

CAMM response to Cloud Computing: A Consultative Document

Issue: 22nd May 2011

The Steering Committee for the Common Assurance Maturity Model (CAMM) agree with the recent comments by the Vice-President of the European Commission, that cloud computing has the potential for a fundamental change in business computing.

CAMM provides the EU with a globally accepted freely available standard. It can be used to reinforce the EU digital agenda and further the leadership of the EU in the information age.

As the initiative is industry-led, charges of narrow political or national interest can be avoided.

CAMM: a description

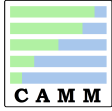
Wide-scale adoption for Cloud computing faces significant challenges without an objective, consistent and complete trust framework to transparently assure information risk management maturity across the supply chain. Moreover, any assessment framework will have a fundamental need to provide a cost model that is satisfactory to small businesses, and will require global adoption because cloud computing transcends national boundaries.

These very challenges motivated the development of CAMM, a global collaborative project with support from multinationals, professional organisations (including the Cloud Security Alliance, ISACA, BITS, PCI, the ISF and many more), standards setting bodies and Research around the globe. Its key aim is to provide a visible, and freely available standard for the transparent assurance of Services delivered by External Supplier organisations and is particularly applicable to Cloud Service Providers.

Policy Issues at Stake

1. Data protection, Governance, Privacy & Security, Consumers

There is a need to provide a model that allows Cloud Service Providers to transparently demonstrate their Information Assurance Maturity, good data protection and governance through assessment, and independent audit. Organisations need to demonstrate to their customers, regulators and stakeholders their commitment to privacy and security in a regular, quantitative manner. With CAMM an unprecedented degree of transparency is offered to customers, acquirers of external suppliers and regulators. Adopting CAMM will augment the governance and security posture of EU organisations resulting in competitive advantage in the marketplace. Being modular, scalable and free-to-use makes CAMM available to all organisations, from SMEs to large corporates and public sector departments – addressing the Commission’s aspirations of scope and availability.



2. Standardization, Interoperability and Portability

CAMM will promote these objectives by providing a single approach for the assessment of all external suppliers. It will provide cross-mapping to other standards (ISO 2700x, COBIT, PCI-DSS, ENISA Cloud IAF, CSA CCM and ISF SOGP) to enhance acceptance by organisations using different standards, thus driving a common approach. This will be further deepened by the ability to share and compare assessment results and through the use of a common, shared language. Organisations using CAMM will adhere to a common baseline, increasing the interoperability of solutions and providing a degree of portability. Finally, CAMM will ensure consistency and repeatability of assessment and audit.

3. Member State and Coordination Issues

As a global, industry-led, body, CAMM provides a coordination facility based on practical problem-solving, not political expediency. CAMM can be used across the EU – its institutions, Member States and its industries.

4. Industrial Policy, Innovation and RTD Policy

CAMM can be used to promote these by providing a baseline to set legal minima, spur further development of innovative solutions and provide a rich database for researchers and political advisors to examine and understand policy interventions.

CAMM provides the EU with a globally accepted freely available standard. It can be used to reinforce the EU digital agenda and further the leadership of the EU in the information age. As the initiative is industry-led, charges of narrow political or national interest can be avoided.

5. International Policy

In summary CAMM Steering Committee, as a collective body representative of the technology industry and international professional community, would strongly urge the Commission to allow for a flexible trust framework that transcends geographical boundaries.

CAMM Steering Committee, 22 May 2011