



Redlined BSCP537 Appendix 1 text for P344

P344 proposes changes for Guidance for completing the SAD, Section 1 – Introduction, sections 1.1, 3.1, 11 and adding a new section 19 . We have redlined these changes against Version 14.0

There is no impact on any other part of this document for this change.

Amend guidance for completing as follows:

BSCP537 Qualification Appendix 1 – Self Assessment Document (SAD)

Guidance for completing the SAD

Qualification process

The SAD embodies the requirements for both Qualification and re-Qualification. Applicants are required to complete the SAD in accordance with BSCP537 ‘Qualification’ and Section J of the BSC. References and abbreviations used in the SAD are based on BSC definitions, where this is not possible further guidance has been provided in BSCP537 section 1.5 List of Definitions. BSC documents referred to within this SAD are available on the [BSC website](#) and in all cases the most recent versions should be applied.

Section J of the BSC and BSCP537 explain that the Qualification process will be based on self assessment by Applicants, with limited follow up work to be undertaken by BSCCo rather than an audit of the system development being undertaken. BSCCo, through limited risk based review and, where required, follow up visits, will determine whether an Applicant’s responses to the questions within the SAD adequately support their self assessment conclusions as to whether they have met the Qualification Requirements.

The Qualification process is not designed to identify whether the Applicant will be in full compliance with all of the requirements in the BSC and the Code Subsidiary Documents. The aim is to reduce the risk to Settlement that may be introduced as a result of a new Qualified Person entering the market. The process is designed to indicate whether, in certain key areas identified as high risk, an appropriate standard has been achieved.

The full set of requirements to which the Applicant must adhere on entry and on an ongoing basis is as set out in the BSC and the Code Subsidiary Documents. The guidance provided in this SAD should not be deemed as a comprehensive interpretation of those requirements.

Re-Qualification process

Qualified Party Agents may identify a need to apply for re-Qualification of their Agency Service. This process is required when there is a Material Change to the functionality of a Party Agent’s systems or processes used for the delivery of that service. Examples of possible re-Qualification triggers are outlined in BSCP537. The agent is required to determine which SAD questions should be re-addressed and these questions should be completed afresh in order to reflect the changes to be implemented. Section 1 (Introduction) should be completed in all cases, with particular reference to Section 1.3.

Throughout the SAD the term ‘service’ is used to describe the systems and processes that an Applicant will utilise to fulfil its obligations as a Qualified Person. When answering questions you should consider all aspects of your service that are relevant and that you intend to use in order to fulfil that requirement.

Guidance for completing the SAD (continued)

Completing the SAD

The SAD is split into 18-19 sections. Sections 1 to 7 are generic and should be responded to in full in respect of all Qualification applications, with the exception of Virtual Lead Parties (VLPs). VLPs are only required to complete Section 1 to 6. The remaining sections relate to specific services, Applicants should address these as relevant to their application. Each section contains a series of questions, for each of which guidance is provided in order to either provide clarification or to set out the areas the response should address.

When completing the SAD, Applicants should provide sufficient detail for the reader (which could be, for example, the director reviewing the responses prior to sign off, or BSCCo) to be able to evaluate whether the requirements have been addressed without requiring the reader to examine the supporting documentation or to perform additional enquiries. Responses should document not only the activities undertaken to address the requirements but should also document the control procedures, such as authorisation, review or testing processes, which have been performed in order for the Applicant to have assured themselves that the requirements have been met in a satisfactory manner. The responses to questions will depend on the size of the Applicant and the sophistication of the systems involved.

The Applicant should also indicate what evidence is available to support the responses given. This evidence will need to be available to BSCCo should any review take place. This evidence should not be attached to the return but a cross reference to the material should be included in the SAD.

References to ‘systems’ within the SAD do not relate solely to the functionality of computer hardware and software, but extend to the supporting business and operational processes (including manual processes). The term ‘development’ in relation to a system refers to either the development of a new system or to any significant changes or upgrades in respect of a previously Qualified system.

For the purposes of responding to this and other sections of the SAD, a ‘Simple’ service is one that is largely paper based, although simple spreadsheets or databases may be used for recording information and email may be used for some communication. Other more sophisticated services are ‘Complex’. A number of the sections in this SAD include specific questions for either Complex or Simple services.

