

Draft UKPIA response to the DCMS Consultation on Embedding standards and pathways across the cyber profession by 2025

Consultation questions

Question 1. To what extent do you agree or disagree, ranging from fully agree to fully disagree, that the market is best placed to define and embed professional standards?

- Fully agree
- **Mostly agree**
- Neither agree nor disagree
- Mostly disagree
- Fully disagree
- Do not know

Question 2. To what extent do you agree or disagree, ranging from fully agree to fully disagree, that government intervention is required to support this approach?

- Fully agree
- **Mostly agree**
- Neither agree nor disagree
- Mostly disagree
- Fully disagree
- Do not know

Question 2a. [If mostly or fully disagree] Please expand on the reasons for this response.

Member response

UKPIA believes that a range of approaches are needed to achieve the goal of developing a common taxonomy that recognises expertise across the range of specialisms in the field, and formally recognise its role as standard-setter. This includes both, market based approaches and some government intervention.

Question 3. To what extent do you agree or disagree, ranging from fully agree to fully disagree, with the proposal that the UK Cyber Security Council should be formally recognised (via legislation) as the standard setting body for the cyber profession with a view to it overseeing the regulation of the profession under a legislative scheme?

- Fully agree
- **Mostly agree**
- Neither agree nor disagree
- Mostly disagree
- Fully disagree
- Do not know

Question 3a. [If mostly or fully disagree] Please expand on the reasons for this response?

Member response

UKPIA believes that a regulatory framework associated with cyber professional standards is the only way to ensure consistency across the sector. However, the focus should be on standard setting, continuous development and flexibility rather than prescriptive rules.

Question 4. To what extent do you agree or disagree, ranging from fully agree to fully disagree, that regulating by activity should be explored in future plans?

- Fully agree
- Mostly agree
- **Neither agree nor disagree**
- Mostly disagree
- Fully disagree
- Do not know

Question 5. To what extent do you agree or disagree, ranging from fully agree to fully disagree, that under-qualified professionals should be prohibited from carrying out activities related to a specialism until they are qualified to do so?

- Fully agree
- Mostly agree
- Neither agree nor disagree
- **Mostly disagree**
- Fully disagree
- Do not know

Question 6. To what extent do you agree or disagree, ranging from fully agree to fully disagree, that role definitions across cyber security functions are inconsistently defined and require consolidation?

- Fully agree
- **Mostly agree**
- Neither agree nor disagree
- Mostly disagree
- Fully disagree
- Do not know

Question 7. Do you think there are any additional considerations that need to be examined to ensure that the proposed measures to regulate professional job titles do not provide unnecessary barriers to entry for candidates entering or wishing to progress in a cyber security career?

- **Yes**
- No
- Do not know

Question 7a. [If yes] what additional measures should be considered?

Member response

UKPIA believes that a broad competency based scheme with mitigation steps for those under qualified / less competent develop their competencies. A framework would allow companies and individuals to demonstrate competence through a range of methods. It would also allow employers to apply measures, such as levels of supervision, to those less competent.

Question 8. To what extent do you agree or disagree, ranging from fully agree to fully disagree, that the profession should regulate the use of professional job titles?

- Fully agree
- **Mostly agree**
- Neither agree nor disagree
- Mostly disagree
- Fully disagree
- Do not know

Question 9. To what extent do you agree or disagree, ranging from fully agree to fully disagree, that individuals should have to meet particular competency standards set by the UK Cyber Security Council in order to utilise a specific job title?

- Fully agree
- **Mostly agree**
- Neither agree nor disagree
- Mostly disagree
- Fully disagree
- Do not know

Question 10. To what extent do you agree or disagree, ranging from fully agree to fully disagree, that statutory regulation on the use of title will not significantly exacerbate the existing skills shortage across cyber security roles in the UK?

