
**Information technology — Cloud
computing — Audit of cloud services**

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ISO/IEC TR 3445:2022

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Foreword

ISO (the International Organization for Standardization) and IEC (the International Electrotechnical Commission) form the specialized system for worldwide standardization. National bodies that are members of ISO or IEC participate in the development of International Standards through technical committees established by the respective organization to deal with particular fields of technical activity. ISO and IEC technical committees collaborate in fields of mutual interest. Other international organizations, governmental and non-governmental, in liaison with ISO and IEC, also take part in the work.

The procedures used to develop this document and those intended for its further maintenance are described in the ISO/IEC Directives, Part 1. In particular, the different approval criteria needed for the different types of document should be noted. This document was drafted in accordance with the editorial rules of the ISO/IEC Directives, Part 2 (see www.iso.org/directives or www.iec.ch/members_experts/refdocs).

Attention is drawn to the possibility that some of the elements of this document may be the subject of patent rights. ISO and IEC shall not be held responsible for identifying any or all such patent rights. Details of any patent rights identified during the development of the document will be in the Introduction and/or on the ISO list of patent declarations received (see www.iso.org/patents) or the IEC list of patent declarations received (see <https://patents.iec.ch>).

Any trade name used in this document is information given for the convenience of users and does not constitute an endorsement.

For an explanation of the voluntary nature of standards, the meaning of ISO specific terms and expressions related to conformity assessment, as well as information about ISO's adherence to the World Trade Organization (WTO) principles in the Technical Barriers to Trade (TBT) see www.iso.org/iso/foreword.html. In the IEC, see www.iec.ch/understanding-standards.

This document was prepared by Joint Technical Committee ISO/IEC JTC 1, *Information technology*, Subcommittee SC 38, *Cloud computing and distributed platforms*.

Any feedback or questions on this document should be directed to the user's national standards body. A complete listing of these bodies can be found at www.iso.org/members.html and www.iec.ch/national-committees.

Introduction

This document provides an overview of the audit of cloud services. ISO/IEC 22123-1 defines the term cloud auditor while ISO/IEC 17789 describes the cloud computing roles and sub-roles and activities related to the audit of cloud services. ISO/IEC TR 23187 which describes the interactions between cloud service partners (CSNs), cloud service customers (CSCs), and cloud service providers (CSPs) provides some perspectives on the role and responsibilities of a cloud auditor. This is covered in part in [Clause 5](#) as shown in [Figure 1](#).

