# Protecting and enhancing the security and resilience of UK data infrastructure - response form

The consultation is available at: [www.gov.uk/government/consultations/XXX](https://www.gov.uk/government/consultations/XXX)

The closing date for responses is 23:55 on 22/02/2024

Please return completed forms to: disr-consultation@dsit.gov.uk

Please be aware that we will publish a formal response to this consultation following analysis of the responses.

Responses will be analysed by the Department for Science, Innovation and Technology (DSIT). The Department will process the information you have provided in accordance with the Data Protection Act 2018 (DPA).

The information you provide will be used to shape future policy development and may be shared between UK government departments, government-approved regulatory authorities, the National Cyber Security Centre (NCSC) and the National Protective Security Authority (NPSA) for this purpose. Personal information will be removed in such instances. Copies of responses, in full or in summary, may be published after the consultation closing date on the Department’s website with personal data removed.

## Questions

Questions about the respondent

Question 1: Are you responding as an individual or on behalf of an organisation?

[ ] Individual [ ] Organisation

Question 2a: If you are responding on behalf of an organisation, which of the following describes your organisation [please refer to multiple if your organisation provides multiple services or infrastructure]?

|  |  |
| --- | --- |
|  | Respondent type |
|[ ]  Colocation data centre provider |
|[ ]  Co-hosting or other non-Cloud data centre service provider (i.e. Hardware-as-a-Service [HaaS]) |
|[ ]  Cloud or hyperscale data centre provider |
|[ ]  Managed service data centre provider |
|[ ]  Enterprise and on-premise data centre provider |
|[ ]  Network data centre provider |
|[ ]  Regional data centre provider |
|[ ]  Edge data centre provider |
|[ ]  Modular data centre provider |
|[ ]  Cloud platform provider (i.e. infrastructure-as-a-service [IaaS] or platform-as-a-service provider [PaaS]) |
|[ ]  Other cloud computing providers (e.g. Software-as-a-Service [SaaS]) |
|[ ]  Managed service provider (MSP) which provides data storage and processing services |
|[ ]  Managed service provider (MSP) which does not provide data storage and processing services |
|[ ]  Internet exchange point operator |
|[ ]  Content delivery network provider |
|[ ]  Telecommunications operator |
|[ ]  Financial services organisation |
|[ ]  Trade body |
|[ ]  Research institution (e.g. academic organisation, think tank, etc.) |
|[ ]  Data centre supplier or service provider |
|[ ]  Consultancy (e.g. security consultancy) |
|[ ]  Real estate |
|[ ]  Other [please specify] - it may help to refer to [SIC codes](https://resources.companieshouse.gov.uk/sic) |

Question 2b: If you are responding on behalf of an organisation, how many data centres do you operate or are you responsible for part of? If necessary, please provide detail on the types of data centre you operate, or data centre services you provide.

Comments: Click here to enter text.

Question 2c: If you are responding on behalf of an organisation, does your organisation operate in the UK, the EU, and/or outside the EU?

[ ]  UK [ ]  EU [ ]  Outside the EU

Question 3: Please describe your role or the capacity in which you are responding

Voluntary Measures and Industry Support Structures

Question 4: What forms of digital or data-related infrastructure should the government consider for potential CNI designation?

Comments: Click here to enter text.

Question 5: How would you compare the expertise required to appropriately risk manage the colocation data centre sector to other critical sectors, such as Communications?

Comments: Click here to enter text.

Question 6: Are there particular benefits, opportunities, or risks to CNI designation for the colocation data centre sector that you would wish to draw our attention to?

Comments: Click here to enter text.

Question 7: What forms of intra-sector and sector-to-government voluntary cooperation would be most useful for the sector?

Comments: Click here to enter text.

Question 8: What voluntary cooperation mechanisms, if any, have you experienced in this or other sectors that demonstrate improvement to risk management?

Comments: Click here to enter text.

Question 9: Which issues lend themselves to intra-sector cooperation, and on which issues would industry welcome further government involvement?

Comments: Click here to enter text.

