REC Service User Categorisation and Assessment Document

February 2025

V5.4

RETAIL ENERGY CODE

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CHANGE HISTORY

Version	Issue Date	Author	Comments
1.0	19 May 2021	The Code Manager	Final version agreed with RECCo
2.0	October 2021	The Code Manager	Updated to include additional Service User categories
3.0	March 2022	The Code Manager	Updated version to reflect updates to the Data Access Schedule

4.0	March 2022	The Code Manager	CSS Update
5.0	March 2024	The Code Manager	Pre-MHHS Update
5.1	August 2024	The Code Manager	Addition of new User Categories
5.2	November 2024	The Code Manager	Addition of new User Category and alteration of existing Housing Association category.
5.3	January 2025	The Code Manager	Addition of a new User Category
5.4	February 2025	The Code Manager	Addition of new User Categories

Service User Categorisation

1. Scope

This document defines the different types of REC Service User Categories and provides details of the specific initial and ongoing assessment processes, particularly in terms of the level and frequency of the Information Security and Data Protection (ISDP) assessment which will be carried out. The level of ISDP assessment will be based on the risks related to use of REC Services. These will vary as REC Services change, and based on changes to access, for example as described in the Data Access Schedule. This document will be updated alongside these changes.

Definitions can be found within the Interpretation Schedule of the REC.

1.1 Applicability

This document details the ongoing assurance requirements of Qualified REC Service Users, as well as the initial Information Security and Data Protection requirements for REC Service User applicants.



This document applies to REC Parties, who access multiple services, as well as Non-Party REC Service Users, who typically have access to enquiry services only.

2. REC Services

Detailed in Table 1 below is a list of REC Services, and whether these services are available to REC Parties and Non-Party REC Service Users.

TABLE 1

REC Service	Available to REC Parties	Available to Non-Party REC Service Users	Ongoing Assurance
Electricity Enquiry Service	✓	✓	Dependent on category of user as set out below.
Gas Enquiry Service	✓	✓	Dependent on category of user as set out below.
Central Switching Service	✓	✓	Dependent on category of user as set out below.
Secure Data Exchange Service	✓		Captured within REC Party Maintenance of Qualification activities – no additional ISDP assessment.
Energy Theft Tip Off Service	✓		Captured within REC Party Maintenance of Qualification activities – no additional ISDP assessment.
GDCC Service	✓	✓	Annual Statement to be submitted each year – no additional ISDP assessment.

3. REC Service Users Initial Assurance

The requirement for REC Service Users to complete an Information Security and Data Protection (ISDP) Assessment is outlined in REC Schedule 9 – Qualification and Maintenance.
The scope of this ISDP Assessment is decided on a risk-based approach by the Code Manager, considering the following factors (amongst others): data items requested, access method requested (i.e. API, Online Portal, Report, or other), user category, existing REC service access, and previous ISDP assessments completed by the user.

The scope of the ISDP is at the discretion of the Code Manager, however the following framework is in place as a guide:

If an applicant is applying for access to a **Standard GES Report**, the applicant should complete a **Verification ISDP** to provide evidence that they meet the requirements outlined in Schedule 9.

If an applicant is applying for access to the **EES or GES Online Portal**, the applicant should complete a **Base ISDP** (Section 1 of the ISDP in the Entry Assessment Forms), where the applicant needs to

provide further information and evidence around controls and policies in place around areas such as user access and data retention.

If an applicant is applying for access to the **EES, GES, or CSS API**, the applicant should complete a **Standard ISDP** (Sections 1 and 2 of the ISDP in the Entry Assessment Forms), where the applicant needs to provide further information and evidence around controls and policies in place around areas such as incident management and API key storage.

The Code Manager will review the specific access requested in the application, along with other factors, and will clarify the scope of the ISDP to the applicant in their Entry Assessment Plan.

4. REC Service Users Ongoing Assurance Cycle

4.1 Ongoing Maintenance of Qualification

4.1.1 Electricity and Gas Enquiry Services

Once Qualified as a REC Service User, you will need to undertake some form of ongoing maintenance of your Qualification every 12 months. This includes completing an Annual Statement, via the REC Portal. In addition to this, there are two forms of ISDP assessment:

Compliance Statement

The Compliance Statement is a self-certification by the REC Service User relating to your information security risk assessment, data privacy procedures, security accreditation and any security breaches you have suffered. The Compliance Statement can be completed via an electronic dynamic form on the REC Portal.