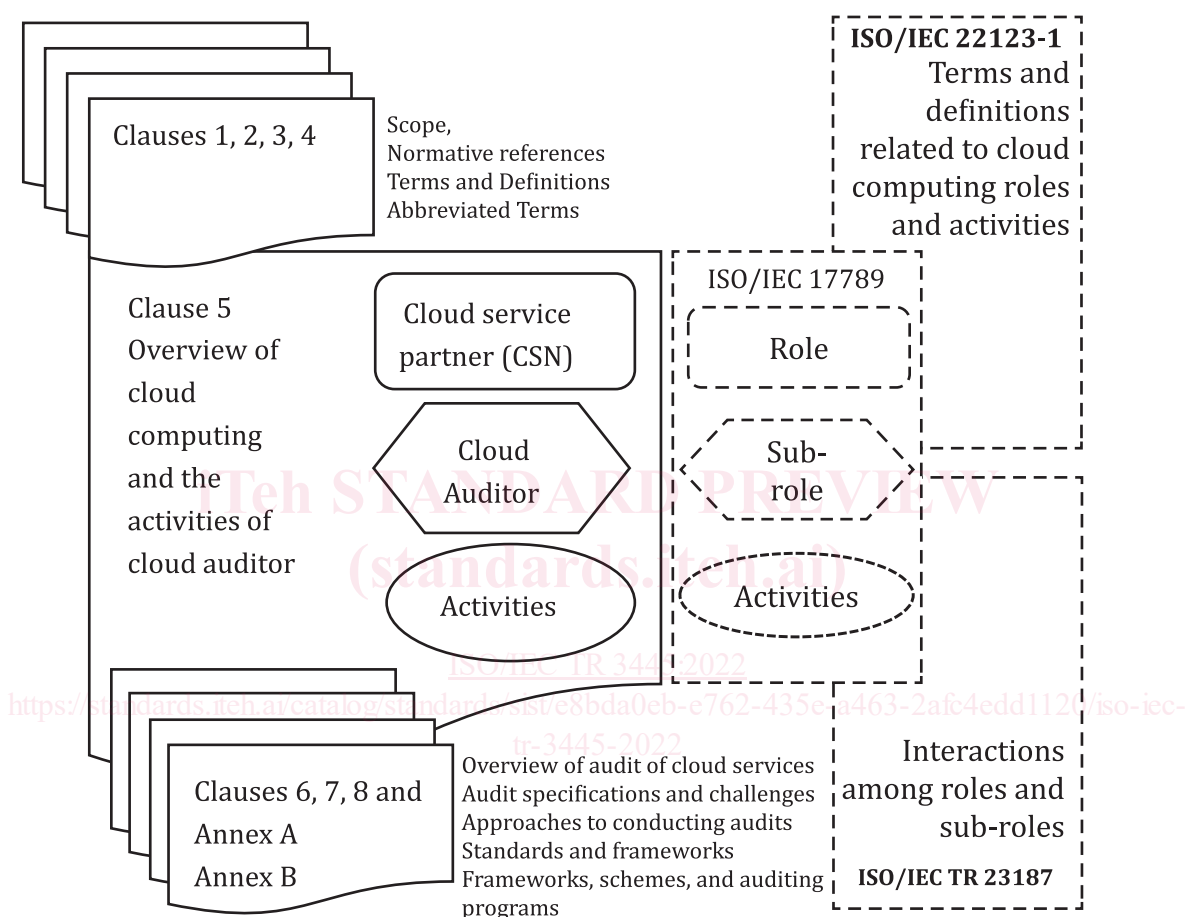


Figure 1 — Structure of the document

The structure of the document is as follows:

[Clause 5](#) includes an overview of cloud computing and its major roles. This clause also covers the role of cloud auditor, its responsibilities, and its relationship with other major cloud computing roles.

[Clause 6](#) provides an overview of cloud service audit including an explanation of the relationship between audit, assessment, compliance, evaluation, assurance and conformity assessment.

[Clause 7](#) builds on the foundation information in [Clause 5](#) to discuss audit specifications and the challenges associated with a cloud audit.

[Clause 8](#) covers approaches to conducting cloud audit.

[Annex A](#) provides information on International Standards relating to audit and frameworks for audit schemes, certification and authorization.

[Annex B](#) is a compilation of available frameworks and standards which can be used for audit schemes, for certification and for authorization.

Information technology — Cloud computing — Audit of cloud services

1 Scope

This document surveys aspects of the audit of cloud services including:

- 1) role and responsibilities of parties conducting audit and description of the interactions between the CSC, CSP, and CSN;
- 2) approaches for conducting audits of cloud services to facilitate confidence in delivering and using cloud services;
- 3) examples of available frameworks and standards which can be used for audit schemes, for certification, and for authorization.

This document builds upon the cloud auditor role as defined in ISO/IEC 17789 and ISO/IEC 22123.

This document is applicable to all types and sizes of organizations that need to plan and conduct internal or external audits, and that use, provide and support cloud services.

This document is not intended to describe certification or to identify controls that are published elsewhere.

2 Normative references

The following documents are referred to in the text in such a way that some or all of their content constitutes requirements of this document. For dated references, only the edition cited applies. For undated references, the latest edition of the referenced document (including any amendments) applies.

ISO/IEC 22123-1:2021, *Information technology — Cloud computing — Part 1: Vocabulary*

3 Terms and definitions

For the purposes of this document, the terms and definitions given in ISO/IEC 22123-1 and the following apply.

ISO and IEC maintain terminology databases for use in standardization at the following addresses:

- ISO Online browsing platform: available at <https://www.iso.org/obp>
- IEC Electropedia: available at <https://www.electropedia.org/>

3.1 Terms related to the use of audit and assessment

3.1.1

assurance

activity resulting in a statement giving confidence that a product, process or service fulfils specified requirement

[SOURCE: ISO/IEC Guide 2, 15.1]

3.1.2

attestation

issue of a statement, based on a decision, that the fulfilment of specified requirements has been demonstrated

Note 1 to entry: The resulting statement, referred to in the source document as a “statement of conformity”, is intended to convey the *assurance* (3.1.1) that the specified requirements have been fulfilled. Such an *assurance* (3.1.1) does not, of itself, provide contractual or other legal guarantees.

Note 2 to entry: First-party attestation and third party attestation are distinguished by the terms *declaration*, *certification* (3.1.4) and accreditation, but there is no corresponding term applicable to second party attestation.

