REC Maintenance of Qualification Guidance

June 2025

V3.2

RETAIL ENERGY CODE

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CHANGE HISTORY

Version	Status	Issue Date	Author	Comments
1.0	Final	May 2021	Code Manager	Final version agreed with RECCo
2.0	Final	February 2022	Code Manager	Minor updates to guidance – system or process change disclosure
3.0	Final	January 2024	Code Manager	Updated for 2024 and R0059
3.1	Final	September 2024	Code Manager	Updated in-line with REC Portal
3.2	Final	June 2025	Code Manager	Updated in-line with REC Portal

Maintenance of Qualification

BACKGROUND

Each organisation that has been Qualified under the REC, including those under CME, is responsible for ensuring that it continues to meet its obligations under the REC and any Access Agreements. A key element of this is maintaining qualification.

You are required to:

- Provide a Maintenance of Qualification Submission annually. You will be notified of this requirement in advance, through the REC Portal.
- Provide a Maintenance of Qualification Submission should a material event that could impact your ability to meet your REC obligations occur, or you reasonably foresee it could occur. Examples of this could be major systems and process change, or the implications of mergers and acquisitions activity.
- Promptly notify the Code Manager of any security breaches that could compromise the security or integrity of any REC Service, or any other REC Service Users.
- If you are a Qualified Energy Supplier or a Distribution Network Operator, inform the Code Manager of any changes to systems and/or processes that may impact interfaces with other Market Participants. Please refer to Section 8 for further guidance on disclosure requirements.

If you fail to submit your Maintenance of Qualification Submission, or the Code Manager believes you are in breach of the Code, this may be escalated to the Performance Assurance Board (PAB). The PAB will consider the escalation, such as whether it constitutes an Event of Default, and may reserve the right to revoke your access to REC Services if it determines that you are in breach of the Code.

1. Maintenance of Qualification Submission

The Maintenance of Qualification Submission takes the form of 4 different types of submission:

