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CHANGE PROPOSAL PLAN

R0048 – DCC SERVICE ORGANISATIONAL CONTROL 2 (SOC2) ASSESSMENTS

DOCUMENT VERSION	V5.0
DATE ISSUED	12/07/2023
DOCUMENT APPROVAL STATUS	APPROVED

RESPONSIBLE COMMITTEE	TECHINCAL EXPERT PANEL

CHANGE PATH	SELF GOVERNANCE

DEADLINE FOR ALTERNATIVE CHANGE PROPOSALS	17/02/2023

LEAD CHANGE ANALYST



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CHANGE OVERVIEW

Currently within the Central Switching Service (CSS) Service Definition document there is a requirement for the CSS Provider to arrange for and undertake system organisation control type 2 (SOC2) assessments on the CSS's cloud-based infrastructure.

This Change Proposal seeks to determine if it is appropriate for the requirement for assurance on the CSS's cloud-based infrastructure to be changed from 'SOC2 Type 2' to 'independently assessed'.

KEY MILESTONES

	FROM	TO
SOLUTION ANALYSIS AND DEVELOPMENT	21/12/2022	10/02/2023
SERVICE PROVIDER IMPACT ASSESSMENT	16/01/2023	06/02/2023
PRELIMINARY CHANGE REPORT AND CONSULTATION ISSUED	17/02/2023	10/03/2023
FINAL CHANGE REPORT ISSUED	17/03/2023	17/03/2023
RESPONSIBLE COMMITTEE DECISION	29/03/2023	29/03/2023
APPEAL WINDOW CLOSURE	12/04/2023	12/04/2023

1 RE-BASELINE ACTIVITY

This Change Proposal has been re-baselined due to additional information being required from the proposer:

- The scope and the approach for the CSS Information Risk Assessment and DCC Security Architecture Framework
- Lower-level detail on the scope and approach for the CIO Assessment of CSS (to allow a comparison between SOC 2 and the CIO Assessment)
- Details on how a CIO Assessment would provide remedial procedures or supporting governance during and/or following assessment.

This additional information has now been received and shared with the RECCo Subject Matter Expert for review, so that we can determine if the appropriate level of detail on a proposed audit regime and framework has been provided. As a result of the time taken to receive the additional information, were proposing to extend the Solution Development period to give time for this verification to take place and to explore the introduction of a new assurance framework. This will involve multiple Party engagement. Following solution development an extended plan will be presented to the Change Panel for approval.

	APPROVED DATES		PROPOSED DATES	
	FROM	TO	FROM	TO
SOLUTION ANALYSIS AND DEVELOPMENT	21/12/2022	11/07/2023	**21/12/2022**	**24/11/2023**

2 SCOPE

2.1 IN SCOPE

This document sets out the Code Managers plan for analysis, solution development, assessment, and the consultation for this Change Proposal.

This includes Service Provider impact assessment for the DCC as the CSS Provider, to gain an understanding of the lead time required to implement the solution and realise the benefits they anticipate will be seen, whilst ensuring that risks to information security are mitigated.

Assessing other Service Providers within the CSS 'ecosystem' such as the Switching Data Service Providers is also in scope of this Change Proposal plan.

2.2 OUT OF SCOPE

It is not anticipated that this Change Proposal will have impacts on REC Parties, therefore, no impact assessment activity for these stakeholders has been included within the plan.

3 REQUIRED ACTIVITIES AND STAKEHOLDER ENGAGEMENT

3.1.1 SOLUTION DEVELOPMENT & ANALYSIS

Whilst legal text was submitted with this Change Proposal, the Code Manager needs to further assess and develop this to ensure that any risks to information security are going to be adequately mitigated within the proposed solution, which will be presented within the Preliminary Change Report.

During solution development the Code Manager will work with the CSS Provider, RECCo and other stakeholders to define a solution that provides a robust audit regime that appropriately manages the data security risks presented within the information risk assessment of the CSS.

3.1.2 IMPACT ASSESSMENT

An impact assessment will be issued by the Code Manager targeted at the CSS Provider, this will provide information for the case for change as well as required lead time for the implementation of this Change proposal.

Although no impacts are anticipated, impact assessments will be requested from the Gas Retail Data Agent and the Electricity Retail Data Agents to ensure that there are no consequential impacts because of the CSS Provider precuring different security certification.

Impact assessments will be issued on 16 January 2023 for a period of 15 Working Days (WDs).

3.1.3 PRELIMINARY CHANGE REPORT DEVELOPMENT AND CONSULTATION

A preliminary assessment will be carried out following the impact assessment, this will consider the response to the impact assessment and the case for change to develop the Code Manager's recommendation.

At this stage a consultation will be issued for a period of 15 WDs to gather feedback from REC stakeholders.

The Preliminary Change Report and consultation will be issued on 17 February 2023.

3.1.4 FINAL CHANGE REPORT

Following the consultation period, time has been included in the plan for a review of any consultation responses received and for these to be addressed prior to publishing the Final Change Report.

3.1.5 ASSUMPTIONS AND DEPENDENCIES

REF.	DEPENDENCY	NOTES	STATUS
R0048.CPP.D001	Assurance starts in August 23	As the DCC will begin assurance activity in August 23	Open

		this change must be concluded ahead of this with time for the DCC to procure a different service if approval is provided.	