Weakest Link - Supplier	1	UK	
Service Provider	11	Energy-UK, Energy-US, NIS D, NIST 800-82	Water-US, UK, NIST CSF
Contractor	4	62443-2-1	Chemical- US, Water- UK
Sub-Contractor	2	UK	
Vendor	12	Energy-UK, Energy-US, UK, NIST CSF, NIST 800-82, 62443-2-1	Chemical- US, EU, NIS D

Table 2: Supply Category Coverage

429 *4.5.1. Service*

430 This category exemplifies the lack of full coverage by any specific framework or of any individual  
431 category. *Vendor* receives good coverage by most frameworks, whilst the NIS Directive offers  
432 moderate coverage and ISO 27001 is poorly represented. *Service Providers* come under the NIS  
433 Directive if they provide a digital service<sup>8</sup> and references additional security measures, whilst NIST  
434 800-82 provides good advice around *Service Integrator* and also introduces the role of Managed  
435 Security Service Providers. ISA 62443-2-1 provides limited coverage in this category, but is the only  
436 framework to consider *Contractors*, providing good coverage and requiring them to be part of the  
437 overall security structure and included in training and policy awareness. None of the frameworks  
438 considers the role of *subcontractors*.

439 *4.5.2. End-to-End*

440 ISA 62443-2-1 is the only framework that covers this category in any extensive detail. NIS  
441 Directive and NIST CSF requires compliance of security measures be undertaken through *Contractual*  
442 obligations, but relies on others to provide appropriate guidance. ISA 62443-2-1 offers greater detail  
443 for cyber security requirements during *Procurement* as well as having contracts to support business  
444 continuity, especially for products that have a long lead-in time. It is also the only framework that  
445 considers the timely *Removal of supplier* access at the conclusion of contracts, as well as being the  
446 only one to include the *Supply Chain Lifecycle*.

447 *4.5.3. Ownership*

448 Similarly, *Foreign Investment or Ownership* is underrepresented by the frameworks, suggesting  
449 that it resides with the Authorities to address. NIST CSF does broach upon supply chains being  
450 complex, globally distributed, and interconnected, but leaves the detail there. Both it and the NIS  
451 Directive do however provide moderate coverage of *Private Entities of CNI Provision* and provide  
452 similar requirements for the needs of all stakeholders to be considered.

453 *4.5.4. Risk*

454 This category is where the NIST CSF outperforms the other frameworks. Together with ISA  
455 62443-2-1, it provides a simple consideration for the increased *Attack Surface* that is brought about  
456 by increased interconnected environment, which it also aligned to the global distribution of resources  
457 and processes within the supply chain. The Framework within NIST CSF assesses against different  
458 levels of competence to judge how an organisation *Shares Information* and collaborates with others,  
459 stipulating that communication is especially important among stakeholders up and down the supply  
460 chain. This is a similar approach that NIS Directive promotes, but the NIS CSF actually has the  
461 Framework to assess against, whilst NIS Directive relies on the member states to determine how  
462 that is undertaken [24].

463 When approaching *Risk Management*, the NIS Directive urges for risk mitigation controls to  
464 be proportionate to the size and role of the organisation assessed. ISA 62443-2-1 requires external  
465 suppliers that have an impact on the security of an organisation to be held to the same security  
466 policies, and for these to be extended to subcontracted entities. ISO 27001 Clause 15 specifically  
467 deals with supplier relations that the business has to evidence but, like ISA 62443-2-1, there is  
468 no actual guidance. NIST CSF version 1.1 introduced a new category on C-SCRM and this goes

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<sup>8</sup>NIS confines this to 3 types of service; *Cloud, Online Market Places, and Search Engines*

469 into a great level of detail, utilising the Framework to understand and document risks associated  
470 with products and services. C-SCRM criteria was also added to the implementations tiers, whilst a  
471 special category has been added to the Framework core.

