

The logo for Electricity North West, featuring the word "electricity" in blue and "north west" in green, with a stylized green leaf icon to the left.

Bringing energy to your door

Respond Data Privacy Statement

17 June 2015



RESPOND

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VERSION HISTORY

Version	Date	Author	Status	Comments
v1.0	17 June 2015	Kate Quigley	1st issue	First issue

GLOSSARY

CB	Circuit Breaker
CCC	Customer Contact Centre
CEP	Customer Engagement Plan
DG	Distributed Generators
DNO	Distribution Network Operator
ECP	Engaged Customer Panel
EHV	Extra High Voltage
ENWL	Electricity North West Limited
FCLS	Fault Current Limiting Service
FNSG	Future Networks Steering Group
HV	High Voltage
I&C	Industrial and Commercial
LCNF	Low Carbon Networks Fund
LCT	Low Carbon Technology
LV	Low Voltage
MPAN	Meter Point Administration Number
PSR	Priority Services Register
SDI	Short Duration Interruption
SDRC	Successful Delivery Requirement Criteria

EXECUTIVE SUMMARY

The Respond Project is funded via Ofgem's Low Carbon Networks (LCN) second tier funding mechanism. Electricity North West received formal notification of selection on 24 November 2014. On 12 December 2014 the Project Direction to initiate and deliver the Respond Project was accepted. The Project will run for 46 months, starting in January 2015 and is due for completion in October 2018.

As customers move to a low carbon future, demand for electricity is expected to increase significantly and this will inevitably increase fault levels on the distribution network. Respond will deliver an intelligent approach to managing fault current – the instantaneous surge of electrical energy which occurs under fault conditions. Respond is an innovative solution to that problem, which is faster and cheaper to apply than traditional reinforcement techniques. This Method will result in significant cost savings by maximising the use of existing assets to defer or prevent the need for reinforcement and speed up the connection of low carbon demand and generation.

To enable robust analysis to be undertaken to assess the impact and viability of the Respond Method, a range of data will be collected during the life of the Project. The majority of data collected for Respond will be technical in nature and will be collected at network level.

Some personal data will be collected as part of the formation of the engaged customer panel (ECP) which will be used to review and test materials relating to a new commercial proposition. Additional personal data will be collected in a customer survey which will quantify the willingness of industrial and commercial (I&C) demand and generation customers to agree to a new Fault Current Limiting service (FCL service) contract.

This data privacy statement describes how personal data will be managed and summarises the steps that will be taken to comply with the Data Protection Act 1998. This document also addresses the specific points set out by Ofgem in paragraph 3.96 of the LCN Fund Governance Document v6.

The key highlights from the Respond data privacy statement are outlined below:

- Electricity North West has a robust data protection policy that integrates a 'privacy by design' approach as advocated by the Information Commissioner's Office (ICO). This policy outlines the standards and procedures for the processing and protection of personal data contained within manual files and on computerised systems, in order to comply with the Data Protection Act 1998. All personal data collected or used in the Respond Project will be managed in accordance with this policy.
- Some personal data (names and addresses of customers) which is already held by Electricity North West will be used to identify customers for participation in the ECP and customer surveys whereby customers will be asked to give feedback on a new FCL service. This personal data is held as part of day-to-day operations in the customer contact centre (CCC) to help identify customers and provide business as usual services eg fault management and planned interruptions. All such data held by Electricity North West is stored in a secure, confidential and appropriate manner.
- Impact Research, one of the Respond Partners, will use this data to recruit customers to participate in the ECP and surveys. In doing so, Impact Research will comply with all requirements of Electricity North West's data protection policy, as described above.
- Project Partners ADE and ENER-G store personal data (names and addresses) of their current members and customers and adhere to the Data Protection Act 1998. ADE and ENER-G will use this data to distribute Project materials and engage their members on behalf of Electricity North West. Analysis of the ECP interviews and surveys will enable Electricity North West to disseminate information about Respond. The results from the

analysis of customer survey responses will be shown in an aggregate manner eg by customer segments. Therefore, in reporting the survey results, no personal data will be put in the public domain.

- As part of the surveys, customers will be informed of the scope and benefits of the Project, and will be informed that survey results will only be shown in an aggregate manner. Consent for use of customers' personal data will be obtained as part of the survey process (See appendix A).
- Electricity North West maintains a priority services register (PSR) of vulnerable customers or those who may be reliant on electricity for medical reasons. This is classified as 'sensitive data' by Electricity North West, and is subject to an even higher level of security and access rights requirements. Access to this data is restricted and will not be shared with Project Partners.
- The Respond Trials are not expected to have any direct effect or adverse impact on PSR customers. As such there are no plans to engage with PSR customers on Trial circuits directly and therefore no requirement to access PSR details as part of this Project.

