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Retail Energy Code Performance Assurance Board Paper

Enhancements to REC Qualification and Data Access Arrangements

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For decision	In June 2026, RECCo provided a paper to the REC Performance Assurance Board (PAB) on the Consumer Consent Service (CCS) and associated Performance Assurance proposals (RECPAB_26_0630_07). This paper provides an update on enhancements to the REC qualification framework arising from both the CCS programme and wider business-as-usual improvement activities. It also explains how the implementation of CCS-related changes will be coordinated with broader improvements to streamline and strengthen the existing Information Security Data Protection (ISDP) assessment framework. RECCo recommends that the REC PAB: • **Agrees** that the revised ISDP question set be incorporated into the Entry Assessment Forms product and issued for industry consultation, with the expectation that revised questions will take effect from January 2027, subject to any changes arising from that consultation. • **Notes** the ongoing work to amend the risk-based qualification arrangements to take account of the risk profile of individual organisations. • **Notes** the proposed approach to reviewing the REC data access application process and incorporating any resulting changes into the wider entry assessment arrangements.
Appendices	RECPAB_26_1027_01_A – Proposed ISDP questions

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1 Background

In June 2026, RECCo presented the proposed CCS performance assurance arrangements to the REC PAB (RECPAB_26 _0630_07), covering monitoring, reporting, and qualification. PAB discussed the proposed controls forinformation security and data protection risks and the factors used to assess an applicant's risk profile. PAB members were supportive of the proposed approach.

The June PAB paper also outlined work with RECCo's Qualification Team to review the existing ISDP questions and risk critieria for applicants seeking access to half-hourly metered data via the CCS. This CCS review focused on both the ISDP assessment questions and the factors used to determine the level of evidence that applicants must provide and the frequency of ongoing activities, based on their risk profile. The PAB was asked to agree to the assurance proposals for inclusion in the CCS drafting consultation which was issued on 7 September 2026.

The review identified improvements relevant to the wider ISDP framework. These were developed first for CCS to meet its delivery timetable, but RECCo's longer-term aim is a consistent and proportionate approach across REC Services, including CCS and Enquiry Services.

In parallel, RECCo and its Qualification Team have been working on a number of data access process improvements. These improvements fall into three main areas:

- Streamlining the data access application process used to determine whether an organisation can access a specific data item.
- Introduction of an organisational risk framework for determining the level of ISDP assessment required.
- Amendments to the ISDP question set to provide a consistent and sustainable assessment of information security and data protection arrangements across all relevant REC services. Proposed changes to the question set were identified through the CCS-initiated review, recognising that the rationale for change is equally applicable to the wider BAU ISDP.

This paper explains how the CCS proposals and BAU activities will be brought together and the next steps for PAB consideration.

2 ISDP question set

2.1 Approach

The CCS review identified that the current ISDP assessment focuses primarily on an organisation's general information security and data protection arrangements. The proposed changes place greater emphasis on how REC data is accessed, used, protected and governed throughout its lifecycle. They cover permission management, data minimisation, retention, data subject rights, onward sharing, profiling, and third-party processing.

The questions were shared with the PAB in June 2026 and subsequently included in the CCS industry consultation. RECCo is proposing to incorporate the revised questions into the BAU qualification arrangements through the annual review of entry documentation. This would provide asingle approach for organisations seeking access to one or more REC Services, including the Central Switching Service, Enquiry Services and CCS.

Implementation from January 2027 would support their consistent application to all new applicants and to existing organisations undertaking maintenance of qualification activities from 2027 onwards.

PAB is invited to agree their inclusion within the Entry Assessment Forms Category 3 Product, as detailed in Appendix A, subject to any changes agreed as a result of the CCS consultation. That consultation closes on 19 October and its outcomes will be summarised verbally at the PAB meeting.

RECCo proposes a further industry consultation on the updated Entry Assessment Forms document in October 2026, to cover their wider application within the BAU qualification arrangements, enabling approval of the changes at the November 2026 PAB meeting.

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2.2 PAB Action

REC PAB Decision
RECCo recommends that the REC PAB: **Agrees** that the revised ISDP question set be incorporated into the Entry Assessment Forms product and issued for industry consultation, with the expectation that revised questions will take effect from January 2027, subject to any changes arising from that consultation.

3 Organisational Risk-Based Assessmet

3.1 Approach

The scope and depth of the current ISDP assessment are primarily based on the user category and the method of data access. The REC Service User Categorisation and Assessment Document[1] defines the assessment type applicable to Central Switching Service and Enquiry Service Users. All Central Switching Service users are expetced to undergo a full ISDP assessment. For Enquiry Service Users, the requirement for an assessment carried out by the Qualifications Team, and whether this is streamlined verification or a full standard assessment, depends on the user category and access method, such as reports, an online portal or an API.