## 472 5. Discussion

473 Our analysis provides evidence that there is currently no simple textbook answer that offers an  
474 authoritative reference to what the supply chain consists of or the optimum approach to implementing  
475 a C-SCRM program. This inconsistency is born from a disparate view of cyber security controls as a  
476 whole and where the management of the supply chain risk should be administered and maintained.

477 This inconsistency is driven by what components the supply chain is considered to comprise of,  
478 but is also influenced by geographical location, the CNI sector that the business resides within, and  
479 the framework they utilise for their supply chain risk management program.

### 480 5.1. Do we need a common taxonomy?

481 Our thematic analysis evidences the lack of a common taxonomy for supply chain procurement  
482 and risk management that puts strain on both the supplier and the client. The supplier may have  
483 to satisfy clients from diverse sectors that are receiving contrasting advice, introducing a resource  
484 overhead on that service delivery. The client, on the other hand, may not have access to the most  
485 suitable guidance or may create ad hoc C-SCRM processes.

486 The analysis of the data within the documents listed in Table 1 provides the four categories  
487 represented in Figure 2 capable of forming the bedrock of a C-SCRM taxonomy.

#### 488 5.1.1. C-SCRM Outline Taxonomy

489 The four C-SCRM categories within Figure 2 are further divided into sub-categories that represent  
490 the results shown in Figure 1. That data analysed is then used to derive more granular attributes  
491 beneath those sub-categories.

#### 492 • Ownership:

493 Controls pertaining to foreign investment or ownership is likely to be driven at an authority  
494 or regulatory level and influenced by political or threat assessments. The risk grows with the  
495 globalisation of the supply chain with trust being exponentially diluted as the visibility and  
496 control of the supply chain diminishes beyond national boundaries.

497 Operators within the CNI sectors are often comprised of private sector organisations of various  
498 sizes and ownership types, including being foreign owned or part of a global organisation. Their  
499 business priorities are different to those of public sector organisations and an appreciation of  
500 this needs to be understood at all stages of the contract.

#### 501 • Risk:

502 The globalisation of the supply chain adds to the overall complexity, which is a sub-category  
503 here. This exposes the attack surface by introducing potential threats outside the traditional  
504 business boundary that is part of the wider risk management criteria that traverses all four  
505 categories. Information sharing captures detail about suppliers that may influence decisions  
506 during the procurement process and throughout the life of the contract. It also refers to  
507 sharing of best practice and threat intelligence to suppliers to ensure their protection and, by  
508 association, that of the organisation.

