

Hosting Certification Framework

Invitation to Consultation

July 2025

Purpose

As part of the broader Commonwealth Cyber Security Uplift, a refresh of the Hosting Certification Framework (HCF) is currently underway to address the evolving requirements of the HCF Certifying Authority, service providers, and Non-corporate Commonwealth Entities (NCEs). This paper invites service providers and interested stakeholders to provide written feedback on the updated HCF to the Department of Home Affairs.

The HCF assists in protecting sensitive Commonwealth data and information by defining controls to assess and certify the ownership, management, operations, and supply chains of Data Centre Providers (DCPs) and Cloud Service Providers (CSPs). The HCF provides a standardised approach to security and risk management for DCPs and CSPs handling sensitive Commonwealth data and information. It supports the secure management of government systems and information by certifying that



hosting and infrastructure services meet consistent and effective risk management standards.

This document articulates the Department's approach to gathering feedback and input from service providers and interested stakeholders on the reformed HCF policy. Stakeholder input will be critical to ensuring the HCF is both practical and effective at supporting national data security outcomes.

Please email <u>HCFReform@homeaffairs.gov.au</u> for a copy of the new proposed HCF policy.

Submission Guidance

We understand that reforms to the HCF will impact the government organisations, service providers, and supply chains it applies to. As such, service providers and interested stakeholders are invited to provide written feedback on the revised HCF Policy.

Submissions can be provided via email at HCFReform@homeaffairs.gov.au.

Submissions may include questions, input on potential opportunities or obstacles, feedback on how the core design objectives may be enhanced, as well as any identified implementation support issues or clarification points.

Feedback received will support the Department of Home Affairs in refining the HCF.

To support this consultation process, the Department of Home Affairs will also be engaging directly with service providers and key government stakeholders.

OFFICIAL 2

Core Design Objectives

Simplified

The HCF reforms are designed to provide tangible benefits for service providers and government stakeholders. All reforms are underpinned by five key design objectives, reflective of identified stakeholder challenges with the HCF:



Certification Process	acknowledge linkages with complimentary security programs and certifications, reducing administrative burden.
Improved Compliance and Assurance	Compliance management processes should incorporate clear consequences for non-compliance, while promoting positive security obligations and incentives to encourage proactive engagement, enhancing trust.
Enhanced Transparency and Communication	Communication channels should be established to enable seamless interaction between all stakeholders, including the Certifying Authority, Applicants, Certified service providers, and NCEs, improving transparency.
Greater Clarity of Obligations	Definitions, terminology, policy scope, and roles and responsibilities should be clearly articulated and appropriately aligned, ensuring shared understanding and effective implementation.
Industry Buy-In	Stakeholder consultation and coordinated feedback mechanisms should be embedded, fostering industry buy-in and sustained two-way engagement.

OFFICIAL 3

Key Focus Areas

To meet this design intent, the HCF reforms encompass eight key focus areas:

- 1. **Purpose and Scope**: Outlining the core objectives of the HCF, with a focus on compliance, enhancing alignment with broader security frameworks, and improving operational efficiency
- 2. **Governance and Accountability**: Clearly defining the roles and responsibilities of key stakeholders and revising the Deed of Certification as the HCF's primary enabling instrument
- 3. **Certification Requirements**: Revising the HCF controls to ensure the HCF remains adaptable and fit-for-purpose in an evolving digital landscape
- 4. **Application Process**: Streamlining and clarifying the HCF application process for service providers
- 5. **Monitoring and Compliance**: Strengthening ongoing monitoring and reporting requirements for HCF Certified service providers to ensure continued compliance by introducing periodic audits and enhancing incident reporting processes to support accountability and transparency
- 6. **Renewal and Recertification**: Streamlining recertification processes by aligning them with the revised Deed of Certification and ongoing reporting obligations
- 7. **Non-Compliance and Sanctions**: Establishing a transparent and graduated enforcement framework to ensure adherence to ongoing requirements and obligations, complemented by positive incentives that encourage service providers to demonstrate strong compliance with the HCF, and
- 8. **Supporting Items:** Identifying required supplementary materials to streamline implementation of HCF reforms and enhance overarching processes. This includes identification of guidance material to enhance clarity for service providers and NCE customers before and after certification.

Together, these reform areas aim to increase clarity and streamline processes for service providers, while ensuring that NCEs have increased confidence that service providers are meeting key security outcomes.



Approach

Smooth implementation of the HCF reforms will require transition planning and management. Each implementation phase will incorporate clear and transparent engagement and consultation with key stakeholders to fully understand the impact of the reforms on each group, as well as enhancing communications to ensure buy-in across all stakeholder groups, ensuring they are 'change ready.'

It is anticipated that implementation of HCF reforms will be occur over three key phases:

Phase 1: Consultation

In July 2025, the first draft of the reformed HCF policy document will be released for consultation, inviting service providers and interested stakeholders to contribute feedback that will help shape the future direction of HCF policy development.

Phase 2: Deed Arrangement

The Deed of Certification will be amended to align with the revised HCF.

Phase 3: Transition Program

Existing service providers are required to move into the reformed HCF program. During this phase, new service providers will be on-boarded through the reformed HCF, and new process will be gradually introduced to transition existing service providers.



OFFICIAL 5