

Consultation Response

IGT118V: Amendments to the IGT UNC Password Protection Protocols

Responses invited by: 20 03 2019

Respondent Details

Name: Amie Charalambous

Organisation: npower

Support Implementation ☒

Qualified Support ☐

Neutral ☐

Do Not Support ☐

Please briefly summarise the key reason(s) for your support / opposition

We are supportive of this modification and see this as a positive step forward. It tightens the security provisions of data being used, in line with GDPR and therefore we believe this will achieve objective (f) as set out within the modification

Self-Governance Statement

Do you agree with the Modification Panel's determination with respect to whether or not this should be a self-governance modification?

Yes

Please state any new or additional issues that you believe should be considered

None

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

As outlined above

Impacts and Costs

What development and ongoing costs would you face if this modification was implemented?

None

Implementation

What lead time would you wish to see prior to this modification being implemented, and why?

We can support the June 19 implementation lead time as outlined within the modification

Legal Text

Are you satisfied that the legal text will deliver the intent of the modification?

Yes

Further Comments

Is there anything further you wish to be taken into account?

As an observation, we notice that by removing the wording 'CD/DVD' to avoid being too prescriptive makes it more prescriptive 'sent by email'. We would suggest amending the wording to 23.1, 'The password will apply to any Protected Information sent by email or other means'. If the wording is left as 'emails' only, there is still the risk that IGTs will send data by other means, such as CD, needs to be covered.

Responses should be submitted by email to IGTUNC@gemserv.com