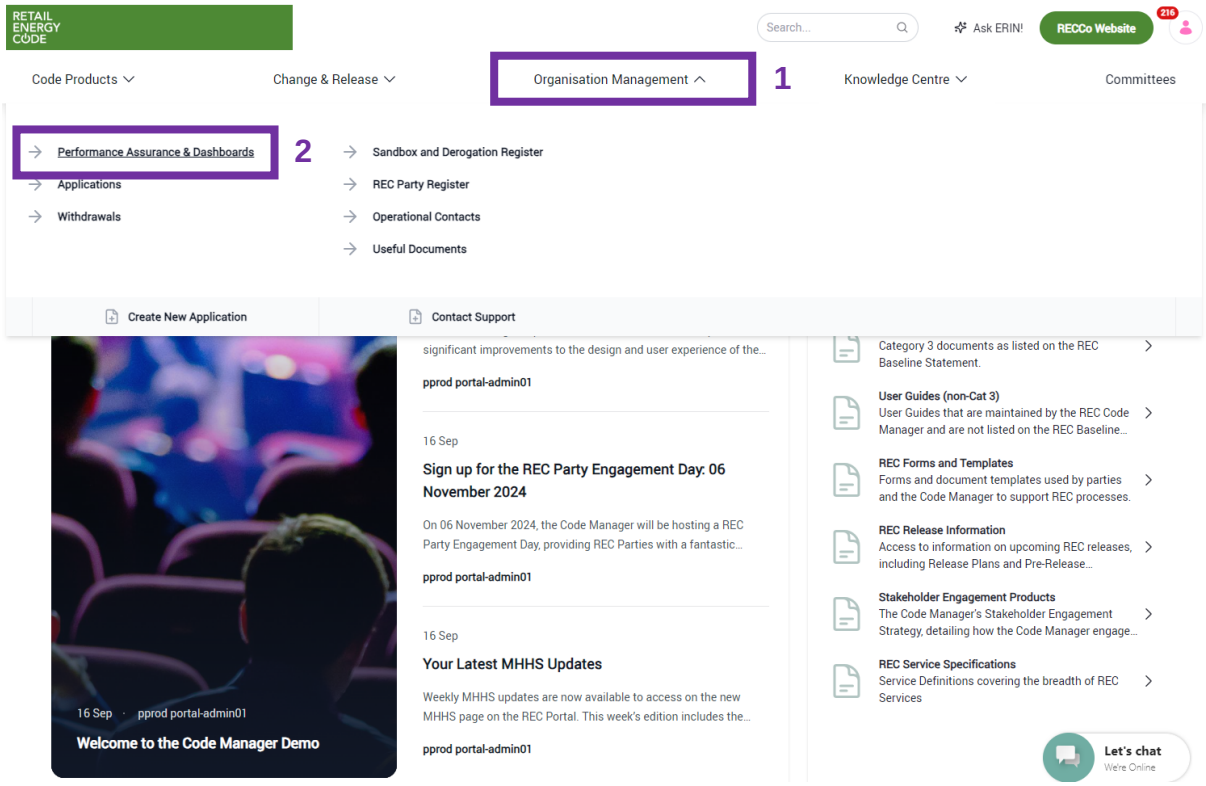


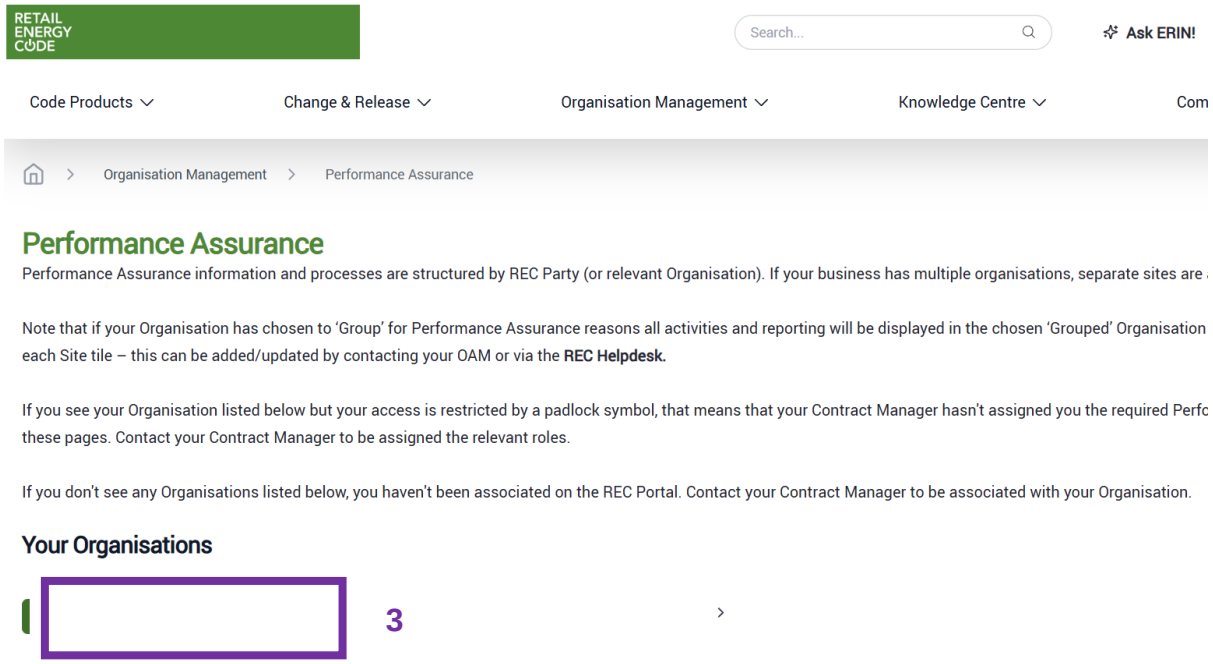
Which of these apply to you will vary based on your role in the market and the services to which you have access. Details of this can be found in the REC Service User Categorisation and Assessment Document.

All forms must be submitted via the REC Portal and can be accessed through Party Operations -> Organisation Management -> Performance Assurance & Dashboards -> Performance Assurance -> Annual Maintenance and by pressing the relevant Annual Maintenance Forms. If you need to make an ad-hoc submission related to a Change or Incident Notification then you can do this using the Ad-hoc System or Process Change Disclosure form, available on the REC Portal.

The Code Manager will communicate when Maintenance of Qualification Submissions are due. Submissions are required for each Party acceded to the REC, as set out in the Party Register. You will also be notified 30 days before you are required to complete the submission.

