

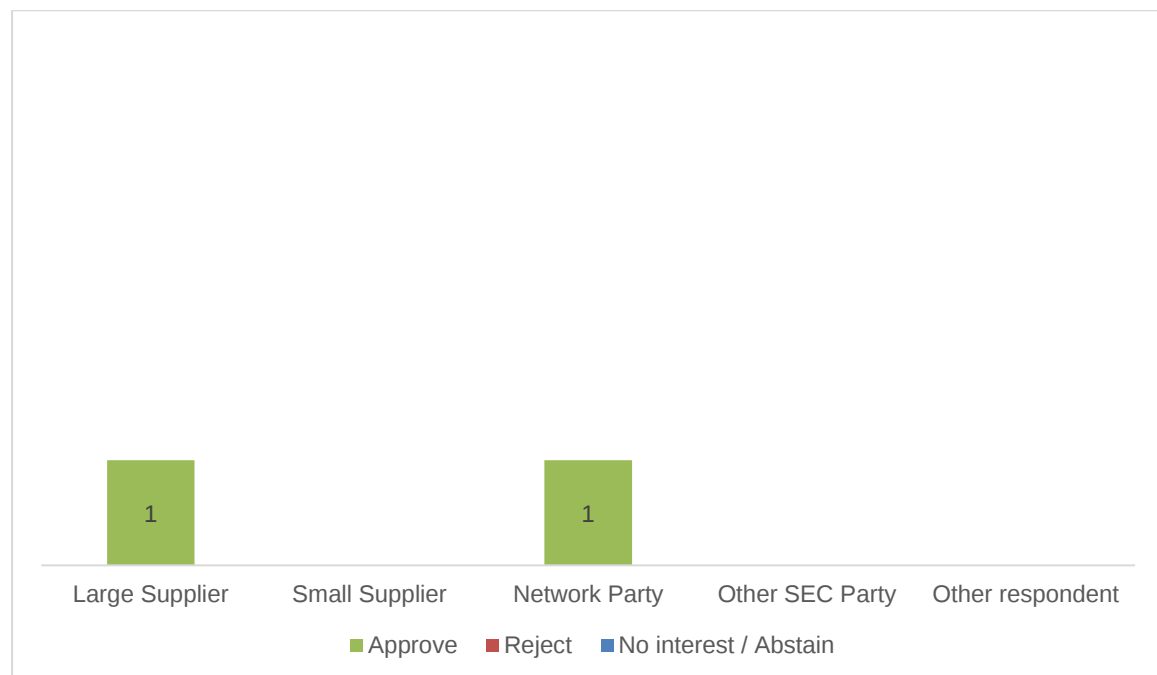
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MP283 ‘Data Breach Reporting’ Modification Report Consultation responses

About this document

This document contains the full collated responses received to the MP283 Modification Report Consultation.

Summary of responses



Question 1: Do you believe that MP283 should be approved or rejected?

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	Approve – with caveats	In principle, we agree with and support this modification. However, I don't think it is ready to be finalised yet. The Modification Report doesn't seem to reflect the discussion undertaken at February's PSC meeting, and the Legal text doesn't specify exactly what is meant by "Data breach" in this scope. The Issues Group meeting discussed in the Modification Report raised some interesting considerations, but these don't seem to have necessarily made it into the proposed Legal Text (both SEC Section I and the Privacy Controls Framework). I think it needs to be super clear what type of data breaches are covered, in order to make sure SEC Other Users know what they should be complying with.	The legal text has been re-worded to clarify that the modification will look to require DCC Users to report Data breaches for Data obtained under SEC Section I. With regards to the discussion at the Issues Group, the legal text wording will reflect that a breach notification obligation with DCC Other Users' third parties as part of their contracts.
National Grid Electricity Distribution	Network Party	Approve	We believe that MP283 should be approved in order to support SEC objective (f) 'To ensure the protection of Data and the security of Data and Systems in the operation of this Code'. To ensure that data privacy is protected sufficiently across the smart metering systems, thus maintaining customer confidence in Smart Metering in general, it is important to obtain a wide understanding of any potential issues using varied sources of information. This means collecting	-

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			intelligence from as many DCC Users as possible so that accurate patterns can be identified, reviewed and used to make any improvements that may be necessary	

Question 2: Please provide any further comments you may have.

Question 2			
Respondent	Category	Comments	SECAS Response
British Gas	Large Supplier	I don't think the legal text is quite right – it doesn't define what type of "Data breach" the DCC Other User would need to report. Is this any Data breach, or just a Data breach involving information that have accessed through Section I. Neither the SEC Section I redlining, nor that in the Privacy Controls Framework document makes that clear.	The comments were taken into consideration, and the legal text will now reflect the points raised.
National Grid Electricity Distribution	Network Party	-	-