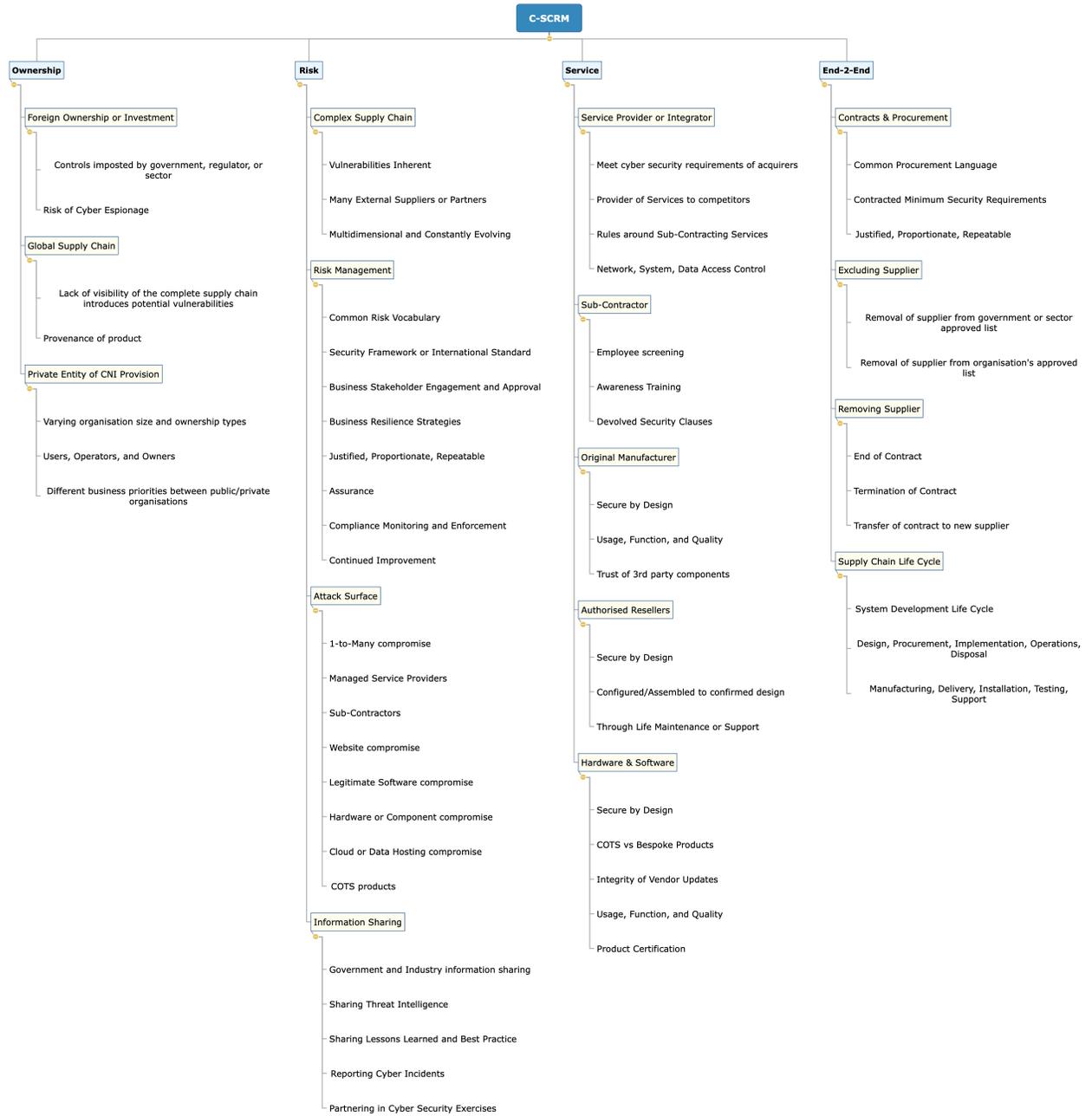


Figure 2: C-SCRM Outline Taxonomy

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- **Service:**

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Outsourcing to a service provider or integrator requires security requirements to be articulated and understood. They may provide services to competitors, so separation of duties and access control is a consideration. They are also a component of the wider attack surface, especially as threat actors may look to target an organisation in the supply chain, or focus on a 1-to-many compromise over a 1-to-1 strategy. The reward of compromising many organisations upstream by focusing on a specific vendor or service provider within the supply chain is an attractive proposition to the threat actor. Hardware and Software are also covered in this category (and are also included in the attack surface considerations), whilst the relationship between client and supplier has been further defined as an engagement with the original manufacture or via an authorised reseller.

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- **End-2-End:**

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Baking security requirements into the contract during procurement to ensure that minimum security standards are understood, whilst also accepting that such security requirements are fit for purpose. Adopting a common procurement language is beneficial and this extends to the whole lifecycle from initial design and procurement through the stages to product disposal at the end or termination of a contract. Some suppliers may be excluded from the approved list for a number of reasons at a government, sector, or organisation level.

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The requirement for a common taxonomy is an underlying theme, both for the ability to communicate risks throughout the supply chain, and for a standard procurement approach that supports the end-to-end supply chain lifecycle. This would enable organisations to proactively introduce risk mitigation controls to cyber security related dependencies and vulnerabilities.

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Such a taxonomy will enable both efficient and collaborative enhancements through the delivery of an agreed vocabulary of C-SCRM business concepts that is repeatable and authoritative. This requires involvement from all stakeholders to resolve the agreed terminology and a governance wrap to manage and maintain it.

