REC Service User Categorisation and Assessment Document

March 2022

V3.0 (Final)

RETAIL ENERGY CODE

Contents

CHANGE HISTORY

| Version	Issue Date	Author	Comments
1.0	19 May 2021	The Code Manager	Final version agreed with RECCo
2.0 (Final)	October 2021	The Code Manager	Updated to include additional Service User categories
3.0 (Final)	March 2022	The Code Manager	Updated version to reflect updates to the Data Access Schedule

Service User Categorisation

1. Scope

This document defines the different types of REC Service User Categories and provides details of the specific ongoing assessment processes, particularly in terms of the level and frequency of the Information Security and Data Protection (ISDP) assessment which will be carried out. The level of ISDP assessment will be based on the risks related to use of REC Services. These will vary as REC Services change, and based on changes to access, for example as described in the Data Access Schedule. This document will be updated alongside these changes.

Definitions can be found within the Interpretation Schedule of the REC.

1.1 Applicability

This document details the ongoing assurance requirements of Qualified REC Service Users. Three services are planned to come within the scope of the REC at a later stage: the new Central Switching Service (CSS), the associated Switching Operator Service (SO), and the Gas Enquiry Service (GES). This is illustrated in the diagram below:
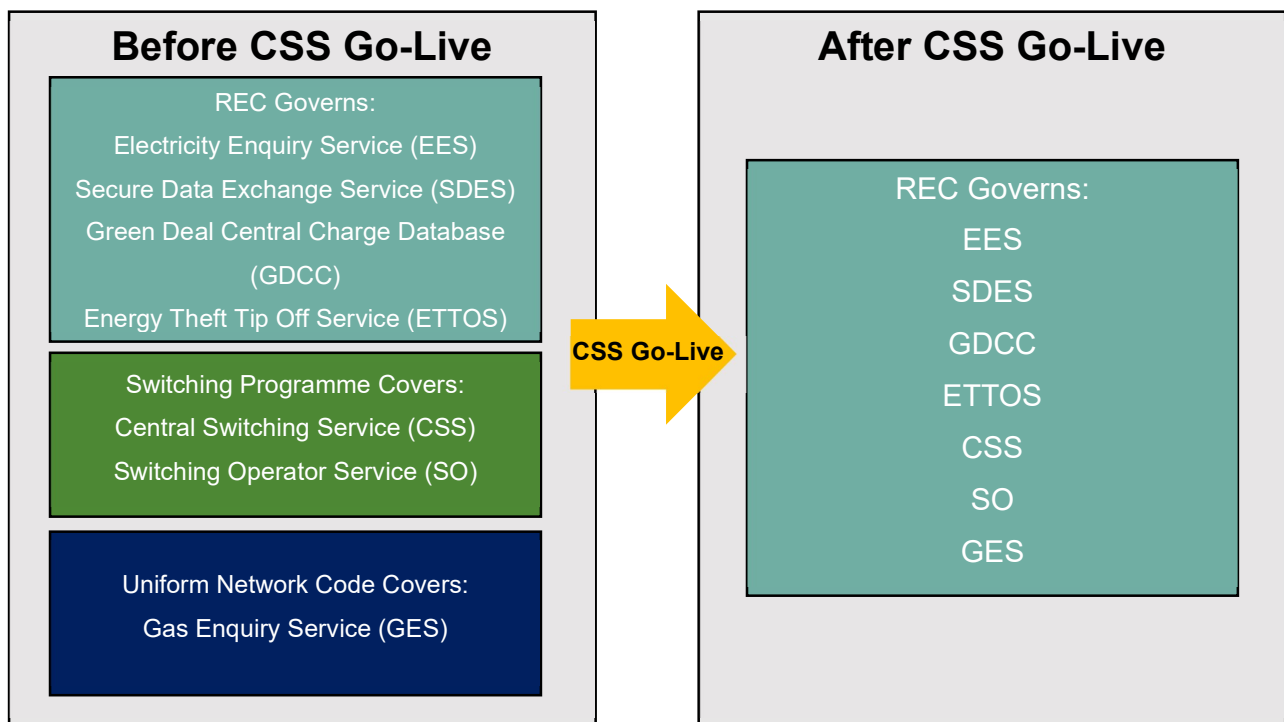
After CSS go-live, the ongoing assurance requirements for individual organisations may increase. For example, Gas Suppliers and Gas Transporters will be REC Parties before CSS go-live and will need

to maintain their Qualification but may have additional information security responsibilities under the REC after CSS go-live. This will vary by organisation, as many organisations will supply electricity and gas, and therefore have information security responsibilities under the REC before CSS go-live.

