



26 August 2021

Department of Home Affairs 6 Chan Street Belconnen ACT 2617

via upload

Dear Sir/Madam

Strengthening Australia's cyber security regulations and incentives

Small business owners and operators occupy many roles, possess varied levels of digital competency in a business and usually do not have the dedicated cyber security resources of their larger counterparts. Despite this, it is critical that small business understand that there are practical steps that can be taken within their capabilities to strengthen their cyber security. Government can also help small business by strengthening the digital tools small businesses already use.

Any potential health checks for small business must reflect consistent, whole of government messaging on cyber security. In acknowledgement of the limited resources, particularly time, that small businesses have to devote to improving their cyber security, the Government should seek to ensure it provides a single source of truth that small business can rely on. Ensuring streamlined messaging will reduce the opportunity for confusion in the pursuit of small business security. Messaging around cyber security threats and mitigation options need to be carefully calibrated so as to empower and enable small business action rather than be presented as so overwhelming that the threat and a small business' capacity to respond, is of too high a level of sophistication. This requires readily accessible, 'actionable information' that supports small business owners and leaders doing what is in their capabilities, while other participants in the ecosystem act to their capabilities as well.

As well as working with insurers, banks, accountants and peak bodies, the Government should consider accounting software providers and other digital infrastructure providers as trusted partners. The Government could partner with these businesses to further build out the security of their products and build in 'cyber security as a service' features that would embed and automate key risk mitigation actions recommended by the Australian Cyber Security Centre. Doing so would instantly strengthen the cyber security of the millions of small business who use these services without relying on voluntary health checks. The Government should also consider how it might embed cyber security within a broader, coherent program that aims to lift digital engagement across the range of active portfolios and agencies (e.g. the promotion of e-invoicing, business digital identity measures and the Australian Small Business Advisory Services).

Thank you for the opportunity to comment. If you would like to discuss this matter further, please contact Mr Eamon Sloane on 02 6213 7451 or at eamon.sloane@asbfeo.gov.au.

Yours sincerely

The Hon. Bruce Billson

Australian Small Business and Family Enterprise Ombudsman