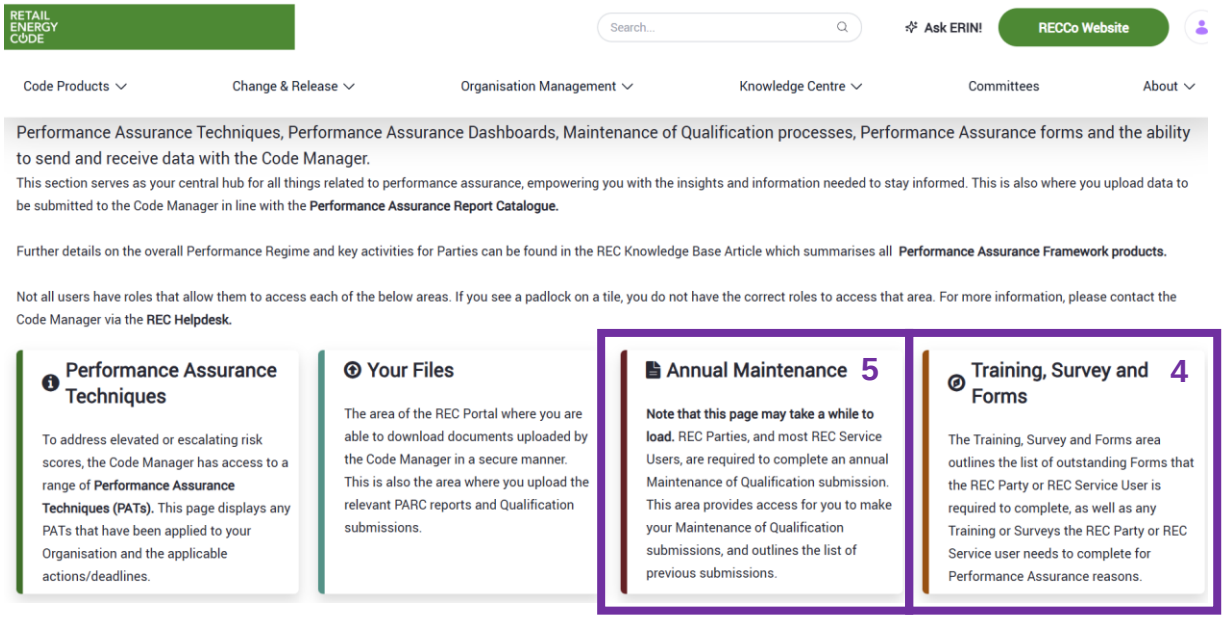
Steps 1 to 3: Navigate to Performance Assurance Area



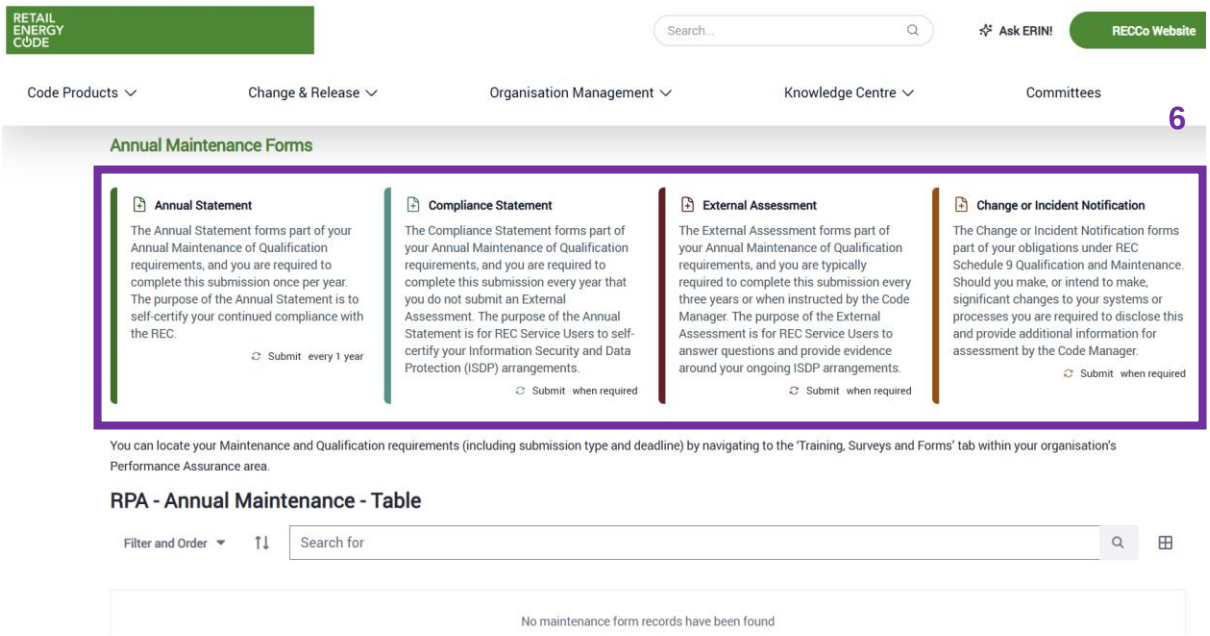


Step 4: Navigate to outstanding requirements in 'Training, Surveys, and Forms'

Step 5: Navigate to submission page in 'Annual Maintenance'



Step 6: Click relevant form(s) to launch submission



2. Annual Statement

Required for all REC Parties and REC Service Users.

