

This document is classified as **White** in accordance with the Panel Information Policy. Information can be shared with the public, and any members may publish the information, subject to copyright.

Paper Reference:	SECP_100_1401_16
Action:	For Decision

Panel Information Policy Review Update

1. Purpose

This paper is designed to update the Panel on progress made with the Panel Information Policy review and the intended next steps. The Panel is asked to note the update and endorse the proposed approach.

2. Background and Problem Statements

The Panel Information Policy is a document that the Panel has established to maintain, classify, handle, and store Party Data in accordance with SEC Section M4.13 and M4.14. At SEC Panel meeting 88, the Panel approved that SECAS review the Panel Information Policy to remove undue complication, streamline where possible and ensure the Policy is fit for purpose. At SEC Panel meeting 92, the Panel approved a set of problem statements, from which SECAS has devised an action plan.

No.	Title	Problem Statement
1	Meeting paper distribution	The Panel information Policy is out of date as it does not reflect the use of Teams as a mechanism to distribute meeting papers and minutes to the SEC Panel and Sub-Committees (excluding SSC and SMKI PMA).
2	Transparency	Stakeholders perceive that key decisions, and rationale for those decisions, are not always visible due to the classification of papers.
3	Complexity	The Panel Information Policy (v3.1) is overly lengthy and complex which could result in parties not reading it in full and inaccurately categorising papers.
4	Consistency	In the absence of a set of criteria to assess against, SECAS and the Sub-Committees are not always able to make a consistent judgement call on behalf of SEC Panel on how it wishes to classify and treat information.
5	Treatment of confidential material	The “RED” information classification treats all SEC Party data and Security documentation equally in terms of storage, handling and distribution, which may not always be proportionate or practical.
6	DCC Classifications	DCC information classification categories do not directly align with SEC classifications, which can cause challenges when mapping and in accepting requests to downgrade papers.

Table 1: Panel Information Policy Problem Statements
Managed by

3. Improving Transparency

Problem Statement 2 ‘Transparency’ has been raised at several Panel meetings, in particular by the Other SEC Party community, and the Panel has instructed SECAS to address the feedback. SECAS has taken several steps to improve the transparency of the SEC Panel and Sub-Committee papers without altering the Panel Information Policy, and continues to encourage downgrading where possible.

Measure	Detail
Downgrading internal papers	<ul style="list-style-type: none"> SECAS routinely challenges any internal paper with Amber or Red classifications, and requires authors to provide a justification for using these classifications. The entire SECAS team has received new training on the paper classifications and how to apply them as appropriate. SEC Panel Project Briefs are now Green by default, when previously Amber by default to improve transparency of the projects undertaken by the team.
Downgrading DCC papers	<ul style="list-style-type: none"> SECAS routinely challenges any DCC paper with Amber or Red classifications, and requires the DCC to provide a justification for using these classifications.
Downgrading papers post-meeting	<ul style="list-style-type: none"> Where possible, SECAS and/or the DCC provides a downgraded version of papers after the meeting, as agreed by the relevant governance group. For example, three papers were downgraded following the November Panel meeting, and two following the December meeting.
Documents available to SEC Parties	<ul style="list-style-type: none"> SECAS continues to classify agendas White, so that SEC Parties have an overview of items and can subsequently query anything with their Party representative. SECAS continues to provide White Headlines, to give public visibility of the outcomes of all items. SECAS will endeavour to reinstate the Panel Paper Overview as a White or Green document, so that Parties have sight of the Panel recommendations ahead of the meeting. This is currently limited to the Panel only. SECAS provides a Green ‘Hot Topics’ bulletin for the Other SEC Party calls, which further details all White and Green Panel papers, as well as the outcomes of Amber and Red items.

Table 2: Steps taken to improve transparency in application of the PIP

4. Action plan and updates

In accordance with the above Problem Statements, SECAS has devised the following action plan.

Problem Statement	Actions	Update
1) Meeting paper distribution	1) Consider if Amber or below materials for SSC and SMKI can be issued via Teams and confirm with Gordon Hextall	SECAS (CB) attended the Security Sub-Committee (SSC) meeting 137 on Wednesday 8 December and presented two items for discussion. Revising SEC Amber Classification (see Action 10,11) Using MS Teams for Amber and below documents. The SSC did not agree that Amber or below materials for SSC and SMKI can be issued via MS Teams for two reasons. Primarily, the SSC were not comfortable that MS Teams has the exact security credentials as Egress, specifically in terms of the audit trail which specifies which documents have been accessed, by whom, and when. Secondly, the SSC agreed that due to the density of Red papers, they would not still heavily rely on Egress, and it would be cumbersome using two paper platforms in tandem.
	2) Update references to Egress to refer to Microsoft Teams for sharing papers excluding SSC/SMKI (dependent on outcome of above action)	The Panel Information Policy has been updated to reflect the move to Microsoft Teams (Appendix B, Section 1.2). Following feedback from the SSC, the SSC and SMKI are noted as excluded from using MS Teams.
2) Transparency	3) Add a new Principle around transparency encouraging that the lowest classification label possible be applied	A new Principle has been added.
	4) Share revised Policy with DCC	The proposed changes to the Policy will be shared with the DCC for comment in tandem with Sub-Committee reviews.
	5) Publicise changes to the Panel Information Policy in the SEC Newsletter	The revised Policy will be publicised via the SEC Newsletter following Sub-Committee endorsement and Panel approval.

