

RESTRICTED - COMMERCIAL

Potential exposures from removal of DSS requirements/new contract

Ref	Exposure	Mitigation/ Act
1	<p><u>Security</u></p> <p>DSS security standards (DITSS) are considerably better defined than the referenced PO/POCL standards.</p> <p>Any removal of the DSS standards may render us exposed.</p>	<ul style="list-style-type: none"> • Retain reference to DSS security standards • Substitute fuller standards (not yet available)
2	<p><u>Data Protection</u></p> <p>DSS had detailed requirements for compliance with Data Protection Act and provision of information for subject access requests.</p> <p>(Min)</p>	<ul style="list-style-type: none"> • Check if POCL are exposed - DSS requirement was specific due to large customer database etc
3	<p><u>Availability of Fraud Information</u></p> <p>POCL were intended to obtain information from Pathway's FRMS from DSS, as POCL had not contracted for this information from Pathway.</p> <p>Although much of this information is not longer relevant with the removal of BPS, some elements (eg out of hours transactions) may still be desirable to obtain.</p>	<ul style="list-style-type: none"> • POCL raise Change Request on Pathway for provision of required information • Source information from TIP (assuming all data that is required is already passed from Pathway)
4	<p><u>Commercial Audit/Charging</u></p> <p>The revision of the charging structure will require changes to the invoicing arrangements. POCL will need to be able to audit these revised processes.</p>	<ul style="list-style-type: none"> •

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5	<p><u>OAS (OBCS Access Service)</u></p> <p>The link from DSS (ESNCS) to Pathway's central system was based on the CAPS link functionality (CAS) and is specified within a DSS only requirements (R956).</p> <p>We need to ensure that rights of access/audit are maintained despite the removal of the CAS requirement.</p>	<ul style="list-style-type: none"> • Introduce Requirement into new contract • Check that no audit/controls rights lost
6	<p><u>OBCS use of PCHL</u></p> <p>Certain OBCS operations were believed to be going to use the PCHL helpdesk.</p>	<ul style="list-style-type: none"> • Check nothing lost