A compliance statement is required to be completed in every year that an external assessment is not completed.

Where the REC Service User fails to submit its REC Service User Compliance Statement or fails to complete rectification steps within the timescales required, the Code Manager will initiate escalation to the REC Performance Assurance Board (PAB) and may suspend the REC Service User's access or take other action until this requirement is completed.

The Code Manager has set out categorisation of the types of assessment expected in a normal three year assessment cycle in Table 2 below, this is dependent on the REC Service User role. REC Service Users will be notified when their next ISDP assessment is due by the Code Manager.

External Assessment

The External Assessment is a comprehensive assessment and is tailored to the access you have to systems. Your External Assessment form should provide adequate coverage of all requirements under the REC, and where processes are carried out on behalf of you by a third party, additional information should be provided around their Information Security and Data Protection arrangements.

For users with access to a REC Service Online Portal or API:

External Assessments are required <u>at least</u> once every three years or at the request of the Code Manager.

The scope of this ISDP Assessment will depend on the category of user and access, as outlined below in Table 2, and the Code Manager will use a risk-based approach to carry out the ISDP Assessment and confirm the responses to all ISDP form questions.
The External Assessment can be completed via an electronic dynamic form on the REC Portal, the Code Manager is notified and then assesses the submission. There is guidance for completing the assessment and supporting evidence that is required that can be found within the Maintenance of Qualification Guidance Document.

If, during this assessment, the Code Manager does not gain the necessary level of assurance that the REC Service User's information security and data protection arrangements are sufficiently robust, this will be communicated to the REC Service User. It is then the responsibility of the REC Service User to propose and carry out corrective actions to resolve all issues to the satisfaction of the Code Manager.

Where the REC Service User fail to submit its External Assessment alongside supporting evidence within the timescales required the Code Manager will initiate escalation to the REC Performance Assurance Board (PAB) and may suspend the REC Service User's access or take other action until this requirement is completed.

TABLE 2

External Assessment (EA) Requirements by Party Type

Enquiry Service User Category	REC Services Available	Report	Online Portal	API
Electricity Supplier	EES, GES, CSS	Standard EA (Required to access CSS API)		
Gas Supplier	EES, GES, CSS	Standard EA (Required to access CSS API)		
Distribution Network Operator	EES, GES, CSS	Standard EA (Required to access CSS API)		
Gas Transporter	EES, GES	No EA	Verification EA	Standard EA
Metering Equipment Manager	EES, GES, CSS	No EA	Verification EA	Standard EA
Gas Shipper	EES, GES, CSS	No EA	Verification EA	Standard EA
Meter Asset Providers	EES, GES, CSS	No EA	Verification EA	Standard EA
Data Aggregators[1]	EES, CSS	No EA	Verification EA	Standard EA
Data Collectors[2]	EES, CSS	No EA	Verification EA	Standard EA
Third Party Intermediaries	EES, GES	No EA	Verification EA	Standard EA
Third Party Intermediary Service Providers	EES, GES	Standard EA	Standard EA	Standard EA
Local Authorities	EES, GES	No EA	Verification EA	Standard EA
The Authority, UK Government Departments, and other Authorities	EES, GES	No EA	Verification EA	Verification EA
ETTOS Service Provider	EES, GES	No EA	No EA	No EA
Citizens Advice / Citizens Advice Scotland	EES, GES	No EA	Verification EA	Standard EA
Microgeneration Certification Scheme Service Company	EES, GES	No EA	Verification EA	Standard EA
Alt Han Company	EES, GES	No EA	Verification EA	Standard EA
Energy UK	EES, GES	No EA	Verification EA	Standard EA
Electricity Market Reform Settlement Limited	EES, GES	No EA	Verification EA	Standard EA
The BSC Technical Assurance Agent	EES	No EA	Verification EA	Standard EA
The Authority	EES, GES	No EA	Verification EA	Standard EA
Research Bodies	EES, GES	No EA	Verification EA	Standard EA

