



## OFFICIAL

# Professional Services Sector Playbook

*The Professional Services Sector Playbook (the playbook) is a high level guide for how the National Office of Cyber Security (NOCS) will coordinate the national response and consequence management activities for a cyber incident impacting an entity in the sector. The playbook outlines how the NOCS will support the impacted entity, government and broader industry response. It highlights how the NOCS will work with the impacted entity and key government and industry stakeholders with a direct interest in the incident, its impacts and the response. The playbook does not provide a prescriptive response to be applied to all incidents impacting the sector. Each response will differ depending on the nature of the incident, the impacted entity and the need for coordinated consequence management activities. The playbook is a living document and will be routinely reviewed and updated following incidents, exercises and feedback. Further information about the NOCS and its services can be found at [www.homeaffairs.gov.au/about-us/our-portfolios/cyber-security/cyber-coordinator](http://www.homeaffairs.gov.au/about-us/our-portfolios/cyber-security/cyber-coordinator).*

## INITIAL RESPONSE

### Notification of an incident

Impacted entities should report cyber incidents to ASD before notifying the NOCS. [www.cyber.gov.au/report](http://www.cyber.gov.au/report) is the place to report a cyber incident to ASD.

The NOCS could then be notified that an incident is impacting a professional services entity via different channels including direct notification from the impacted entity, its third party service providers, or other Australian Government or state and territory government agencies.

Directly emailing [NOCS.Reponse@homeaffairs.gov.au](mailto:NOCS.Reponse@homeaffairs.gov.au) is the most effective way to ensure the NOCS is aware of an incident and to seek advice on whole-of-government coordination and consequence management support.

Impacted entities should also notify relevant regulators as required. The NOCS is not a regulator and operates separate to an impacted entity's regulatory obligations.

Part 4 of the *Cyber Security Act 2024* establishes a limited use obligation that restricts how the National Cyber Security Coordinator and the NOCS can record, use or disclose information that a Professional Services entity or another entity acting on their behalf voluntarily provide under Part 4 in specified circumstances. Additional information on the limited use obligation can be found on the NOCS webpage above.

### Initial engagement with impacted entity

The NOCS will engage with ASD in the first instance to understand the incident and inform the timing and nature of the NOCS' initial engagement with the impacted entity.

Engagement with the NOCS is voluntary. Its services complement existing structures/frameworks to enhance an impacted entity's incident response, coordinate government and industry responses to incidents, and manage the consequences of incidents.

Once notified of an incident, the NOCS will engage the impacted entity to:

- gain an initial view of the nature of the incident, systems/information affected, and potential or actual impact
- determine who is already assisting with the response (e.g. third-party incident response, ASD and/or AFP) and who has been advised (e.g. regulators and/or relevant state and territory governments)
- provide an overview of the NOCS' role and outline next steps, including establishing whether the NOCS can add value by coordinating the response, and
- consider whether the impacted entity requires additional support from other government entities.

The NOCS will engage other government agencies, including key policy departments, regulators, state and territory agencies, and key forums and committees to understand interests and inform understanding of potential consequences.

To encourage the transparent and timely sharing of information between the NOCS and the impacted entity, the NOCS operates under Australian Government security classifications and will adopt the Traffic Light Protocol ([www.cyber.gov.au/tlp](http://www.cyber.gov.au/tlp)) when dealing with information provided by an impacted entity.

### *Assess consequences*

Informed by initial assessment and discussions, the NOCS will assess potential consequences, considering:

- safety of individuals
- potential impacts to the Australian Government and state and territory governments, such as the exposure of government information
- potential impacts to other entities, including to critical infrastructure, such as the exposure of sensitive operational or corporate data
- sectoral impacts, depending on nature, jurisdiction and/or specialisation of the professional services entity
- any public statements or market announcements planned or released
- exposure of:
  - personal information
  - ID credentials
  - information relating to vulnerable persons
  - national security or law enforcement information
  - sensitive corporate or commercial information
- any other potential or actual consequence identified, based on the specific incident.

### *Categorise incident*

The Australian Government Crisis Management Framework outlines triggers to activate Australian Government crisis coordination arrangements and a 4-tiered approach to guide and support appropriate and consistent levels of coordination in response to crises. As such, the severity and complexity of an incident will guide the determination of appropriate coordination efforts to be provided by the NOCS and other responding agencies and departments.