1 THE RESPOND PROJECT

1.1 Background and context

The former Department of Trade and Industry wrote in 2005 that active fault level management will help distribution network operators (DNOs) to connect customers' low carbon demand and generation quickly and at lowest cost to customers.

New demand and generation increases potential fault current on the distribution networks. By using intelligent software configured in an innovative way, Respond will trial technical and commercial techniques to manage fault current on high voltage (HV) (6.6kV and 11kV) and extra high voltage (EHV) (33kV) networks.

Fault level is the potential maximum amount of fault current that will flow when a fault occurs on the network. Respond will develop and deploy intelligent new software, the Fault Level Assessment Tool, to continuously calculate the potential maximum fault current which fluctuates throughout the day, and provide a platform from which a range of three innovative fault mitigation techniques can be automatically and adaptively enabled when potential fault current exceeds existing switchgear rating. This will manage and regulate the flow of fault current safely when a fault occurs.

This novel approach will maximise the use of existing assets and remove the need to replace expensive switchgear prematurely, reducing the cost and increasing the speed of connecting many I&C demand and generation customers where fault level capacity could be exceeded. All distribution customers will benefit through avoidance of the traditional fault level reinforcement costs and the environmental benefits of accelerating uptake of low carbon generation.

Respond has four objectives:

- To trial the Fault Level Assessment Tool software;
- To trial two technical techniques and one commercial technique which will provide effective and efficient fault level management when deployed on existing network infrastructure;
- To deliver novel and highly transferable solutions that can then be applied to the HV and EHV networks by a GB DNO; and

- To demonstrate release of network capacity allowing quick and lower cost connection for customers' demand and generation, enabling DNOs to support the UK's decarbonisation strategy.

Six hypotheses were developed for Respond. Hypothesis four, below, is directly relevant to the customer workstream. The Respond Project will test the following hypotheses (in the identified workstream):

1. The Method is faster and cheaper to apply than traditional reinforcement (technology workstream);
2. The Method will deliver a buy order of fault level mitigation solutions based on a cost benefit analysis (trials & analysis workstream);
3. The Method facilitates the active management of fault current, using a combination of retrofit technologies and commercial services (trials & analysis workstream);
4. The Method enables a market for the provision of a Fault Current Limiting service (FCL service) (customer and trials & analysis workstream);
5. The Method uses existing assets with no detriment to asset health (trials & analysis workstream);
6. The Method reduces bills to customers through reduced network reinforcement costs (trials & analysis workstream).

1.2 The role of data in Respond

A range of data will be collected during the life of the Project to enable robust analysis to assess the effects and viability of Respond as a whole, and to understand the market for, and customer perceptions of, the FCL service.

The majority of the data collected will be technical in nature and assessed at network level to prove the Project hypotheses.

The Respond technique and the Project methodology means that the requirement to use personal data will be minimal and the data relevant to Respond is described in greater detail in the subsequent sections.

1.3 The time period over which data will be collected in Respond

The live Respond Trial phase will take place over a two year period following a preparation and installation phase. The Trial and evaluation phase, spanning May 2016 to April 2018 will allow the gathering and analysis of network data from sufficient fault occurrences to prove the effectiveness of the three techniques. This will be followed by the evaluation, dissemination and closedown phase of the Project.

Customer engagement activities in Respond will be focussed on testing the market for a commercial FCL service. The use of personal data will be restricted to developing materials to understand the appetite, optimum price and route to market for the managed response contract.

The use of personal data will factor in the development of survey and customer engagement materials; customer surveys; the purchase, implementation and Trial phase of the FCL service; in addition to post-event analysis to ensure the technologies operate as intended and to understand customer impact. All Respond activities will be conducted in a manner so as not to disrupt the smart meter programme.

2 DATA BEING COLLECTED FOR THE RESPOND PROJECT

2.1 What is personal data?

The following definitions are taken from the Data Protection Act 1998.

'Personal data' is defined as any information which is capable of being used to identify a living individual.

In addition to name, address and contact details, this could include individual preferences, transactional history, records of activities or travel, profiles or credit scores.

'Sensitive personal data' is defined as any personal data that relates to any of the following: racial or ethnic origin, political opinions, religious or other similar beliefs, trade union membership, physical or mental health, sexual life, criminal convictions or proceedings.