Prepayment Meter Infrastructure Providers	EES, GES	No EA	Verification EA	Standard EA
REC Code Manager	EES, GES	No EA	No EA	No EA
Industry Code Managers	EES, GES	No EA	Verification EA	Standard EA
Service Providers to Local Authorities	EES	No EA	Verification EA	Standard EA
Service Providers to End-Users – Electric Vehicle Charging	EES	No EA	Verification EA	Standard EA
Service Provider to End-Users – Demand Flexibility	EES	No EA	Verification EA	Standard EA
The Crown Estate	GES	No EA	Verification EA	Standard EA
Organisation or Local Authority providing grants and other funding	GES	No EA	Verification EA	API access not permitted
Switching Service Desk	EES, GES	No EA	No EA	No EA
The Crowded Meter Room Co-ordinator	EES	No EA	No EA	No EA
Housing Associations	EES, GES	No EA	Verification EA for EES, Online Portal access not permitted for GES.	Standard EA
Service Provider to Local Authorities or Housing Associations	EES, GES	No EA	Verification EA	Standard EA
Energy Consultants	GES	Standard EA	Online Portal access not permitted.	Standard EA
Third Party Service Provider – Non-Switching	EES	No EA	Verification EA	Standard EA
Radio Teleswitch Support	EES	No EA	Verification EA	Standard EA
Property Owner	EES	No EA	No EA	Standard EA
Charities supporting domestic Consumers	EES	No EA	Verification EA	Standard EA

[1] After the completion of MHHS Transition, Data Aggregators and Data Collectors will be removed from the DAM.
[2] After the beginning of the MHHS Transition, Data Services will be added to the DAM with the same access as Data Collectors.

Certain triggers can require a REC Service User to undergo an External Assessment more frequently than detailed above. Some of these triggers are listed within Section 5.

If you become Qualified as a REC Party or REC Service User, your first-year assessment will occur within 12 months of when you became Qualified, and at least once a year thereafter. Your requirements will be detailed within your account on the REC Portal.

As a result of the changes brought about by MHHS, there will be new industry participants such as Data Services, and the deprecation of other industry participants such as Data Collectors and Data Aggregators.

Data Services will be added to the DAM with the same access of Data Collectors, however there may be additional roles and further changes to the DAM.

4.1.2 Green Deal Central Charge Database

The Code Manager has set out our categorisation of the types of REC Service Users that are allowed to access the GDCC in Table 3 below.

TABLE 3

GDCC Service User Category	REC Services User Category	Maintenance of Qualification?
Electricity Supplier	REC Party	Users of only the GDCC are not required to maintain their Qualification under the REC. However, if the GDCC User has access to other REC Services, they will be required to maintain their Qualification, in line with Table 2 above.
Green Deal Providers	Non-REC Party	
Green Deal Finance Parties	Non-REC Party	
Green Deal Remittance Processors	Non-REC Party	
Distribution Network Operators*	REC Party	

**only when acting in their capacity as an MPAS Provider*

4.2 Amendments to Assurance Cycle

As a REC Service User, you may request that the Code Manager considers amending your ongoing assurance cycle. The following information must be submitted to the Code Manager via the REC Portal to allow it to consider the modification to your ongoing assurance cycle:

- The frequency and nature with which you intend to access data from REC Services;
- Whether your intended use of data requires you to make such data available outside of your own organisation;
- The extent to which your intended use of data requires you to hold or store data; and

  The means by which data is to be accessed.

Where the Code Manager is satisfied that an amended ongoing assurance cycle is appropriate, it will update the ongoing assurance cycle and inform you and the REC PAB.

5. Information Security External Assessment Triggers

Table 4 is a non-exhaustive list of triggers which will be considered by the Code Manager as to whether an External Assessment is required in a year where you would ordinarily be required to only provide a compliance statement.

TABLE 4

Trigger	Description
System or Process Change (REC Parties only)	A change made to your systems processes or relevant third party provider that may impact interfaces with other Market Participants. This includes any changes to systems that interface with CSS.
CSS Interface Provider (CSS User only)	A change of your CSS Interface Provider to a different CSS Interface Provider.
Incidents or data breaches	A security incident or data breach that has been reported either directly to the Code Manager or has been reported within the public domain.
Loss/suspension of licence or requalification required by another code (Suppliers, DNOs only)	Where the REC Party or REC Service User has been suspended as a party under another code or is required to requalify under another code.

If the Code Manager believes an External Assessment is required rather than a Compliance Statement, the REC Party or Non-REC Party Service User will be notified of when an assessment is due. This will be at least 30 days prior to the assessment due date.

To find out more please contact: enquiries@recmanager.co.uk