Cyber Security Coalition vzw / asbl

General rules and working guidelines for Focus Groups

This document is designed to set out the working guidelines for the Focus Groups of the Cyber Security Coalition. It aims at allowing a smooth and effective operation of the Focus Groups and to create a neutral, non-commercial forum where the Coalition members can freely exchange information and experiences in trust.

Mission

The mission of the Coalition is to bolster Belgium's cyber security resilience by building a strong cyber security ecosystem at national level. We do so by bringing together the skills and expertise of the academic world, the private sector and public authorities on a trust-based platform aimed at fostering information exchange and implementing joint actions.

The Focus Groups fit within the Operational Collaboration strategic objective: to foster peer-to-peer collaboration in a trusted community. The Focus Groups are the most important centres of activities within the association. They elaborate in-depth on specific, cross-sector issues related to cybersecurity.

Rules of ethics

- The Focus Groups exist to work in the interest of all members of the Coalition and not in the interest of an individual member or group of members.
- Participants in the Focus Groups treat everyone with respect and dignity.
- They communicate openly and honestly.
- They accept and abide by the Coalition's articles of association.
- They respect the non-commercial nature of the association.
- They refrain from any activities which might constitute a conflict of interest or otherwise damage the reputation of the Coalition and/or its members.
- No agreement or engagement shall take place on competition issues that could be construed as breaching competition law. Cf. specific rules on antitrust.
- Any issues or concerns with fair treatment should be raised immediately with the Focus Groups' chairs and discussed.

Governance

The Board of Directors can establish Focus Groups to elaborate more in-depth on specific cybersecurity topics of common interest within the strategic objectives of the association.

Each member is expected to contribute actively to minimum two Focus Groups of their choice by designating its experts as member of the relevant Focus Groups.

Composition of the Focus Groups

Without ignoring the existing differences between members, sectors, roles and competences, and maturity levels, Focus Groups' compositions should reasonably try to reflect a balanced representation of these.

Participation of a Coalition member in a Focus Group should be based on a strong commitment to the activities of the Focus Group for the benefit of the whole Coalition community.

Where possible, the Coalition members shall try to ensure continuity in their representation in the Focus Group and consistency of the positions taken by their representatives, and send a core group of people to the Focus Group meetings.

Each Coalition member designates its representatives in the Focus Groups and is requested to send a mail to the Operations Office to present/ update his representative(s) in the Focus Groups.

Representatives of member organizations should validate specific positions within their own organization prior to divulging them to other participants within the Focus Group. Consultants working for a Coalition member can represent that member provided he/she is formally authorised (mail sent to the Operations Office). The member concerned remains responsible for the positions/ statements of its consultant.

The member organizations are not allowed to delegate representation in the Focus Group to external organizations. Only representatives of associated enterprises (e.g., subsidiaries) have access to the Focus Groups. Sector federations can be represented in the Focus Groups by representatives of their member organizations provided the latter have a strong expertise in the subject matter dealt with by the Focus Group This subject matter expert is authorized to represent the sector federation in one Focus Group only.

As a general rule, attendance to Focus Group meetings shall be limited to three people per member for each Focus Group. If there are space limitations, this may be further restricted to two or one. Where more than one representatives are designated by a member, one person should be identified as the principal representative and contact person.

Chairs of Focus Groups and sub-Focus Groups

Minimum three chairs per Focus Group are appointed "ad personam". They are first appointed by the Focus Group members and then ratified by the Board of Directors for continuity purposes. They act in the interest of the association and ensure compliance with the present "General rules and working guidelines for Focus Groups".

The chairs shall define the objectives, scope of activities and deliverables of the Focus Group and submit these to the Board of Directors for approval. Scope, tasks and deliverables may thereafter be adapted, as the case may be by the Focus Group chairs in agreement with the Board of Directors.

Once the objectives are defined and approved, the chairs are responsible for the realisation of them: a chair is a subject matter expert and knows the corresponding ecosystem. A chair shall assist in defining the agenda by finding topics and guest speakers for the meetings. A chair shall attend minimum ¾ of the focus group meetings and preferrable all the focus group meetings.

The Focus Group chairs will represent the Focus Group towards the Board of Directors and report regularly to this committee about the activities of their Focus Group.

The Focus Group chairs are encouraged to seek consensus in the discussions. If this is not possible, a voting procedure can be initiated by the chair and decisions can be taken by a positive vote of the majority of the member organizations participating in the meeting.

In agreement with the Board of Directors, participation in a specific Focus Group can be limited by the Focus Group chairs to a specific number and/ or kind of members, according to the sensitiveness of the issue.

The Focus Group chairs may invite, under their responsibility, external observers to participate in their discussion, provided they contribute to the Coalition objectives. The participation of these observers serves a specific purpose and is limited in time.

In order to better tackle different issues and facilitate in-depth discussions within a Focus Group, a sub-Focus Group could be created. Each sub-Focus Group could have one or more chairs appointed "ad personam" and chosen by the Focus Group. There is no need to have the chairs of the sub-Focus Groups ratified by the Board of Directors.