Scope

Question 10: Please share any views you may have on the definitional approach, and on the proposed indicative definitions for:

1. a data centre
2. relevant data centre services
	1. colocation
	2. co-hosting

Comments: Click here to enter text.

Question 11: Please share, and explain, any views you may have on the proposed scope of third-party data centres, the operation of which are part of colocation and co-hosting services.

Comments: Click here to enter text.

Question 12: Of the services and infrastructure that are indicated as outside the scope of the proposed framework, are there any that you feel should be included, or that you feel require a different treatment? Please explain the reasons for your answer.

Comments: Click here to enter text.

Question 13: Please share any information that you consider might help to inform the government’s scope approach. This might include, for example, information on the taxonomy of and terminology used to describe the data centre and data centre services landscape and market.

Comments: Click here to enter text.

Question 14: Please express your preference on the options set out for the treatment of data centres that are owned and operated by cloud service providers:

[ ]  Option A

[ ]  Option B(1)

[ ]  Option B(2)

**Please explain the reasons for your answer.**

Comments: Click here to enter text.

Question 15: Please express your preference on the options set out for the treatment of data centres that are owned and operated by managed service providers:

[ ]  Option A

[ ]  Option B(1)

[ ]  Option B(2)

**Please explain the reasons for your answer.**

Comments: Click here to enter text.

Question 16: Please share any views you may have on the proposed power to expand the scope.

We are particularly interested in information on existing or emergent forms of data storage and processing infrastructure, data centre services, and connected infrastructure which may warrant future attention from the perspective of security and resilience.

Comments: Click here to enter text.

**Question 17: Please share any views you may have on the proposed power to exempt from scope and set exemption thresholds.**

**We would welcome any information or evidence that could be helpful for the government to make a decision on any approach to small and micro-businesses, and to small data centres, whether initially, or using the proposed power.**

Comments: Click here to enter text.

Question 18: How much do you agree or disagree that owners of third-party data centres should be included within the scope of the proposed framework? [scale from strongly disagree to strongly agree]

[ ]  Strongly disagree

[ ]  Somewhat disagree

[ ]  Neither agree nor disagree

[ ]  Somewhat agree

[ ]  Strongly agree

Please explain the reasons for your answers to the previous question.

Comments: Click here to enter text.

Question 19: Please provide any information that you consider would be helpful to inform the government approach. For example, information on ownership and market structures, owner and wholesale leaseholder contractual arrangements and divisions of responsibility.

Comments: Click here to enter text.

Registration

Question 20: Please share your views on the information that could be required at the point of registration. Do you have any recommendations for other information or data that you feel should be required?

Comments: Click here to enter text.

Security and Resilience Measures

Question 21: How much do you agree or disagree that the proposed mechanisms to set security and resilience measures will provide the necessary capability to address security and resilience risks, now and in the future? [scale from strongly disagree to strongly agree]

[ ]  Strongly disagree

[ ]  Somewhat disagree

[ ]  Neither agree nor disagree

[ ]  Somewhat agree

[ ]  Strongly agree

Please explain the reasons for your answers to the previous question.

Comments: Click here to enter text.

Question 22: How much do you agree or disagree that an outcome-based approach to the baseline measures is the most effective approach? [scale from strongly disagree to strongly agree]

[ ]  Strongly disagree

[ ]  Somewhat disagree

[ ]  Neither agree nor disagree

[ ]  Somewhat agree

[ ]  Strongly agree

Please explain the reasons for your answers to the previous question.

Comments: Click here to enter text.

Question 23: Please share any comments or reflections on the indicative measures, including where there may be gaps.

We would welcome views on whether there are any areas or measures where a more prescriptive approach may be required to effectively protect or enhance security and resilience.

Comments: Click here to enter text.

Standards, Assurance and Testing

Question 24: Please provide information on your use of standards, assessment frameworks, and testing (and any other security and resilience assurance tools) for your UK operations, sites, and services using the table provided in the Catalogue of questions section.