This document applies to REC Parties, who access multiple services, as well as Non-Party REC Service Users, who typically have access to enquiry services only.

2. REC Services

Detailed in Table 1 below is a list of REC Services, and whether these services are available to REC Parties and Non-Party REC Service Users.

TABLE 1

REC Service	Available to REC Parties	Available to Non-Party REC Service Users	Ongoing Assurance
Secure Data Exchange Service	✓		Captured within REC Party Maintenance of Qualification activities – no additional ISDP assessment.
Energy Theft Tip Off Service	✓		Captured within REC Party Maintenance of Qualification activities – no additional ISDP assessment.
GDCC Service	✓	✓	No additional ISDP assessment – unless the User has access to another REC Service.
Electricity Enquiry Service	✓	✓	Dependent on category of user as set out below.
Gas Enquiry Service*	✓	✓	Dependent on category of user as set out below.
Central Switching Service*	✓	✓	Dependent on category of user. This will be updated prior to CSS Go-Live.

Ongoing assurance relating to these services will start from the point they are under REC Governance.

3. REC Service Users Ongoing Assurance Cycle

3.1 Ongoing Maintenance of Qualification

3.1.1 Electricity and Gas Enquiry Services

Once Qualified as a REC Service User, you will need to undertake some form of ongoing maintenance of your Qualification every 12 months. This includes completing an Annual Statement, via the REC Portal. In addition to this, there are two forms of ISDP assessment:

External Assessment

The External Assessment is a comprehensive assessment and is tailored to the access you have to systems. Your External Assessment form should provide adequate coverage of all requirements under the REC, and where processes are carried out on behalf of you by a third party, additional information should be provided around their Information Security Data Protection arrangements.

External Assessments are required <u>at least</u> once every three years or at the request of the Code Manager.

The ISDP Assessment concentrates on the existence of defined processes, whether these are documented procedures or automated processes and the Code Manager may undertake sample checking of process to assess compliance. The Code Manager shall use a risk-based approach to carry out the ISDP Assessment and confirm the responses to all ISDP form questions.
The External Assessment can be completed via an electronic dynamic form on the REC Portal, the Code Manager is notified and then assess the submission. There is guidance for completing the assessment and supporting evidence that is required that can be found within the REC Entry Assessment Information Pack.

If, during this assessment, the Code Manager does not gain the necessary level of assurance that the REC Service User's information security and data protection arrangements are sufficiently robust, this will be communicated to the user. It is then the responsibility of the REC Service User to propose and carry out corrective actions to resolve all issues to the satisfaction of the Code Manager.

Where the REC Service User fails to submit its REC Service User Assurance Evidence within the timescales required the Code Manager will initiate escalation to the REC Performance Assurance Board.

Compliance Statement

The Compliance Statement is a lighter touch assessment applied to REC Service Users and the same statement for all organisations. It covers questions relating to your information security risk assessment, data privacy procedures, security accreditation and any security breaches you have suffered. It also covers changes to your circumstances that could affect security or data privacy. The Compliance Statement can be completed via an electronic dynamic form on the REC Portal, the Code Manager is notified and then assess the submission.

A compliance statement is required to be completed in every year that an external assessment is not completed.

Where the REC Service User fails to submit its REC Service User Compliance Statement or fails to complete rectification steps within the timescales required, the Code Manager will initiate escalation activities in accordance with the REC Performance Assurance Schedule.

The Code Manager has set out our categorisation of the types of assessment expected in a normal three-year assessment cycle in Table 2 below, this is dependent on the REC Service User. REC Service Users will be notified when their next ISDP assessment is due by the Code Manager.

