Risk Assessment Number	SPEN_024
Dataset	Flexibility Dispatch Data
No. Data Tables	1
Date	May 2025
Refresh Date	May 2026
Approver	Kirsty Scott

1. Principles

SPEN classify their data into three categories, based on the risk assessment outcome:

• *Open*: data is published for all to use, modify, and distribute with no restrictions.

• *Shared*: data is published to a limited group of participants with restrictions on usage.

• *Closed*: due to sensitivities within the data, it is not suitable for publication, however, may be shared with specific stakeholders under a bespoke data sharing agreement where appropriate.

The risk assessment determines the classification and whether it can be published.

The risk assessment considers 6 categories:

1. *Personal privacy*

2. *Security*

3. *Public interest*

4. *Commercial*

5. *Legislation/Regulation preventions*

6. *Other*

Risk scoring is based on a combination of the likelihood of the risk occurring and the impact of it – with an outcome between 0 and 10.

• Risk score of 4 or below: no mitigations applied.

• Risk score of 5-7: mitigations required to be applied before publication.

• Risk score of 8 or above: due to sensitivities within the data, dataset may be categorised as 'Closed' and not suitable for publication.

• If the **total** risk score after mitigation is above an 8 then the dataset is classified as 'Closed' and not suitable for publication.

The mitigations that can be applied are as below:

1. *Aggregation*: combining/summarising in order to reduce granularity whilst still maintaining some value.

2. *Anonymisation*: removal/partial removal of identifying features, e.g. location info, name, address, postcode.

3. *Delay*: deferring release of data for a defined period until a time where the risk is greatly diminished or no longer exists, e.g. outage data could be used to target the network when some sections are placed under greater load, therefore a delay in publication could be implemented to mitigate the risk of the data being used to attack the network.

4. *Pseudonymisation*: replacing identifying features with a different unique identifier, e.g. replacing name and address with an ID that is held internally.

5. *Redaction*: removal or overwriting of features.

6. *Restrict use and access*: e.g. subject to shared data licence conditions, user registration and approval.

7. *Other*: any other mitigating action that could be applied, details of the action are provided in the risk assessment.

Name of Dataset:	Flexibility Dispatch
Date of Assessment:	12/05/2025
Dataset Owner:	
Assessment completed by:	
Dataset Description:	In the UK flexibility market, dispatch refers to the process of activating flexibility providers to utilise their resources to balance supply and demand on the electricity grid. It involves instructing providers to either increase or decrease electricity consumption or generation. Data ingested from the Piclo site & pushed to ODS.

When assessing below, for all sections, consideration must also be given to other datasets that may be openly available elsewhere (within or outwith the organisation) that when combined with this dataset could create sensitivity issues. Do not consider in isolation.

Risk Assessment: **If issues exist, mitigating actions must be listed within the Risk Scoring and Mitigation Table - see overleaf**	**PERSONAL PRIVACY:** Are there any sensitivities with the dataset in relation to people's rights to personal privacy? Can individuals be identified directly from the dataset or indirectly by combining with other information?	YES
	SECURITY: Evidence of any sensitivities with the dataset in relation to security needs? (consider personnel, physical security and cyber security). Would any existing security issues be exacerbated by publishing the data that sensible protocols such as physical site security, personnel vetting or robust cyber security cannot already mitigate against? Consider if data is already publicly available e.g. satellite imagery and therefore only what the incremental risk would be.	YES
	PUBLIC INTEREST: Evidence of any sensitivities with the dataset that may have a negative impact on the public interest i.e. the welfare or well-being of the general public and society. Is the data likely to drive actions, intentionally or unintentionally, that negatively impact consumers e.g. enabling manipulation of markets, or incentivising actions that are detrimental to Net Zero, or any other actions with a negative consumer impact?	NO
	COMMERCIAL: Evidence of commerical sensitivity with the dataset that typically relates to the private administration of the business and if not protected, will have a negative impact on products and services for end consumers? Consider also intellectual property restrictions whereby data has been obtained by SPEN but with terms and conditions imposed which would restrict onward publishing. Note that data relating to the private administration of the SPEN business e.g. HR or payroll is not expected to be 'open' data, however, de-sensitised versions can still be made available.	YES
	LEGISLATION/REGULATION PREVENTIONS: Evidence of any sensitivities with the dataset in relation to legislation and/or regulatory obligations? Any specific legislation or regulation that prohibits publication? E.g. Utilities Act 2000, Electricity Act 1989, Data Protection Act 2018, Competition Act 1998, Enterprise Act 2002, Enterprise and Regulatory Reform Act 2013	NO
	OTHER: Other personal privacy, security, public interest, end consumer, legislation/regulation risk, health and safety implication risk? For example risk of health and safety being compromised? Is data quality substantially poor and substantially inadequate at meeting users needs?	NO