You will be required to submit an Annual Statement via the REC Portal to self-certify your continued qualification under the REC. The Annual Statement must be approved by a Director as per Companies House (or, if the Company is not registered in Companies House, an equivalent representative) and submitted to the Code Manager to be assessed.

If you are an Energy Supplier or DNO you must also highlight any changes or forthcoming changes and categorise the risks associated with the change. This Annual Statement will be assessed by the Code Manager.

The Annual Statement submission involves you completing the Annual Statement on the REC Portal, self-certifying that you meet the requirements to remain Qualified.

If you are implementing any changes you may request guidance on adherence to the Code through raising a request within the REC Portal to the Code Manager.

The Annual Statement and, where applicable, the underlying questions that accompany any change can be found within Appendix 1.

3. Annual Statement Outcome

The Code Manager will assess your Annual Statement return and will request further information from you, where required.

If, during the assessment of the Annual Statement, the Code Manager does not gain the necessary level of confidence required, additional information may be requested in order to assess your ongoing compliance with the REC.

If you are an Energy Supplier or DNO making a change, dependant on the nature of the change and your responses, the Code Manager may recommend further testing. This will be arranged through messages in the REC Portal.

4. Compliance Statement

Required for all REC Parties and REC Service Users where an External Assessment is not required

Compliance Statements are required for users of EES, GES and CSS. How often these are required depends on your user category and is set out in the REC Service User Categorisation and Assessment Document. If you are required to provide a Compliance Statement, this will be submitted alongside your Annual Statement submission on the REC Portal.

The Compliance Statement requires you to self-certify your Information Security and Data Protection (ISDP) arrangements. You are expected to have adhered to those process and controls you have put in place to protect against ISDP risks that you may face and by completing the Compliance Statement you are confirming you have abided by your ISDP requirements.

The Compliance Statement must be approved by a Director as per Companies House (or, if the Company is not registered in Companies House, an equivalent representative) and submitted to the Code Manager to be assessed.

An example Compliance Statement can be found within Appendix 2.

5. Compliance Statement Outcome

The Code Manager will confirm you have submitted your Compliance Statement, and if the Code Manager does not gain the necessary level of confidence that it requires, the Code Manager may request additional information to assess your ongoing compliance with the REC.

6. External Assessment

Required periodically if you are an Energy Supplier, DNO, or REC Service User.

External Assessments are required for REC Parties and some Non-Parties, and are typically required once every three years. Which Non-REC Party Service Users will be requested to do External Assessments is set out in the REC Service User Categorisation and Assessment Document. If you are required to undergo an External Assessment, this will start with you answering a series of questions submitted alongside your Annual Statement submission on the REC Portal. The External Assessment must be approved by a Director as per Companies House (or, if the Company is not

registered in Companies House, an equivalent representative) and submitted to the Code Manager to be assessed.

The External Assessment requires you to answer questions and provide evidence around your ongoing ISDP arrangements. You are expected to have adhered to those process and controls you have put in place to protect against ISDP risks that you may face and in completing the External Assessment you will document how you have abided by your ISDP requirements. Evidence will also be required to support the External Assessment, referred to as 'REC Service User Assurance Evidence'. This REC Service User Assurance Evidence will be assessed by the Code Manager. Guidance on completing the External Assessment, including what questions will be asked, how to answer those questions, and what evidence you need to provide can be found within Appendix 2.

7. External Assessment Outcome

The Code Manager will assess the REC Service User Assurance Evidence you have submitted, performing a review of submitted policies and procedures and sample checking adherence and compliance to the requirements.

If, during the assessment, the Code Manager does not gain the necessary level of confidence required, additional information may be requested to be uploaded via the REC Portal to assess your ongoing compliance with the REC.

The Code Manager will produce an evaluation report setting out any issues identified. You will be required to provide applicable rectification steps for any issues raised, which will be included within the evaluation report.

8. Change or Incident Notification

Required for all REC Service Users

System Change

Should you make, or intend to make, significant changes to your systems or processes you are required to disclose this and provide additional information for assessment by the Code Manager. You can access this at any time on the REC Portal by completing an 'Ad-hoc System or Process Change Disclosure' return, or declare when completing your Annual Statement.