2.2 What personal data is Electricity North West processing for Respond?

Electricity North West holds relevant personal data about its customers such as names and addresses and details on connection equipment and consumption. The company also maintains a priority services register (PSR) of elderly and vulnerable customers. In the majority of cases, only data that is relevant to the customer's electricity supply is held. The only sensitive personal data held is in relation to customers who are registered as reliant on electricity for a medical need. (Electricity North West is registered on the ICO data protection public register ref Z5419068.)

The customer engagement activities that will be undertaken during the Respond Project that may involve measurement and/or data collection are outlined below:

- **Engaged customer panel (ECP):** The ECP will comprise of a small but representative group of industrial and commercial (I&C) customers, convened to provide feedback on the FCL service proposition and to develop/refine customer survey and engagement materials. It is envisaged that customers joining the ECP will be recruited either via telephone using customer data provided by Electricity North West or by its Project Partners, ADE and ENER-G, who will introduce the Project and seek the involvement of their members and customers.

Electricity North West will provide Impact Research with a limited amount of personal data (addresses and contact details) derived from the distributed generation (DG) list and MPAN database to facilitate the recruitment. Impact Research will keep a log of customers who do not wish to be re-contacted in the future for market research purposes and will share this log with Electricity North West.

Following the formation of the ECP, no further personal data will be collected. Any personal data stored as part of this engagement activity (customer names and contact details) will not be shared with any organisations outside of Electricity North West and feedback from the interviews will be anonymised.

ECP participants will be informed of the objectives and Method of the research, what data will be collected from them and how it will be used and stored. Customers will be required to provide written consent prior to their participation and will be required to consent to the interview being recorded via a voice recording device or by means of electronic notes. Consent for use of customers' personal data will be obtained as part of the recruitment process (See appendix A).

- **Pilot of customer survey materials:** A small number of pilot surveys will be conducted to ensure the customer survey instrument is robust, clear and understood by the customer.

To facilitate this, personal data (addresses and contact details) will be issued to Project Partner Impact Research from the DG list and MPAN database. During the pilot no further personal data will be collected. Any personal data stored as part of this engagement activity (customer names and contact details) will not be shared with any organisations outside of Electricity North West and all pilot survey results will be anonymised.

- Customer survey:** An online survey will test the appeal of the FCL service, the willingness of customers to take part in the Trial phase and the optimum price that will enable a market for the Method. Electricity North West will provide Impact Research with a customer list derived from the DG list and MPAN database in order that they can recruit appropriate customers and conduct surveys prior to the FCL service Trial phase in accordance with the protocol set out in the Respond customer engagement plan (CEP).

Impact Research will keep a log of customers who do not wish to be re-contacted in the future for market research purposes and will share this log with Electricity North West.

It is envisaged that Project Partners, ENER-G and ADE, will work in partnership with Impact Research to introduce Respond to their members and customers and provide a means of inviting them to voluntarily register their interest in taking part in the customer survey via a dedicated URL. The data that will be collected in the contact form will include the customer's name, company address, job title, email address, telephone number and contact information.

Some customers may register their interest in taking part in the surveys independently via the website or via other channels. Details of any suitable customers who have approached the company directly will be passed to Impact Research for potential survey recruitment.

Personal data obtained from the surveys will not be shared with any organisations outside of Electricity North West and all survey results will be anonymised.

Any customer data collected during any Respond customer engagement activity will be treated in confidence in accordance with the Code of Conduct of the Market Research Society. This means that Impact Research, a company Partner of the Market Research Society, will abide by the following guidelines with respect to recruiting customers into the customer engagement activities;

Table 1 – Market Research Society Guidelines and the Respond customer engagement process

Market Research Society guidelines	Respond customer engagement process
Members must ensure that participants give their informed consent where personal data are collected directly from them.	Customers will be briefed on what personal data is required, why it is required and how it will be stored. Customers will then be asked to sign (or 'click' with regards to the online survey) a consent form to confirm their acceptance.
Members must ensure that they have a fair and lawful basis for the collection and processing of personal data from sources other than the data subject themselves.	Impact Research will process personal data supplied by Electricity North West in the form of a customer database derived from the distributed generation and MPAN databases. Data will be handled fairly and lawfully in line with the Data Protection Act 1998 and customers will be given the