[SOURCE: ISO/IEC 17000:2020, 7.3]

3.1.3

authorization

privileges that give access to designated activities

[SOURCE: ISO 11442:2006, 3.5]

3.1.4

certification

third party *attestation* (3.1.2) related to an object of *conformity assessment* (3.1.6), with the exception of accreditation

[SOURCE: ISO/IEC 17000:2020, 7.6]

3.1.5

certification audit

audit (3.2.2) carried out by an auditing organization independent of the client and the parties that rely on *certification* (3.1.4), for the purpose of certifying the client's management system

Note 1 to entry: In the definitions which follow, the term “audit” has been used for simplicity to refer to third party certification audit.

Note 2 to entry: Certification audits include initial, surveillance, re-certification audits, and can also include special audits.

Note 3 to entry: Certification audits are typically conducted by audit teams of those bodies providing *certification* (3.1.4) of conformity to the requirements of management system standards.

Note 4 to entry: A *joint audit* (3.2.11) is when two or more auditing organizations cooperate to audit a single client.

Note 5 to entry: A *combined audit* (3.2.9) is when a client is being audited against the requirements of two or more management systems standards together.

Note 6 to entry: An integrated audit is when a client has integrated the application of requirements of two or more management systems standards into a single management system and is being audited against more than one standard.

[SOURCE: ISO/IEC 17021-1:2015, 3.4]

3.1.6

conformity assessment

demonstration that specified requirements are fulfilled

Note 1 to entry: The *process* (3.1.8) of conformity assessment as described in the functional approach in [Annex A](#) can have a negative outcome, i.e. demonstrating that the specified requirements are not fulfilled.

Note 2 to entry: Conformity assessment includes activities defined elsewhere in the source document, such as but not limited to testing, inspection, validation, verification, *certification* (3.1.4), and accreditation.

Note 3 to entry: Conformity assessment is explained in [Annex A](#) as a series of functions. Activities contributing to any of these functions can be described as conformity assessment activities.

Note 4 to entry: The source document does not include a definition of “conformity”. “Conformity” does not feature in the definition of “conformity assessment”. Nor does the source document address the concept of compliance.

[SOURCE: ISO/IEC 17000:2020, 4.1]

3.1.7

compliance compliant

meeting or exceeding all applicable requirements of a standard or other published set of requirements

[SOURCE: ISO/TR 19591:2018, 3.60]

3.1.8

process

set of interrelated or interacting activities that use inputs to deliver an intended result

[SOURCE: ISO 19011, 3.24]

3.2 Terms related to cloud service audit

3.2.1

assessment

process of collecting and analyzing outcomes to determine course of actions

3.2.2

audit

systematic, independent and documented *process* ([3.1.8](#)) for obtaining *objective evidence* ([3.2.12](#)) and evaluating it objectively to determine the extent to which the audit criteria are fulfilled

Note 1 to entry: *Internal audits* ([3.2.10](#)), sometimes called first-party audits, are conducted by, or on behalf of, the organization itself.

Note 2 to entry: External audits include those generally called second and third party audits. Second party audits are conducted by parties having an interest in the organization, such as customers, or by other individuals on their behalf. third party audits are conducted by independent auditing organizations, such as those providing *certification* ([3.1.4](#))/registration of conformity or governmental agencies.

[SOURCE: ISO 19011:2018, 3.1]

3.2.3

cloud service audit

audit ([3.2.2](#)) of the provision and use of one or more cloud services

Note 1 to entry: An audit of a cloud service can include cloud characteristics, cloud deployment, cross cutting aspects and related management and security functions.

3.2.4

audit client

organization or person requesting an *audit* ([3.2.2](#))

Note 1 to entry: In the case of *internal audit* ([3.2.10](#)), the audit client can also be the *auditee* ([3.2.7](#)) or the individual(s) managing the audit programme. Requests for external audit can come from sources such as regulators, contracting parties or potential or existing clients.

[SOURCE: ISO 19011:2018, 3.12]

3.2.5
audit programme

arrangements for a set of one or more *audits* (3.2.2) planned for a specific time frame and directed towards a specific purpose

[SOURCE: ISO 19011:2018, 3.4]

3.2.6
audit scope

extent and boundaries of an *audit* (3.2.2)

Note 1 to entry: the audit scope generally includes a description of the physical and virtual-locations, functions, organizational units, activities, and processes, as well as the time period covered.