- Fully agree
- Mostly agree
- Neither agree nor disagree
- **Mostly disagree**
- Fully disagree
- Do not know

Question 11. As an employer, to what extent do you agree or disagree, ranging from fully agree to fully disagree, that you would prioritise recruitment of professionals with a job title recognised by the UK Cyber Security Council?

- Fully agree
- **Mostly agree**
- Neither agree nor disagree
- Mostly disagree
- Fully disagree
- Do not know

Question 12: As an employer, to what extent do you agree or disagree, ranging from fully agree to fully disagree, that your recruitment practice would be improved by having a clear, competence framework underpinned by legislation for cyber professionals to adhere to?

- Fully agree
- **Mostly agree**
- Neither agree nor disagree
- Mostly disagree
- Fully disagree

- Do not know

Question 13. As an employer, to what extent do you agree or disagree, ranging from fully agree to fully disagree, that you would support staff with their continuous professional development to achieve a job title recognised by the UK Cyber Security Council?

- Fully agree
- **Mostly agree**
- Neither agree nor disagree
- Mostly disagree
- Fully disagree
- Do not know

Question 14. As an employee, would you apply to obtain qualifications towards a professional job title recognised by the UK Cyber Security Council?

- **Yes**
- No
- Do not know

Question 15. As an employee, to what extent do you agree or disagree, ranging from fully agree to fully disagree, that it would be beneficial to have a professional job title that is recognised by the UK Cyber Security Council?

- Fully agree
- **Mostly agree**
- Neither agree nor disagree
- Mostly disagree
- Fully disagree
- Do not know

Question 15a. Please explain more about why you agree or disagree that it would be beneficial to have a professional job title recognised by the UK Cyber Security Council.

Member response

UKPIA supports the use of regulated, standards based role descriptions and a broad competency framework with options for flexibility where individuals do not yet meet the required competence level.

UKPIA is aware of many other bodies and institutions that follow similar competence based approach to demonstrate certain level has been reached without the use of rigid job roles.

Examples of other professional bodies are:

- Institute of Civil Engineers,
- Geological Society,
- Institute of Environmental Management and Assessment, and
- The Chartered Institute of Water and Environmental Assessment

Within these bodies each level of competence demonstrated is awarded with a professional qualification. The competencies can be demonstrated through specific assessments and peer based interviews, conducted by members of the body. It is also underpinned by a system of demonstrating continuous professional development.

Adoption of a similar approach would allow companies to take a more fluid approach to the assessment of the competencies required for each role.

Question 16. As an employer, would you be willing to pay more (in terms of wage) for someone who has an assessed competency based on a regulated professional title?

- Yes
- No
- Do not know

Question 17: [if yes] How much more may you be willing to pay in terms of annual wage for someone who has an assessed competency based on a regulated professional title?

- £1,000 or less
- Over £1,000 to £4,000
- £4,001 to £7,000
- £7,001 to £10,000
- Over £10,000
- Do not know

Question 18: As an employer, would you pay more (in terms of training and professional development) for someone who has an assessed competency based on a professional title awarded by the UK Cyber Security Council?

- Yes
- No
- Do not know

Question 19: [if yes] How much more may you be willing to pay in terms of training and development for someone who has an assessed competency based on a professional title?

- £500 or less
- Over £500 to £1,000
- Over £1,000 to £5,000
- Over £5,000
- Do not know

Question 20. To what extent do you agree or disagree, ranging from fully agree to fully disagree, that there should be a centrally-held Register of Practitioners for the cyber profession?

- Fully agree
- Mostly agree
- Neither agree nor disagree
- Mostly disagree
- Fully disagree

- Do not know

Question 21. To what extent do you agree or disagree, ranging from fully agree to fully disagree, that the Register of Practitioners should include a periodic review to ensure practitioners continue to meet competence and ethical requirements?

- Fully agree
- Mostly agree
- Neither agree nor disagree
- Mostly disagree
- Fully disagree
- Do not know

Question 22. To what extent do you agree or disagree, ranging from fully agree to fully disagree, that employers should not be legally required to employ practitioners whose titles have been recognised through the UK Cyber Security Council?