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Our research indicates that such stakeholder agreement would be challenging with varying technologies, sectors, motivations, priorities, regulations, regions, and political influences at play. There are financial incentives for finding a common approach, but there is also effort required and likely compromises to be made in order to reach that objective.

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## 5.2. *Harmonisation of frameworks*

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Repeated comments within the sampled documents to harmonise frameworks also supports this need for commonality. This would deliver a baseline that organisations and suppliers can aim towards, with the understanding of sector specific nuances that would need to be applied on top of this foundation level of assurance.

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It may be that one-size doesn't fit all though. The CNI sectors provide very different services. They are publicly and privately owned and operated and come in various sizes. Some are foreign owned, whilst others are international companies working in multiple regions. Many rely on ICS to delivery their product and ICT to support the business and engage with the customer base. Their supply chain will likely be complex and global. It will be made up of the traditional vendor solutions and the wider supply chain components detailed in this paper. Some will have constraints placed upon them by their regulator, whilst others will have more flexibility in choosing their supplier and their levels of assurance.

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552 Suppliers provide various solutions and services, often for multiple customers. Vendor solutions  
553 may be bespoke or COTS products with their own standards and regulations and may be national  
554 or international organisations in their own right. They may provide their product to multiple  
555 organisations within the same CNI sector, to multiple CNI sectors, and to organisations in other  
556 sectors or countries. Therefore, as businesses consider moving towards COTS solutions, cloud-based  
557 services, and automation, the ability to insist on contractual obligations may become compromised.

558 There may be other aspects that are not suitable for frameworks to cover, such as foreign  
559 investment or ownership that will likely sit better at a central authority level as this research  
560 indicates.

561 It is with this backdrop that the implementation of guidance at either an authority or sector  
562 level is challenging. Our research finds that some sectors fare better than others, with all focusing  
563 on some areas of the supply chain categories, but none on all of them. Our analysis identifies  
564 commonality in the quality and type of guidance offered by the UK and US Energy sectors, but  
565 national discrepancies within the other two sectors.

566 Given the repeated desired outcome for a harmonisation of standards, efforts currently happening  
567 on both sides of the Atlantic may help drive this forward. The NCSC has recently developed a  
568 CNI Hub [53] to provide advice and guidance for stakeholders in both the public and private sector  
569 CNI, whilst CISA recently produced their SCRM Essentials [15] for ICT. The strong relationship  
570 between these two organisations that extends to other international partnerships may provide the  
571 impetus needed. There is currently no equivalent EU guidance, although ENISA recently shone  
572 a light on supply chain cyber security with their guidelines for the Internet of Things (IoT) [25].  
573 Collaboration to bring together disparate programs under a communal banner can advance the  
574 collective objective.

### 575 5.3. Mapping the C-SCRM Taxonomy

576 The discussion above highlights the appetite for a baseline C-SCRM framework to satisfy the  
577 varying needs and demands of companies, industries, sectors, regulators, and governments. A  
578 common and successful approach often begins in the form of an “Essentials” document, which is a  
579 very high-level requirement and an approach used to good effect by both NCSC and CISA<sup>9</sup>.

580 We map the *CISA ICT SCRM Essentials* [15] and the *NCSC Principles of Supply Chain*  
581 *Security* [20]<sup>10</sup> products against the initial C-SCRM taxonomy in figure 2 and find alignment (figure  
582 3) at a sub-category level that bodes well for a common ground to take forward. The bold ticks  
583 indicate that the sub-category is referenced, whilst the clear ticks indicate that it is not evident in  
584 the referenced paper, but is covered by supplementary documents<sup>11</sup> within the organisation (NCSC  
585 or CISA). Where this is not the case, a cross is used to show that no reference is observed. We then  
586 provide more detailed alignment to the specific attributes within the sub-categories that can be  
587 found in Figure 4.

588 Figure 3 indicates the levels of coverage of the sub-categories within the C-SCRM. However,  
589 using the detail in figure 4 to drill down further and investigate the coverage of the attributes within  
590 those categories, we see gaps begin to appear.

