

DIP Manager Risk Operating Plan Consultation Summary

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Synopsis

This paper provides a summary of the consultation feedback received on the DIP Manager (DM) Risk Operating Plan (ROP) 2026/27 and the DIP Manager's responses.

1. Introduction

- 1.1. As part of its DIP Assurance Strategy, the DIP Manager drafted the DM ROP, a document detailing the assurance activities/mitigations the DIP Manager will undertake in the forthcoming DIP Year to reduce risk(s) arising from DIP Users.
- 1.2. The DIP Manager consulted on the DIP ROP between 11 March and 25 March 2026, asking seven questions; these questions are detailed below, along with a summary of received responses from eight parties, such as Distributors, Suppliers, Code Bodies, and Data Services.

2. Question 1: Do you agree with the risks identified in the DIP Risk Register?

- 2.1. Most respondents agreed that the DIP Risk Register detailed the risks associated with DIP Users. However, other respondents indicated that the scope did not encompass all risks to DIP as it did not include all DIP Participants, such as the DIP Manager and the DIP Service Provider.
- 2.2. One respondent explained that the requirements detailed in the DIP Risk Register were not feasible. Rather, the obligations should be more granular. This would reflect that the DIP is a technology service.
- 2.3. Additionally, respondents suggest edits to the DIP Risk Register. This would provide clarity to the identified risk(s).

DIP Manager response

- 2.4. The DIP Risk Register focuses on DIP Users. Prioritising DIP Users and their risks ensures the DIP Manager can focus on supporting Users to meet their obligations and requirements in the DIP Rules. However, adding additional risks associated with all DIP Participants will occur at the quarterly review of DIP risks.
- 2.5. The recommendations on clarifying how the current risks in the DIP Risk Register will be implemented.

3. Question 2: Do you foresee any additional risks that should be included in the Risk Register?

- 3.1. Respondents held a variety of concerns about additional risks that could be added to the DIP Risk Register. Namely, respondents held concerns with requalification, other users' compliance, issues with how messages are validated, message recovery, and a lack of a defined process to enable participant-to-participant resolutions.
- 3.2. The overarching theme from respondents was that issues (or risks) will create operational issues. Respondents want the assurance process to provide confidence that Users, the DIP Manager, and the DIP Service Provider are responding to issues as they arise to reduce any operational impacts.

DIP Manager response

- 3.3. The DIP Manager manages DIP On-Boarding. Qualification and Re-qualification for Industry Codes is a matter for the Code Body a party is seeking to qualify for.
- 3.4. DIP Users are expected to adhere to the DIP Rules. The DIP Manager monitors DIP Users' compliance and engages specific users when it identifies a possible non-compliance.
- 3.5. The DIP Rules explain how message choreography occurs. However, DIP Users (such as License Distributor System Operators (LDSO)) have highlighted areas for improvement, including status messages. The DIP Manager is working on drafting a DIP Change Request to resolve this issue; it will provide clarification on how status messages can and should be managed by DIP Users.
- 3.6. Message validation can be impacted by webhooks¹. Users who have set webhooks incorrectly will affect others. Generally, a technical check occurs before a Potential User enters the pre-production environment. However, in some instances, the DIP Manager has observed that specific webhooks weren't checked during the onboarding process. The DIP Manager is currently determining how this issue is addressed.

4. Question 3: Do you agree with the evaluation of risk events in the Risk Evaluation Document?

- 4.1. Respondents agreed with the risk events within the Risk Evaluation Document (RED). Some respondents recommend minor changes to some topics to enhance their clarity.

DIP Manager response

- 4.2. The DIP Manager has implemented the recommended changes to the RED.

5. Question 4: Are there any additional risk events that need to be considered?

- 5.1. Respondents agreed with the risk events presented in the RED.

DIP Manager response

- 5.2. DIP Manager has no additional comments.

6. Question 5: Do you agree with the mitigations laid out in the Risk Operating Plan?

- 6.1. Respondents agreed with how the DIP Manager would mitigate against the risks in the DIP Risk Register. However, some respondents raised additional concerns. These were when audits would occur for DIP Users, the DIP Manager, and the DIP Service Provider. Further, how non-compliance would be managed or escalated. How the DIP Manager communicates with all DIP Participants, and the scope of the DIP Risk Register.

DIP Manager Response

¹ A method of augmenting or altering the behaviour of a web page or web application with custom callbacks

6.2. The DIP Manager acknowledges there are outstanding queries regarding the assurance activities occurring in the current DIP Year. To provide reassurance, the DIP Manager is currently determining how it can fulfil specific requirements, such as audits. Additionally, the DIP Manager is developing a process to escalate DIP Users; the escalation process is intended to be available from April 2026 onward. Moreover, the DIP Manager is developing its communication framework to support all users receiving timely updates about the DIP, the DIP Rules, and the DIP Manager.

6.3. The DIP Risk Register will be reviewed in the coming quarter to ensure all DIP Participants' risks are captured.

7. Question 6: Do you believe any additional mitigations would be required?

7.1. Respondents agreed with the mitigations detailed in the ROP.

DIP Manager response

7.2. DIP Manager has no additional comments.

8. Question 7: Do you have any additional comments?

8.1. A few respondents noted key themes from comments they had previously described in their responses. These included capturing all DIP Participants' risks, audits, and how the DIP functionality will evolve.

DIP Manager response

8.2. The DIP Manager has engaged specific respondents who raised concerns and will use their views to continue to develop, enhance, and implement assurance activities over the next DIP Year.