

NESO Data Policy

Purpose

The purpose of the Data Policy (“the policy”) is to describe the principles of how National Energy System Operator (“NESO”) manages its data activities and associated risks to meet its overall strategic objectives, regulatory, and legislative requirements.

The objective of the policy is to:

- Ensure data (which includes information and records) is fit for purpose and support business processes, models, and customers.
- Understand, identify, and mitigate data risks that exist in the organisation.
- Ensure that data adheres to business, legal and regulatory requirements, including Ofgem Data Best Practice.

Scope

This policy applies to all of NESO, its employees, contractors, third party organisations, and individuals working on its behalf, including vendors who hold or process NESO data and records.

The policy applies to all forms of data, information, and records within ESO as specified in the Data Policy aligned Supporting Policies.

Mandatory Data Principles

The following mandatory data principles, grouped by their capability, are supported by accompanying Supporting Policies and Standards & Procedures. These documents provide clear guidelines on how to uphold and achieve these principles effectively.

Data Management

Principle Number	Data Principle	Corresponding Document
1	Accountabilities and responsibilities for the identification, definition, quality, and classification of data are defined and embedded	NESO Data Management Supporting Policy
2	Master and Reference data is standardised, managed, and used as trusted sources across the organisation	
3	Data is sourced from a designated Authoritative Data Source or Trusted Source to promote consistency and accuracy of data	
4	The origin of data, including how it has been derived, is knowable and auditable	
5	Data is easy to discover and accessible via an organisation wide Data Catalogue	

Data Quality

Principle Number	Data Principle	Corresponding Document
6	The quality of data is assessed, monitored, and managed to help ensure data is fit for purpose	NESO Data Quality Supporting Policy

National Energy System Operator
Data Classification: Public
Data Criticality: Critical
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Records Management

Principle Number	Data Principle	Corresponding Document
7	Records are owned, managed, stored, retained, and disposed of according to legal, regulatory, and business requirements	NESO Information and Records Management Supporting Policy

Data Classification

Principle Number	Data Principle	Corresponding Document
8	Data is classified in accordance with its sensitivity to ensure it can be protected by appropriate security measures	NESO Data Classification Supporting Policy

External Data Sharing

Principle Number	Data Principle	Corresponding Document
9	Data is externally shareable unless overriding legal, regulatory, ethical, or contractual constraints apply	NESO External Data Sharing Supporting Policy

Data Privacy

Principle Number	Data Principle	Corresponding Document
10	Processing activities involving personal information are risk assessed and processed in line with applicable data protection laws and regulations	NESO Data Privacy Supporting Policy

End User Developed Applications (EUDAs)

Principle Number	Data Principle	Corresponding Document
11	Risks associated with the usage of end-user developed applications (EUDAs) are known and mitigated	NESO End User Developed Applications Supporting Policy

Artificial Intelligence (AI)

Principle Number	Data Principle	Corresponding Document
12	Artificial Intelligence is encouraged and sought to be shared internally and externally to drive knowledge exchange and collaboration in line with NESO's AI Ambition	NESO Artificial Intelligence Supporting Policy
13	Artificial Intelligence research, experimentation and development is assessed before sharing to ensure it has appropriate controls and security	

14	Artificial Intelligence used for business operations is run on NESO approved platforms	
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Roles and Responsibilities

The Chief Information Officer (CIO) is accountable for the policy and its implementation for NESO.

The Head of Data and AI is responsible for:

- Setting the policy appropriate to NESO and compatible with its strategic direction.
- Allocating responsibilities and resources for the management of data on a risk basis.
- Overseeing a management system to continually improve the suitability, adequacy, and effectiveness of data at NESO.

All individuals employed by or carrying out work on behalf of NESO must comply with the policy and all associated Supporting Policies and Standards & Procedures.

Appendix

Associated Legislation & Frameworks

The policy also aligns with regulations, including the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, license conditions such as Ofgem Data Best Practice, and the Energy Act 2023. It also aligns with leading industry frameworks, including Dublin Core (ISO 15836) and Information & documentation - Records Management (ISO 15489).

Associated Documentation

- [NESO Security Policy](#)
- [NESO Information Technology Policy](#)
- NESO Data Supporting Policies

Compliance With This Policy

Failure to comply with this policy may result in disciplinary action up to and including dismissal, in accordance with NESO's disciplinary procedures.

Policy Exceptions & Retained Risk

Divergence from this policy may threaten NESO's business and operations. Where there is a compelling business case, exceptions from this policy may be permitted under certain conditions.

All requests for exceptions must be the subject of a cost-benefit analysis and risk assessment to determine appropriate risk treatment and - if the exception is approved - the retained risk.

Policy Exception Requests, assessments, denials, and approvals must be documented and recorded.

Approvals must be made by persons in positions accountable for accepting the retention of risks on behalf of NESO, in accordance with an authorised approval matrix. Retained risk will be subject to regular review.

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Review & Continual Improvements

This policy will be updated to reflect changes in technology, regulations, threats, and business requirements on an ad-hoc basis and will be reviewed annually.

Document Details

Version number	V1.0
Owner	Michelle Berti
Role	Head of Data & AI
Author	Jarrishan Rajendran
Team	Data Governance Team
Approved by	Shubhi Rajnish
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Amendments

Version	Date	Change details
0.1	12-July 2024	Document created
1.0	05-Sept 2024	Moved to new template