The NOCS will categorise the incident on the following scale, as determined by national thresholds:

- 'nationally catastrophic incident', which might require leadership by the Prime Minister
- 'nationally significant incident', which might require leadership by the Minister for Cyber Security or the National Cyber Security Coordinator (Coordinator)

- 'significant incident', which might require leadership by the NOCS, or
- 'incident', which might require the NOCS to support another government agency leading a response.

Categorisation considerations include:

- What is the nature of the incident?
- Is there potential for harm?
- Does it affect a large portion of the population?
- Does it involve multiple jurisdictions?
- Is there high media/political interest?
- Is the NOCS able to add value through coordinating the response?

### *Engaging the Coordinator and the Minister*

The NOCS will advise the Coordinator on the nature of the incident, the response required and any requirement to brief the Minister for Cyber Security.

## COORDINATED RESPONSE

### *Initial briefings for shared situational awareness*

The NOCS will initially meet with the impacted entity or its designated representative to understand the nature and extent of the incident.

In consultation with the impacted entity, the NOCS may also convene an initial briefing with the impacted entity and relevant Australian Government and state and territory government agencies. The briefing will provide an overview of the incident, consider its potential impacts and discuss the requirement for coordinated consequence management activity. This may include representatives from state and territory cyber response agencies who are best-equipped to provide advice on potential impacts within their jurisdictions.

Where the impacted entity has government clients, a government agency may be involved as both a stakeholder in the coordinated response and also as an impacted entity. Consideration will be given to the management of these differing interests to separate commercial and legal considerations from broader consequence management activities.

### *Public communications*

The NOCS will coordinate a consistent public communications approach across government and consult with the impacted entity to ensure alignment of public messaging throughout the response. Ownership and endorsement of business-specific messaging will remain with the impacted entity.

### *Working groups for coordination and consequence management*

Following this, the NOCS may establish working groups based on the specific nature of the incident and what data/systems/impacts are assessed as requiring a coordinated response. The NOCS will leverage existing forums and committees, where appropriate.

The impacted entity may provide situational updates to working groups. The impacted entity may not be required for all working group meetings or the entirety of a meeting if discussion focuses on specific government processes.

For the professional services sector, specific coordinated response working groups the NOCS may convene include:

- **Chief Information Security Officer Working Group (CISOWG)** – A CISOWG could be convened by ASD's ACSC with the NOCS' support for secretariat purposes. The CISOWG could include representatives from the impacted entity; their third party service provider; relevant representatives from the Australian Government and state and territory governments; and relevant industry representatives. A CISOWG could discuss technical issues to support the impacted entity to respond to the incident and mitigate potential technical impacts to government and industry stakeholders from the incident.
- **Professional Services – Government Working Group (PS–GWG)** – The PS–GWG will take on the name of the impacted service, i.e. Legal Services Working Group, Consulting Services Working Group, Accounting Services Working Group, etc. This working group will consider specific impacts to Australian Government entities as a result of the incident. The working group will have representatives from all affected Commonwealth and state and territory government entities, as well as the OAIC.
  - The PS–GWG will be chaired by the NOCS. If the impacted entity's provision of service is facilitated through a Commonwealth Government panel arrangement, the PS–GWG will include

representatives from these bodies (e.g. the Australian Government Legal Services Panel administered by the OLSC or the Management Advisory Services Panel administered by the MAS Panel Management team).

- Consideration may also be given to including a body with regulatory or quasi-regulatory functions in relation to the professional service provided – for example, when a licensing body stipulates particular standards in relation to cyber security, it may be relevant for a representative to be included in the working group, similar to the inclusion of regulators in other sectors.
- **Professional Services - Industry Working Group (PS–IWG)** – The PS–IWG involves relevant industry entities, organisations and relevant third-parties (e.g. service providers) that need to remain up-to-date on the incident and may themselves be impacted entities. Attendance will be subject to consent from the primary impacted entity to ensure messaging is targeted and supported by the 'need to know' principle of information sharing.
  - Two separate industry sub-working groups may be established. One sub-group may focus on other professional services entities in the same market and will provide assurance that other providers are taking the necessary protective measures to mitigate any consequences. The other working group would focus on wider industry clients to ensure they have visibility of actions being taken in response to the incident.
- **Communications Working Group (CWG)** – The primary function of the CWG is to provide media/communications representatives from the relevant government departments and agencies with a forum to discuss and coordinate public communications during an incident, including the alignment of messaging and timing of notifications.
  - The CWG is chaired by NOCS Crisis Media. The impacted entity will be invited to ensure alignment of public communications from government and the impacted entity. However, the impacted entity may be excused from discussions focused on government communications issues.
- **Data Review Working Group (DRWG)** – The DRWG brings together technical experts assisting the impacted entity and government specialists to better support the entity in its data review process. DRWG

efforts may include addressing complex data analysis issues, informing the data discovery process and refining search terms to enable effective data assessment and remediation efforts.