Examples include (not exhaustive):

- a major change to core systems, including data migrations.

- significant business process changes that could impact market participants (e.g. following business growth).
- corporate or operational restructure, (e.g. following merger and acquisition activities, or as a result of SOLR).
- change of ownership.
- a significant outage or incident.
- an information security event, including all ICO reportable incidents.
- change of material outsource providers that support your market role.

The Code Manager expects the Party to perform an Impact Assessment to ascertain whether a change has the potential to materially impact your ability to meet REC obligations. Management should document any changes to systems or processes that may impact interfaces with other market participants, made since the last Annual Statement or are it planned to be made in the next 12 months. Management are expected to self-certify the categorisation of risks associated with any changes.

Incident

Under the REC, all Parties and Non-Parties are required to make this disclosure following a material event (e.g. a security breach) that could impact your ability to meet your current or future REC obligations, or impact interfaces with other market participants, REC services or central services.

Guidance on completing this disclosure, including what questions will be asked, how to answer those questions, and what evidence you need to provide can be found within Appendix 4.

If you would like to discuss the nature of any planned change, or significant event, and whether this would impact your Maintenance & Qualification Submission, please contact: enquiries@recmanager.co.uk

APPENDIX 1 - MAINTENANCE OF QUALIFICATION - ANNUAL STATEMENT

I confirm, to the best of my knowledge based on reasonable enquiry, as an organisation qualified under the REC, that:

- Management have understood the applicable requirements under the Retail Energy Code, including any obligations that have changed since qualification;
- Management are not aware of any non-compliance to maintain being Qualified under the REC; and
- The operational contacts on the REC Portal are up to date and accurate

Additional items for companies who have undergone declarable system or process changes:

- Management have documented any changes to systems or processes that may impact interfaces with other Market Participants, made since the last Annual Statement or are it planned to be made in the next 12 months; and
- Management self-certify, based on reasonable enquiry, the categorisation of risks associated with any changes.

Additional items for Suppliers Only:

- Management have reported any system or technical issues reported to them by their prepayment meter infrastructure provider to the Code Manager;
- Management have accurately reported all known Confirmed Energy Thefts to the Code Manager, as defined under the REC; and
- Management have put in place processes for providing supporting evidence of compliance with theft reporting requirements if requested by the Code Manager.
- We are aware of the importance of keeping ETTOS tip offs confidential and have put in place relevant training, guidance and information security controls in order to achieve this.
- Smart Metering Installation Self-Declaration:
    - I hereby confirm compliance (as at the date of signature of this Self Certification) with all relevant clauses of the Smart Metering Installation Requirements (‘the Requirements’) I confirm that the processes that are in place for providing the material evidence of compliance for all elements of the Requirements are working appropriately and that material evidence of this can be provided if requested by the Code Manager.
    - I hereby confirm that as at the date of signing this Self-Declaration, taken together with every other Licensee in the same Energy Company Corporate Group is a member of the following Supplier constituency:
        - Please note: Fuel (i.e. Gas, Electricity, Dual Fuel) and if Large (as per REC Schedule 1, >250k Meter Points)
          e.g. 'Electricity Supplier' or 'Large Dual Fuel Supplier'
        - You are welcome to add any additional distinction, such as Non/Domestic and Non/Half-Hourly, though this is not a requirement.
    - I also hereby confirm that, as at the date falling one month prior to the date given in the Date of Signature the Licensees with the same Group supplied the following number of supply points:

APPENDIX 2 - MAINTENANCE OF QUALIFICATION – COMPLIANCE STATEMENT

I confirm, to the best of my knowledge having made all due inquiries and based on the sources of evidence that:

- We have maintained an up-to-date risk assessment covering information security and data protection risks associated with obligations under the REC Code, taking into account any significant change to our circumstances and whether there have been any security breaches;
- We have a complete and up-to-date relevant ICO Checklist;
- There have been no significant changes in our circumstances that would give rise to an increase in security or privacy risk, or where there has been a change, the appropriate mitigations have been put in place;
- We have appropriate information security accreditation reflective of the risks applicable to our organisation;
- There have been no security breaches or ICO reportable data incidents, or if there have been such incidents, the nature of such incidents have been detailed in the Information Security and Data Protection Form; and
- We regularly review user access permissions to REC Services. We have confirmed all users to REC Services are appropriate and that permissions are correct.

