

Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

'Publication of Performance Assurance Parties' impact on Settlement Risk'

The Modification seeks to increase the effectiveness of all detective and investigative Performance Assurance Techniques (PATs) including Error and Failure Resolution (EFR) through greater incentives.

Improved efficiency of Performance Assurance Framework (PAF) with swifter resolution rates to EFR plans and any other significant issues that impact Settlement is expected.



Elxon recommends the Panel raises the attached Modification Proposal in accordance with the provisions of Section F - Modification Procedures 2.1.1(d)(vi)



Elxon recommends this Modification is progressed to the Assessment Procedure for an assessment by a Workgroup



Elxon does not consider it likely that this Modification will impact the European Electricity Balancing Guideline (EBGL) Article 18 terms and conditions held within the BSC

This Modification is expected to impact:

- Suppliers
- Non Half Hourly Data Aggregator (NHHDA)
- Half Hourly Data Aggregator (HHDA)
- Meter Operating Agents (MOAs (Central Volume Allocation (CVA) Non Half Hourly (NHH) and Half Hourly (HH))
- Licensed Distribution System Operator (LDSO)
- Supplier Meter Registration Agents (SMRAs)
- Non Half Hourly Data Collectors (NHHDCs)
- Half Hourly Data Collectors (HHDCs)
- Meter Administrators (MAs)

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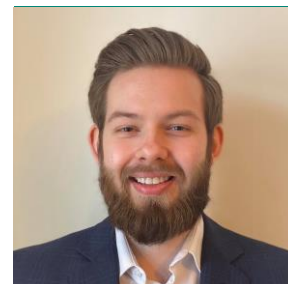
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About This Document



Not sure where to start? We suggest reading the following sections:

- Have 5 mins? Read section 1
- Have 15 mins? Read sections 1, 4, 5 and 6
- Have 30 mins? Read all sections
- Have longer? Read all sections and the annexes and attachments

This document is a recommendation to the Balancing and Settlement Code (BSC) Panel to raise a Modification Proposal (Attachment A) in accordance with [BSC Section F – Modification Procedures](#) 2.1.1(d)(vi). Elexon will present this paper to the BSC Panel at its meeting on 14 October 2021.

If the Panel agree to raise the Modification Proposal, this document will form its Initial Written Assessment (IWA), and the Proposal Form will be updated and published on the Elexon Website accordingly. There are two parts to this document:

- This is the main document. It provides details of the Modification Proposal, an assessment of the potential impacts and a recommendation of how the Modification should progress, including the Workgroup's proposed membership and Terms of Reference.
- Attachment A contains the Modification Proposal Form.

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1 Summary

What is the issue?

Resolving issues through EFR can take a substantial amount of time. This change would result in an additional escalation step to incentivise swifter improvement. Improved efficiency of Assurance Framework with swifter resolution rates to issues is expected.

What is the proposed solution?

The proposed solution would amend [BSC Section Z – Performance Assurance](#) to allow the PAB to publish notices to industry in respect of PAPs' contribution to Settlement Risk along with relevant risk data where:

1. This action is approved by the BSC Panel; and
2. The relevant PAP has failed to meet an EFR milestone following prior escalation for the same issue; or
3. Exceptional circumstances require that such a notice is issued outside of the EFR process e.g. where the relevant PAP's contribution to Settlement Risk is sufficiently significant to risk serious impact on other market participants enough to and the resolution of the associated issue is therefore time critical.

Impacts and costs

This Modification is expected to impact on Suppliers, NHHDA, HHDA, MOAs (CVA, NHH and HH), LDSO, SMRAs, NHHDCs, HHDCs and MAs.

The central implementation cost of this Modification will be less than £1k to make the necessary changes to the BSC Sections.

No market participants are expected to incur implementation costs as a result of this Modification. However it is anticipated that there may be impacts on PAPs who meet the criteria above and therefore have notices published regarding their impact on Settlement Risk.

Implementation

The Proposer recommends an Implementation Date for this Modification of 30 June 2022 as part of the scheduled June 2022 Release. This will allow the benefits of this Modification to be realised as soon as possible.

