

Written Evidence Submission on Cyber Security and Resilience Bill

Capita Submission



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1 Executive Summary

Capita strongly supports the Cyber Security and Resilience Bill's aim to strengthen the UK's cyber posture and align with evolving threats. Our feedback focuses on four key areas:

- **Scope and Definitions:** Stronger clarification of “managed service” and critical supplier designation criteria to avoid ambiguity in differing scenarios.
- **Incident Reporting:** Confirm timelines (24-hour initial, 72-hour detailed) but provide guidance on the required level of detail and allow flexibility for complex investigations.
- **Resilience Requirements:** Define minimum standards for supply chain security and ensure proportionality in Secretary of State powers.
- **Implementation:** Minimise duplication for organisations with existing frameworks and provide practical guidance to accelerate compliance.

We encourage DSIT to maintain industry engagement and publish clear, actionable guidance to ensure effective and proportionate implementation.

1.1 Introduction

As Chief Information Security Officer, I welcome the intent of the Cyber Security and Resilience Bill to strengthen the UK's cyber posture and align with evolving threat landscapes. The proposed measures reflect the critical need for resilience across essential services and supply chains.

1.2 General Position

- We support the Bill's objectives to enhance incident reporting, improve supply chain security, and provide flexibility for future regulatory updates.
- The alignment with NIS2 principles is a positive step towards harmonising UK and EU standards.

2 Specific Feedback

2.1 Scope and Definitions

- Managed Service Providers (MSPs): Greater clarity is needed on the definition of “managed service” and designation criteria for critical suppliers. Ambiguity may lead to inconsistent interpretation across sectors and unnecessary time and effort in attempting to satisfy ambiguous requirements.
- Critical Supplier Designation: Recommend publishing clear thresholds and examples to ensure transparency and predictability.

2.2 Incident Reporting

- Timelines: The proposed 24-hour initial notification and 72-hour detailed report are reasonable; however:
 - * Guidance should specify what constitutes “sufficient detail” at each stage.
 - * Consider flexibility for complex investigations where root cause analysis may exceed 72 hours.
- Reporting Channels: A single, secure reporting portal would streamline compliance and reduce duplication.

2.3 Resilience Requirements

- Supply Chain Security: Support the inclusion of security duties for suppliers but request:
 - Clear minimum standards for contractual obligations.
 - Practical guidance for SMEs to avoid disproportionate compliance burden.
- Secretary of State Powers: While necessary for national security, recommend safeguards to ensure proportionality and industry consultation before issuing directions.

2.4 Implementation Considerations

- Impact Assessment: For organisations already operating under robust frameworks (e.g., NCSC guidance, ISO 27001), the Bill should minimise duplication.
- Support for Industry: Provision of templates, FAQs, and sector-specific guidance will accelerate adoption and reduce compliance costs.

3 Conclusion

Capita is committed to supporting the UK's cyber resilience objectives. We encourage DSIT to:

- Provide clarity on definitions and thresholds.
- Offer practical guidance for incident reporting and supply chain obligations.
- Engage industry in ongoing consultation to ensure measures remain proportionate and effective.

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