



# Risky Business!

## New Risk Management Obligations for Telcos

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## ***Security of Critical Infrastructure (Telecommunications Security and Risk Management Program) Rules 2025*** (TSRMP Rules)

- New legislation switching on risk management obligations

## ***Security of Critical Infrastructure Act 2018*** (SOCI Act)

- Amended to consolidate rules relating to security and critical infrastructure previously under telecommunications legislation

# What are the consolidated rules?



## ‘Protect your asset’ obligation:

*Protect your **critical telecommunications assets** so far as it is reasonably practicable to do so, where there is a **material risk** of harms that will have **relevant impact***

*(“Reasonably practicable” added as per industry feedback...yay!)*

# What are the consolidated rules?



## Notification obligation:

*Notify of changes or proposed changes to your telco services or systems **where that change is likely to have a material adverse effect** on your capacity to **comply with the obligation to protect your asset.***

### Examples:

- Changing the location of your equipment/services
- Entering into an outsourcing arrangement
- Procuring “notifiable equipment”

### Examples where there is likely **no material adverse effect**:

- Like-for-like replacement of equipment
- Day-to-day changes such as software updates

# What are the TSRMP Rules?



## All-hazards Risk Management Program

- Identify operational context of each **critical telecommunications asset**
- Identify each hazard where there is a **material risk** the hazard could have a **relevant impact** on your asset
  - Physical security and natural
  - Cyber
  - Personnel
  - Supply Chain
- Minimise or eliminate that material risk and
- Mitigate the relevant impact of the hazard
- Board-approved Annual Report (from FY2026)

***bolded terms defined here***



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# What are the TSRMP Rules?



## Cyber and Information Hazards:

- Comply with **maturity level 1**– by 4 Oct 2026
- Comply with **maturity level 2**– by 4 Oct 2027

*\*\*comply, not become certified\*\**

- Suggested frameworks:
  - ISO/IEC 27001:2023
  - Essential Eight
  - NIST Framework
  - AESCSF
  - Cybersecurity Capability Maturity Model

# Do they apply to me?



Obligation	Carriers	CSPs w/ 20,000+ SIOs CSPs that supply Cth govt	All other CSPs
Protect your asset	✓ As of 4 Apr 2025*	✓ As of 4 Apr 2025*	✗
Risk Management Program	✓ By 4 Oct 2025	✓ By 4 Oct 2025	✗
Cybersecurity Framework Compliance	✓ Level 1 maturity by 4 Oct 2026 ✓ Level 2 maturity by 4 Oct 2027	✓ Level 1 maturity by 4 Oct 2026	✗
Notification	✓ As of 4 Apr 2025*	✗ As of 4 Apr 2025	✗
Mandatory Cyber Incident Reporting	✓ As of 4 Apr 2025*	✓ As of 4 Apr 2025*	✗ No longer applies as of 4 Apr 2025
Asset Registration	✓ As of 4 Apr 2025*	✓ As of 4 Apr 2025*	✗ No longer applies as of 4 Apr 2025
Notifying data service providers	✓ Since 2022	✓ Since 2022	✓ Since 2022
Responding to serious incidents	✓ Since 2022	✓ Since 2022	✓ Since 2022

\*= these obligations previously existed under telecommunications legislation

# But this is all too hard!! >\_<



IAA is partnering with the Wireless Internet Service Providers Association of Australia (**WISPAU**) to run group training sessions:

- Mastering the *SOC/Act*
- How to establish a Critical Infrastructure Risk Management Program
- Maximising Cyber Resilience
- How to conduct a security risk assessment

***Cost-effective way to ensure compliance!***  
***Please let us know if you're interested!***