Market Research Society guidelines	Respond customer engagement process
	opportunity to opt out of future communications relating to market research.
<p>Members must ensure that participants are provided with sufficient information to allow informed consent to be given. This includes: a. the name of the organisation or individual responsible for data collection; b. the general subject of the data collection; c. the purpose of the data collection; d. whether the data collection is to be recorded and/or observed; e. who is likely to have access to live or recorded information; f. the likely length in minutes of the data collection, if asked; g. any costs likely to be incurred by the participant; and h. an assurance that the activity is being conducted in accordance with the MRS Code of Conduct.</p>	<p>Customers will be provided with a consent form that provides sufficient information, a draft of which is included in Appendix A</p>
<p>Members must ensure that the anonymity of participants is preserved unless participants have given their informed consent for their details to be revealed or for attributable comments to be passed on.</p>	<p>Impact Research supports and enforces ISO 20252 quality standards and the guidelines in the Market Research Society Code of Conduct in all of its customer engagement. Following these protocols will ensure that there is documented evidence that the anonymity of participants has been protected, unless informed consent has been gained.</p>
<p>Members must take reasonable steps to ensure that anonymisation is effective, with reference to developments in technology and to the data environment into which data are released.</p>	<p>The audio recordings created from ECP meetings will not be used for any purpose other than research, such as promotion or direct sales activities. They will be dated and deleted, at the latest, two years after the research is completed. In exceptional cases the audio recording will be listened to/the transcription read by employees at Electricity North West working on this Project. In these circumstances, the Respond team will go through the recordings first to delete any references to people's names or anything else that could identify them.</p>
<p>If participants have given consent for data to be passed on in a form which allows them to be personally identified, members must: a. demonstrate that they have taken all reasonable steps to ensure that the data will only be used for the purpose for which the data were collected b. and inform participants as to what will be revealed, to whom and for what purpose.</p>	<p>Notably the requirement to pass Electricity North West the details of those customers who have expressed an interest, during the survey, in taking part in the FCL service Trial for re-contact purposes. A draft consent form has been included in Appendix A which informs participants as to what will be revealed, to whom and for what purpose. Electricity North West is committed to only using the data for the agreed purpose of contacting customers</p>

Market Research Society guidelines	Respond customer engagement process
	(where informed consent has been obtained) to engage further about the Respond Project.
Members must ensure that follow-up contact with a participant is carried out only if the participant's permission has been obtained at the previous point of data collection. The only exception to this is re-contact for quality control purposes.	Impact Research will only provide the means (names and contact details of customers) for Electricity North West to re-contact customers where informed consent has been obtained.
Members must ensure that a participant's right to withdraw from a project at any stage is respected.	Impact Research will give all customers, with whom it engages, the opportunity to opt-out of engagement and/or future communication regarding the Respond Project. In doing so it will keep a log of customers that have opted out and share this with Electricity North West.
Members must take reasonable steps to ensure that the following activities do not take place before 9am Monday to Saturday, 10am Sunday or after 9pm any day, unless by prior agreement: a. In person visits to private homes b. Calls to household landline telephone numbers c. Calls to mobile telephone numbers d. Messages via SMS or other direct message facilities to mobile telephones	Impact Research follows the guidelines suggested by the Market Research Society, with the exception that it has a lower threshold of no engagement taking place beyond 8pm at night. Engagement relates to: a. In-person visits to industrial and/or commercial premises. b. Calls to industrial and/or commercial telephone numbers c. Calls to mobile telephone numbers d. Messages via SMS or other direct message facilities to mobile telephones.

Impact Research is registered as a data controller with the Information Commissioner under the Data Protection Act 1998, registration number is Z2226132.

- PSR customers:** The company's PSR database holds details of special requirements for individual PSR customers. This sensitive data will not be shared with any Partner or organisation outside Electricity North West. There is no requirement for Impact Research to specifically target PSR customers to take part in the ECP or customer surveys.

A list of data items being processed in connection with the Respond Project is detailed in Appendix B.

3 HOW PERSONAL DATA WILL BE USED IN RESPOND

The Project will use names, addresses and telephone numbers of customers from the existing customer contact database to introduce the scope and impact of the Respond Project to recruit customers to take part in customer engagement activities, including the ECP and customer surveys.

The customer's location will be provided by reference to a substation name and number, circuit reference, meter point administration number (MPAN) and premise address.

Electricity North West will not pass customer names and addresses to third parties, other than those Partners who have a specific need for this information as part of the Project and only where the consent of each customer to process their personal data in this manner has been obtained. All Project Partners are committed to adhere to the DPS as part of their contractual obligations.

At the end of the Project and as part of disseminating the learning and outcomes, aggregated data and the results of the Project will be shared with interested parties such as other DNOs and academic institutions. Any data shared with interested parties or published for general readership will not contain any personal data. No personal data will be provided to any third parties for any marketing activity. Electricity North West will not use this Project or any information collected in connection with the Project to market any products or services to customers unless informed consent has been granted, specifically in relation to further engagements about a FCL service. Customers may be contacted about any supply quality problems that might be identified during the course of the Trials.

