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Stage 02: Working Group Meeting Summary

SECMP0057 'Users to notify SSC of a second or subsequent User system'

Date and location

22 August, 2018, (14:00 – 15:00).

Gemserv offices, Central and Waterloo Rooms, 5th Floor, 8 Fenchurch Place, London, EC3M 4AJ.

Summary of SECMP0057 Working Group Meeting

- The Working Group highlighted that a User could begin to utilise a second or subsequent User System very quickly and so early engagement with the SSC would be encouraged. The agreed solution detailed the following:
 - User submits their notification and within the next eight weeks the SSC would assess that notification and decide upon next steps.
 - These next steps might include accepting the notification and assessing the User at their next scheduled assessment or requesting an ad-hoc User Security Assessment to take place earlier than scheduled.
 - Should the assessment be deemed to be ad-hoc then the SSC would need to review the outcome and decide whether the User System will be permitted to 'go-live'.
 - The User will not be permitted to set their second or subsequent User System to 'live' unless the SSC had first approved this addition to their User System.
- The Working Group advised an eight-week minimum requirement for notification to SSC, prior to the User planning to 'go-live' with their second or subsequent User System, and that this should be contained within the Security Controls Framework.

Terms of Reference

The Working Group discussed the four additional Terms of Reference (ToR) questions and concluded the following:

- It was advised should a User be part of an active merger or acquisition then they may not be permitted to share details of a second or subsequent User System due to confidentiality agreements in place. The Working Group noted that should this be the case then that User would still be obligated to go through the above process, detailed under the solution, before they were able to 'go-live' and this may need to take place before they were able to go public. Withholding information would

What stage is this document in the process?

01	Initial Assessment
02	Refinement Process
03	Modification Report
04	Decision

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not allow the User to reach the 'go-live' stage. The Working Group confirmed the SSC did not release personal details of Users during normal proceedings and would refer to Users in a way in which they could not be identified.

- The Working Group highlighted should the disclosure of information have a market impact then this could be halted by external governing bodies.
- The Working Group advised that the SSC would need sufficient information to understand how the User System was built and connected together before permitting the User System to 'go-live', in order to understand what risks this may pose.
- The Working Group suggested adding the question, "are there any valid reasons why a User would not wish to disclose to the SSC how they are intending to employ a second or subsequent User System" to the list of consultation questions.
- The Working Group highlighted the word "employ" may not be suitable and "as utilised" may be a better fit throughout the modification. The Working Group added that it would need to be established what constituted the point at which a User would need to notify SSC aside from when the SEC states "as reasonably practicable". The Working Group agreed that a User would need to notify SSC when they were "starting to develop or utilise a second or subsequent User System".

Benefits

- The Working Group identified the following benefits:
 - SECMP00057 would provide clarity to Users and remove any unintended ambiguity by having the obligations around second and subsequent systems documented clearly in the SEC. Additionally, having the timescales provided in the accompanying documentation, such as the SCF, would better inform Users and would highlight that the second or subsequent User System may need to go through a security assessment.

Drawbacks

- The Working Group identified the following drawbacks:
 - There could be an additional cost to Users should the modification be approved due to potentially needing to undergo additional assessments.
 - The SSC would also need to spend more time and resource assessing these potential risks, once highlighted.
 - Finally, there could be a risk of different Users being treated differently depending on how they initially describe their subsequent systems to the SSC, which could result in similar setups being assessed differently.

Consultation Questions

- The Working Group agreed they should ask the Industry if they were planning on purchasing a second or subsequent User System, which would assist in allowing the SSC to gauge what the future architecture might look like. This would also help the SSC understand what the future workload might be.

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Next Steps

- The legal text will be updated and circulated to the Working Group along with the Draft Modification Report and response form for a five Working Day review. We plan to issue this documentation to the Working Group by Friday 31st August.
- Following this, there will be an Industry Consultation for 15 Working Days and the responses received will be collated and sent to the Working Group for review. All correspondence can then be via email unless there is anything in the consultation responses that warrants a face-to-face meeting.
- The Draft Modification Report due date is scheduled for the 9th November Panel.

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