The Focus Groups' chairs are responsible for the overall coordination between the sub-Focus Groups and the consolidation of activity reports and deliverables so that the Board of Directors have a comprehensive view on the activities within the Focus Group.

In principle a one-year rolling period of activity ownership is applied. However, the chairs' mandate can be renewed. If a chair resigns before the end of his/her mandate or would like to be substituted,

the Focus Group can elect at any time a new chair. The chair must ensure a smooth transition of the pending action items to the next chair during an on-site meeting.

Escalation route

The Board of Directors acts as escalation body for any complaint in respect of Focus Group matters. Such complaint should be sent to the responsible support manager of the Operations Office, who will immediately refer to the Board of Directors to smoothly solve the issue.

Focus Groups can be disbanded by the Board of Directors upon request of the chairs.

The operational details of the functioning of these Focus Groups are further detailed in this document.

Functioning of the Focus Groups

Each Focus Group should within six months of the kick-off meeting of the Focus Group prepare general objectives, expected deliverables and a roadmap that will be reviewed and agreed upon by the Board of Directors. Objectives, deliverables and roadmap will be updated at least once per year.

Meetings can take place on site or by way of conference/ video call. Invitation and the meeting agenda are sent out two weeks beforehand in writing. On-site meetings generally have a full or half-day duration and are hosted by a volunteering member organization which bears the catering costs. Focus Groups are recommended organizing at least one on-site meeting per quarter.

The Focus Group chair shall appoint a scribe who will prepare draft minutes and an actions & decisions log under supervision of the chair. Meeting minutes and actions & decisions log shall be distributed to the Focus Group members preferably within fifteen days after the meeting took place and be formally approved at the following meeting. The actions & decisions log should clearly identify the action item, the target date and progress. The Coalition logo should be included in the meeting minutes, actions & decisions log and any other documents produced by the Focus Groups.

The representatives of the member organizations shall be active members of the Focus Group and share relevant information and experiences with the other participants. The Focus Group chair is encouraged to seek involvement of member organizations boasting a particular expertise or bringing new perspectives to the discussions. He/she will be invited once a year to present the activities and achievements of the Focus Group as well as the yearly action plan at one of the experience sharing events organized by the Coalition for the entire member community.

The chair will track meeting attendance and report to the Operations Office accordingly. A representative who consistently declines meetings' participation can be denied access to the Focus Group's information by the chair.

In order to enhance greater sharing of possibly sensitive information among the members in the Focus Group the Traffic Light Protocol ('TLP') standards are applied. Information received during the discussions within Focus Groups are classified by default 'amber' but the source of the information can alter this classification. The Focus Group chair is responsible for ensuring that recipients of TLP information understand and apply these standards. Focus Groups can also decide to apply in conjunction with the TLP the Chatham House Rule: participants may reveal neither the identity nor the affiliation of the source of information, nor that of any other participant.

A violation of the TLP and Chatham House Rules may result in exclusion from the Focus Groups. This will be decided upon by the Board of Directors. Coalition members and the Operations Office are invited to inform the Board of Directors about any breach they are aware of.

Focus Group and sub-Focus Group chairs are allowed to present official Coalition positions only after approval of the position by the Board of Directors.

Specific rules related to antitrust

The main principle of competition law is that free competition may not be hindered. Member organizations may not directly or indirectly exchange information or make agreements with the purpose of or consequence to restrict competition. This does obviously not apply to information which is publicly available.

Participants in Focus Group should take care to ensure that no individual commercially sensitive information proper to a member organization is being discussed nor exchanged in the presence of competing members during Focus Group meetings. In case of doubt of the sensitivity of a topic from a competition point of view, this topic cannot be discussed until advice of a competition law expert is obtained and that this advice allows to discuss the topic either without any reservations or within certain limits.

There is no limitative list of topics which are per se forbidden by law, but as soon as the information may give way to an alignment or collision between the members, it is to be avoided. This generally concerns business information, both actual or future, of market players, which is commercially sensitive and therefore confidential.

Are in any event included:
- o Terms and conditions of sales, purchase, delivery and payment (e.g., in case of compulsory use);
- o Information concerning contracts with third parties, including customers, distributors or suppliers of raw materials;
- o Restrictions on participation in trade fairs (e.g., if not objectively justified);
- o Limitative schemes for recognition ((e.g., if not objectively justified).

Any discussion that is or could be questionable or inappropriate from a competition law point of view shall be terminated at once. The participant explicitly objects and withdraws from such discussion and should request that his/her objection be recorded in the minutes of the meeting. If the discussion is not terminated, he/she must leave the meeting. The mere receipt of commercially sensitive business information of a competitor can constitute an infringement, even though the recipient did not align its behaviour or did not itself disclose any information. Passively tolerating or facilitating such information exchanges can be considered as a participation in the infringement.