591 Both organisations require suppliers adhere to a contracted minimum level of security standards.  
592 NCSC recommends that these are proportionate, whilst CISA suggests the use of an approved

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<sup>9</sup>NCSC created Cyber Essentials, whilst CISA has recently published ICT SCRM Essentials

<sup>10</sup>This was published jointly with the Centre for the Protections of National Infrastructure (CPNI)

<sup>11</sup>CISA ICT Supply Chain Risk Management report[14]. NCSC CNI Hub [53]

C-SCRM	NCSC	CISA
<b>End-2-End</b>		
Contracts & Procurement	☑	☑
Excluding Supplier	⊗	☑
Removing Supplier	☑	⊗
Supply Chain Life Cycle	☑	☑
<b>Ownership</b>		
Foreign Investment or Ownership	☑	⊗
Global Supply Chain	⊗	☑
Private Entity of CNI Provision	☑	☑
<b>Risk</b>		
Complex Supply Chain	☑	⊗
Risk Management	☑	☑
Attack Surface	☑	☑
Information Sharing	☑	☑
<b>Service</b>		
Service Provider or Integrator	☑	☑
Sub-Contractor	☑	☑
Original Manufacturer	☑	☑
Authorised Resellers	⊗	☑
Hardware & Software	☑	☑

**Legend:**

- ☑ Referenced in the document
- ⊗ Not Observed
- ☑ Referenced elsewhere by the organisation

Figure 3: C-SCRM Alignment

593 supplier list (which is a more palatable than calling it an exclusion list). NCSC has good coverage  
 594 around the removal of suppliers at the end or termination of a contract and how that may be  
 595 transferred to a new supplier but, although they reference the supply chain lifecycle, they don't  
 596 cover any of the attributes. CISA does, albeit not within the analysed document.

597 The concept of ownership and the sub-categories of it are not addressed in either paper and,  
 598 although both address it in other documents, the attributes they cover are not aligned.

599 As one would expect with C-SCRM, risk is a category that is well covered, at least with regards  
 600 to risk management. Both recommend alignment with industry standards and best practice. CISA  
 601 points to NIST, without specifying any particular product, whilst NCSC highlights ISO 28000  
 602 and the Government Supplier Framework [65]. Both consider the complexity of supply chains.  
 603 CISA was particularly keen to promote representation from multiple parts of the organisation when  
 604 defining the SCRM program and to promote it as a business priority, whilst NCSC instead put  
 605 value in information sharing. This included sharing information within the business of suppliers  
 606 who continually fail to meet security or performance expectations, but also the positive aspect  
 607 of the sharing of threats, vulnerabilities and best practice across the supply chain. They set out  
 608 requirements for reporting security incidents and that organisations may assist and support suppliers  
 609 where security incidents have a potential to affect their business or the wider supply chain. The  
 610 propagation of lessons learned to all suppliers was also recommended.

611 Service is a C-SCRM category that looks good in Figure 3 but, when focusing on the attributes,  
 612 a different picture emerges. Both have strong coverage around service provision and the need for  
 613 cyber security requirements of providers and integrators. Both appreciate that services may be  
 614 further sub-contracted by suppliers and NCSC recommends contracting what can be outsourced  
 615 and ensuring that security requirements are flowed down. Both papers touch upon hardware and  
 616 software with regards to vulnerabilities and being part of the attack surface, but neither addresses

617 any of the attributes for this or with regards to the original manufacturer or authorised resellers,  
 618 although CISA does cover elements of this elsewhere.

619 What this mapping of the C-SCRM taxonomy down to an attribute level shows is that although  
 620 there is commonality between CISA and NCSC documents, there are also differences in the attributes  
 621 on which they concentrate. There are also significant gaps. Some of these are addressed in different  
 622 products within the organisation, but there are also significant areas that are missing entirely.  
 623 Further research will be required to determine whether these gaps are important, but as these  
 624 attributes are derived from data extracted from the body of researched documents, it would suggest  
 625 that they are valid and require addressing.

