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Action:	**For Discussion**

SEC Document Management Review update

1. Purpose

This paper provides an update on our progress with the SEC Document Management Review[1] and our intended next steps. The Panel is invited to endorse the proposed improvements and next steps.

2. Workstream 1: Establishing the structure

As part of the February 2020 Release we have applied version numbers to each SEC Section and Subsidiary Document to increase the transparency on when changes occur to the individual sections. We have also ended the practice of pre-designating changes, which introduced complexity in configuration management and confusion for Parties. Instead, redlining for all approved changes in a SEC Release will be available on the SEC Release's page on the SEC website. We are also working with BEIS on publishing a designations log, which will clearly show when changes to certain SEC sections are expected to be designated by BEIS.

The SEC document log is now live. The log provides a single definitive source of information regarding the SEC versions that are currently in effect and a history of when and why changes have occurred. The document log also groups documents into more meaningful categories based on purpose and function (for example 'Technical Specifications' or 'Security'); allowing Parties to find all related obligations more easily.

2.1 Next steps

Streamline the structure

We have identified a number of SEC Subsidiary Documents that can be merged in order to streamline the existing SEC document structure. Over the next month we will seek input from the relevant Sub-Committees for each document to see which documents it is appropriate to merge.

A prime set of documents for merging are Schedule 1 'Framework Agreement', Schedule 2 'Specimen Accession Agreement', and Schedule 5 'Accession Information'. We believe the information in these three Schedules can be contained in a single document and set out more efficiently. As the committee responsible for these documents, the Panel can choose to merge these documents into a single Schedule (albeit a modification will be required). We believe these three documents provide an opportunity to not only reduce the number of Subsidiary Documents, but to introduce a set of

[1] Please see Panel paper SECP_72_1309_16 for the agreed scope of this review.

principles that can be applied consistently across the document suite (e.g. referring to all appendices as annexes, rather than a combination of appendix, schedule and annex).

If the Panel is supportive, we will bring back some redline drafting to the April 2020 Panel meeting and seek support to raise a Draft Proposal. Equally, once we have agreement from the Sub-Committees on which Subsidiary Documents can be merged or removed, we will raise the relevant modifications to progress the work. Once we have reduced the number of Subsidiary Documents, we intend to formalise the categorisation of documentation by moving away from calling all Subsidiary Documents 'Schedules' or 'Appendices' and renaming these more appropriately.

Technical Specifications

We are engaging with BEIS and the Technical Architecture and Business Architecture Sub-Committee (TABASC) on the best way to manage Technical Specifications going forward, including version control and the use of validity periods. There are also ongoing discussions about how the documents will be structured which may result in the existing specifications being split out into multiple documents.

We will keep the Panel up to date with how this work is progressing as modifications will very likely be required.

3. Workstream 2: Document hierarchy

The SEC makes reference to three types of documentation; the SEC, Schedules and SEC subsidiary documents. It sets out that all three document types are considered to form the SEC, and therefore SEC governance applies to them all.

In addition to these three document types, sections of the SEC also mandate the existence of other supporting documents, for example the SEC Release Management Policy and the Security Controls Framework. Whilst these documents are individually required to exist by the SEC, there is no overarching framework provided for their governance or maintenance.

As the SEC has developed it has become apparent that there are certain sections and obligations that do not require the full rigour of the Modification Process to amend. Recently, the Self-Service Interface (SSI) requirements were removed under SECMP0058 'Changes to the governance of the Self-Service Interface', and should MP080 'Managing DUIS Uplifts' be approved, the Technical Specification Applicability Tables would no longer be a SEC Schedule.

We believe as the SEC develops, this trend will increase and more 'code required documents' will be created in order to apply proportionate levels of governance. In order to provide certainty around the framework of these documents, and to provide a clear and consistent approach in their governance, we believe they need to be formally recognised within the SEC as a category of document.

3.1 Next steps

In order to recognise the code required documents we want to include them as a category of documentation in Section A. We also believe it appropriate to include an obligation that a complete list of all code required documents and their versions should be published by SECAS. We already do this under the new document log but placing the obligation in the SEC shows the importance of this class of document.

Additionally, we believe there would be benefit in outlining a minimum level of governance that would be required to amend the documents. This should not be burdensome, but creating a framework will provide some certainty to Parties on how and when such documents would change. We would suggest that before changes can be made to these documents a consultation must take place and the responsible owner of the document must notify Parties that a new version of the document is available. If additional change governance is felt appropriate, then such steps would be set out in the code required document itself.

We will be seeking endorsement to raise a Draft Proposal that would formally recognise code required documents as a category of SEC documentation that are managed under proportionate governance outside of the existing Section D process.

4. Workstream 3: Consolidation and simplification

We have previously discussed with the Panel how drafting documents in plain English will help make it simpler for Parties to follow the SEC obligations. We believe Section D 'Modification Process' would be a good section to use as a real-life example of how we can streamline provisions and write them in a clearer style.

We also believe that the definitions in Section A would benefit from redrafting. Replacing definitions that just refer to Code sections with actual definitions will help Parties. For example, we believe the definition of " Alternate", currently "Has the meaning given to it in Section C5.19", should be replaced with "A person a Panel Member may, from time to time, appoint to exercise and discharge all the functions, powers and duties of the Panel Member at Panel meetings."

4.1 Next steps

We will review Sections A and D and provide redline versions as examples of how these sections can be improved. If there is support from the Panel a Draft Proposal can be raised to progress the changes. It is likely such work would conclude around July.

5. Recommendations

The Panel is requested to **ENDORSE** SECAS's proposed improvements to the management of SEC documentation and the approach to taking these forward.

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SECAS Team

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