This will be used to inform the design and potential implementations of the proposed standards, assurance and testing mechanisms, and may inform the design of baseline security and resilience measures.

|  |  |
| --- | --- |
|  Question 23 – survey table |   |
| **Standard / assessment / assurance tool** (if there are multiple versions or types, please indicate) | **Use** **(in the UK)**[Y/N] | **Primary reason for use** e.g. customer requirement, competitor-alignment, customer reassurance, because of controls/assurance provided | **Estimation of resourcing costs associated with use** (annually, in GBP, where possible) | **Self-assessed / third-party verified/****certified** [S-A / TPV] | **Estimation of cost per third party assessment and frequency of assessment** (in GBP, where possible) | **Are costs proportionate to security and resilience benefits?** [scale from strongly disagree to strongly agree] |
| **ISO/IEC 27001 and 2** | [ ]  | Click here to enter text. | Click here to enter text. | [ ]  S-A[ ]  TPV | Click here to enter text. | [ ]  Strongly disagree[ ]  Somewhat disagree[ ]  Neither disagree nor agree[ ]  Somewhat agree[ ]  Strongly agree |
| **ISO/IEC 22301** | [ ]  | Click here to enter text. | Click here to enter text. | [ ]  S-A[ ]  TPV | Click here to enter text. | [ ]  Strongly disagree[ ]  Somewhat disagree[ ]  Neither disagree nor agree[ ]  Somewhat agree[ ]  Strongly agree |
| **ISA/IEC 62443** | [ ]  | Click here to enter text. | Click here to enter text. | [ ]  S-A[ ]  TPV | Click here to enter text. | [ ]  Strongly disagree[ ]  Somewhat disagree[ ]  Neither disagree nor agree[ ]  Somewhat agree[ ]  Strongly agree |
| **ISO/ IEC 22237** | [ ]  | Click here to enter text. | Click here to enter text. | [ ]  S-A[ ]  TPV | Click here to enter text. | [ ]  Strongly disagree[ ]  Somewhat disagree[ ]  Neither disagree nor agree[ ]  Somewhat agree[ ]  Strongly agree |
| **EN 50600** | [ ]  | Click here to enter text. | Click here to enter text. | [ ]  S-A[ ]  TPV | Click here to enter text. | [ ]  Strongly disagree[ ]  Somewhat disagree[ ]  Neither disagree nor agree[ ]  Somewhat agree[ ]  Strongly agree |
| **ANSI/TIA-942** | [ ]  | Click here to enter text. | Click here to enter text. | [ ]  S-A[ ]  TPV | Click here to enter text. | [ ]  Strongly disagree[ ]  Somewhat disagree[ ]  Neither disagree nor agree[ ]  Somewhat agree[ ]  Strongly agree |
| **Uptime Institute Tier standard** | [ ]  | Click here to enter text. | Click here to enter text. | [ ]  S-A[ ]  TPV | Click here to enter text. | [ ]  Strongly disagree[ ]  Somewhat disagree[ ]  Neither disagree nor agree[ ]  Somewhat agree[ ]  Strongly agree |
| **PCI DSS** | [ ]  | Click here to enter text. | Click here to enter text. | [ ]  S-A[ ]  TPV | Click here to enter text. | [ ]  Strongly disagree[ ]  Somewhat disagree[ ]  Neither disagree nor agree[ ]  Somewhat agree[ ]  Strongly agree |
| **SOC1** | [ ]  | Click here to enter text. | Click here to enter text. | [ ]  S-A[ ]  TPV | Click here to enter text. | [ ]  Strongly disagree[ ]  Somewhat disagree[ ]  Neither disagree nor agree[ ]  Somewhat agree[ ]  Strongly agree |
| **SOC2** | [ ]  | Click here to enter text. | Click here to enter text. | [ ]  S-A[ ]  TPV | Click here to enter text. | [ ]  Strongly disagree[ ]  Somewhat disagree[ ]  Neither disagree nor agree[ ]  Somewhat agree[ ]  Strongly agree |
| **ANSI/TIA-942** | [ ]  | Click here to enter text. | Click here to enter text. | [ ]  S-A[ ]  TPV | Click here to enter text. | [ ]  Strongly disagree[ ]  Somewhat disagree[ ]  Neither disagree nor agree[ ]  Somewhat agree[ ]  Strongly agree |
| **NIST CSF or SP** | [ ]  | Click here to enter text. | Click here to enter text. | [ ]  S-A[ ]  TPV | Click here to enter text. | [ ]  Strongly disagree[ ]  Somewhat disagree[ ]  Neither disagree nor agree[ ]  Somewhat agree[ ]  Strongly agree |
| **Cyber Essentials** | [ ]  | Click here to enter text. | Click here to enter text. | [ ]  S-A[ ]  TPV | Click here to enter text. | [ ]  Strongly disagree[ ]  Somewhat disagree[ ]  Neither disagree nor agree[ ]  Somewhat agree[ ]  Strongly agree |
| **Cyber Essentials** | [ ]  | Click here to enter text. | Click here to enter text. | [ ]  S-A[ ]  TPV | Click here to enter text. | [ ] Strongly disagree[ ] Somewhat disagree[ ] Neither disagree nor agree[ ] Somewhat agree[ ]  Strongly agree |
| **Cyber Assessment Framework (CAF)** | [ ]  | Click here to enter text. | Click here to enter text. | [ ]  S-A[ ]  TPV | Click here to enter text. | [ ] Strongly disagree[ ] Somewhat disagree[ ] Neither disagree nor agree[ ] Somewhat agree[ ]  Strongly agree |
| **Other tools [please specify]** | [ ]  | Click here to enter text. | Click here to enter text. | [ ]  S-A[ ]  TPV | Click here to enter text. | [ ] Strongly disagree[ ] Somewhat disagree[ ] Neither disagree nor agree[ ] Somewhat agree[ ]  Strongly agree |