	6) Share revised Policy across the Sub-Committees and rationale for changes	SECAS suggests sharing the proposed changes to the Policy and associated rationale for changes with the Sub-Committees in February 2022, before seeking Panel approval in March 2022.
3) Complexity	7) Review document, identify areas of duplication and streamline	The Policy has been reviewed and duplicate sections have been removed.
4) Consistency	8) Add a set of criteria for each colour classification to assist with labelling	A set of criteria and examples of classified documents has been added to the labelling table in Appendix B of the Policy.
5) Treatment of confidential material	9) Review the SEC for all requirements related to sharing of information and identify restrictions in amending the policy	<p>The SEC has been reviewed for all requirements related to sharing of information and identify restrictions in amending the policy. The SEC does not prescribe a definition of confidentiality or a concurrent SEC classification; however, Section M 'Confidentiality' contains the most information on handling and sharing data:</p> <ul style="list-style-type: none"> SEC Section M4.9 obliges a Party to clearly mark its Party Data as 'confidential', or (in the case of the DCC only) 'controlled', the Panel (or its Sub-Committees or Working Groups, the Code Administrator, the Secretariat or SECCo, as applicable) may treat such Party Data as not being confidential (and shall have no confidentiality obligation in respect of the same). SEC Section M4.13 requires that the Panel shall establish and maintain a policy for classifying, labelling, handling and storing Party Data received by it (and its Sub-Committees and Working Groups, SECAS and SECCo) pursuant to the provisions of SEC Section G (Security), SEC Section I (Data Privacy), and SEC Section L (Smart Metering Key Infrastructure) and its related SEC Subsidiary Documents. SEC Section M4.15 defines the DCC's obligations to confidentiality. Liability for breaches of data is defined in SEC Section M2.3. SEC Sections M4.20-

6) DCC Classifications		<p>24 define the DCC's paper classifications 'DCC Confidential' and 'DCC Controlled', further explained in Appendix A to the Policy.</p> <ul style="list-style-type: none"> SEC Section M7.6 specifies Arbitration as a confidential matter.
	10) Differentiate between security data, party data and commercial information	When SECAS (CB) attended the SSC meeting 137 on Wednesday 8 December, the SSC was consulted on the potential benefits of revising the SEC Amber classification.
	11) Consider treating all Party data as "commercial in confidence" to be shared as AMBER and amend description of AMBER to tighten up the circumstances in which information can be shared - "need to know" too vague	<p>SECAS' rationale was that by applying a more rigorous Amber definition based on the GCHQ/BCSC Traffic Light Protocol, and thereby removing the ambiguous 'need-to-know' basis for sharing documentation, this would better differentiate Amber and Green classifications. Therefore, Amber papers would be more secure and could therefore be applied to certain data, which is currently Red by default. For example, Amber could be applied to Party data.</p> <p>However, the SSC was not comfortable that the Amber classification should be changed, and also not comfortable that Party data should be classified below Red. It is also anticipated that the DCC would not agree to downgrade any commercially sensitive data to Amber.</p> <p>Therefore, SECAS no longer recommends that the Amber classification is reworded, or that Security and Party data should be classified separately.</p>
	12) Seek views of Chairs and DCC	SECAS suggests that the Chairs and DCC are further consulted following this update at the January Panel meeting.
	13) Arrange meeting with DCC and identify opportunities to align with SEC classifications - include rep from each team	SECAS and the DCC held a preliminary meeting in July 2021. SECAS then followed up with the DCC. Due to staff changes, SECAS and the DCC re-engaged later in 2021.

	<p>14) Follow up with DCC colleagues via email to confirm if DCC alignment to SEC classifications is possible and if not, obtain a summary of any barriers</p>	<p>The DCC expressed some concerns around declassifying Amber papers, as echoed by the SSC.</p> <p>SECAS has now approached the DCC with a suggested additional DCC Classification. Currently, the DCC has three paper classifications: DCC Confidential, DCC Controlled, and DCC Public. SECAS recommends a further classification, DCC Controlled (SEC Parties), which would be the equivalent to Green. This would allow the DCC to better distinguish between types of controlled groups and would also align the DCC and SEC classifications. If agreed by the DCC, this will be drafted into Appendix A of the Panel Information Policy.</p>
--	--	--

Table 3: Panel Information Policy Review Update

5. Upcoming activity

Unless the Panel objects, SECAS will carry out the following remaining actions:

Actions	Due
Share draft changes to the Policy across the Sub-Committees and rationale for changes	February 2022
Share draft changes to the Policy with DCC	February 2022
Seek Panel approval of the draft changes to the Policy.	March 2022
Publicise changes to the Panel Information Policy in the SEC Newsletter	March 2022

Table 4: Panel Information Policy Review Next Steps

6. Recommendations

The Panel is requested to:

- **NOTE** the update; and
- **ENDORSE** the proposed approach.

Cecily Bain

SECAS Team

7 January 2022