4 OBTAINING CONSENT FOR THE USE OF PERSONAL DATA

Participation of customers will be via agreement to take part in one or more of the following activities: the engaged customer panel, pilot of the customer survey materials, the customer survey, the Respond (FCL service) Trial. Customers who agree to participate in any of these activities will be fully informed by the market research provider (Impact Research) about how their data will be used and shared before signing up. Customers will be asked to sign a consent form (or agree electronically) and by doing so, they will agree to their information being used for pre-defined purposes. A draft of the consent form is detailed in Appendix A.

Impact Research will also inform customers that their personal data will not be included or shown (in a disaggregated manner) in any customer analysis, without prior consent to do so.

5 INFORMATION PROVIDED TO THE CUSTOMER PRIOR TO CONSENT BEING SOUGHT

The Respond Project team will identify Electricity North West customers who are eligible to take part in the ECP or customer survey, make them aware of the scope of the Project and inform them of any impact that participating in the Trial may have on them.

Project Partners, ENER-G and ADE, will work in partnership with Impact Research to introduce Respond to their members and customers to convene an ECP and use appropriate communications materials tested and refined by the ECP to provide a means of inviting their customers and members to voluntarily register interest in taking part in the customer survey and subsequent Trials.

Customers who agree to participate in any form of customer engagement will be fully informed about how their data will be used prior to signing up and completing a consent form

6 PRIORITY SERVICES REGISTER CUSTOMERS

Electricity North West maintains a priority services register (PSR) of vulnerable customers or those who may be reliant on electricity for medical reasons. Customers on the PSR will not be directly impacted by the Respond Project. As such, there are no plans to engage with PSR customers on an individual basis and no sensitive personal data will be passed to organisations outside Electricity North West.

7 OWNERSHIP OF PERSONAL DATA

Personal data collected by or on behalf of Electricity North West will be owned by the individual to whom it relates and held by Electricity North West.

Personal data provided by third parties will be owned by the individual to whom it relates and held by third parties and Electricity North West.

8 RETAINING PERSONAL DATA

Electricity North West will retain its existing database of customers' names, contact details and profile status, as this is held for normal business purposes to provide services to customers. Data is stored in a secure, confidential and appropriate manner. It will only be retained while relevant and only disclosed to third parties where appropriate or with explicit consent.

More detailed information on the storage and retention of data is outlined in Appendix C.

Electricity North West will not retain any other personal data collected during the Project, beyond the life of the Project.

Anonymised technical data will be retained. This will not contain any personal data.

Impact Research will collect data from various customer groups through a combination of qualitative and quantitative customer engagements methods. Customers who participate in any customer engagement with Impact Research will be fully informed of how their data will be used before agreeing to take part. All data will be stored in a secure, confidential and appropriate manner and will be accessible only to the Respond Project team for the duration of the Project. All data relating to the Project will be retained for two years after completion of the Project when it will be destroyed or anonymised.

9 MANAGING PERSONAL DATA BASED ON THE PRIVACY BY DESIGN APPROACH

Electricity North West will continue to manage its existing database of customers' names, contact details and in accordance with the ICO data protection public register.

Electricity North West's IT systems are secure and managed with the principles of ISO27001. Data is managed according to Electricity North West's IT security policies. The policies are reviewed annually and reissued to all users to remind them of their responsibilities.

Data provided to any third party involved in the Project for analysis will not contain any personal data unless there is a specific need for this information as part of the Project. This data privacy strategy has been developed following the guidance issued by the information commissioner.

This Project complies with Electricity North West's existing data protection policy which is based on the Data Protection Act. This is based on Data Protection Act's 8 Principles of Information Handling. Electricity North West is registered with the UK ICO for the use of personal customer data.

The Respond Project has taken account of the principles of Privacy by Design and the Data Protection Act as follows:

- The potential impact of the Project on the privacy of individuals has been assessed to ensure that data privacy is integral to the design of the Respond methodology and to

minimise the risks to privacy as a result of processing personal data. One of the main objectives has been to minimise the requirement to collect, process or show personal data in connection with the Project.

- Personal data about individuals involved in the Project will be processed in accordance with existing systems and business practices.
- The Project will respect the interests of customers by providing appropriate information about required data as part of the Project, with whom the data will be shared and for what purpose it will be used.
- The Project approach recognises the need for privacy of customers' data as well as the need to develop the technologies and processes required for future smart grids.
- When data collected is shared in connection with the Project with Partner organisations, it will only contain customer names, addresses and data that is specifically required for the execution of their Project roles. Data will be shared by secure means. Its use, retention, security and confidentiality will be restricted in written contracts.
- Any personal data collected during the Project will be securely retained or destroyed. Electricity North West has appropriate security and organisational procedures in place, which will ensure the robustness of data collection and storage systems.
- Personal data will not be passed to third parties for marketing purposes.