Specific rules for service providers

The Board of Directors of the Coalition confirms that service providers can apply for full-fledged membership of the Coalition and as a consequence of the latter's Focus Groups subject to the following conditions:
- They have relevant expertise in cybersecurity consulting and advising;
- They designate expert resources as member of the Focus Groups as opposed to commercial staff;
- They actively support the Coalition's mission and strategic objectives.

It is precisely that expertise that the Board members see as a true added value for the realization of the Coalition's objectives.

Service providers within the meaning of this document are representatives of companies that provide products and services that support cybersecurity resilience. These include in particular business consultants, auditors, lawyers, IT service providers, and providers of software and hardware tools. Representatives of these companies include both employees and contractors.

- Service providers should get actively involved and through their cooperation help prepare the activities of the Coalition, including the Focus Groups.
- When applying for membership of the Coalition and its Focus Groups, service providers have to provide appropriate expertise in person. Example: a sales manager of a company that provides IT services that support a particular domain of cybersecurity without a personal experience in that domain will not be allowed to adhere to the Focus Group. Example: only persons who are operationally active in a SOC / Cyber Defence team can bring added value to the inter-CSIRT Focus Group.
- By applying for membership of the Coalition and its Focus Groups, service providers recognize the present "General rules and working guidelines for Focus Groups" as binding.
- The Coalition Board members expect the service providers to actively support discussions through their own experience or lectures, and to enrich the activities by (co-)organizing or supporting different types of knowledge sharing sessions and Focus Groups.
- Any commercial use of any of the communication channels, activities and Focus Groups resulting from the Coalition's initiative, or which could recognizably be serving only to passively gather information, will not be tolerated.
- Service providers are not allowed to use the Coalition to actively acquire jobs and assignments. These include, among others:

- o Targeting members for the purpose of marketing / advertising using or referring to the Coalition;
- o Directly sending company presentations to other cybersecurity professionals when the only contact has been through the Coalition;
- o The distribution of gifts or advertising material without the prior agreement of the Board of Directors;
- o Distributing business cards without solicitation;
- o The use of the name "Cyber Security Coalition" or "cybersecuritycoalition.be" or the Coalition logo to achieve goals that do not serve the purposes and objectives of the association;
- o The use of contact details accessible only through the Coalition's activities, communications or other supports for the purpose of corporate public relations;
- o Any other form of undesirable advertising even if not explicitly mentioned here.
- The number of service providers in a Focus Group should be limited to maximum one third in order to ensure cross-sector exchange.
- The Focus Group chair can limit the participation in the meeting to users only in function of the agenda topic (e.g., evaluation of a particular ICT solution).
- Work results from Focus Groups or other experience sharing sessions may only be used by service providers if they have actively participated in the Focus Group or session.
- Any document created within any of the experience sharing activities and Focus Groups issued from the Coalition's initiative shall be used in accordance with the Traffic Light Protocol and shall be marked as a Coalition document. Insofar such document would be used in another context, e.g. by service providers, the authorship is to be cited correctly. Should content be transferred, the source must be marked.

A violation of the "General rules and working guidelines for Focus Groups" such as active promotion or acquisition efforts towards Coalition members may result in exclusion from the Focus Groups. This will be decided upon by the Board of Directors. Coalition members and the Operations Office are invited to inform the Board of Directors about any breach they are aware of.

Operations Office's support to the Focus Groups

The Operations Office shall appoint a support manager for each Focus Group. The support manager facilitates the Focus Groups as follows:
- She submits any demand for a new Focus Group to the Board of Directors for approval;
- She ensures that the guidelines stipulated in this document are communicated to the chairs of the Focus Group;
- She assists the chairs with the promotion of the Focus Group among the Coalition members;
- She prepares in cooperation with the chairs the kick-off meeting of the Focus Group;
- She manages the list of members of the Focus Group;
- She communicates the meeting calendar to the Focus Group members;
- She manages the annual budget approved by the Board of Directors in support of the Focus Groups and handles any request for financial assistance submitted by the chairs;

- She collects status reports from the chairs with a view to regular reporting on the achievements of the Focus Groups to the Board of Directors; she will also invite the chairs for pitches in the Board of Directors meeting.
- In case of a complaint regarding Focus Group matters, she will establish a fast and swift contact between the demanding member(s) and the Board of Directors.
- She introduces any demand by the chairs for termination of a Focus Group to the Board of Directors.

The Focus Groups should be self-sustaining and take care of the logistics, minutes taking and actions monitoring. Within the budgetary limits the support manager can facilitate these activities by providing the chairs with financial support (e.g., reimbursement of costs of a scribe).

Sources for the development of this document:
- European Cyber Security Organisation: 'General rules and working guidelines for the participation, functioning and governance of ECSO Working Groups and Task Forces' – Update 5 December 2017
- Compliance Pro Register's Code of Conduct for Service Providers: the text of this code has been freely adapted of the "DICO Beraterkodex" of DICO, the German Institute for Compliance.
- Agoria Antitrust Code of Conduct 2017