**Disclosure Request Report**

**[Insert a Request Title]**

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| --- | --- |
| **Prepared by:** |  |
| **Submitted for:** | Approval or Development |
| **Decision details:** |  |
| **Date:** |  |

1. **Introduction and background [Xoserve to Update]**

Include information relating to the party who will receive the protected information, and the purpose of disclosure

1. **Permitted Purpose [Xoserve to Update]**
2. **Lawful Basis for the Disclosure of Information In the Event Personal Data is being Disclosed [CoMC to update]**

In the event that any data disclosed is considered to be ‘personal data’ as defined by the GDPR, a lawful basis will need to be determined in accordance with Article 6 of the GDPR. As Controller of any personal data it will be for the GT/iGTs to determine what that lawful basis should be.

1. **Data items [Xoserve to Update]**

| **Data Item** | **Justification** | **Conditionality** |
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1. **Privacy Impact Assessment [Xoserve to Update]**

Where the disclosure of information includes the processing of personal data a Privacy Impact Assessment may be required.

Xoserve has considered the various tests that may be applied and considers that none of these are met and so a Privacy Impact Assessment is not required.

The tests (and answers) applied in determining whether a Privacy Impact Assessment was required were:

a) Will the project involve the collection of new information about individuals?

b) Will the project compel individuals to provide information about them?

c) Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information?

d) Are you using information about individuals for a purpose it is not currently used for, or in a way it is not currently used?

e) Does the project involve you using new technology that might be perceived as being privacy intrusive? For example, the use of biometrics or facial recognition.

f) Will the project result in you making decisions or taking action against individuals in ways that can have a significant impact on them?

g) Is the information about individuals of a kind particularly likely to raise privacy concerns or expectations? For example, health records, criminal records or other information that people would consider to be private.

h) Will the project require you to contact individuals in ways that they may find intrusive?

i) Will the disclosure of information utilise new technology for Xoserve?

j) Will the disclosure include information that identifies a vulnerable customer?

k) Will the disclosure release mass data to a party?

l) Will the disclosure include information that identifies an occurrence of theft of gas?

m) Will the disclosure require a fundamental change to Xoserve Business?

1. **Commercial model [Xoserve to Update]**

Include a description or illustration of the commercial model under which the service is to be provided and where relevant, the terms and conditions.

1. **Anticipated Method of Delivery [Xoserve to Update]**

This will be updated by Xoserve in line with the DPM

1. **CoMC determinations [Xoserve to Update]**

CoMC is requested to approve this Disclosure Request Report.

*Where a Privacy Impact Assessment is required, insert and populate the below table. If one is not required, remove the table.*

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| --- | --- | --- | --- | --- |
| **DESCRIPTION OF RISKS TO PRIVACY** | **RISK ASSOCIATED TO; DATA SUBJECTS, COMPLIANCE WITH DATA PROTECTION LEGISLATION, ORGANISATION / CORPORATE RISK** | **PROPOSED MITIGATION** | **RISKS ELIMINATED / REDUCED OR ACCEPTED.** | **IS THE SOLUTION A JUSTIFIED, COMPLIANT AND PROPORIONATE RESPONSE TO THE AIMS OF THE PROJECT** |
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