

Non-confidential submission from TAS:

Lodged via email on Friday 17/05/2019 to PolicyDevelopment@apra.gov.au

Hi,

TAS has discussed the CPG234 draft with most of our clients, including an information security session focussing on CPG234.

We asked for feedback on the CPG234 draft, offering to collate and include this as combined feedback to APRA.

No customers gave us formal feedback to pass on.

From TAS, as a body who is working with our customers specifically to ensure compliance with CPS234, we do have some simple feedback to offer.

1. This is a very good document, and includes very useful guidance. The TAS information security team is very impressed with the guide (and the standard, for that matter), and have conveyed this to customers. For example, we have advised customers, that as the standard requires adopting a set of principles, and the guide provides an excellent set of principles, we expect most organisations to universally adopt the proposed principles as they are written.
2. While the guide does align closely to the standard, to aid in compliance usability, it would be very beneficial to actually include (or at least reference) each specific CPS234 requirement with the corresponding guidance note, rather than just having guidance notes for each section.
3. The guide recommends that a range of activities (remediation etc) be conducted in a timely manner. It may be worthwhile adding a suggestion that the timeframe be linked to the organisation's risk framework (ie risk assessed and remediated based on risk appetite).

Regards,

Stephen Frede

Head of Information Security



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