C-SCRM	NCSC	CISA
<b>End-2-End</b>		
<b>Contracts &amp; Procurement</b>	●	●
Common Procurement Language	⊗	⊗
Minimum Security Requirements	●	●
Justified, Proportionate, Repeatable	●	⊗
<b>Excluding Supplier</b>	⊗	●
From Government Approved List	⊗	⊗
From Organisation's Approved List	⊗	●
<b>Removing Supplier</b>	●	⊗
End of Contract	●	⊗
Termination of Contract	●	⊗
Transfer of contract to new supplier	●	⊗
<b>Supply Chain Life Cycle</b>	●	⊗
System Development Life Cycle	⊗	⊗
Design, Procurement, Implementation, Operations, Disposal	⊗	⊗
Manufacturing, Delivery, Installation, Testing, Support	⊗	⊗
<b>Ownership</b>		
<b>Foreign Investment or Ownership</b>	⊗	⊗
Controls imposed	⊗	⊗
Risk of Cyber Espionage	⊗	⊗
<b>Global Supply Chain</b>	⊗	⊗
Lack of visibility of vulnerabilities	⊗	⊗
Provenance of product	⊗	⊗
<b>Private Entity of CNI Provision</b>	⊗	⊗
Organisation Size and ownership type	⊗	⊗
Users, Operators, and Owners	⊗	⊗
Different Business Priorities	⊗	⊗
<b>Risk</b>		
<b>Complex Supply Chain</b>	●	●
Vulnerabilities Inherent (by proxy)	●	●
Multiple External Suppliers or Partners	●	●
Multidimensional & Constantly Evolving	⊗	⊗
<b>Risk Management</b>	●	●
Common Risk Vocabulary	⊗	●
Security Framework or Standard	●	●
Business Stakeholder Approval	⊗	●
Business Resilience Strategies	●	●
Justified, Proportionate, Repeatable	●	⊗
Assurance	●	●
Compliance Monitoring & Enforcement	●	●
Continued Improvement	●	⊗
<b>Attack Surface</b>	●	⊗

1-to-Many compromise	●	⊗
Managed Service Providers	⊗	⊗
Sub-Contractors	●	⊗
Website compromise	●	⊗
Legitimate Software compromise	●	⊗
Hardware or Component compromise	⊗	⊗
Cloud or Data Hosting compromise	●	⊗
COTS Products	⊗	⊗
<b>Information Sharing</b>	●	⊗
Government & Industry info sharing	●	⊗
Threat Intelligence	●	⊗
Lessons Learned & Best Practice	●	⊗
Reporting Cyber Incidents	●	⊗
Partnering in Cyber Security Exercises	⊗	⊗
<b>Service</b>		
<b>Service Provider or Integrator</b>	●	●
Meet Cyber Security Requirements	●	●
Provider of Services to competitors	⊗	⊗
Sub-Contracting Services	●	●
Network, System, Data Access Control	●	●
<b>Sub-Contractor</b>	●	●
Employee Screening	●	⊗
Awareness Training	⊗	⊗
Devoled Security Clauses	●	⊗
<b>Original Manufacturer</b>	●	⊗
Secure by Design	⊗	⊗
Usage, Function, and Quality	⊗	⊗
Trust of 3 <sup>rd</sup> party components	⊗	⊗
<b>Authorised Resellers</b>	⊗	⊗
Secure by Design	⊗	⊗
Configured/Assembled to agreed design	⊗	⊗
Through Life Maintenance or Support	⊗	⊗
<b>Hardware &amp; Software</b>	●	●
Secure by Design	⊗	⊗
COTS vs Bespoke Products	⊗	⊗
Integrity of Vender Updates	⊗	⊗
Usage, Function, and Quality	⊗	⊗
Product Certification	⊗	⊗

**Legend:**

- Observed in the document
- ⊗ Not Observed
- ⊙ Provided elsewhere by the organisation

Figure 4: C-SCRM Attributes

626 5.4. Baseline C-SCRM Framework

627 There is a need for a common best practice that will allow a baseline for C-SCRM to deliver a  
 628 more informed choice at a sector and organisational level.

