

With reference to the above and further to Mid-Term Review of the National Cyber Security Strategy 2019-2024, the following are the initial observations as pertaining to the attached and are provided for review and further discussions as you may deem appropriate.

Q: Is the vision in the Strategy still relevant? How should it be updated to reflect recent developments?

It is the view of GNCCB, that the vision outlined within the National Cyber Security Strategy 2019-2024, “an Irish society that can continue to safely enjoy the benefits of the digital revolution and can play a full part in shaping the future of the internet” remains relevant. Significant developments on a domestic front as a result of significant incidents such as the HSE Ransomware attack as well as international factors such as the Covid-19 pandemic and the Russian invasion of Ukraine have heightened the public’s awareness of Cyber related threats in their own environments, are likely to put a greater emphasis on risk to SME’s, the education sector as well as community, voluntary and domestic targets than would have been envisaged at the commencement of this strategy. At its core however, the focus as outlined within this vision of Irish society continuing to enjoy the benefits of the digital revolution and playing a full part in the shaping of the future of the internet remains stronger than ever.

Q: Are the objectives in the Strategy still relevant? How should they be updated to reflect recent developments? Are there new objectives which should be included?

The objectives of the strategy remain relevant, however given the heightened awareness of the public to Cyber related threats, further objectives surrounding the education of the general public in addition to those relating to National security and critical infrastructure should be considered, with a strong emphasis to prevent cyber-attacks at all levels within Irish society

Q: Are the proposed measures appropriate and relevant to the current situation? Are there further proposals which should be considered? Which, if any, proposals should be prioritised? (National Capacity Development)

The proposals as outlined within the strategy provide a significant enhancement to the role of the National Cyber Security Centre as part of the overall strategies for the state in respect of both the prevention and detection of Cyber related attacks. The strategy provides for the increased legislative underpinnings for the NCSC and addresses the role of the Defence Forces as part of this strategy. The strategy is however silent on the role of An Garda Síochána in this strategy, as it is silent on the obligations to investigate criminal offences, and attempts to commit such offences by An Garda Síochána as set out in legislation. It is the view of the Garda National Cyber Crime Bureau that any cyber-attack or attempt to commit such an attack, is at its core, a criminal offence and therefore requiring a criminal investigation into same. The development of the Garda National Cyber Crime Bureau, and their capabilities to leverage intelligence and investigative capacity from other Law Enforcement agencies should also form a core part of the measures.

Q: Are the proposed measures appropriate and relevant to the current situation? Are there further proposals which should be considered? Which, if any, proposals should be prioritised? (Critical National Infrastructure Protection)

The measures as outlined pertaining to the protection of National Critical Infrastructure are deemed to be comprehensive, particularly in light of the additional measures proposed. There are no additional proposals that are identified for consideration.

Q: Are the proposed measures appropriate and relevant to the current situation? Are there further proposals which should be considered? Which, if any, proposals should be prioritised? (Public Sector Data and Networks)

There are no additional proposals to be made by GNCCB for consideration.

Q: Are the proposed measures appropriate and relevant to the current situation? Are there further proposals which should be considered? Which, if any, proposals should be prioritised? (Skills)

The proposed measures are deemed to be both relevant and appropriate. The development of training in the area of cyber security at junior cycle, albeit on a pilot course, is to be welcomed. This is likely to provide a trained and skilled workforce and as well as providing a general awareness for cyber security and good cyber hygiene. The further development of such training at both primary and secondary levels is posed for consideration.

Q: Are the proposed measures appropriate and relevant to the current situation? Are there further proposals which should be considered? Which, if any, proposals should be prioritised? (Enterprise Development)

No additional proposals

Q: Are the proposed measures appropriate and relevant to the current situation? Are there further proposals which should be considered? Which, if any, proposals should be prioritised? (Engagement)

No additional proposals

Q: Are the proposed measures appropriate and relevant to the current situation? Are there further proposals which should be considered? Which, if any, proposals should be prioritised? (Citizens)

The continued collaboration between the Garda National Cyber Crime Bureau and the National Cyber Security Centre in the development of National information campaigns is to be welcomed. The joint proposals issued as part of the European Cyber Safety Month have shown to be effective and far reaching and similar joint campaigns would be deemed to be helpful in this regard. GNCCB have a significant reach to the members of the public and it involvement in such joint operations with the NCSC will assist both organisations in reaching a wider target audience. It is proposed that the engagement of both GNCCB and the NCSC in locally run campaigns such as Capture the Flag (CTF) competitions would be a proactive means in further engaging with citizens.

Q: Are the proposed measures appropriate and relevant to the current situation? Are there further proposals which should be considered? Which, if any, proposals should be prioritised? (Governance Framework and Responsibilities)

No additional proposals