A number of the questions may require the Applicant to seek assistance from a third party developer, where that third party has developed all or part of the service, in order to provide a response. However, in all cases the responses are the responsibility of the Applicant. There may be an overlap in responses given and the Applicant should consider the most appropriate way to co-ordinate their own responses with those of the third party provider.

Suppliers after successfully completing Qualification will Qualify as either a HH Supplier or a NHH Supplier. If a HH Supplier wishes to then operate as a NHH Supplier or vice versa they would then have to complete the Qualification Process (not the re-Qualification process) to act in that different capacity.

Additional guidance on the completion of the SAD can be found in Appendix 3 of BSCP537 and further guidance on the Qualification and re-Qualification processes can be found in the Overview of Qualification document.

Director Sign off page

NAME OF APPLICANT:

Qualified Person:

Except for the matters detailed below (delete if not applicable), having made appropriate enquiries of other directors and officials of the organisation, we confirm that:

1. the BSC Qualification Documentation (SAD) in respect of the above service is true, complete and accurate and not misleading because of any omission or ambiguity or for any other reason; and
2. in our opinion, the arrangements as documented are adequate and appropriate for that service.

Please detail any exception here:

Approved by

Print Name

Signature

Position

Date

Note: The SAD should be authorised by a registered Director of the company (verifiable with Companies House, or in the case of a non-UK company a person having an equivalent position) for and on behalf of their company in respect of Qualification issues.

Amend section 1 introduction as follows:

SECTION 1 – INTRODUCTION

Objectives of this section

This section is designed to gather factual information about the Applicant and the service that they have applied to operate.

Guidance for completing this section

This section has been split as follows:

- 1.1 Generic Section (to be completed in all cases).
- 1.2 Re-Qualification Application Section (to be completed by those Applicants applying for Re-Qualification).
- 1.3 Additional Information

The final question, in this and every section, is not mandatory and is provided so that Applicants can provide any additional information that they consider to be relevant to their application.

For Supplier Qualification please state clearly which market you wish to operate in: Non Half Hourly, Half Hourly or both. Applicants who are currently operating in a market and who wish to Qualify for the other market will have to Qualify again for the second market they wish to operate in.

Amend section 1.1 as follows:

1.1 Generic Section

Question	Guidance	Response	Evidence
1.1.1 What is the name of the organisation applying to become a Qualified Person?	The company name should be the statutory entity applying for Qualification (or re-Qualification), as registered with Companies House.		

Question	Guidance	Response		Evidence
1.1.2 What is the company number of the organisation applying to become a Qualified Person?	The company number refers to the registered company number.			
1.1.3 What is (are) the MPID(s) that will be associated with this service?	The process for registering an MPID in MDD is given in BSCP509.			
1.1.4 What service is this application for?	Please tick the appropriate box(s). Descriptions of the service are in BSC Section S.	Qualification	Re-Qualification	
		NHHDA NHHDC HHDA HHDC SMRA SVA HHMOA SVA NHHMOA CVA MOA Meter Administrator NHH Supplier HH Supplier UMSO <u>VLP</u>	NHHDA NHHDC HHDA HHDC SMRA SVA HHMOA SVA NHHMOA CVA MOA Meter Administrator UMSO	
1.1.5 What are the contact details for this application?	A key contact will act as the central point of communication for BSCCo in relation to this application.	Key contact name: Address: Email address: Telephone number: Fax number:		

Question	Guidance	Response	Evidence
1.1.6 Who are the authorised signatories for the service(s) for Qualification matters?	Qualification-related documentation should be authorised by a registered Director of the company (verifiable with Companies House), for and on behalf of their company in respect of Qualification issues. A sign off sheet has been provided for this purpose (page 4).		
1.1.7 What is the background to this application?	Include details of the trigger for this application and a description of the service to be operated.		
1.1.8 Is the service that you intend to operate Complex or Simple?	Please tick the appropriate box and provide an explanation as to why you have reached the conclusion made. Complex indicates applicant has IT based systems and processes. Simple indicates applicant has Manual based systems and processes	Complex ☐ Simple ☐	
1.1.9 What is the background to this application?	Provide a simple description or diagram as to how your service will operate and how elements of the service fit together. Include a description of IT systems that are to be used in the operation of this service. Specify where any of the software used has been centrally developed (e.g. the NHHDA software) or is commonly used by other participants within the industry.		