629 Such an approach would promote the introduction of a common taxonomy and agreement on  
630 what constitutes the cyber supply chain, allowing further research into a baseline framework that  
631 satisfies many of the requirements, with individual refinement at a local, regional, or sector level.

632 Such a baseline framework, be it delivering common best practice guidance or a more detailed  
633 document set, should consider the supply chain categories identified within this work and look  
634 beyond the obvious product and service provision. Each category has good coverage from at least  
635 one AOI<sup>12</sup>, whilst two recent frameworks analysed provide a solid foundation. The NIS Directive  
636 and, in particular, the NIST CSF have delivered on some key categories, but there are still gaps  
637 and NIST references out to other globally recognised frameworks whilst recognising the need to  
638 continually adapt the CSF to align with best practices.

639 Once a baseline is produced, a common processes for measuring degrees of adoption must be  
640 considered. There are established ways to assign metrics within the frameworks. NCSC has provided  
641 the Cyber Assessment Framework (CAF) to enable CNI sectors to show conformity with the NIS  
642 Directive, whilst the NIST CSF has a framework core and associated tiers to deliver such metrics as  
643 common best practice.

644 What rests within a framework and what is the responsibility of individual authorities needs  
645 to be addressed. *Foreign investment and ownership* would appear to sit with political authorities,  
646 whilst cyber security *procurement* guidance is quite well defined by the UK and US energy sectors  
647 and these may provide a suitable opportunity to merge and replicate out to other sectors.

## 648 6. Conclusion

649 The supply chain is being increasingly targeted by threat actors to take advantage of the  
650 client/supplier trust to compromise their intended victim organisation(s) via third-party risk. CNI  
651 sectors are at particular risk of attack by threat actors. The ability for organisations to conduct  
652 a comprehensive risk management program of the cyber supply chain is essential to ensure that  
653 business benefits gained from employing a global and diverse supply chain are not undermined by  
654 increasing the potential risk of compromise.

655 This paper focuses on the advice and guidance given to three sectors that are jointly categorised  
656 as critical national infrastructures by the UK, the US, and the EU. We scrutinised authority and  
657 sectorial C-SCRM guidance before examining frameworks that sectors were directed towards. Our  
658 detailed comparison identifies a variable understanding of what constitutes the supply chain that  
659 risk can be assessed against. This inconsistency at both authority and sectorial level promotes our  
660 conclusion that there is a requirement for a common taxonomy to support a baseline C-SCRM  
661 framework.

662 This research is important in underlining a recurring theme for a common taxonomy within  
663 cyber security. Our research finds that there are some significant gaps across the different sectors  
664 that should be addressed. This would be supported by a common taxonomy that permits for this  
665 coverage to be understood across different regions and authorities.

666 We utilise our results to create an initial C-SCRM taxonomy based on the research data. This  
667 produces four top level categories, with sub-categories and attributes that were then mapped against  
668 two relevant CISA and NCSC products. Future research will aim to validate this taxonomy leading  
669 to its evaluation and expansion.

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<sup>12</sup>*Global Supply Chain* is the exception to this, but three AOIs do cover it to a moderate level and *Complex or Large Supply Chain* is very similar and has better coverage

670 This study forms the foundation to encourage future academic research into the development  
671 of a common taxonomy that can be used to create a baseline C-SCRM framework. This may be  
672 introduced through a high-level “Essentials” document that could evolve towards more detailed  
673 guidance or inclusion within established frameworks.

674 Our future work intends to develop and validate this initial taxonomy within C-SCRM to use as  
675 the foundation to develop a baseline framework to support systematic handling of cyber security  
676 risks in the supply chain. Consideration must be given to the competing stakeholder priorities and  
677 look to create a solution that can be broadly accepted. This will provide a rigorous discipline of  
678 C-SCRM to allow the broad cyber supply chain to be recognised and enable risks to be assessed  
679 and managed.

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