Ref	Sensitivity Area	Risk Details:	Risk Impact before Mitigation	Risk Likelihood before Mitigation	Risk Score	Mitigating Actions	Risk Impact after Mitigation	Risk Likelihood after Mitigation	Risk Score
1	Personal Privacy	The data in question is composed of flexibility data related to Scottish Power Energy Networks'Dispatch'. This data is several levels removed from personal data and does not directly identify individuals or their patterns of life. It primarily includes aggregated and anonymised information regarding the instruction to change demand/generation.	Moderate	Remote	3	Anonymisation	Minor	Remote	2
2	Security	The data to be published, as well as currently public data, follows existing ODP security policies. The flexibility data is several levels removed from sensitive operational details and does not contain information that could expose a cyber security vulnerability, be used in a manner harmful to SPEN's cyber security controls, or reveal limitations/weaknesses in our operational activities. Additionally, it does not include specific information about system assets that could be exploited with malicious intent.	Minor	Remote	2	N/A	Minor	Remote	2
3	Public Interest	N/A	N/A	N/A	0	Other	N/A	N/A	0
4	Commercial	While the data aims to promote positive outcomes, there is a risk that it could be used in ways that negatively impact consumers. This could include enabling market manipulation or incentivizing actions that are detrimental to achieving Net Zero goals. To mitigate these risks, it is crucial to implement robust monitoring and regulatory measures to ensure the data is used ethically and in alignment with public interest.	Moderate	Unlikely	4	N/A	Minor	Remote	2
5	Legislation/Regulation Preventions	N/A	N/A	N/A	0	N/A	N/A	N/A	0
6	Other	N/A	N/A	N/A	0	N/A	N/A	N/A	0

Overall Risk Score (without mitigation)	4.13

Overall Risk Score (with mitigation)	2.68

LIKELIHOOD RATINGS:

	Likelihood
	N/A
	Remote. Would only happen in exceptional circumstances e.g. there are no historical instances.
	Unlikely. There may have been potential cases/ near misses in the past.
	Possible. Known to have happened before on rare occassions, or has partially occurred.
	Expected. Has happened before and strong possibility it will likely occur again.
	Certain. Expected to occur frequently.

IMPACT RATINGS:

Impact	E.g. if in P&L and/or cash terms	Examples if in stakeholder terms. Reputation and relationships with employees; customers; shareholders, press, government, and/or regulators
N/a	N/a	N/a
Minor. Would have insignificant impact.	< £1m	Short term loss of employee morale, local adverse publicity/media report.
Moderate. Would have moderate impact which can be effectively managed.	£1m-£10m	Minor employee disengagement, prolonged local adverse publicity/media reporting, localised stakeholder concern, temporary drop in share price, minor reduction in customer base.
Significant. May require intervention but further impact on any other critical assets/processes unlikely.	£10m-£25m	Isolated employee disengagement, business unit(s), national media interest creating stakeholder concern, negative national stakeholder statements, prolonged decrease in share price, moderate reduction in customer base.
Major impact on key processes/ critical assets affected requiring immediate action to prevent long term damage to the organisation.	£25m-£50m	Employee disengagement across several business units, extensive prolonged adverse reactions from media and/or key stakeholders, significant decrease in share price, and a significant reduction in customer base.
Catastrophic impact upon the business and/or wider industry and/or stakeholder. Reputational damage/ regulatory non-compliance.	>£50m	Company wide employee disengagement, downgrade in credit rating, extensive widespread negative reporting or public disputes with key stakeholders, loss of investor confidence, extensive reduction in customer base, escalation inevitable and impossible to contain.

RISK SCORING:

		IMPACT					
		Not Applicable	Minor	Moderate	Significant	Major	Catastrophic
LIKELIHOOD	Not Applicable	0	0	0	0	0	0
	Remote	0	2	3	4	5	6
	Unlikely	0	3	4	5	6	7
	Possible	0	4	5	6	7	8
	Expected	0	5	6	7	8	9
	Certain	0	6	7	8	9	10