APPENDIX A – DRAFT RESEARCH PARTICIPATION CONSENT FORMS

ECP consent form (draft)

Research Participation Consent Form

The interview/s you take part in will be audio recorded.

The Data Protection Act requires that Electricity North West collects and uses the information you provide to it in a manner that respects and protects your confidentiality. Your personal details (name, address, phone number) will not be disclosed to anyone else without your permission other than to Impact Research and Electricity North West.

In most cases the audio recording will be heard and the transcription read **only by the transcriber and researchers from the research company.** The transcript will only be read/audio recording listened to for research purposes and only to pursue the aims of the study. Excerpts from the transcripts may be used to illustrate the research findings. This will always be done in a way to protect your identity ie comments will not be attributed to you personally.

The recordings will not be used for non-research purposes, such as promotion or direct sales activities. They will be dated and deleted, at the latest, two years after the research is completed. In **exceptional cases** the audio recording will be listened to/the transcription read by employees at Electricity North West working on this Project. In these circumstances, the Respond team will go through the recordings first to delete any references that may allow Electricity North West to identify you personally.

You may find the following questions and answers helpful in understanding what data will be collected from you and how it will be used. **Please read this information and indicate your consent at the bottom of the form.**

What is the purpose of market research?

Market research attempts to generate understanding and knowledge about customer behaviour within it, by gaining information (data) from specific samples of customers and extending results to the population as a whole.

Market research is scientifically-conducted research where the identity of respondents, and all personal data they give to the researchers, are kept fully confidential, and cannot be disclosed or used, for any non-research purpose.

Market research is not a commercial communication or a selling opportunity. Market research has no interest in the individual identity of respondents.

Who is Impact Research?

Impact Research is an independent market research agency whose registered address is
3 The Quintet, Churchfield Road, Walton on Thames, Surrey, KT12 2TZ.

What is personal data?

The following definitions are taken from the Data Protection Act 1998.

‘Personal data’ is defined as any information which is capable of being used to identify a living individual.

In addition to name, address and contact details, this could include individual preferences, transactional history, and record of activities or travel, profiles or credit scores.

'Sensitive personal data' is defined as any personal data that relates to any of the following: racial or ethnic origin, political opinions, religious or other similar beliefs, trade union membership, physical or mental health, sexual life, criminal convictions or proceedings.

What personal or sensitive personal data will be collected from you?

You will be asked to provide Impact Research with your contact details so that Electricity North West or its Partners are able to re-contact you to take part in market research. Any answers you give in the interviews will be treated in confidence in accordance with the Code of Conduct of the Market Research Society.

This means that all of the information collected will be used for research purposes only and it will not be possible to identify any particular individual or address in the results.

Who will this personal or sensitive personal data be shared with?

At the end of the Project and as part of sharing the learning and outcomes, aggregated data and the results of the Project will be shared with interested parties such as other electricity companies and academic institutions. Any data shared with interested parties or published for general readership will not contain any personal data.

No personal data will be provided to any third parties for any marketing activity.

Electricity North West will not use this Project or any information collected in connection with the Project to market any products or services to customers.

Customers may be contacted about any supply quality problems that are identified through the feedback they give, but only if they have given their consent for this.

So that this is absolutely clear, we would like you to now sign the following statement:

I am happy to have the feedback I give through participating in this market research attributed to me so that Electricity North West are aware that I have taken part in this market research.

Please circle: YES / NO

I am happy for Impact Research to get in touch with me again in the future to discuss the service I receive from Electricity North West for market research purposes.

Please circle: YES / NO

I am happy for my data to be passed to Electricity North West in order that they can discuss with me any aspect of my electricity supply in the future.

Please circle: YES / NO

I agree that after the above explanation, I was given the option not to take part in the engaged customer panel, if I had any reservations.

Your full name

Company name.....

Signed

Date.....

Pilot, customer survey and Trial survey consent form (DRAFT)

Research Participation Consent Form

If you choose to complete this survey, the responses you give will be automatically captured.

Should you choose to have telephone support, the interview you take part in may be audio recorded.

The Data Protection Act requires that Electricity North West collects and uses the information you provide to it in a manner that respects and protects your confidentiality. Your personal details (name, address, phone number) will not be disclosed to anyone else without your permission other than to Impact Research and Electricity North West.

You may find the following questions and answers helpful in understanding what data will be collected from you and how it will be used. **Please read this information and indicate your consent at the bottom of the form.**

What is the purpose of market research?

Market research attempts to generate understanding and knowledge about customer behaviour within it, by gaining information (*data*) from specific samples of customers and extending results to the population as a whole.