Recommendation

The associated PAF review recommendations report detailed the proposed solution which was discussed and approved by the PAB. This solution has subsequently been refined and expanded to meet our customers evolving needs and has therefore been re-approved by the PAB which has recommended that the revised solution is submitted to the BSC Panel to be raised.

As the scope of the Risk data which could be included in notices regarding PAP's contribution to Settlement Risk needs to be fleshed out along with the circumstances in

which such notices might be issued, it is recommended that this Modification is progressed through Assessment Procedure where it can be considered by a Workgroup.

Following approval, implementation would require amendment of the relevant BSCP and BSC Sections. These changes will need to be carefully communicated to all PAPs so that they understand the changes before they are potentially impacted through EFR. EFR guidance notes and LWIs will also need to be updated to reflect the changes.

2 Why Change?

What is the issue?

Through industry engagement undertaken as part of the [Performance Assurance Framework \(PAF\) review project](#), one of the problems identified was that issues often take longer to resolve than expected, given appropriate resource allocation to issue resolution by relevant market participants. This was particularly evident in respect of the Error and Failure Resolution (EFR) process where EFR plans often take a considerable time to be resolved, with many plans remaining open for over a year.

Further Information and Detail

If EFR plans could be resolved more quickly it would mitigate the material Settlement impact of the associated Error/Failure. Moreover were it that poor performance identified through all Performance Assurance Techniques (PATs) was addressed more quickly this would have a significant beneficial impact on all [Settlement Risks](#) being managed directly through the application of PATs.

Where a Performance Assurance Party (PAP) fails to meet one of the milestones within their plan or otherwise meets the EFR escalation criteria (as set out within [BSCP538 - Error and Failure Resolution](#) and the [EFR Escalation guidance note](#)) the PAP can be escalated to the Performance Assurance Board (PAB). If further escalation is required the PAP may subsequently be escalated to the BSC Panel. Unfortunately in many instances this results in a cycle of repeated escalations to the PAB while the PAP continues to fail to meet the milestones set out within their EFR plan.

It is also possible to envision a scenario where a PAP is found to be contributing to one or more Settlement Risks to such an extent that it would not be reasonable to wait for EFR to be applied and EFR escalation to be triggered before taking action to remedy this impact, such as notifying other PAPs of the increase in Settlement Risk and the potential impacts on their business.

Engagement with the PAB both through the PAF review project and subsequently has indicated that one of the most effective incentives to resolve issues and improve performance against Settlement Risk is public peer comparison and publication of PAP performance against Settlement Risks. [Section B - the Panel](#), 3.3.8 restricts the PAB's ability to publish notices in respect of a PAPs contribution to Settlement Risk.

It is therefore proposed that a Modification is progressed to introduce:

1. An additional step to the EFR Escalation process; and
2. Powers for the PAB to publish public notices of PAPs contribution toward Settlement Risk(s) where a PAP fails to meet their EFR milestones again following EFR escalation, or outside of the EFR process in exceptional circumstances where the impact is sufficiently significant to risk serious impact on other market participants and resolution of the issue is time critical.
 - a. With such notices requiring final approval by the BSC Panel on the basis that it is the BSC Panel which is ultimately accountable for such actions since it delegates its powers in respect of Performance Assurance to the PAB.

It is anticipated that these changes will incentivise swifter resolution of issues.

Background

Error and Failure Resolution

EFR is a key remedial technique in Elexon's Performance Assurance Framework. It is used to assure Elexon, the PAB and the rest of the industry that parties understand identified performance issues and have robust plans in place to correct them in a timely manner. As part of the EFR process, parties agree with Elexon what steps they will take to resolve the identified performance issues. As part of the EFR process Elexon also works to provide parties with advice and guidance.

EFR can be applied against all BSC Settlement Risks where an associated issue has been identified. EFR is used to assist PAPs to understand and rectify performance issues and non-compliances. When applying EFR against a Settlement Risk, we take into account the net significance of the risk and the PAP's contribution to the issue identified. The PAB can define specific escalation criteria for specific Settlement Risks or net significance values.