Note 2 to entry: A virtual location is where an organization performs work or provides a service using an on-line environment allowing individuals irrespective of physical locations to execute processes.

[SOURCE: ISO 19011:2018, 3.5]

3.2.7
auditee

organization as a whole or parts thereof being audited

[SOURCE: ISO 19011:2018, 3.13]

3.2.8
auditor

person who conducts an *audit* (3.2.2)

[SOURCE: ISO 9000:2015, 3.13.15]

3.2.9
combined audit

audit (3.2.1) carried out together at a single *auditee* (3.2.7) on two or more management systems

Note 1 to entry: When two or more discipline-specific management systems are integrated into a single management system this is known as an integrated management system.

[SOURCE: ISO 9000:2015, 3.13.2, modified]

3.2.10
internal audit

audit (3.2.2) conducted by, or on behalf of, an organization itself for management review and other internal purposes, and which can form the basis for an organization's self-declaration of conformity

Note 1 to entry: In many cases, particularly in smaller organizations, independence can be demonstrated by the freedom from responsibility for the activity being audited.

[SOURCE: ISO 22300:2021, 3.1.134]

3.2.11
joint audit

audit (3.2.2) carried out at a single *auditee* (3.2.7) by two or more auditing organizations

[SOURCE: ISO 9000:2015, 3.13.3]

3.2.12
objective evidence

data supporting the existence or verity of something

Note 1 to entry: objective evidence can be obtained through observation, measurement, test or by other means.

Note 2 to entry: objective evidence for the purpose of the *audit* (3.2.2) generally consists of records, statements of fact, or other information which are relevant to the audit criteria and verifiable.

[SOURCE: ISO 9000:2015, 3.8.3]

3.2.13

party

natural person or legal person, whether or not incorporated, or a group of either

[SOURCE: ISO/IEC 22123-1:2021, 3.4.1]

4 Abbreviated terms

BCR	binding corporate rules
Cloud SLA	cloud service level agreement
CSA	cloud service agreement
CSC	cloud service customer
CSN	cloud service partner
CSP	cloud service provider
CSU	cloud service user
FISMA	The Federal Information Security Modernization Act of 2014 (FISMA 2014) (US)
GDPR	General Data Protection Regulation (EU GDPR)
HSPD-12	Homeland Security Presidential Directive 12 (US)
ISMS	information security management system
IT	information technology
LGPD	Brazil's Lei Geral de Proteção de Dados
PCIDSS	Payment Card Industry Data Security Standard
PIA	Privacy impact assessment
PIMS	Privacy information management system
SDOC	Suppliers Declaration of Conformity
SLO	cloud service level objective
SQO	cloud service qualitative objective

5 Overview of cloud computing and the activities of a cloud auditor

5.1 Overview of cloud computing

5.1.1 General

Cloud computing, as defined in ISO/IEC 22123-1:2021, 3.2.1, is a paradigm for enabling network access to a scalable and elastic pool of shareable physical or virtual resources with self-service provisioning

and administration on-demand. The cloud computing paradigm is comprised of cloud computing roles and activities, cloud capabilities types and cloud service categories, cloud deployment models, key characteristics and cross cutting aspects as shown in [Figure 2](#).

