

MARKET ARRANGEMENTS CODE CHANGE PROPOSAL

Change Proposal Reference <i>(To be completed by the Panel Secretary)</i>	CPM019	Version No	1.0
Type of Change Proposal:	Code Change Proposal		
Submission Date	10 October 2019		
Title: of Market Arrangements Code Change Proposal	GDPR Data Security Standards		
Summary: of Market Arrangements Code Change Proposal <i>(40 to 50 Words Maximum)</i>	This change proposal seeks to amend the GDPR suggested data security standards/schemes in Schedule 13		
General Details of the Proposer			
Name of Proposer	David Oliver-Sheppard		
Capacity (on behalf of a Trading Party, as a Panel Member, as the Customer Representative or the Market Operator).	Northumbrian Water on behalf of the GDPR Issues Committee		
Contact Email	Huw.comerford@mosl.co.uk		
Telephone Number	07908 905 780		
The Proposer recommends that this Change Proposal should: <i>(delete as appropriate)</i>	Proceed to Assessment		
	Proceed to Consultation		
	Proceed to Recommendation		
Is the change Urgent (Yes/No)? If yes, please provide reason for urgency (if applicable)	No		

Related Documents		
Reference of any associated Code Panel Market Arrangements Code Change Proposal		
Documents Accompanying Form	CPM0XX - Market Arrangements Code CPM0XX – Draft Recommendation Report	
Market Arrangements Code Change Proposal Details		
Description of the issue or defect which this Market Arrangements Code Change Proposal seeks to address, as required under the Market Arrangements Code Section 7.1.2(b).		
<p>As part of the original work undertaken by the GDPR Issues Committee in 2017, a review was undertaken to understand potential technical data security standards that could be implemented. As a result of this review and in consideration of the ‘light touch’ approach agreed by the Committee, Schedule 13 was updated with examples of suggested security schemes/standards.</p> <p>A part of the GDPR Issues Committees work was to review the compliance efficacy of the technical data security standards for which an independent security expert review was undertaken. One of the findings of the independent data security experts review was that Cyber Essentials/Cyber Essentials Plus would not meet the list of security requirements under the ICO guidance. Several schemes/standards that would meet the requirements were provided to the committee to consider and they selected four they considered appropriate.</p>		
Description of the Market Arrangements Code Change Proposal, its nature and purpose and how it is consistent with the Market Arrangements Code Principles and required under the Market Arrangements Code Section 7.1.2(c)		
<p>This change proposal will update the example data security schemes/standards in section E of Schedule 13 of the MAC to the schemes/standards selected by the GDPR Issues Committee. The schemes selected by the committee are:</p> <ul style="list-style-type: none"> • NIS • ISO27001 • PAS555:2013 • CSA <p>ISO27001 is already listed as an example in Schedule 13 so would not need to be updated.</p>		
Principles		
Description of the principles affected by the Change Proposal on the items below (if applicable) as detailed under Schedule 1 Market Arrangements Code Principles and Definitions		
Principles	Affected (Y/N)	Description
Efficiency	N	
Proportionality	N	

Transparency	Y	This change helps to ensure mutual assurance between Trading Parties by requiring them to operate to a similar standard of data security and protection.
Barriers to entry	N	
Non-discrimination	N	
Customer participation	N	
Seamless markets	N	
No limit on upstream competition	N	
Description of any consultation carried out in advance of the Market Arrangements Code Change Proposal being made (if any), as required under the Market Arrangements Code Sections 7.1.2(f).		
Further Information		
The following sections of the Market Arrangement Code have been updated: Schedule 13 – Section E 1.2		

Key	
	To be completed by the Market Operator
	To be completed by the Proposer