If you are unable to make the disclosure above, please contact the Code Manager (enquiries@recmanager.co.uk) to discuss your circumstances as soon as possible.

APPENDIX 3 - MAINTENANCE OF QUALIFICATION – EXTERNAL ASSESSMENT

You must submit a formal response to each question on the REC Portal alongside any submission of evidence, referred to as 'REC Service User Assurance Evidence', which will be assessed by the Code Manager to demonstrate compliance.

The questions themselves are within the "Item to be assessed" column, and within the "Your response" and "REC Service User Assurance Evidence" columns there are entries that advise on how to fill in the required response and what evidence is required.

Please note that not all questions are applicable to every Change type and every Market Role, or REC Service User category.

#	**Item to be assessed**	**Your Response**	**REC Service User Assurance Evidence**
1	Please specify the architecture of your in-scope systems.	Please provide sufficient information to enable RECCo to understand the overall structure of your systems including the type of gateway, routing and validation mechanisms, applicable security systems and applications. Please also include a list of all systems utilised. Please highlight any changes you have made to the systems since your last ISDP assessment. In-scope systems means any systems used for generating, sending, receiving, storing (including for the purposes of back-up), manipulating or otherwise processing electronic communications, including all hardware, software, firmware and data associated with such activities in relation to the REC Service, which are operate by, or on behalf of, your organisation.	Schematic diagram to show components and relationships, with annotation showing where data flows are processed. Indicate the type of gateway, whether it is high or low volume, remote, and/or shared with other organisations (who should be identified). List of all systems
2	Are you making use of any subcontractors, third parties or service providers to provide the operation of the service or develop and manage any of the technical solution?	Yes / No	

#	Item to be assessed	Your Response	REC Service User Assurance Evidence
2a	Please provide a list of all subcontractors, third parties or service providers, including what activity they are performing.	Please enter details of all subcontractors, third parties and/or service providers that you intend to rely on in operating the service once you have acceded and their role in operating the service. In addition please detail any service providers who are supporting you through the assessment process.	List of all subcontractors, third parties or service providers including details of what they are providing.
3	How have you been accessing the data for the REC Service you have access to?	Please provide details of how you have been accessing the data on the relevant REC Service, such as if it is via the web portal, APIs or report.	
4	Have you made any changes to how you identify and appropriately assess all information security and data protection risks relating to your business operations?	Detail any changes to your risk methodology, aligned to a recognised risk framework, including any changes to how the organisation managements' security and data risks which may include organisations risk appetite, risk and threat identification processes, risk scoring and treatment criteria and how risks are addressed and governed. Detail any new risks within the risk register, including risk scoring, owners, applicable controls and mitigating actions. Where applicable, detail any new risk treatment plans detailing the response to any risks identified.	Risk Methodology Risk Register Risk Treatment Plans (where applicable)
5	Have you maintained any information security accreditation that you hold to mitigate the applicable risks to your organisation?	Please provide details of any current or new relevant information security or data protection accreditation covering all or elements of your architecture and organisation.	Including but not limited to: ISO27001 certificate Cyber Essentials Plus Certification IASME Governance Standard ISO27701 certificate
6	How have you ensured that you have appropriate risk, security and control arrangements in place that have been reviewed on a regular basis?	Please confirm how risk has kept under review, including items that may include triggers, threat sources and the frequency of reviews.	Risk Methodology Governance review minutes

#	Item to be assessed	Your Response	REC Service User Assurance Evidence
7	How have you ensured that there is appropriate governance, oversight and right tone from the top in relation to Information Security and Data Protection?	How have you obtained Management commitment to developing and embedding Information Security, including areas that may include appropriate levels of governance, within the organisation? How have you assigned accountable owners for Information security.	Policy document detailing responsibilities Governance committee TOR, agenda and minutes detailing Information security Audit/review documentation
8	How has your business taken steps to ensure appropriate information security and control procedures are in place?	Details of how you have taken steps to ensure appropriate information security and controls are in place, such as the embedding of an Information Security Policy that complies with good industry practice such as ISO2700 Formal procedures and schedules in place for reviewing the Security Policy and adherence thereto, and reporting findings to Senior Management.	Information Security Policy Statement of Applicability Audit/review documentation
9	How has your business taken steps to ensure appropriate physical security and environmental control procedures are in place?	Details of how you have taken steps to ensure appropriate physical security and environmental controls are in place, such as adherence to a documented procedure which details all expected controls around both physical and environmental security which may include how premise are physically secure and access restricted and appropriate environmental controls for all relevant hardware such as servers.	Physical and environmental security policy Audit/review documentation