RECCo and its Qualification Team have identified opportunities to enhance this approach by considering both the risks associated with the data and organisation-specific factors. The aim is to apply greater scrutiny of higher-risk use cases while streamlining the assessment process for lower-risk applicants.

This aligns with the proposed CCS qualification arrangements, which recognise the following factors when determining an applicant's risk profile:

- The data's risk profile, including whether this is personal data versus open publicly available data.
- the type of user and the proposed purpose - including the nature and sensitivity of the data being accessed and the scale and purpose of the proposed access.
- the maturity of the applicant's information security and data protection arrangements, including its experience of managing comparable data and the evidence available to demonstrate that relevant controls are operating effectively.
- whether the applicant is accessing data for its own purposes or is expecting to pass consumer data to other downstream organisations - where downstream data sharing is expected, assurance will include the controls in place to manage the associated data protection and information security risks.
- the number of data access requests that the applicant expects to make, or is making, on an annual basis when considering ongoing maintenance of qualification assessments, together with the overall scale of data access.
- the extent of reliance on third-party processors, subcontractors or other service providers.
- any relevant history of information security incidents, personal data breaches or regulatory enforcement activity - the impact this has on the organisation's risk profile will recognise the nature of the incident, any remediation undertaken and the controls implemented to address identified weaknesses.

Changes to the basis of determining assessment scope require careful consideration full stop. The Qualification team therefore began a trial in early 2026 in which new Enquiry Service User applicants complete a pre-assessment

1 REC Service User Categorisation and Assessment Document

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questionnaire Alongside a standard process. Responses will be modelled to test the questionnaire and how combinations of answers map to high, medium or low organisational risk categories. The trial will also assess whether the proposed approach identifies material risks, produces consistent categorisation between assessors and supports a proportionate level of assessment compared with the existing process. It will also consider the evidence required and the effort involved for applicants and assessors.

For CCS, RECCo proposes a dedicated section in the Rec Service User Categorisation and Assessment document through the CCS modification currently progressing as REC Issue I0318. This will explain the risk-based categorisation mechanism to potential CCS users and form a core part of CCS governance. RECCo will continue to monitor the new CCS process and the wider Enquiry Service User trial and, in discussion with PAB, determine how and when the mechanism will be formally rolled out to Enquiry Service Users.

3.2 PAB Action

REC PAB Decision
RECCo recommends that the REC PAB: • **Notes** the ongoing work to amend the risk-based qualification arrangements to take account of the risk profile of individual organisations.

4 Data Access Application

4.1 Approach

This work covers the process for requesting access to REC data, up to the point the request is handed to the Qualification team for assessment. This process sits in front of the ISDP assessment and determines whether an organisation can access the specific data items it has requested.

Following potential improvements identified by the qualification team earlier in 2026, RECCo began a wider review of the data access request process in September 2026. The aim is A more proportionate, efficient and risk-based process that maintains appropriate appropriate assurance and governance. The review brings together RECCo (including Enquiry Services service delivery and RECCo's data protection subject matter experts), the REC Professional Services and Qualification teams.

Initial areas for exploration are:

- The applicant journey involves several stages and hand-offs between organisations, which can feel disjointed.
- Approvals for new use cases are aligned to the monthly governance cycle. This can make it harder to respond quickly when a straightforward request arrives between meetings.
- The Data Access Matrix (DAM) has not kept pace with the systems it describes. Some data item names differ from those used in system documentation, and some items are no longer in scope.
- There is limited plain English guidance for applicants on the process, what individual data items mean and how the DAM is used.

Opportunities to explore

- Simplifying the front end of the process, for example by building the DAM into the application form so applicants can select the type of access and data items they need from the outset.
- Reviewing how approvals are completed so that the level of review is proportionate to the risk.
- Updating the DAM so that data item names align with system documentation, out-of-scope items are removed and ownership for keeping it up to date is clear.
- Developing plain English guidance for applicants covering the process, the data items available and how the DAM works.

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- How categorisation is utilised in data access request assessments and flows through to the ISDP assessment.

The review is closely linked to the work on the risk-based ISDP assessment described above, and RECCo intends to consider the two together. It will look at how the nature of the data, the proposed use, the organisation requesting access and the associated risks could inform the level of scrutiny applied at each stage. The aim is that an organisation's risk profile is considered consistently, from the point it requests access through to its ISDP assessment and ongoing maintenance of qualification.

The next step is a workshop in November 2026 to explore and map the current process end to end, review the issues identified and agree which options to explore further. Owners for the follow-on activity will be agreed at the workshop. RECCo expects to bring a proposal to PAB in early 2027 setting out the findings, options explored and recommendation. Any resulting changes would be incorporated into the wider entry assessment arrangements and aligned with the timing of any changes to the risk-based assessment.

4.2 PAB Action

REC PAB Decision
RECCo recommends that the REC PAB: • **Notes** the proposed approach to reviewing the REC data access application process and incorporating any resulting changes into the wider entry assessment arrangements.

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