Where a PAP fails to meet one or more of the milestones set out within their EFR plan or otherwise meets the escalation criteria set out within BSCP538, Elexon may escalate the EFR plan. EFR escalation is to the PAB in the first instance but may also be to the BSC Panel where further escalation is required.

PAF Review

The [PAF review](#) was a review of the Performance Assurance Framework. Key aims of the PAF review were:

- Better engagement with Parties about issues that do and don't matter to them (their risk appetite)
- Increase the quantity and quality of participation in consultations
- Meet the current and future assurance needs of the Panel, the PAB and the wider electricity industry e.g. smart metering, alternative business models, CVA risk
- Improve the measurability of Settlement error and the mitigating effect of assurance activities
- Deliver a valued and trusted assurance service to BSC Parties under the strategic and tactical guidance of the BSC Panel and PAB

The PAF review concluded by outlining a set of recommendations. The recommendations for EFR were unanimously approved by the PAB following detailed discussion. This included the requirement for a Modification to be raised to amend BSC Section H and BSCP538.

Desired outcomes

The desired outcomes of this Modification include:

1. Mitigation against PAPs being subject to repeated escalations wasting industry resource (i.e. the PAB and Elexon's time and effort);
2. Swifter resolution of routine EFR issues;
3. Swifter resolution of issues identified through PATs which are found to be having a serious impact on Settlement Risk(s); and
4. Greater transparency across industry in respect of PAPs contribution to Settlement Risk(s).

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Proposed solution

The proposed solution would amend BSC Section Z to allow the PAB to publish notices to industry in respect of PAPs' contribution to Settlement Risk along with relevant risk data where:

1. This action is approved by the BSC Panel; and
 - a. The relevant PAP has failed to meet an EFR milestone following prior escalation for the same issue; or
 - b. Exceptional circumstances require that such a notice is issued outside of the EFR process e.g. where the relevant PAP's contribution to Settlement Risk is significant enough to potentially have a serious impact on other PAPs and the resolution of the associated issue is therefore time critical.

Where a PAP is escalated to the PAB for failing to meet a milestone in its EFR plan, the PAB shall serve notice to the PAP that should it fail to meet a further milestone in the same EFR plan, in addition to being escalated again, a public notice will be issued to inform other PAPs of the escalated PAP's contribution to Settlement Risk along with associated Risk data.

The escalated PAP should also at this stage be notified that further notices will be published where they continue to miss milestones within the same EFR plan.

Notes on Approach and BSC Change

In order for this approach to be effective, the PAB would need to be mindful that utilising notifications to industry of PAP's failure to resolve an EFR plan too frequently or too widely would weaken its effectiveness.

This action should therefore only be applied in extreme cases.

Delivery of this change would require a Modification to BSC Section Z and BSCP538 in order to allow for the publication of such notices including data which would be considered confidential and/or commercially sensitive. The publication of such data is currently prohibited by 3.3.8 BSC Section B, "save as expressly provided by the Code". Updates to guidance would also be required.

Benefits

If EFR plans and other high materiality issues are resolved more quickly, impact on Settlement Risks and other market participants will be mitigated.

Avoiding repeated escalations and making the EFR escalation process more dynamic will also reduce the resource burden on the PAB allowing the committee to focus on proactive risk management rather than routine issue resolution.

This change should result in improved resolution times for issues and therefore reduce the impact against multiple risks.

Applicable BSC Objectives

It is Elexon's view that this Modification better facilitates BSC Applicable Objectives (c) and (d) as ensuring the Errors and Failures within the market are resolved helps ensure an even playing field for all market participants. Likewise effective management of issues, risks and non-compliances incentivises compliant and cooperative market behaviours.

Additionally, this change is intended to ensure the timely resolution of non-compliances with the BSC arrangements, thereby supporting the efficient implementation of these arrangements.

Implementation approach

Elexon recommends an Implementation Date for this Modification of 30 June 2022 as part of the scheduled June 2022 Release. This will allow the benefits of this Modification to be realised as soon as possible.



