**Disclosure Request Report**

**Consistency of Data Items Across API and DDP**

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| **Prepared by:** | David Addison |
| **Submitted for:** | Approval |
| **Decision details:** | CoMC is requested to approve this request to amended Data Permission Matrix and permit additional data items to be exposed via API and extend data items available to Portfolio Shippers and the Distribution Network via DDP |
| **Date:** | 20th May 2020 |
| **DRR Reference:** | 052002 |

# Introduction and background

Modification 0697 (Alignment of the UNC TPD Section V5 and the Data Permissions Matrix), if implemented, will remove the means (i.e. the services – e.g. API; DES; etc) that data is shared to each market participant type (user) from the Data Permissions Matrix (DPM).

This Modification will in principle eliminate the need for DSC Contract Management Committee (CoMC) members to approve release of a data item via other services, unless the Committee wish to place specific conditions on the means that such data is shared with a user. With this approach, an existing user who already has access to data will not require additional consent to receive the same data via an alternative mechanism provided it remains the same type of service. Services will be classed as ‘request services’ and ‘portfolio services’.

Modification 0697 is not expected to be implemented until early July at the earliest; until then, if market participants want Xoserve to implement data variety enhancements to the Data Discovery Platform (DDP) and Application Programme Interface (API) delivery mechanisms, Xoserve would need to put forward a DRR for each enhancement.

This DRR requests CoMC to approve the following changes:

* to make the provided data items consistent across the API delivery mechanisms where a user is entitled to data via an alternative service; and
* to add data items for existing users (i.e. the Portfolio Shipper and for the Distribution Network in their own geographical area (for the purposes of the DPM ‘Portfolio GT’)) to the API and DDP services which are not currently available.
* **To clarify, certain data items that are provided to CDSP and that relate to a user’s portfolio will not be made available via the API or DDP. These items include but may not be limited to; any consumer contact details (including for the avoidance of doubt, Emergency Contact details) and Priority Services customer details.**

# Data items

The proposed changes to the DPM will make the following changes:

* Add new users for the API service
  + MAMs (i.e. the appointed MAM - Portfolio View)
  + Major Energy User (Portfolio View)
* Where a previously approved data item is provided to the user via an alternative service add ‘Yes’ to relevant API service column, provided that there are no conditions of release of the data item. Where conditions are attached to the release of a data item these tests must be undertaken by the API Service before the data item is released.
* Amend the columns for the API and DDP services for both Portfolio Shipper and ‘Portfolio’ GT to release all data items – with the following conditions:
  + Current data is available
  + Non current data is only available where the Portfolio Shipper was the Registered User, or to the Portfolio GT.

Certain data items that have been provided to the CDSP will be excluded from API and DDP platforms – examples of these data groups are: Consumer Contact Details – including Emergency and End User Contact Details

* Priority Consumer Service Information

As a result, this would significantly increase the amount of data items available via DDP and API.

# Privacy Impact Assessment

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 a Privacy Impact Assessment is not required.

Two Data Protection Impact Assessments (DPIAs) were completed in preparation for this DRR, one for the API related changes in the DPM, the other for DDP. Extracts from both DPIAs can be found under Appendix 2. Xoserve’s information security team approved the DPIAs on 19th May 2020; approval evidence is available upon request.

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

* 1. Will the project involve the collection of new information about individuals?

**No -** No information, new or otherwise, will be collected as part of this project.

* 1. Will the project compel individuals to provide information about themselves?

**No -** Individuals will not be providing information about themselves as part of this project.

* 1. Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information?

**No –** this DRR does not propose release of data related to individuals to users who are not already able to access this information by another service.

* 1. Are you using information about individuals for a purpose it is not currently used for, or in a way it is not currently used?

**Yes –** we are extending the services by which existing parties are able to access data. We are asking for permissions to disclose the same data to certain parties via the API. Xoserve has completed the Data Protection Impact Assessment (DPIA). Further details about the DPIA can be provided upon request.

* 1. 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.

**No -** No new technology is being implemented as part of this project.

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

**No –** No decisions/action against individuals will be made because of this change.

* 1. 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.

**No -** No personal/sensitive information will be passed between parties as part of this project.

* 1. Will the project require you to contact individuals in ways that they may find intrusive?

**No -** No intrusive contact will be made as part of this change.

* 1. Will the disclosure of information utilise new technology for Xoserve?

**No -** No new technology will be utilised as part of this change.

* 1. Will the disclosure include information that identifies a vulnerable customer?

**No -** Vulnerable customer identification cannot be determined via flows of data as part of this change.

* 1. Will the disclosure release mass data to a party?

**Yes-** Whilst the DDP service can result in a release of large volumes of data, this data is already available to the users who can access this service.

* 1. Will the disclosure include information that identifies an occurrence of theft of gas. **No -** Theft of gas identification cannot be determined via the use of this service.
  2. Will the disclosure require a fundamental change to Xoserve business

**No -** No fundamental change to Xoserve business will be seen as part of this change.

# Commercial model

The API and DDP services are already available within the Data Services Contract, Service Description Table, Service Lines.

The API services are available in line with the Third Party and Additional Services Policy. This change will potentially extend the API service to new user types.

# Method of access to the dataset

Access to the dataset will be provided via an existing API and DDP.

# CoMC determinations

CoMC is requested to approve this Disclosure Request Report.

# Appendix 1: Current Data Permissions Matrix with proposed changes as per this Disclosure Request Report

The DPM will be updated following approval by Contract Management Committee.

# Appendix 2: API and DDP Data Protection Impact Assessment Extracts

# DDP DPIA: -

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# API DPIA: -

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