Question	Guidance	Response	Evidence
1.1.10 What is your intended scale of operation?	This is the volume of MSIDs at which you expect to operate in the market. This should correlate to the level of testing which has been performed. This will provide guidance as to the extent of the operation and the relative risk to Settlement. Guidance on volume and performance testing is provided in the SAD Additional Guidance document.		
1.1.11 Has the system that you intend to operate been developed internally or have you relied on a third party provider?	Please tick the appropriate box and enter the names of any third party developers. Please provide a brief description of the role of each third party developer. A number of the sections in this SAD include additional questions that should be completed where the Applicant has relied on a third party provider for system development. Please also provide details of the software/applications you intend to use to operate the services if not already included in your response to 1.1.9.	Internally developed ☐ Third party developer ☐	
1.1.12 Do you intend to rely on any subcontractors or service providers during the operation of the service and how do you intend to manage the relationship(s)?	Enter all subcontractors or service providers that you intend to rely on in operating the service once Qualified. Please provide a brief description of the role of each subcontractor or service provider in operating the service on an ongoing basis.		

Question	Guidance	Response	Evidence
1.1.13 Are you currently a Qualified Person?	If any other services are currently provided by your organisation, please provide details of the type, Market Participant ID and number of MSIDs currently managed. Also indicate whether the current services are operated as a 'Complex' or a 'Simple' service.		

Amend section 3.1 as follows:

3.1 Complex Service Section

Question	Guidance	Response	Evidence
3.1.1 How have you developed and implemented your test strategy and/or plans to demonstrate that you are able to operate the service?	The response should address the following areas: (1) A clear approach to testing should be documented. Please provide a brief description of your overall approach to testing. (2) Responsibilities for each element of the plans should be defined and assigned. (3) Any risks associated with the plans should be documented and a risk analysis should have been performed. Where any risks identified are to be mitigated by testing this should be made clear. (4) Success or acceptance criteria should be defined for each stage of testing activity together with an explanation as to how these will be measured. (5) A policy for the performance of regression testing should be set out (when individual parts of the system fail their test requirements then		

Question	Guidance	Response	Evidence
	any link between these and the rest of the system should be re-tested - (this is optional for Simple systems).		
3.1.2 How have you demonstrated that these plans have been formally approved?	A project board and/or sponsor and/or senior member of the organisation should have approved all aspects of the test planning and documentation (including where relevant test strategy, test criteria, test specification and data and test schedules) prior to testing taking place. Evidence of the sign off of key documentation should be made available.		
3.1.3 How have you determined the extent and coverage of testing that you intend to perform?	The extent and coverage of testing should be set out together with an explanation as to how this has been determined.		
3.1.4 What types of testing have you performed to ensure that all aspects of your service have been tested appropriately?	Refer to Appendix 2 for additional information on the requirements for certain aspects of testing. Examples of business processes that require testing are referenced in the service specific sections. Please note whether or not your testing covers each of the following areas and describe the level of testing carried out in each area: (1) Unit testing. (2) System testing. (3) Factory testing. (4) Integration testing. (5) Interface testing between the Applicant and other participants that you might reasonably be expected to interact with.		

Question	Guidance	Response	Evidence
	(6) BSC Compliance (a documented link/audit trail between the BSC requirements identified as relevant to the operation of the service and the testing performed should be maintained, it is anticipated that this will be demonstrated by some form of mapping document showing each requirement and linking this to the system specifications or local working procedures with evidence as to how each has been tested). This is considered to be a key requirement of the Qualification process. (7) Performance, resilience and capacity testing (including a description as to how testing has demonstrated that the service will be able to perform at the level of activity predicted by your intended maximum scale of operations as detailed in Section 1). (8) Regression testing. (9) Disaster Recovery testing (to avoid repetition within the SAD, Disaster Recovery planning and testing has been covered as one topic in Section 4. -Please provide a cross reference to your response in that section). (10) Business processes or user acceptance testing (a formal acceptance of the systems by the users is considered to be a key criteria for Qualification). (11) Testing of local working procedures (local working procedures should provide the link between the requirements that have to be complied with and the practical reality of operating the service).		

