



The Business Services Association
130 Fleet Street,
London.
EC4A 2BH

BSA response - Cyber Governance Code of Practice call for views

Tuesday 19th March, 2024

Introduction

The Business Services Association (BSA) and its members welcome the opportunity to provide feedback on the Cyber Governance Code of Practice and would like to express our appreciation to the Government for providing the opportunity to do so.

We appreciate the work that the Government has put into formulating this Code and we would also like to thank DSIT colleagues for taking the time to meet with the BSA and its members to discuss the proposals set out in this call for views. An overview of the BSA is included below for reference as well as a current membership list. As discussed during these meetings, the key to the success of these proposals will lie in the traction they gather at board level. We would be happy to continue to provide feedback and insights as to the Code's impact at this level once introduced so as to ensure that it is having the desired impact.

Following consultation with BSA members, we will not be submitting a formal response to the full questionnaire set out in the call for views. We would, however, like to provide short commentary on the overall proposals based on feedback from our members. We hope that this is of use to DSIT colleagues and if there are any questions on the points below then these should be directed to bsa@bsa-org.com

BSA Comments on the Code

Guidance, such as the Cyber Governance Code of Practice, can help to encourage conversations on best practice and challenges in cyber security, which supports transparency and openness across the sector in relation to this important issue. Again, we appreciate the work that the Government has put into drafting the Code, and the forum by which they accept responses in order to strengthen it.

We welcome the focus that the Code places on ensuring the security of supply chains as an integral part of bolstering cyber security for businesses as a whole. This is a key theme for BSA members, many of whom deliver services and infrastructure projects across critical national infrastructure and are already supporting SMEs in their supply chains to bolster their own cyber ecosystems.

One area in which the Code could perhaps be strengthened would be by including a section on ensuring the security of hardware architecture and software. This is especially pertinent in a geopolitical climate where risks to national security have been highly reported in recent years. Cyber crime continues to pose a significant challenge to public sector bodies as well as businesses, and securing hardware and software is therefore imperative.

There is also scope for public sector procurement rules to be leveraged in support of this goal. The National Procurement Policy Statement (NPPS) provides priorities and guidance for contracting authorities and has the scope to include cyber security requirements as a priority in the procurement of both goods and services. We understand that this is an area of consideration for DSIT colleagues and would welcome its adoption.

In summary, the BSA welcomes the publication of the Code and looks forward to supporting DSIT to ensure its widespread adoption.

E: bsa@bsa-org.com W: www.bsa-org.com [@THEBSASSOC](https://twitter.com/THEBSASSOC)



Business Services Association

Who We Are:

The Business Services Association (BSA) is a policy and research organisation. We are here to represent all those who are interested in delivering efficient, flexible, and cost-effective service and infrastructure projects across the private and public sectors. We are based in the United Kingdom and hold meetings and events throughout the country.

Our members are key providers of service and infrastructure projects to the private and public sectors. Members include large and small businesses, charities, and social enterprises. The work of BSA members improves the lives of tens of millions every day across every region of the country; from building and maintaining our roads, energy supply, and digital ecosystem, to feeding school children and keeping our hospitals clean and safe.

What We Do:

We provide a forum for service providers to come together to discuss issues of common interest. We also have a wide-ranging policy programme which can be broken down into three interconnected core themes: inform, advocate, and engage.

How We Do It:

Inform

We ensure that our members are kept up to date with government policy and wider market trends, whilst also keeping government informed on the issues affecting the sector. This includes producing daily, weekly, and monthly political and media monitoring reports for members; conducting our monthly Economic Tracker survey and sharing the insights with relevant stakeholders across central, devolved, and local government; and arranging briefing sessions and meetings with officials on pertinent policy areas.

Advocate

We champion the good work the sector does by collating case studies and producing reports that highlight the sector's contributions to the UK economy. It also involves working collaboratively and constructively with policy makers on key policy areas for the sector such as procurement reform.

Engage

We arrange regular engagement opportunities to promote positive relationships between the sector and key stakeholders. This ranges from holding roundtables with government ministers and prominent members of the opposition, to arranging large summits that bring together over 100 members and stakeholders to discuss a specific theme. Recent examples include summits on Digital Skills and the transition to Net Zero.

Why We Do It:

Our sector lies at the very heart of the UK economy. Service and infrastructure providers are key innovators and growth facilitators, spearheading our transition to a green and digital economy, and operating throughout both the public and private sectors. The sector also invests in providing high quality administrative services, facilities management, infrastructure, and IT so other businesses can do what they do best.

It is therefore crucial that the sector's voice is heard and its good work recognised.



List of BSA Members, March 2024

3C3 Ltd	IBM
4Merit	Ingeus
AECOM	ISS UK
Amey Plc	Jobs22
Ankura	Kier Group Plc
Aramark	KPMG
Arcadis LLP	Lumby CMS
Arcus FM	Mace
AtkinsRéalis	Maximus UK Ltd
Atlas FM	Mazars
Atos	Medallia
AutogenAI	Mitie
Baachu	MTC
Balfour Beatty Plc	NatWest
Barclays Corporate	NCG
Bellrock	Netcompany UK Ltd
Bevan Brittan LLP	P3
Birkin Group	Pinsent Masons LLP
Browne Jacobson LLP	Public Digital
BT Group Plc	Reed in Partnership
Business 2 Business	Robertson FM
Capita Plc	Salisbury Group
Catch 22	Seetec Group Ltd
CGI	Serco Group Plc
CH & Co Group	Sharpe Pritchard LLP
City FM	Sodexo Ltd
Clyde & Co LLP	Sopra Steria Ltd
CMS Cameron McKenna Nabarro Olswang LLP	Space Solutions
Compass Group Plc	Spend Network
Connections Consulting	Strictly Education
Corndel Ltd	The Grichan Whitestone Partnership
Costain	The Growth Company
Deloitte	The Network Group
DWF LLP	The Palladium Group
Elior UK Ltd	The Shaw Trust
Equans	The Sustainability Group
Eric Wright FM	Turley
Form1 Partners	Twin UK
Fujitsu UK	Veolia
G3 Systems Ltd	Vercity
G4S Plc	VINCI Facilities
Glaston Consulting	VPS Group
Global Secure Accreditation	Wand Consulting
GoodPeople	Wates Group
HP	WSP