

THE YEAR 3 USER CIO SECURITY SELF-ASSESSMENTS

BUILDING ON SOLID FOUNDATIONS

Preparing for the initial assessments required as part of the Smart Energy Code (SEC) is a significant undertaking for many organisations. With the next stage in the process looming, it is important to ensure the focus is maintained.

BACKGROUND

Assessments are a key part of the process under the SEC to enable businesses to connect to smart metering systems as Users of services provided by the Data Communications Company (DCC).

The initial Full User Security Assessment (FUSA) carried out in the first year was aimed at ensuring organisations met the system, organisational and information security obligations set out under the Security Controls Framework.

The next 'Year 3' stage will see the User Security Self-Assessment carried out by the User with the results being reviewed by the User CIO and the SSC.

The aim of the self-assessment is to identify whether there has been any material increase in the security risk relating to the User System since the last User Security Assessment was conducted.



Gemserv

WHAT IS REQUIRED?

Organisations should view the Year 1 and 2 assessments as milestones on the journey of being involved in the Smart Metering Programme within the UK and to build on the foundations it established.

They now need to be able to demonstrate that they are continuing the good practices implemented ahead of that initial assessment and to show they are successfully moving from the design phase of the solution to live business processes where compliance can be clearly evidenced through policies and procedures.

Management teams have an important role to play in continuing to support and embed best practices and ensure staff are engaged in adhering to policies and procedures. That will also help ensure organisations have a well-presented suite of documents in place which would make a good impression to auditors of an organisation's approach to the process.

SPECIFIC VUSA USER CIO TASKS

The User CIO for the Year 3 audit will expect to see compliance against SEC sections G3-G6.

The Self assessment audits will require a questionnaire and Validation workbook to be completed and submitted to the User CIO. Comments from the User CIO will be submitted along with the Validation workbook to the SSC who may:

- consider that the User responses are proportionate and satisfactory and do not reflect any security non-compliances and will notify the User accordingly; or
- request the User to undertake actions and to provide evidence and/or a plan to clarify the nature of any material increase in the security risk identified by the User CIO or to remediate any potential non-compliance indicated by the User CIO comments and report to the SSC as required by SEC item G8.28(b); or
- request the User CIO to formally carry out an assessment of compliance as allowed in G8.3(d).

It is important to note ISMS maintenance is the sole responsibility of the DCC User. However, some documents may require input and ownership from Shared Resource Providers or other 3rd party solution providers.

In such cases, the expectation is that 3rd party providers are to maintain documents on behalf of the DCC User. Ultimately, the DCC User needs to be assured that the 3rd party documentation meets SEC obligations and that this is accepted by the DCC User or life-cycle of the 3rd party relationship.

HOW GEMSERV CAN HELP

Gemserv has a dedicated expert team that has successfully supported over 30 energy suppliers in becoming DCC Users. Preparing for CIO audits and the experience gained means we are well-placed to help you ensure you are fully prepared as quickly and cost-effectively as possible.

We have extensive experience of the SEC requirements including the Security Controls and Privacy Controls Framework that are crucial to the success of the programme.

To help you achieve the next milestone in the Year 3 audit, Gemserv offers a bespoke package to ensure you are aligned to SEC obligations and meet the criteria set out for the security standards. This includes expert advice on the Security Controls Framework along with the steps needed to meet the requirements of SEC Sections G3-G6.

CONTACT US

To understand more about how Gemserv can help you, please contact one of our team on:

E: bd@gemserv.com
T: +44 (0)20 7090 1091
W: [@gemservinfosec](http://www.gemserv.com)

London Office

8 Fenchurch Place
London
EC3M 4AJ

Company Reg. No: 4419878