



Risk Assessment Number	SPEN_025
Dataset	Flexibility Market Research Data
No. Data Tables	4
Date	June 2025
Refresh Date	June 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 Market Research Data	
Date of Assessment:	09/06/2025	
Dataset Owner:		
Assessment completed by:		
Dataset Description:	These data tables provide summary information on the level of generation and demand, by customer type and connection voltage, at 5 levels of aggregation – LV Feeder, LV Transformer, 11kV Feeder, Primary Substation, and Census Zone (Datazones in Scotland, Output Areas in England & Wales).	
<i>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.</i>		
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.	NO
	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?	YES
	COMMERCIAL: Evidence of commercial 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	YES
	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	MPANs are part of source data.	Significant	Remote	4	Aggregation	Minor	Remote	2
2	Security	N/A	N/A	N/A	0	N/A	N/A	N/A	0
3	Public Interest	The data helps to make commercial decisions. If the data published is incorrect, could lead to a negative outcome for consumers and environmental targets.	Moderate	Unlikely	4	Other	Minor	Remote	2
4	Commercial	The data helps to make commercial decisions. If the data published is incorrect, could lead to a negative outcome for consumers and environmental targets.	Moderate	Unlikely	4	Other	Minor	Remote	2
5	Legislation/Regulation Preventions	GDPR concerns surround raw data and MPANs.	Significant	Remote	4	Aggregation	Minor	Remote	2
6	Other	N/A	N/A	N/A	0	N/A	N/A	N/A	0

Overall Risk Score (without mitigation)	4.86
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Overall Risk Score (with mitigation)	2.86
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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 occasions, 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