Market research is scientifically-conducted research where the identity of respondents, and all personal data they give to the researchers, are kept fully confidential, and cannot be disclosed or used, for any non-research purpose.

Market research is not a commercial communication or a selling opportunity. Market research has no interest in the individual identity of respondents.

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In addition to name, address and contact details, this could include individual preferences, transactional history, and record of activities or travel, profiles or credit scores.

'Sensitive personal data' is defined as any personal data that relates to any of the following: racial or ethnic origin, political opinions, religious or other similar beliefs, trade union membership, physical or mental health, sexual life, criminal convictions or proceedings.

What personal or sensitive personal data will be collected from you?

You will be asked to provide Impact Research with your contact details so that Electricity North West or its Partners are able to re-contact you to take part in market research. Any answers you give in the interviews will be treated in confidence in accordance with the Code of Conduct of the Market Research Society.

This means that all of the information collected will be used for research purposes only and it will not be possible to identify any particular individual or address in the results.

Who will this personal or sensitive personal data be shared with?

At the end of the Project and as part of sharing the learning and outcomes, aggregated data and the results of the Project will be shared with interested parties such as other electricity companies and academic institutions. Any data shared with interested parties or published for general readership will not contain any personal data.

No personal data will be provided to any third parties for any marketing activity.

Electricity North West will not use this Project or any information collected in connection with the Project to market any products or services to customers, unless you have given your express permission to do so.

Customers may be contacted about any supply quality problems that are identified through the feedback they give, but only if they have given their consent for this.

So that this is absolutely clear, we would like you to now read and complete the following statement:

I agree to take part in this research and for my feedback to be used as outlined above.

Please select one: YES / NO

I am happy to have the feedback I give through participating in this market research attributed to me so that Electricity North West are aware that I have taken part in this market research.

Please select one: YES / NO

I am happy for my data to be passed to Electricity North West in order that they can discuss any aspect of FCLS with me in the future.

Please select one: YES / NO

I am happy for Impact Research to get in touch with me again in the future to discuss the service I receive from Electricity North West for market research purposes.

Please select one: YES / NO

Your full name

Company name.....

Signed

Date.....

APPENDIX B – DATA BEING PROCESSED FOR RESPOND

Data item	Source of data	Is this personal data?	What is the purpose of processing this personal data	Is this being passed to a third party outside Electricity North West?
MPAN (meter point administration number)	Electricity North West customer database or provided by third parties	No	n/a	Yes, to Impact Research, customer engagement provider)
Supplier name	Electricity North West customer database or provided by third parties	No	n/a	Yes, to Impact Research, customer engagement provider
Customer name	Electricity North West customer database or provided by third parties	Yes	Customer communications and engagement	Yes, to Impact Research, customer engagement provider
Customer address	Electricity North West Customer database or provided by third parties	Yes	Customer communications and engagement	Yes, to Impact Research, customer engagement provider
Customer location - transformer name and number, LV feeder reference and distance from feeder end	Electricity North West geographical information system	No	n/a	Yes to Impact Research, customer engagement provider
PSR status	Electricity North West customer database or provided by third parties	Yes	Customer communication	No
Customer Profile Status	Electricity North West customer database or provided by third parties	No	n/a	Yes, to Impact Research, customer engagement provider

APPENDIX C – ELECTRICITY NORTH WEST’S DATA PROTECTION POLICY

- 1. Purpose**
- 2. Scope**
- 3. Policy statement**
- 4. Definition of data**
- 5. Complying with data protection principles**
- 6. Disclosure and processing of personal Information**
- 7. Responsibility**
- 8. List of associated documents**

Purpose

The intention of this policy is to define the responsibilities of both you and the company in adhering to legislation regarding data protection and to offer reassurances to you regarding the secure processing of your own and other individuals’ personal data.

The policy outlines the standards and procedures for the processing and protection of personal data contained within manual files and on computerised systems, in order to comply with the Data Protection Act 1998. The Act regulates the use of personal data and gives effect in UK law to the European Directive on Data Protection. Failure to comply can ultimately lead to a criminal offence being committed, a fine to us and consequential damage to our reputation.

We hold two main types of personal data:

- relating to workers and potential workers
- relating to customers

Scope

All computerised and manual records concerning current, former, permanent and temporary employees of Electricity North West and its associated businesses, and customers and the general public. In terms of recruitment and selection it also applies to all successful and unsuccessful applicants.

Policy statement

We will process personal data in a manner that complies with the principles of good practice in the Data Protection Act.

Data will be stored in a secure, confidential and appropriate manner. It will only be retained while relevant and will only be disclosed to third parties where appropriate or with explicit consent.