#	Item to be assessed	Your Response	REC Service User Assurance Evidence
10.	How has your business taken steps to ensure appropriate user access security and control procedures have been developed with respect to your service to guard against unauthorised logical access to data and programs?	Details of how you have taken steps to ensure appropriate user access security and controls are in place, such as adherence to a documented procedure which details all expected user access controls which may include: A User access matrix detailing what all access all roles have, highlighting any roles where segregation of duties is required. Regular performance of User access reviews to all relevant systems. Details around password requirements and Multi-factor authentication. Sign off for new user access and removal of users who no longer require access.	Access controls policy Access control matrix Audit/review documentation
11	How has your business taken steps to ensure that credentials used to access services are held in a secure manner, and any relevant secret key material is secured throughout its lifecycle.	Details of how you have taken steps to ensure appropriate credential management controls are in place, such as adherence to: A documented procedure detailing how different access credentials are held securely. A documented procedure detailing the lifecycle of any secret key material used, which may include details around: generation, registration, distribution, installation, storage, renewal and destruction and how this is being performed securely.	Access controls policy Cryptographic lifecycle policy Secret Key Register Audit/review documentation
12	What steps has your business taken in relation to Human Resource Security, such as appropriate screening and relevant training?	Details of how you have taken steps to ensure appropriate Human Resource Security is in place, such as adherence to a documented procedure which details all expected human resource security detailing appropriate screening of employees and information security training requirements.	Human resource security policy Screening and Training matrix Audit/review documentation

#	Item to be assessed	Your Response	REC Service User Assurance Evidence
13	How has your business ensured that any unauthorised activity within your relevant systems is monitored for, and if detected has been appropriately prevented and/or rectified?	Details around adherence to all security controls in place in relation to the monitoring systems which may include: Firewalls, including configuration, monitoring and review; Virus detection; Configuration change monitoring; Software installation monitoring.	System monitoring policy Operational evidence Audit/review documentation
14	How has your business monitored and identified any vulnerabilities on your relevant systems, and if identified what steps have been taken to mitigate or remediate the vulnerabilities?	Details around adherence to a documented procedure which may include: how you monitor and scan for vulnerabilities within your system; what patching is performed and how often this occurs.	Vulnerability scanning procedures Patch management procedures Operational evidence Audit/review documentation
15	What processes does your business have in place in relation to incident management and how have you adhered to these?	Details around adherence to a documented procedure which details how incidents are dealt with which may include identification, triage, communication, reporting, management, resolution and review.	Incident management procedure Operational evidence Audit/review documentation
16	How have you ensured your data is held in a secure manner, retained for the necessary time required and deleted appropriately?	Details around adherence to a documented procedure which may include details such as how data is classified based on its nature, how that data should be handled and stored based on its classification, how long it should be held for, and how it should be destroyed.	Data classification and retention policy Operational evidence Audit/review documentation
17	How have you ensured data is only accessed for the purposes for which it is required?	Details around adherence to a documented procedure which may include details such as how access to data is restricted appropriately and how that access is monitored.	Data access policy Operational evidence Audit/review documentation
18	How have you adhered to your business continuity and disaster recovery arrangements in place within your organisation to ensure minimum disruption to service?	Details around adherence to a business continuity and disaster recovery arrangements procedure including details around any applicable resource training and exercises, failover testing and back up arrangements.	Disaster recovery and business continuity plan Testing evidence Audit/review documentation

#	Item to be assessed	Your Response	REC Service User Assurance Evidence
19	Please provide a completed up-to-date and relevant ICO checklist	A Completed ICO data protection self-assessment(s), these can be found here: https://ico.org.uk/for-organisations/advice-for-small-organisations/getting-started-with-gdpr/data-protection-self-assessment-medium-businesses/	Completed ICO checklist(s)
20.	Have you reported any data breaches to the ICO in the last year?	Please provide details of all data breaches you have provided to the ICO, along with any remedial action taken.	
21. *To be added next year*	How do you ensure that ETTOS tip offs are kept confidential?	Please include information on relevant training, guidance and user access controls you put in place to ensure that ETTOS tip offs are kept confidential.	

APPENDIX 4 – MAINTENANCE OF QUALIFICATION – CHANGE OR INCIDENT NOTIFICATION

If you declare that there are system or process changes in your annual statement, or as part the disclosure of a material event, you will need to make this declaration:

- Management have documented any changes to systems or processes that may impact interfaces with other Market Participants, made since the last Annual Statement or are it planned to be made in the next 12 months; and
- Management self-certify, based on reasonable enquiry, the categorisation of risks associated with any changes.