Question	Guidance	Response	Evidence
	(12) Any other types of testing that may have been performed. For Applications that will include a migration of data from one system to another, section 7 sets out the requirements for data cleansing, migration strategy planning and migration testing.		
3.1.5 How have you monitored the progress and results of testing at each stage?	The response should address the following areas: (1) A formal record should be maintained of the progress of each of the testing activities planned in the test strategy or plans, including a record of actual test results against expected test results in order to determine whether testing is complete. (2) A formal record should be maintained of each fault, problem or issue encountered during the testing process. Each fault, problem or issue should be given a severity and priority for resolution and tracked to closure/resolution. Evidence should be retained that failed scripts have been followed up and problems resolved. (3) A formal assessment should be performed at the end of each stage of the testing process in order to determine whether all testing activities are complete.		
3.1.6 How have you ensured that all high severity faults, problems and issues identified have been addressed and do you have a plan in place to address any non-high	The response should address the following areas: Reports should be produced on all outstanding faults and issues identifying for each the nature of the fault, severity, steps to be taken to resolve the fault and impact on the organisation's ability to operate the service.		

Question	Guidance	Response	Evidence
severity faults, which you consider can be addressed at a later stage?	Evidence to support the response to this question is expected to include an issue log/report.		
3.1.7 How are you able to demonstrate that all planned testing has been completed?	Evidence of completion is expected to include a test completion report. Where planned testing has not been completed an explanation as to why this has been the case should be provided within the supporting evidence. It is anticipated that all high severity faults will have been cleared and this should be confirmed within any test completion report provided.		

Amend section 11 as follows:

SECTION 11 – HHDA

Objectives of this section

The objective of this section is to consider the controls that have been built into the systems and processes supporting your Agency Service to ensure the requirements of the BSC, BSCP503 and PSL100 are met. Whilst sections 1 to 7 of the SAD are generic to all Agency Services, this section focuses on the specific controls required to operate effectively as a HHDA agent.

Guidance for completing this section

The HHDA agent aggregates half hourly Meter readings received from the HHDC agents. The aggregated data is then passed to the SVAA in accordance with the Settlement timetable. Upon request from the SVAA the HHDA will also forward individual half hourly meter readings to the SVAA. The section is split as follows:

Business Processes and Mitigating Controls: This section looks at the controls over the input of Half Hourly Meter readings and the transmission of ~~aggregated~~ data to the SVAA. It also considers the maintenance of standing data (which, if incorrect, may impact upon Settlement), the processes for identifying errors (monitoring data quality), the provision for a full audit trail history of the data used by your Agency Service and any changes made to it as outlined in BSCP503.

Exception Management: The section looks at the specific controls you have in place to report on, monitor and resolve exceptions during the processing of your data.

A number of questions in the SAD relate to ‘data quality’. This section of the SAD is concerned with the on-going quality of your data when your Agency Service is live and in operation. The quality of the data used to initially populate your Agency Service is considered in Section 7 of the SAD. A number of the questions in the service specific sections of the SAD relate to how you will ensure the accuracy of incoming and outgoing data and in the event that poor quality data does enter your Agency Service, how you identify and resolve this to minimise the impact upon other Parties and Party Agents.

Both system and manual controls should be considered when answering the SAD questions as your Agency Service will rely on both system and manual processes to effectively fulfil its obligations. Responses should consider the procedures in place for dealing with electronic data flows received via the Data Transfer Network and also manual data flows received via any other means (e.g. email, fax, letter).

11.1 Business processes and mitigating controls

Question	Guidance	Response	Evidence
11.1.1 How do you ensure that data is received and processed completely, accurately, and in a timely manner in line with the requirements of BSCP503 and PSL100?	The HHDA receives a number of key inputs: (1) Registration data from SMRA on D0209 data flows (BSCP503 3.2.1 and 3.2.2). (2) Estimated and actual consumption data received from HHDC agents on D0036 data flows (BSCP503 3.3.1). (3) MDD, Data Aggregation timetables and		

Question	Guidance	Response	Evidence
	Settlement timetables from the SVAA on D0269 and D0270 data flows (BSCP503 3.1.3). (4) Line Loss Factor changes from LDSOs on D0265 data flows (BSCP503 3.3.1). (5) BM Unit allocations or changes from Suppliers on D0297 data flows (where the Applicant is seeking Qualification as a HHDA following agreement with its associated Supplier(s) to implement additional BM Units) (BSCP503 3.5). <u>(6) Metering System Reporting Notification from SVAA (D0354; D0355; and D0356) (BSCP503 3.7).</u> The response should address the following areas: (a) The identification, review and authorisation of flows prior to processing. (b) Controls are in place to ensure that all data required is received. This may be by controls within the update routines or by manual controls (you should include details as to how you will ensure that you have been notified of all changes to Line Loss Factors). (c) The validation of data for formats and lengths (e.g. the MSID is valid) (BSCP503 Appendix 4). (d) The validation of data for its internal consistency. (e) The validation of standing data received against the latest version of MDD, data items such as Measurement Class, Data Aggregator ID, Data		