Question 25: How much do you agree or disagree with the proposed inclusion of an earned recognition mechanism to account for existing tools used in the sector? [scale from strongly disagree to strongly agree]

[ ]  Strongly disagree

[ ]  Somewhat disagree

[ ]  Neither agree nor disagree

[ ]  Somewhat agree

[ ]  Strongly agree

Please share any views on the proposed approach, and any design and implementation recommendations or suggestions you may have.

Comments: Click here to enter text.

Question 26: Please share any views you have on this section and these topics. This may include your views on the most effective and appropriate security and resilience-related standards, certifications, assurance assessments and testing for the sector.

Comments: Click here to enter text.

Personnel

Question 27: Please indicate whether you conduct any background checks on staff and/or require this of visiting contractors? If so, please share what they entail (i.e. overseas checks, financial checks and/or qualification and employment checks).

Comments: Click here to enter text.

Question 28: How confident are you that your current background checks provide sufficient risk mitigation? [scale from very confident to not at all confident]

[ ]  Very confident

[ ]  Fairly confident

[ ]  Moderately confident

[ ]  Slightly confident

[ ]  Not at all confident

Question 29: Please share your views on the forms of government support that could help you conduct background checks.

Comments: Click here to enter text.

Incident Reporting

Question 30: Please share your views on the proposals for incident reporting to a regulator, and to other affected parties. For example, views on the proposed indicative minimum threshold and conditions.

Comments: Click here to enter text.

Question 31: Please share your views on the proposed approach to customer incidents, and to supply chain incidents and vulnerabilities.

Comments: Click here to enter text.

Question 32: Please share any information you feel would be relevant on your Service Level Agreements with customers and supply chain actors. What forms of government support could assist with these agreements and arrangements for the sector?

Comments: Click here to enter text.

Public disclosure

Question 33: Please share your views on public disclosure. This may include views on the process described, the parties involved, and the examples given for circumstances that could lead to a regulator considering whether the public should be informed.

Comments: Click here to enter text.

Regulatory Model and Function

Question 34: Please share any views on the Regulatory model and function section, including the proposed supervisory and enforcement approaches.

Comments: Click here to enter text.

Question 35: How much do you agree or disagree that the proposed powers are sufficient to effectively supervise the sector and enforce the proposed security and resilience duties? [scale from strongly disagree to strongly agree]

[ ]  Strongly disagree

[ ]  Somewhat disagree

[ ]  Neither agree nor disagree

[ ]  Somewhat agree

[ ]  Strongly agree

Question 36: Which existing bodies should be considered as candidate regulators?