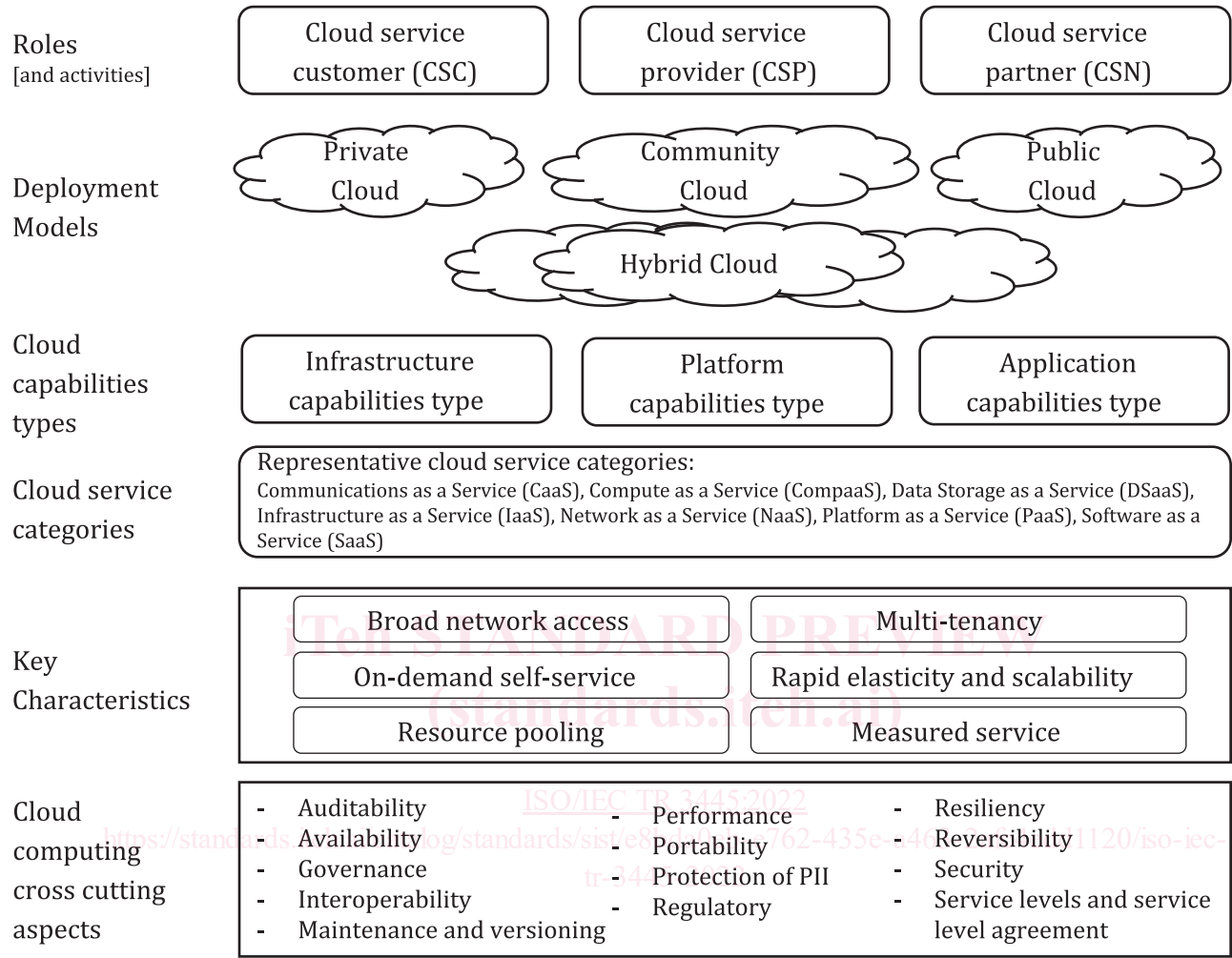


Figure 2 — Overview of cloud computing

5.1.2 Cloud computing roles, sub-roles and activities

In the context of cloud computing and of particular importance to this document is the clarification of the different roles and their activities. ISO/IEC 22123-1 identifies the major roles of cloud computing and ISO/IEC 17789 expands on the roles to include sub-roles activities, and their relationship to the functional components and functional layers of cloud computing.

The major cloud computing roles are:

- Cloud service customer (CSC) is a party which is in a business relationship for the purpose of using cloud services.
- Cloud service provider (CSP) is a party which makes cloud services available.
- Cloud service partner (CSN) is a party which is engaged in support of, or auxiliary to, activities of either the CSP or the CSC, or both.

In performing the role, the party ([3.2.13](#)) can take on more than one sub-set of the cloud computing activities of a given role. ISO/IEC TR 23187: provides an overview of and guidance on interactions

between cloud service partners (CSNs), specifically cloud service brokers, cloud service developers and cloud auditors, with CSPs and CSCs.

ISO/IEC 22123-1 and ISO/IEC 17789 do not claim to describe all possible CSN sub-roles. These standards have identified three initial sub-roles of the CSN: the cloud service broker, the cloud service developer, and the cloud auditor. A CSN supports the CSC or CSP or both in delivering or using the cloud services. In the use of cloud computing and in carrying out the activities of each role, an audit client can be a CSC, CSP or CSN. Through the delivery and use of cloud services, interaction and related activities initiated by one party can influence responsive activities from another party or parties.

5.2 Overview of the activities of a cloud auditor

5.2.1 Cloud auditor

Auditors of cloud services and more generally of management systems are required to conduct independent assessments of the CSC's system specific controls for its cloud services. These potentially address stored data, applications, operations, performance, privacy and security of the cloud implementation. Security measures that the CSP implements and operates are also included.