What are the Applicable BSC Objectives?

(a) The efficient discharge by the Transmission Company of the obligations imposed upon it by the Transmission Licence

(b) The efficient, economic and co-ordinated operation of the National Electricity Transmission System

(c) Promoting effective competition in the generation and supply of electricity and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity

(d) Promoting efficiency in the implementation of the balancing and settlement arrangements

(e) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency [for the Co-operation of Energy Regulators]

(f) Implementing and administering the arrangements for the operation of contracts for difference and arrangements that facilitate the operation of a capacity market pursuant to EMR legislation

(g) Compliance with the Transmission Losses Principle

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4 Areas to Consider

In this section we highlight areas which we believe the Panel should consider when making its decision on how to progress this Modification Proposal, and which a Workgroup should consider as part of its assessment of this Modification. We recommend that the areas below form the basis of a Workgroup's Terms of Reference, supplemented with any further areas specified by the Panel.

Areas to consider

The table below summarises the areas we believe a Modification Workgroup should consider as part of its assessment of this Modification:

Standard Areas to Consider
How will this Modification impact the BSC Settlement Risks?
What changes are needed to BSC documents, systems and processes to support this Modification and what are the related costs and lead times? When will any required changes to subsidiary documents be developed and consulted on?
Are there any Alternative Modifications?
Should this Modification be progressed as a Self-Governance Modification?
Does this Modification better facilitate the Applicable BSC Objectives than the current baseline?
Does this Modification impact the EBGL provisions held within the BSC, and if so, what is the impact on the EBGL Objectives?

Additional Areas to Consider
What (if any) limitations should be placed on the scope of Settlement Risk data which the PAB is permitted to publish in a public notice of a PAP's contribution to Settlement Risk where said PAP meets the criteria set out within the solution.
What (if any) additional criteria or thresholds should need to be met prior to such a notice being published regarding a PAP's contribution to Settlement Risk? Such criteria and thresholds should be considered both for: <ul style="list-style-type: none">a) Instances where a PAP fails against its EFR milestones resulting in repeated escalation; andb) Exceptional circumstances where such notices could be issued outside of the EFR process. Currently defined as where the impact is sufficiently significant to risk serious impact on other market participants and resolution of the issue is time critical.
What (if any) restrictions should be placed on the frequency with which such notices regarding a PAP's contribution to Settlement Risk could be published? The solution as drafted would allow such notices to be issued as frequently as monthly in extreme cases where a PAP's impact on Settlement Risk persisted in severity.

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PAB Endorsement

At its meeting on 30 September 2021, Elexon presented a draft Modification Proposal Form to the PAB, detailing the revised solution which allows for notices to be published to industry in respect of PAPs' contribution to Settlement Risk along with relevant risk data. The PAB **unanimously** recommended to the Panel that the Modification be raised in accordance with BSC Section Z 8.2.

PAB members suggested that the constraint of when the publication of data is allowed should be discussed within the Workgroup. Allowing data to only be published only after missing a milestone may be too restrictive. Elexon agreed to discuss this within the Workgroup.

Next steps

We invite the Panel to raise this Modification under Section F 2.1.1(d)(vi).

If the Panel agrees to raise this Modification, we recommend it should be assessed by a Workgroup and submitted to the Assessment Procedure.

Workgroup membership

We recommend that the Workgroup comprise of participants who have expertise or experience in the following areas:

- Assurance & Compliance
- Settlement Risks
- EFR

Self-Governance

This Modification will not materially amend any BSC processes or procedures, however it will impact all BSC parties with the potential to impact on competition. Therefore as an initial view, we believe it will materially impact on the Self-Governance Criteria and so **should not** be treated as a Self-Governance Modification. This will further be assessed as part of the Workgroup process given the potential to impact on competition.

What is the Self-Governance Criteria?

