

Representation - Draft Modification Report UNC 0649S

Update to UNC to formalise the Data Permissions Matrix

Responses invited by: 5pm on 11 October 2018

To: enquiries@gasgovernance.co.uk

Representative:	Edward Ewan Fyfe
Organisation:	Scotland Gas Networks and Southern Gas Networks
Date of Representation:	11 th October 2018
Support or oppose implementation?	Qualified Support
Relevant Objective:	f) Positive

Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)

SGN offers its Qualified Support for this modification. We agree that the objective is positive and helps to formalise existing processes. However, we also require a better understanding how it will work in practice. SGN understands where new data items are proposed, these will be subject to the review and approval by the DSC Contract Management Committee. Moreover, new categories of users will require separate UNC Code Modifications.

SGN is also mindful of General Data Protection Regulation (GDPR) obligations and therefore would require sight of the processes and procedures proposed to ensure their management and governance is suitably robust. We have reviewed the current CDSP's Privacy Statement and acknowledge that specific GDPR articles are being taken into consideration. However, the additional understanding of the processes behind the Privacy Statement would reassure SGN that the individual's rights such as data access, rectification, erasure etc. are fully acknowledged and implemented in the modification.

Self-Governance Statement: *Please provide your views on the self-governance statement.*

We agree with the self-governance statement within this modification as this is a non-material change

Implementation: *What lead-time do you wish to see prior to implementation and why?*

As soon as reasonably practicable.

Impacts and Costs: *What analysis, development and ongoing costs would you face?*

No SGN costs or system development identified

Legal Text: *Are you satisfied that the legal text will deliver the intent of the Solution?*

Yes - SGN are satisfied the legal text will deliver the intent of the solution.

Are there any errors or omissions in this Modification Report that you think should be taken into account? *Include details of any impacts/costs to your organisation that are directly related to this.*

None identified.

Please provide below any additional analysis or information to support your representation

None to add.