The cloud auditor is further responsible for assessing the CSC's cloud-specific controls. The audit specification criteria vary and can depend on many factors. The audit specifications (see [Clause 7](#)) can be set in collaboration with the CSP, by the cloud auditor alone, by standards set independently or possibly as required by law.

Since the cloud auditor's defined audit responsibilities cover both the use and provision of cloud services, the auditor can conduct the audit for the CSP, the CSC or both organizations.

The cloud auditor can perform both internal and external audits.

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	Traditional IT	Infrastructure capabilities type	Platform capabilities type	Application capabilities type	
Data and governance					Responsibilities retained by CSC
Endpoints security					
Identity and access management					
Application					Depends on cloud service type
Network controls and security					
Operating system					
Servers / virtualization					
Network					
Storage / data Centre					

Key



-  CSC responsibilities
 CSP responsibilities

Figure 3 — An example of CSP and CSC responsibilities

Shared responsibility as illustrated in [Figure 3](#) means the audit criteria specifications vary depending on the cloud deployment model and the cloud services being implemented. It is the responsibility of an auditor to have a comprehensive understanding of these implementation in order to establish clear boundaries and ownership of the security controls that are to be audited. It is important to note that a CSC can use a CSP's third party attestations as evidence that the requirements associated with the CSP have been satisfied.

5.2.2 Responsibilities of a cloud auditor

A cloud auditor's primary responsibility is to conduct audit to the agreed specifications, policies and agreements.

The specifications (see [Clause 7](#)) can include standards defined by the CSP, CSC or cloud auditor; standards defined independently, or standards required by law. Certification provided by CSPs and third party suppliers can be evaluated and considered in the result of the audit. The CSP sets the policies for auditing CSP's infrastructures and services.

All agreements are based on the negotiated cloud service agreement (CSA) or cloud service level agreement (cloud SLA).

In addition, ISO/IEC 17789:2014, A.4 states that the cloud auditor's activities focus on the following categories of audits:

- security audit: see [6.3.4.3](#);
- privacy audit: see [6.3.4.4](#);
- performance audit: see [6.3.4.5](#).

Many principles help to make an audit an effective and reliable tool. ISO 19011 discusses principles that provide critical guidance to auditors or cloud auditors in performing their tasks including integrity, fair presentation, professional care, confidentiality, independence, evidence-based approach and risk-based approach. In addition, an understanding of the relationship between transparency, assurance and accountability is a relevant contributor to audit quality.

In addition, the following practises are helpful to ensure an audit is an effective and reliable tool as well as maintain compliance with local laws or regulations:

- Audits can be conducted in a risk-based manner, taking into account concerns regarding the organizational burden for both the outsourcing institution and the cloud service provider, as well as practical, security, and confidentiality concerns regarding access to certain types of business premises or data in multi-tenant environments.
- Audits are subject to the principle of proportionality; they are to be applied in a manner that is appropriate, taking into account, in particular, the institution's size and internal organization and the nature, scope and complexity of its activities.
- Auditors have a professional duty to preserve their objectivity and to avoid conflicts of interest. (Customer audit requirement).
- Auditors are expected to treat all information received as strictly confidential and handle with due care. (Customer audit requirement).
- Auditors usually are compliant with generally accepted international professional standards for auditing and with a code of ethics, one such example is the International Professional Practices Framework (IPPF) issued by the Institute of Internal Auditors of North America (IIA).

5.2.3 Cloud auditor's cloud computing activities

The cloud auditor can conduct the audit for the CSP, CSC, or both. The cloud audit can include both internal (see [6.3.2](#)) and external audits (see [6.3.3](#)). ISO 19011:2018, 5.4.1 discusses the role and responsibilities of the individual(s) managing an audit programme, and ISO 19011:2018, 5.4.2 explains the competence of the individual(s) managing the audit programme.

ISO 19011:2018, 5.2 lays out objectives for an audit programme and the auditor's activities can be aligned with establishing those audit programme objectives. The individual(s) conducting an audit of cloud services can refer to those guidelines.

The auditors in conducting an internal or external audit of a cloud-based IT system have to exercise professional judgement to complete the audit in response to the audit request. In completing the audit for compliance to SOC 2, for example, the auditor in his/her finding can point to pertinent standards previously not being considered or overlooked by the requester. This calls into the recommendation that the auditors need to have appropriate continual development activities to maintain the necessary competency and knowledge in, e.g. information security, data protection and cloud computing system.