

DSC Change Proposal Document

Customers to fill out all of the information in the sections coloured ■
 Xoserve to fill out all of the information in the sections coloured ■

General Details

Change Reference:	XRN 5969		
Change Title:	Amendment to DSC T&Cs to include a requirement to provide data incident nominated contact details		
Date Raised:	28/08/2025		
Sponsor Representative Details:	Organisation:	Xoserve	
	Name:	Jayne McGlone	
	Email:	N/A	
	Telephone:	N/A	
	Name:	Jayne McGlone	
	Email:	uklink@xoserve.com	
	Telephone:	N/A	
	Business Owner:	TBC	
Change Status:	☐ Proposal	☒ With DSG	☐ Out for Review
	☐ Voting	☐ Approved	☐ Rejected

Impacted Parties

Change Reference:	☐ Shipper	☐ Distribution Network Operator
	☐ NG Transmission	☐ IGT
	☒ All	☐ Other <Please provide details here>

Justification for
Customer Class(es)
selection:

All DSC Parties as they will be required to provide a designated Data Incident Nominated Contact and be responsible for notifying the CDSP of any changes to these contact details

Proposer Requirements / Final (redlined) Change

Problem Statement:	There is currently no centralised record of data privacy contacts for each DSC party. In the event of a personal data breach, data protection legislation requires timely notification to data controllers. Without readily available contact details for the responsible data privacy individuals within each DSC party, the CDSP will notify the Individual Contract Manager for each party which could inadvertently cause the notified party to face delays in meeting these legal obligations. This gap in contact details could hinder effective incident response and compliance with statutory timescales.
Change Description:	This change is seeking to make an amendment to the DSC Terms and Conditions to introduce a new obligation for all DSC parties to provide a nominated contact for data protection matters. The contact information would be used in the event of a data incident or upon receipt of a data subject access request, supporting timely and compliant responses in line with data protection legislation. At present new market entrants are required to provide contact details for their individual contract manager for DSC-related matters (as per DSC Clause 4.5(c) and further detailed in the CDSP Service Document – Contract Management Arrangements, paragraph 5). However, there is no equivalent requirement for a data privacy contact.

	An amendment to the CDSP Service Document – Contract Management Arrangements will also be needed to define how the nominated contact details could be used. The proposed change is limited to the DSC Terms and Conditions and is intended to enhance compliance with data protection legislation.	
Proposed Release:	Ad Hoc	
Proposed Consultation Period:	☐ 10 Working Days ☐ 20 Working Days	☐ 15 Working Days ☐ Other [specify here]

Benefits and Justification

Benefit Description:	As soon as the change is implemented there will be a contractual obligation for each DSC party to provide contact details for CDSP to use in the event of a data breach or on receipt of a data subject access request.
	<i>What, if any, are the tangible benefits of introducing this change? What, if any, are the intangible benefits of introducing this change?</i>
Benefit Realisation:	As soon as the change is implemented this will require all DSC parties to provide and nominate contact for data protection matters. CDSP will carry out an exercise to contact all DSC Parties to request this information.
	<i>When are the benefits of the change likely to be realised?</i>
Benefit Dependencies:	There is a dependency on all existing DSC Parties to provide the relevant contact details to enable CDSP to record the information
	<i>Please detail any dependencies that would be outside the scope of the change, this could be reliance on another delivery, reliance on some other event that the projects has not got direct control of.</i>

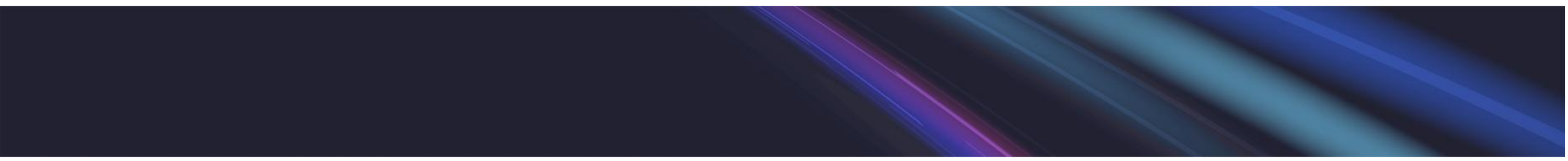
Service Lines and Funding

Service Line(s) Impacted - New or existing:	No change to existing service lines and no requirement for a new service line – the requirement to provide and maintain the contact details will be set out in the DSC Terms and Conditions. We would propose funding from Service Area 13 Managing Change. The funding arrangements shown below are as per the Budget and Charging Methodology for the mentioned Service Area.		
Level of Impact:	Low		
If None please give justification:			
Impacts on UK Link Manual/ Data Permissions Matrix:	None		
Level of Impact:	N/A		
If None please give justification:	There is no change to UK Link Systems, the change will not result in the sharing of any data items that are held in the Supply Point Register therefore no impact to the DPM.		
Funding Classes:	Customer Classes/ Funding	Delivery of Change	On-going Budget Amendment
	☒ Shipper	52 %	XX %
	☒ National Gas Transmission	7 %	XX %
	☒ Distribution Network Operator	40%	XX %
	☒ IGT	1 %	XX %
	☐ Other [please specify]	XX %	XX %
ROM or funding details:	A Rough Order of Magnitude (ROM) assessment has been completed, and initial high level indicative delivery costs are anticipated to be between £0 and £10,000 Link for ROM		



Funding Comments:	No comments received from workgroup
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Please send the completed forms to: pmo@xoserve.com



Version Control

Document

Version	Status	Date	Author(s)	Remarks
1.0	For approval		Josie Lewis	For approval at ChMC 10/09/25
2.0	Approved	10/09/2025	Kate Lancaster	Approved at ChMC 10/09/25