- Fully agree
- Mostly agree
- Neither agree nor disagree
- Mostly disagree
- Fully disagree
- Do not know

Question 22a. [If disagree] Why do you think that employers should be legally required to only employ practitioners whose titles have been recognised through the UK Cyber Security Council?

Member response

UKPIA firmly believes that it should not be a legal requirement to employ practitioners whose titles have been recognised through the UK Cyber Security Council.

Organisations should be able to continue to obtain employees from the widest pool of candidates and should be free to select candidates with the necessary skills / experience needed for a role. It should be recognised that in the field of cyber security the lack of a certificate or official title does not equate to lack of competence and so individual organisations (especially cyber mature organisations) should be able to leverage their own standards or internal requirements for assessing competence for a role. While as a matter of course any individual may choose to use the professional recognised titles if they believe appropriate to do so.

In other words, registered professional titles through the UK cyber security council may be useful to help employers identify employees with the right level of awareness of competence similar to that of any professional qualification or degree level education. Employers should not be restricted, by regulation, to only employing such individuals as doing so would likely result in smaller pool of candidates for a job role. It would also impact candidates without a title as they may be overlooked for candidates with less ability, despite having the required skills and knowledge. It may also have the effect of restricting progression for employees by retaining them in specific roles with specific titles.

Mandating that specific roles have specific titles would likely introduce an unnecessary financial/organisational burden on organisations to put employees through the title obtaining process. This may also act as a barrier to cyber career development opportunities which does not fit with the overall aim to increase the number and quality of cyber professionals within the UK.

Question 23. Do you consider there to be any perceived risks or overlaps with existing legislative arrangements, particularly in devolved nations?

- Yes
- No
- Do not know

Question 23a. [If yes] In what areas do you think there would be perceived risks or overlaps with existing legislative arrangements?

Member response

UKPIA believes that there may be some potential overlap with general competency management requirements for operators of essential services, who likely fall under the National Information Systems (NIS) and Control of Major Accidents and Hazards (COMAH) regulations which are both regulated by the Health and Safety Executive.

Question 24. To what extent would it be helpful or unhelpful, ranging from very helpful to very unhelpful, to explore introducing public procurement routes to embed competency requirements for the market, as it relates to cyber professionals?

- Very helpful
- Slightly helpful
- Neither helpful nor unhelpful
- Slightly unhelpful
- Very unhelpful
- Do not know

Question 25. To what extent do you agree or disagree, ranging from fully agree to fully disagree, that government departments and relevant public sector bodies should align recruitment and professional development standards to those developed by the UK Cyber Security Council?

- Fully agree
- Mostly agree
- Neither agree nor disagree
- Mostly disagree
- Fully disagree
- Do not know

Question 26. Should the government and/or the UK Cyber Security Council continue to explore the creation of a further voluntary certification scheme that is aligned to existing programmes?

- Yes
- No
- Do not know

Question 27. To what extent do you think it would be helpful or unhelpful, ranging from very helpful to very unhelpful, for Cyber Essentials and CCP to align their requirements with any future professional standards that may be set by the UK Cyber Security Council?

- Very helpful
- Slightly helpful
- Neither helpful nor unhelpful
- Slightly unhelpful
- Very unhelpful
- Do not know

Question 28. In addition to the proposals mentioned in the document above, what more could be done to further support cyber security professionals and the policy ambition to embed standards and pathways within the profession?

Member response

If DCMS is concerned about a lack of competence within the practitioner community then a system that requires continual professional development and competence based professional qualifications would help to deliver confidence.

Question 29. Do you consider there to be additional considerations required to ensure that these proposed measures will not provide unnecessary additional barriers to entry for candidates to enter and progress a career in cyber security?

- Yes
- No
- Do not know

Question 29a. [If yes] what additional measures could be considered?

Member response

UKPIA has no response to this question.