You will also have to complete the following additional questions about the changes, with answers captured on the REC portal.

#	Item to be Assessed	Your response	Evidence to Support…
	Nature of Change and Impact Assessment		
1	What is the nature of the change(s) that you wish to introduce into your operational systems?	Please describe the change in business terms and how it affects the processes you use in order to meet with the requirements of the REC and to interoperate with other Market Participants.	Change description. System architecture.
2	How do you intend to identify the items (procedures, instructions, applications etc.) that are impacted by the change(s)?	Please describe the analysis that will be carried out and the impact assessment records that will be available.	Change management impact assessment process and impact assessment records.
	What risks have you identified in the changes you propose to make, and how have you mitigated these?	Please describe how you have identified the risks and put in place arrangements to ensure these are minimised.	Change risk assessment. Change risk treatment plans.
	Change and Configuration Management		
3	What management processes do you intend to use to ensure that all necessary changes have been included?	Please describe the management processes that demonstrate that design of the change(s) will be effectively controlled.	Change management processes. Project plan. Review records.

	System/ User Acceptance Testing		
5	What management processes do you intend to use to ensure that the change(s) has been effectively tested?	Please describe the test management processes that demonstrate that the change(s) will be effectively tested.	Test strategy. Test plan. Test review records.
6	If changes include alterations to operational procedures and user activities, please confirm what involvement Business Users will have in the testing/acceptance of the changes?	Please provide a copy of the user acceptance processes.	Business review and approval records. Test strategy. Test results and review records.
7	Is any testing planned with other Market Participants with respect to this change(s)?	If the answer to this question is 'Yes', please describe the tests.	Test strategy. Test plan. Test review records.
8	If the answer to 7 above is 'No', how will you ensure that the change(s) will allow you to inter-operate correctly with other Market Participants?	Please describe the management controls that will give you the confidence that the change(s) will allow you to inter-operate correctly with other Market Participants.	Management controls or internal test strategy. Test plan. Test review records.
	Non-Functional Testing		
9	If high volume interaction is anticipated, what non-functional testing activities will be introduced to ensure system capabilities?	Please describe any high volume and load balancing testing that your organisation intends to complete.	Test Strategy. Test plans and results. Test completion approvals.
	Data Migration		

10	If the programme involves data migration of business records, how will you ensure that data quality & integrity are maintained or improved?	Please describe the controls that are in place to monitor data integrity and quality at each stage of the migration process.	Migration strategy. Trial data migration plans. Data quality and integrity assessments. Data evaluation exercises & statistical evidence.
	Implementation		
11	How will you ensure that the cutover to the changed processes does not cause disruption to the Market?	Please describe the controls that are in place to minimise disruption to services at the point of bringing the changed processes into operation in the live Market, this could include phased implementation or parallel running.	Cut-over strategy and plan.
12	Will you be carrying out dress rehearsals prior to cut-over?	Please describe any plans for dress rehearsals.	Cut-over strategy and plan. Dress rehearsal detailed plan.
13	If the answer to 12 above is 'No', how will you ensure that all tasks in your implementation plan can be completed in the appropriate time-frame?	Please describe any planning exercises in this area.	Detail relevant controls.
14	How will you ensure that complications that arise during cut-over will not produce a detrimental effect on live operation?	Please describe any plans for recovery and/or roll-back.	Cut-over plan. Project business continuity plan.
15	Has your organisation planned to inform all interested parties of this change?	Please describe any contact your organisation intends to have with other Market Participants, informing them of the implementation of your programme.	Cut-over plan. Assessment of parties that may be affected by the changes. Letter containing operational contacts, dates.
16	Do you intend to carry out post go-live production proving?	Please describe any post go live proving strategy, processes & plans.	Post go-live monitoring and test plans.

17	If the answer to 16 above is 'No', how will you ensure that all tasks in your Implementation Plan have been operationally verified as successful?	Please describe your production acceptance criteria and any planned production acceptance tests.	Production acceptance criteria. Test plans. Test scripts.
	Business Training		
18	How will you ensure that all business users are fully conversant with the new operational processes and procedures associated with this change?	Please describe your approach to user training.	Training strategy & plans. Training guides. Training records.
	Post Implementation		
19	How will you ensure that changes continue to be effective?	Please describe any ongoing operational monitoring activities planned by your organisation.	Operational monitoring plans & reports.



To find out more please contact:

enquiries@recmanager.co.uk

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