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| Paper Reference: | CSC_08_2910_08 |
| Action: | For Decision |

DP091 Draft Proposal decision

1. Purpose

This paper provides a summary of our assessment of [DP091 'Updating Security Assurance Status'](#), taking into account industry views and the views of the SEC Panel Sub-Committees on the problem this Draft Proposal has identified. We are asking the Change Sub-Committee (CSC) to agree that this Draft Proposal should progress to a Modification Proposal.

2. What is the issue?

DP091 has been raised by Gordon Hextall on behalf of the Security Sub-Committee (SSC).

Once a Party completes their Full User Security Assessment (FUSA) the SEC Panel assign them one of four assurance statuses. Two of these, "Provisionally Approved" and "Deferred", indicate significant security deficiencies that require substantial remediation, the severity of which are not reflected in the current SEC terminology.

The SSC believes that the assurance status set should be clear to Parties and accurately reflect the situation. As such it proposes to amend these assurance status as follows:

- "Provisionally Approved" to "Deferred"; and
- "Deferred" to "Rejected".

Additionally, there is no current provision for the SSC to require a Party to undertake a second FUSA. The SEC only allows for updates to the original User Security Assessment Response. The SSC believes it would be more appropriate that where a Party is set a status of "Rejected" a second FUSA is more appropriate than an updated User Security Assessment Response. A second FUSA would provide assurance for all Parties, and the DCC, that the (significant) deficiencies have been addressed.

The problem statement containing the information provided by the Proposer and updated by SECAS during our initial investigations can be found in Appendix A.

3. Comments on the issue

The SSC discussed the matter at its meeting on 16 October 2019 and agreed that the matter should be resolved as soon as possible in order to provide clarity to Parties and enable the SSC to request appropriate actions from Parties who have had a FUSA rejected.

4. Next steps

During investigation of this Draft Proposal we and the Proposer have agreed that there is a solution which we both feel resolves the issue. We welcome any comments from the CSC before it is presented to the Panel. We recommend that the Modification Proposal should go straight to the Report Phase.

The issue and solution put forward focus solely on the provisions of setting security assurance statuses and appear self-evident. Since the SSC are the expert group for security matters, and are charged with progressing User Security Assessment Responses, we do not believe there would be any benefit of sending the Modification Proposal to the Refinement Process and discussing it at a Working Group meeting.

We recommend that this Draft Proposal is presented to the Panel at its November meeting and then issued for Modification Report Consultation. A decision on the Modification Proposal can then be made at the December Change Board meeting and, if approved, could form part of the February 2020 SEC Release.

5. Recommendations

The Change Sub-Committee is requested to:

- **AGREE** that the issue identified under DP091 is clearly defined and understood;
- **RECOMMEND** to the Panel that this Draft Proposal should be converted to a Modification Proposal; and
- **RECOMMEND** to the Panel that the Modification Proposal should proceed to the Report Phase.

Adam Lattimore

SECAS Team

22 October 2019

Attachments

- **Appendix A:** DP091 problem statement
- **Appendix B:** DP091 draft legal text