All information held within our computer systems are subject to the information technology security policies. Copies of these policies are available from the Volt.

Failure to process personal data appropriately could result in disciplinary action and in some cases criminal prosecution if information is inappropriately processed or used in a manner for which is was not intended.

Definition of data

The 1998 Act defines **data** as: information which is processed automatically, recorded for this purpose, recorded as part of a relevant filing system and / or forming part of an accessible record. The definition includes both computer and structured paper files. Data is categorised as:

- **Personal data:** Relates to a living person who can be identified from that data and includes any expression of opinion or intention in respect of an individual. Personal data can include: name, date of birth, salary, next of kin details, address and telephone numbers, personnel and development information, health information, bank account details and can be found in a variety of documents or records, for example e-mails regarding an individual and notes regarding an individual. This also includes customer call notes if they relate to an identifiable individual.
- **Sensitive data:** Is personal data relating to race and ethnic origin, political or religious belief, trades union membership, physical or mental health, sexual orientation, criminal offences or sentences. This also includes priority services register (PSR) customers where the customer is reliant on electricity for a medical need.
- **Data subject:** The individual of which data is being disclosed or held.

Complying with data protection principles

Everyone who processes personal data (meaning the obtaining, holding, accessing, viewing, recording or carrying out any activity such as amending, altering or deleting) must ensure that they comply with the eight principles set out in the Act as part of their job.

Personal data:

- Must be processed fairly and lawfully and not processed unless certain conditions are met
- Should be obtained for specified and lawful purposes only and not used in any way which is incompatible with those purposes
- Should be adequate, relevant and not excessive in relation to the purpose
- Should be accurate and kept up to date
- Shall not be kept for longer than is necessary for the specified purpose
- Shall be processed in accordance with your rights
- Shall be held in a secure manner to prevent unauthorised processing, loss, destruction of or damage to the data
- Shall not be transferred to certain non-EU countries unless suitable protection for your rights is ensured.

Disclosure and processing of personal information

Before any **personal data** can be processed at least one of the conditions set out in the act must be met. These include:

- Consent has been given to the processing
- The processing is necessary for the performance or setting up of a contract or other contract to which the data subject is party

- Processing is necessary for non-contractual legal obligations (e.g. Health and Safety)
- Processing is necessary to protect the data subjects vital interests
- Processing is necessary for the administration of justice or functions of a public nature
- Processing is necessary for the user's or recipient's legitimate interests and there is no unwarranted prejudice to the individual.

In addition at least one of the following further set of conditions must be met before processing **sensitive personal data**. These include:

- Explicit consent has been given to the processing
- Processing is for legal requirements or rights in connection with employment
- Processing is necessary to protect the data subject's or another person's vital interests
- Processing is necessary in connection with legal advice or proceedings
- Processing is necessary for administration of justice or exercise of crown functions
- Processing is necessary for medical purposes and is undertaken by a health professional.

Responsibility

Under the Act any data subject has certain rights. Subject to making a formal request in writing, these include:

- The right to be told of data held relating to them
- The right to receive a copy of that data
- The right to seek correction of any incorrect data.

Once requested in writing and the data subject's identity has been verified the company has a legal obligation to respond to the request with 40 calendar days, although where possible we endeavour to respond within 10 working days. Whilst we are eligible to levy a £10 administration charge for the completion of this process, in normal circumstances such a charge will not be made.

The data compliance procedures for the disclosing and processing of personal information are available from HR.

Electricity North West is committed to fulfilling our obligations in respect of the Data Protection Act 1998 and ensuring that it, and any third parties with access to personal data (eg recruitment agencies), have processes, which are compliant with the legislation.

It is the duty of all of us to conform to our policy and procedures and to accept and carry out our responsibilities in accordance with the Data Protection Act 1998. Failure to do so could amount to gross misconduct and lead to disciplinary action. You are required to familiarise yourself with the requirements under the Act.

Personal data must be treated with due care and respect of the person it concerns. Unnecessary data must not be collected or held any data for longer than is absolutely necessary. Any data held should be accurate and up to date.

All those persons referred to within the scope of this policy are required to adhere to its terms and conditions.

Individual managers are responsible for ensuring that this policy is applied within their own area. Any queries on the application or interpretation of this policy may be discussed with HR prior to any action being taken.

The HR department has the responsibility for ensuring the maintenance, regular review and updating of this policy. The HR director will approve amendments to the policy.

List of associated documents

This policy is underpinned by and linked to other HR and IS policies including:

- Discipline policy
- Information technology security policies including e-mail and internet policies
- Employee monitoring.