TABLE 2

Enquiry Service User Category [1]	REC Services Available [2]	Compliance Statement Required?	External Assessment Required?
Electricity Supplier	EES, GES	✓	✓
Gas Supplier	EES, GES	✓	✓
Distribution Network Operator	EES, GES	✓	✓
Gas Transporter	EES, GES	✓	✓
Metering Equipment Manager	EES, GES	✓	✓
Gas Shipper	EES, GES	✓	
Meter Asset Providers	EES, GES	✓	✓
Data Aggregators	EES	✓	✓
Data Collectors	EES	✓	✓
Third Party Intermediaries	EES, GES	✓	✓
REC Code Managers	EES, GES	✓	
Non-Domestic Consumers (portfolio access only)	EES, GES		
Energy Theft Tip Off Service Provider	EES, GES	✓	
Non-REC Code Managers	EES, GES	✓	
Citizens Advice/ Citizens Advice Scotland	EES, GES	✓	
Local Authorities	EES, GES	✓	

[1] Only applicable to GES Users from CSS go-live
[2] Subject to the Code Managers approval

Enquiry Service User Category [1]	REC Services Available [2]	Compliance Statement Required?	External Assessment Required?
Department for Work and Pensions	EES	✓	
HM Revenue and Customs	EES	✓	
Police	EES	✓	
Other Law Enforcement Agencies	EES	✓	
UK Office for National Statistics	EES, GES	✓	
The Revenue Protection Association	EES, GES	✓	
Third Party Intermediary Service Providers	EES, GES	✓	✓
Energy Ombudsman	EES, GES	✓	
The Microgeneration Certification Scheme Service Company	EES	✓	
The Alt HAN Company	EES, GES	✓	✓
Energy (UK)	EES	✓	
BSC Technical Assurance Agent	EES	✓	
The Authority	EES, GES	✓	
Research Bodies	GES	✓	

Certain triggers can require a REC Service User to undergo an External Assessment more frequently than detailed above. Some of these triggers are listed within Section 5.

If you become Qualified as a REC Party or REC Service User, your first-year assessment will occur within 12 months of when you became Qualified. Your requirements will be detailed within your account on the REC Portal.

If you are transitioned onto the REC as a REC Party or REC Service User, your first assessment is required to occur within 12 months from initially being transitioned. It will then occur every 12 months thereafter. Your individual requirements will be detailed within your account on the REC Portal.

3.1.2 Green Deal Central Charge Database

The Code Manager has set out our categorisation of the types of REC Service Users that are allowed to access the GDCC in Table 3 below.

TABLE 3

GDCC Service User Category	REC Services User Category	Maintenance of Qualification?
Electricity Supplier	REC Party	Users of only the GDCC are not required to maintain their Qualification under the REC. However, if the GDCC User has access to other REC Services, they will be required to maintain their Qualification, in line with Table 2 above.
Green Deal Providers	Non-REC Party	
Green Deal Finance Parties	Non-REC Party	
Green Deal Remittance Processors	Non-REC Party	
Distribution Network Operators*	Non-REC Party	

*only when acting in their capacity as an MPAS Provider

3.2 Amendments to Assurance Cycle

As a REC Service User, you may request that the Code Manager considers amending your ongoing assurance cycle. The following information must be submitted to the Code Manager via the REC Portal to allow it to consider the modification to your ongoing assurance cycle:

- The frequency with which you intend to access data from REC Services;
- The nature of the data you intend to access;
- Whether your intended use of data requires you to make such data available outside of your own organisation;
- The extent to which your intended use of data requires you to hold or store data; and
- The means by which data is to be accessed.

Where the Code Manager is satisfied that an amended ongoing assurance cycle is appropriate, it will update the ongoing assurance cycle and inform you and the REC Performance Assurance Board (PAB).

4. Information Security External Assessment Triggers

Table 4 is a non-exhaustive list of triggers which will be considered by the Code Manager as to whether an External Assessment in a year where you would ordinarily be required to only provide a compliance statement is required.

TABLE 4

Trigger	Description
System or Process Change (REC Parties only)	A change made to your systems or processes that may impact interfaces with other Market Participants.
Incidents or data breaches	A security incident or data breach that has been reported either directly to the Code Manager or has been reported within the public domain.
Loss/suspension of licence or re-qualification required by another code (Suppliers, DNOs only)	Where the REC Party or REC Service User has been suspended as a party under another code or is required to re-qualify under another code.

If the Code Manager believes an External Assessment is required rather than a Compliance Statement, the REC Party or Non-REC Party Service User will be notified of when an assessment is due. This is at least 30 days prior, to the assessment due date.

To find out more please contact:
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