Question	Guidance	Response	Evidence
	Collector ID, GSP Group, Line Loss Factor details or energisation status (BSCP503 4.1.2 to 4.1.7). (f) The validation of Line Loss Factor data (BSCP503 4.2). (g) The validation of BM Unit files (BSCP503 4.5). <u>(h) The validation Metering System Reporting Notification (BSCP503 4.6).</u>		
11.1.2 How do you ensure that the aggregation process is performed in accordance with the Settlement timetable and that the transmission of the Aggregated Half Hour Data (D0040) or BM Unit Half Hourly Aggregated Data (D0298) to SVAA is complete and accurate?	The response should address the following areas: (1) A schedule of aggregation runs and expected transmission times and dates is prepared and issued to staff. (2) Aggregation run numbers are allocated to ensure that all are processed in the correct order. (3) Controls are in place to ensure that data is aggregated by each GSP Group for each associated Supplier for each Settlement day and separate totals for each BM Unit are maintained. (4) File sequence numbers, record counts and check sums are included in the data transmitted to ensure completeness. (5) Where the DTN has not been utilised, receipt acknowledgements received from SVAA are checked to ensure completeness of transmission. (6) Aggregation runs are monitored/reviewed to ensure that timetables are met. (7) Processes are in place to re-run an aggregation/transmission should processing		

Question	Guidance	Response	Evidence
	problems be encountered.		
11.1.3 How will you ensure that a full refresh is requested from the SMRA at least once a year?	Procedures should be in place to ensure that the HHDA Agent request a full refresh from SMRA on an annual basis. (BSCP503 3.2.2). BSCP503 Appendix 4.1.7 sets out the validation requirements to be performed on receipt of the refresh. Controls should be in place to ensure that the refresh is applied in accordance with the requirements set out in BSCP505.		
11.1.4 What controls and procedures do you have in place to ensure that the requirements of BSCP533 are met?	The response should address the following: (1) Calculations are in accordance with the calculation guidelines specified in BSCP533 Appendix B PARMS Calculation Guidelines (2) Submissions are in accordance with BSCP533 (3) Data is submitted in the required file format specification (in accordance with BSCP533 Appendix A PARMS Data Provider File Formats (4) Controls in place for data validity and completeness (5) Demonstration of a full understanding of, and capability to fulfil, the obligations and requirements of PARMS.		
11.1.5 How will you ensure that you have appropriate audit trails in place to meet the requirements as set out in PSL100?	The systems should be capable of reporting (or archived information should be stored so that it is available for enquiry) sufficient information so as to enable a user to obtain, in a timely fashion: (1) A breakdown of any aggregated information		

Question	Guidance	Response	Evidence
	calculated. (2) Any changes to standing data held or used by the system. The audit trail and archiving requirements for HHDA are set out in PSL100 sections 10.2 and 10.3.		
11.1.6 How have you ensured that you can meet the data retention requirements set out in BSC Section U1.6 and PSL100 Sections 10.2 and 10.3?	Section U1.6 sets out the requirements on Parties and their Party Agents to retain Settlement Data for: (1) 28 months after the Settlement Day to which it relates on-line; (2) Until the date 40 months after the Settlement Day to which it relates in an archive; and (3) At the request of the Panel, for more than 40 months if needed for an Extra Settlement Determination. The response should address the following: (a) Controls to ensure that any archived data can be retrieved within 10 Business Days. (b) Systems and procedures to ensure that all data that is retained is in a form in which the data can be used in carrying out a Settlement Run or Volume Allocation Run.		
<u>11.1.7 How have you ensured the complete and accurate transmission of any requested Metering System Half Hourly Metered Volume</u>	<u>The response should address the following areas:</u> <u>(1) A schedule of aggregation runs and expected transmission times and dates is prepared and issued to staff.</u> <u>(2) Aggregation run numbers are allocated to ensure</u>		