Comments: Click here to enter text.

Question 37: Please share your views on the proposed methods of funding. Are there further funding methods or avenues that you feel we should consider?

Comments: Click here to enter text.

Monitoring and Evaluation

Question 38: We welcome your views on the cost to businesses of the proposed framework should it be implemented. Please provide evidence.

Comments: Click here to enter text.

Question 39: We welcome views on costs to small and micro businesses in the UK of the proposed framework should it be implemented. In particular, consider how best to quantify the impact on profits of small and micro data centre providers. Please provide evidence.

Comments: Click here to enter text.

Statutory Framework

Question 40: Please share any views or preferences you may have on the legislative or regulatory vehicle the government could use to deliver this framework.

Comments: Click here to enter text.

Environmental Considerations

Question 41: Please share your views on how to ensure unnecessary environmental harm could be mitigated where organisations are required to meet statutory requirements.

Comments: Click here to enter text.

General

Question 42: Should provision be made for potential insolvency of significant data centres or other operators to prevent loss of cumulative UK capacity?

Comments: Click here to enter text.

Analysis and evidence

Question 43: Annex A contains a number of statistics produced via research and analysis, and also contains observations based on more anecdotal evidence. Please consider it from your individual business’s point of view as well as looking across the wider industry and share any views.

Comments: Click here to enter text.

Question 44: To what extent do the estimates of the total revenue generated and number of people employed by data centres fit with your understanding?

Comments: Click here to enter text.

Question 45: Does the estimated number of data centres align with your knowledge and evidence?

Comments: Click here to enter text.

**Question 45a: How many of the data centres are colocation data centres, co-hosting data centres, managed service providers and colocation managed service providers?**

Comments: Click here to enter text.

Question 46: What are your views on the estimate that downtime costs the industry in the low single-digit billions per year (noting that there is a wide error range around this)?

Comments: Click here to enter text.

Question 47: Please share your views on the drivers behind decisions to supply data centre capacity:

1. What was the decision-making process for the location of your facilities?
2. What would be the potential benefits and disbenefits of locating them elsewhere, including in other UK locations or abroad?
3. How do environmental considerations play a part in such decisions?
4. If you had the power to change them, how would you change factors outside your direct control? For example, the ability of the grid to supply energy (has this restricted or will it restrict your ability to provide DC capacity?).

Comments: Click here to enter text.

**Question 48: Do you have plans to expand capacity? If so, what type of facility would this expansion take the form of, and where would it be?**

Comments: Click here to enter text.

Question 49: Annex A mentions that the industry is highly-concentrated.

1. Do you have a view as to the market forces behind this?
2. Do you have views on whether the market forces are likely to change in future, particularly if edge becomes more prevalent?

**a)** Comments: Click here to enter text.

**b)** Comments: Click here to enter text.

**Question 50: Similarly, how do you think the market structure may be affected by use cases? For example, might AI lead to increased market concentration as a result of the need for large-scale compute capacity in one place, or might AI lead to a greater proliferation of smaller providers?**

Comments: Click here to enter text.

Question 51: Do you operate edge data centres?

1. If not, why not, and do you plan to expand into the edge market in future? Again, if not why not?
2. If yes, how is this being delivered, i.e. what form of data centre are you/will you construct?
3. How do you see the market for edge taking shape in future?

**a)** Comments: Click here to enter text.

**b)** Comments: Click here to enter text.

**c)** Comments: Click here to enter text.

Final questions and contact

Question 52: Please list which questions you have answered in the space provided below (there is no need to respond to all question if they are not all relevant to you).

Click here to enter text.

Click here to enter text.

**Question 53: Are you willing to be contacted at a later date, to discuss your responses or ask further questions?**

[ ]  Yes [ ]  No

**Question 54: If yes, please provide your email address. This will be kept in confidence and only used for the purposes of this consultation and directly- related activities.**

Email: Click here to enter text.

**Thank you for taking the time to respond.**