- **Identity Services and Security Working Group (IDSSWG)** – The IDSSWG will primarily be required for data breaches impacting personally identifiable information. The IDSSWG enables credential issuing bodies, service providers, regulators and other relevant stakeholders to discuss and align their response to these incidents, improving the timeliness, effectiveness and efficiency of remediation activity.
  - The IDSSWG is co-chaired by Services Australia and AGD, with the NOCS providing secretariat and briefing support.
  - The IDSSWG will include Services Australia, AGD, ATO, DFAT, AFP and representatives from credential issuing bodies of relevant state and territory governments. OAIC may also be invited to support general policy guidance.
- **Sensitive Issues Working Group (SIWG)** – The SIWG may include representatives from agencies concerned that particularly sensitive information may have been exposed, for example, information relating to vulnerable persons, sensitive health information, national security or law enforcement information etc.

Where possible, working groups are streamlined to avoid duplication, reduce overhead and enable proactive response.

#### *National Coordination Mechanism*

Alongside ongoing assessment of an incident, an NCM may be held. For cyber incidents, the Coordinator co-chairs the NCM with Deputy Coordinator-General, Emergency Management and Response, NEMA.

An NCM could be held at the start of an incident to provide shared situational awareness of an incident, understand the potential impacts of an incident, identify lines of effort required to manage the consequences of an incident, and establish working groups or task existing working groups.

During an NCM:

- the impacted entity provides an update to participants to support situational awareness
- discussion occurs on problem definition, impacts and consequence management

- lines of effort are agreed to mitigate impacts and consequences, and
- attendees can ask questions or comment on issues of concern or relevance.

These meetings will be maintained at a cadence appropriate to the level of coordination and communication required, and in consultation with the impacted entity and relevant stakeholders.

Additional information on the NCM can be found [here](#).

### POST COORDINATED RESPONSE

#### *Ceasing the coordinated response*

The NOCS will cease coordination and consequence management activities when a coordinated approach is no longer required, in consultation with the impacted entity.

If required, the NOCS will assist with facilitating bilateral engagement between the impacted entity and any key stakeholders that remain involved in the post-coordinated response. This will support continuity and the resolution of any emerging issues which might benefit from whole-of-government coordination.

#### *Lessons learned*

The finalisation of coordination and consequence management activities may include a post-incident review, conducted in consultation with the impacted entity, relevant industry stakeholders, and Australian Government and state and territory government agencies.

This will be supported, where appropriate, by the development of a public communications response on key 'lessons learned' to uplift Australia's cyber resilience and security, in consultation with the impacted entity.

## ACRONYMS

<b>ACSC</b>	<i>Australian Cyber Security Centre</i>
<b>AFP</b>	<i>Australian Federal Police</i>
<b>AGD</b>	<i>Attorney-General's Department</i>
<b>ASD</b>	<i>Australian Signals Directorate</i>
<b>ATO</b>	<i>Australian Taxation Office</i>
<b>CISOWG</b>	<i>Chief Information Security Officer Working Group</i>
<b>CWG</b>	<i>Communications Working Group</i>
<b>DFAT</b>	<i>Department of Foreign Affairs and Trade</i>
<b>DRWG</b>	<i>Data Review Working Group</i>
<b>IDSSWG</b>	<i>Identity Services and Security Working Group</i>
<b>MAS</b>	<i>Management Advisory Panel</i>
<b>NCM</b>	<i>National Coordination Mechanism</i>
<b>NEMA</b>	<i>National Emergency Management Agency</i>
<b>NOCS</b>	<i>National Office of Cyber Security</i>
<b>OAIC</b>	<i>Office of the Australian Information Commissioner</i>
<b>OLSC</b>	<i>Office of Legal Services Coordination</i>
<b>PS-GWG</b>	<i>Professional Services – Government Working Group</i>
<b>PS-IWG</b>	<i>Professional Services – Industry Working Group</i>
<b>SIWG</b>	<i>Sensitive Issues Working Group</i>

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