A Modification that, if implemented:

(a) does not involve any amendments whether in whole or in part to the EBGL Article 18 terms and conditions; except to the extent required to correct an error in the EBGL Article 18 terms and conditions or as a result of a factual change, including but not limited to:

- (i) correcting minor typographical errors;
- (ii) correcting formatting and consistency errors, such as paragraph numbering; or
- (iii) updating out of date references to other documents or paragraphs;

(b) is unlikely to have a material effect on:

- (i) existing or future electricity consumers; and
- (ii) competition in the generation, distribution, or supply of electricity or any commercial activities connected with the generation, distribution, or supply of electricity; and
- (iii) the operation of the national electricity transmission system; and
- (iv) matters relating to sustainable development, safety or security of supply, or the management of market or network emergencies; and
- (v) the Code's governance procedures or modification procedures; and

(b) is unlikely to discriminate between different classes of Parties.

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Timetable

Proposed Progression Timetable for this Modification	
Event	Date
Present Initial Written Assessment to Panel	14 October 2021
Workgroup Meeting	W/C 8 November 2021
Workgroup Meeting	W/C 6 December 2021
Workgroup Meeting	W/C 10 January
Assessment Procedure Consultation	7 February 2022 – 18 February 2022
Workgroup Meeting	W/C 28 February 2021
Present Assessment Report to Panel	14 April 2022
Report Phase Consultation	18 April 2022 – 29 April 2022
Present Draft Modification Report to Panel	12 May 2022
Issue Final Modification Report to Authority	19 May 2022

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6 Likely Impacts and costs

Estimated implementation costs

The central implementation cost of this Modification will be less than £1k to make the necessary changes to the BSC Sections.

No market participants are expected to incur implementation costs as a result of this Modification.

Implementation costs		
Organisation	Item	Implementation
Elexon	Documents	<£1k
Industry	Systems & processes	None
Total		<£1k

Impact on BSC Parties and Party Agents		
Party/Party Agent	Potential Impact	Potential cost
Suppliers	Following a failed PAB escalation, Elexon may serve notice to the relevant PAP that they meet the criteria for Breach of the Code and invite immediate response, or serve notice to industry detailing their impact on relevant Settlement Risks unless immediate resolution or new evidence is presented, and agree a reasonable timescale for resolution.	Low
NHHDA		
HHDA		
CVA MOAs (NHH, HH)		
LDSO		
SMRAs		
NHHDCs		
HHDCs		
MAs		

Impact on the NETSO	
Potential Impact	
None	

Impact on BSCCo	
Area of Elexon	Potential Impact
None	N/A

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Impact on BSC Settlement Risks

We would expect a generic positive impact on BSC Settlement Risks from this Modification, as it should encourage EFR issues to be resolved more quickly. This will have a positive impact on the integrity of data entering settlement.

As EFR can be applied to all Settlement Risks this change is anticipated to positively impact on all Settlement Risks (where EFR is or continues to be applied).

Impact on BSC Systems and processes

BSC System/Process	Potential Impact
None	N/A

Impact on BSC Agent/service provider contractual arrangements

BSC Agent/service provider contract	Potential Impact
None	N/A

Impact on Code

Code Section	Potential Impact
Section Z 'Performance Assurance'	The BSC will be revised to provide for notices to be published regarding PAPs' contribution to Settlement Risk including the publication of associated Risk data where the criteria described in the solution are met.

Impact on EBGL Article 18 terms and conditions

This Modification does not impact on the EBGL Article 18 Terms and Conditions held within the BSC.

Impact on Code Subsidiary Documents

CSD	Potential Impact
BSCP538	The BSCP will be updated to introduce a trigger for notices to be published regarding PAPs' contribution to Settlement Risk where they fail a milestone in their EFR plan resulting escalation (where they have already been previously escalated for the same EFR plan).

Impact on other Configurable Items

Configurable Item	Potential Impact
None	N/A

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Impact on Core Industry Documents and other documents	
Document	Potential Impact
None	This Modification will not impact on any other Core Industry Documents.

Impact on a Significant Code Review (SCR) or other significant industry change projects
This Modification will not impact on any ongoing SCRs.