Question	Guidance	Response	Evidence
<u>(D0354) to SVAA?</u>	<u>that all are processed in the correct order.</u> <u>(3) Controls are in place to ensure that data for each Settlement Period in each Settlement Day is provided for each specified Metering System.</u> <u>(4) File sequence numbers, record counts and check sums are included in the data transmitted to ensure completeness.</u> <u>(5) Where the DTN has not been utilised, receipt acknowledgements received from SVAA are checked to ensure completeness of transmission.</u> <u>(6) Aggregation runs are monitored/reviewed to ensure that timetables are met.</u> <u>(7) Processes are in place to re-send a Metering System Half Hourly Metered Volume should processing problems be encountered.</u>		

Add section 19 as follows:

SECTION 19 – VIRTUAL LEAD PARTY

Objectives of this section

The objective of this section is to consider the controls that have been built into the systems and processes supporting your Virtual Lead Party (VLP) service to ensure the operational requirements of the BSC and BSCPs are met. This section focuses on the specific controls required to operate effectively as a VLP.

Guidance for completing this section

The VLP is responsible for managing the performing and monitoring the completion of business processes that it has initiated.

This section has been split as follows:

19.1 Business Processes and Mitigating Controls Section

19.2 Additional Information

The final question, in this and every section, is not mandatory and is provided so that Applicants can provide any additional information that they consider to be relevant to their application.

19.1 Business processes and mitigating controls

<u>Question</u>	<u>Guidance</u>	<u>Response</u>	<u>Evidence</u>
<u>19.1.1 How do you ensure that data flows are sent or received and processed completely, accurately and in a timely manner, in line with the requirements of the MSID Pair submission process?</u>	<u>The response should describe the processes you have in place for dealing with Settlement related data flows and should address the following:</u> <u>(1) How all data flows are identified, reviewed and authorised prior to processing</u> <u>(2) The validation of data for formats and lengths (e.g. the MSID is valid and other data items (where applicable) have been checked to be accurate)</u> <u>(3) The validation of data for its internal consistency, for completeness and accuracy</u> <u>(4) Controls in place to ensure that all data required or expected is received and that all data to be sent is sent in a timely manner. This may be through controls within the</u>		

<u>Question</u>	<u>Guidance</u>	<u>Response</u>	<u>Evidence</u>
	<u>update routines or through manual controls.</u> <u>(5) Where data is to be sent or received to SVAA by agreed methods other than via the [API] how you:</u> <u>manage the approval or agreement of receipt/sending of data in another agreed format,</u> <u>record and retain the agreement of the method as well as the actual data received or sent; and</u> <u>ensure that timescales surrounding this data are adhered to.</u>		
<u>19.1.2 What controls and procedures are in place to ensure the accurate, complete and timely sending, receiving and processing of data flows for key Settlement related events?</u>	<u>The response should make reference to the following key events:</u> <u>(1) Sending of MSID Pair data.</u> <u>(2) Sending of Delivered Volume (initially and retrospectively).</u> <u>(3) Receipt and processing of MSID submissions exceptions.</u> <u>(4) Receipt and processing of Delivered Volume exceptions.</u> <u>(5) Receipt and processing of request for submission of missing data sets.</u>		
<u>19.1.3 What procedures are in place for identifying, monitoring and resolving unprocessed data flows or notification of exceptions arising in processing and other errors in order to ensure that performance requirements are met?</u>	<u>The response should address the following:</u> <u>(1) The internal reporting mechanisms in place to identify rejections, errors, outstanding or missing data and backlogs in data processing on a daily basis.</u> <u>(2) The ongoing analysis performed to identify all points of rejection/failure in data flow processing.</u> <u>(3) Management processes in place to monitor performance against the standards as set out in the BSC and BSCPs.</u> <u>(4). Procedures setting out the action to be taken to resolve different exception types and provide guidance as to how to resolve underlying problems, which may be preventing a data flow/notification from processing.</u> <u>(5) A mechanism to capture any root causes of exceptions and problems should be</u>		

<u>Question</u>	<u>Guidance</u>	<u>Response</u>	<u>Evidence</u>
	<u>established.</u>		

19.2 Additional information

<u>Question</u>	<u>Guidance</u>	<u>Response</u>	
<u>19.2.1 What additional detail would you like to add to your response?</u>	<u>The Applicant can use the space provided to add any additional clarification and/or evidence that they consider necessary.</u> <u>This question is optional.</u>		