Impact of the Modification on the environment and consumer benefit areas:	
Consumer benefit area	Identified impact
1) Improved safety and reliability Unlikely to have a significant impact either way.	Neutral
2) Lower bills than would otherwise be the case Unlikely to have a significant impact either way.	Neutral
3) Reduced environmental damage Unlikely to have a significant impact either way.	Neutral
4) Improved quality of service Possibly by ensuring accurate Settlement which thereby contributes to accurate billing.	Neutral
5) Benefits for society as a whole Unlikely to have a significant impact either way. Incentivising a fair and compliant electricity market but otherwise minimal.	Neutral



What are the consumer benefit areas?

- 1) Will this change mean that the energy system can operate more safely and reliably now and in the future in a way that benefits end consumers?
- 2) Will this change lower consumers' bills by controlling, reducing, and optimising spend, for example on balancing and operating the system?
- 3) Will this proposal support:
 - i) new providers and technologies?
 - ii) a move to hydrogen or lower greenhouse gases?
 - iii) the journey toward statutory net-zero targets?
 - iv) decarbonisation?
- 4) Will this change improve the quality of service for some or all end consumers. Improved service quality ultimately benefits the end consumer due to interactions in the value chains across the industry being more seamless, efficient and effective.
- 5) Are there any other identified changes to society, such as jobs or the economy.

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7 Recommendations

We invite the Panel to:

- **RAISE** the Modification Proposal in Attachment A (in accordance with F2.1.1(d)(vi));
- **AGREE** that this Modification progresses to the Assessment Procedure;
- **AGREE** the proposed Assessment Procedure timetable;
- **AGREE** the proposed membership for the Modification Workgroup; and
- **AGREE** the Workgroup's Terms of Reference.

Appendix 1: Glossary & References

Acronyms

Acronyms used in this document are listed in the table below.

Acronym	
Acronym	Definition
BSC	Balancing and Settlement Code
BSCP	Balancing and Settlement Code Procedure
CVA	Central Volume Allocation
EFR	Error and Failure Resolution
HH	Half Hourly
HHDA	Half Hourly Data Aggregation
HHDC	Half Hourly Data Collector
IWA	Initial Written Assessment
LDSO	Licensed Distribution System Operator
MA	Meter Administrator
MOA	Meter Operator Agent
NHH	Non Half Hourly
NHHDA	Non Half Hourly Data Aggregation
NHHDC	Non Half Hourly Data Collector
PAB	Performance Assurance Board (<i>Panel Committee</i>)
PAF	Performance Assurance Framework
PAP	Performance Assurance Party
SMRA	Supplier Meter Registration Agent

External links

A summary of all hyperlinks used in this document are listed in the table below.

All external documents and URL links listed are correct as of the date of this document.

External Links		
Page(s)	Description	URL
2	BSC Section F – Modification Procedures	https://www.elexon.co.uk/the-bsc/bsc-section-f-modification-procedures/
3	BSC Section Z – Performance Assurance	https://www.elexon.co.uk/documents/bsc-codes/bsc-sections/bsc-section-z/
5	PAF review project	https://www.elexon.co.uk/reference/performance-assurance/performance-assurance-framework-review/

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External Links		
Page(s)	Description	URL
5	Settlement Risks	https://www.elexon.co.uk/reference/performance-assurance/performance-assurance-processes/performance-assurance-risk-evaluation-register/#:~:text=A%20Settlement%20Risk%20is%20a,(or%20has%20impacted)%20Settlement.&text=Exelon%20use%20the%20approved%20Risk,and%20evaluate%20the%20Settlement%20Risks.
5	BSCP538 'Error and Failure Resolution'	https://www.elexon.co.uk/csd/bscp538-error-and-failure-resolution/
5	EFR Escalation guidance note	https://www.elexon.co.uk/guidance-note/efr-efr-escalation-process/
5	Section B the Panel	https://www.elexon.co.uk/documents/bsc-codes/bsc-sections/bsc-section-b-the-panel-2/
6	PAF review	https://www.elexon.co.uk/documents/groups/pab/2020-meetings-pab/234-july/pab234-08a-breach-default-and-efr-paf-review-recommendations/