

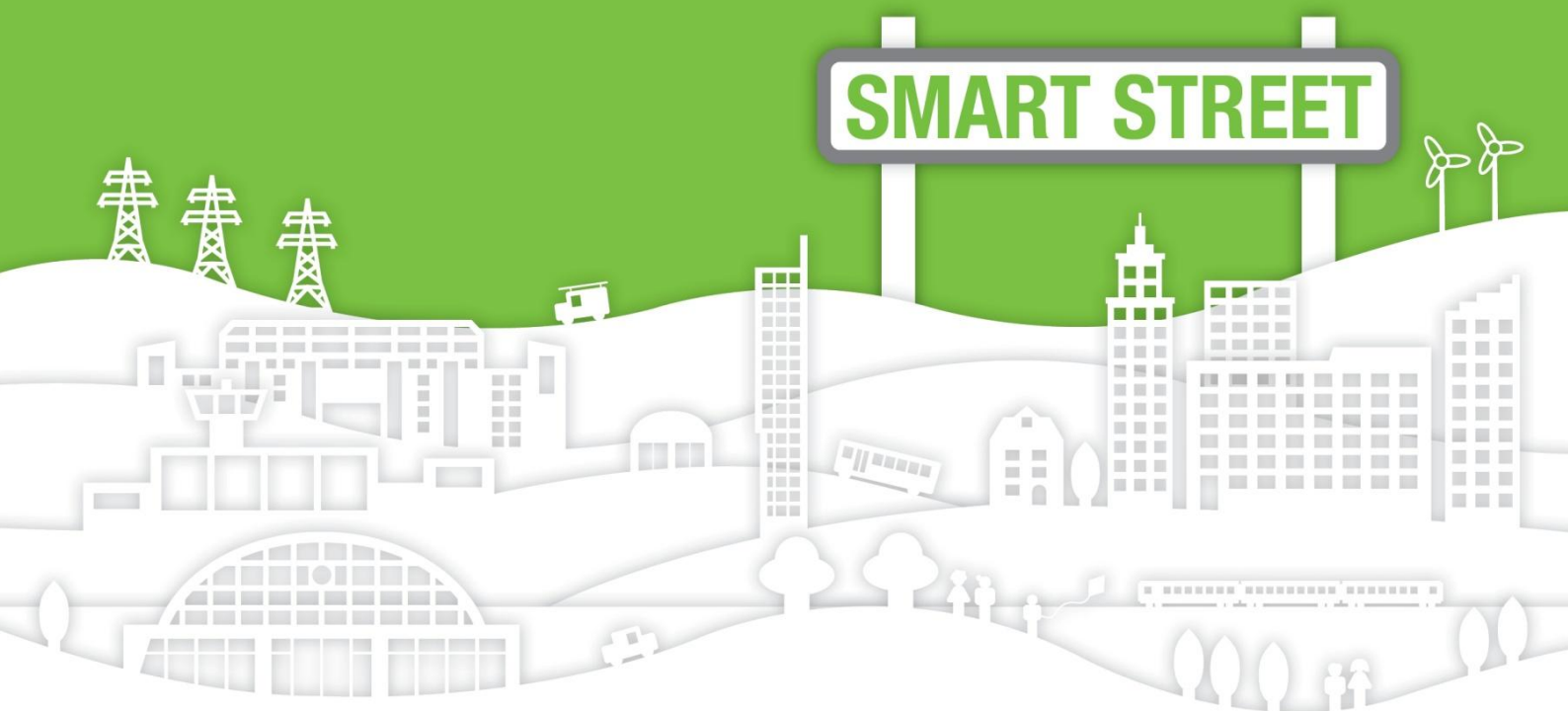


Smart Street Data Privacy Statement

26 June 2014

A white sign with a grey border and a drop shadow, mounted on two white posts. The sign contains the text "SMART STREET" in a bold, green, sans-serif font. The sign is positioned in the middle ground of a stylized cityscape.

SMART STREET



CONTENTS

- 1 THE SMART STREET PROJECT..... 5**
- 2 DATA BEING COLLECTED FOR THE SMART STREET PROJECT..... 8**
- 3 HOW PERSONAL DATA WILL BE USED IN SMART STREET..... 10**
- 4 OBTAINING CONSENT FOR THE USE OF PERSONAL DATA..... 10**
- 5 INFORMATION PROVIDED TO THE CUSTOMER PRIOR TO CONSENT BEING SOUGHT..... 11**
- 6 PRIORITY SERVICES REGISTER CUSTOMERS..... 11**
- 7 OWNERSHIP OF PERSONAL DATA..... 11**
- 8 RETAINING PERSONAL DATA..... 11**
- 9 MANAGING PERSONAL DATA BASED ON THE PRIVACY BY DESIGN APPROACH..... 11**

VERSION HISTORY

Version	Date	Author	Status (draft, etc)	Comments
V0.1	12 June 2014	M Brainch	1 st issue	First issue
V0.2	16 June 2014	J Stell	2 nd issue	Reformatted, applied consistent use of language and incorporated comments from R Somerville and T Coatsworth
V2.0	26 June 2014	K Quigley	3 rd issue	Amended following feedback from Ofgem

EXECUTIVE SUMMARY

The Smart Street Project is funded via Ofgem's Low Carbon Networks (LCN) second tier funding mechanism. Electricity North West received formal notification of selection for funding on 29 November 2013. The Project is due for completion by 31 December 2017.

As the demand for electricity is expected to double by 2050, the Smart Street Trials aim to test innovative technologies to ensure the network is fully prepared for the increase in solar panels, electric vehicles and heat pumps. The Project has the potential to lead to lower bills for customers by helping appliances run more efficiently.

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

Some personal data will be collected as part of the customer focus group surveys that will be undertaken to assess whether customers observe any changes in the quality of their electricity supply as a result of the Smart Street Trials. This data privacy statement describes how this personal data will be managed and summarises the steps that will be taken to comply with the Data Protection Act 1998.

The key highlights from the Smart Street 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 Smart Street 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 recruit customers for the engaged customer panel (ECP) who will be asked to give feedback in a power quality survey. This personal data is held as part of day-to-day operations in the customer contact centre to help identify customers and provide business as usual services eg fault management, proactive updates, planned supply interruptions etc. All such personal data held by Electricity North West is stored in a secure, confidential and appropriate manner.
- Impact Research, one of the Smart Street Partners, will use this data to recruit customers to participate in the Smart Street ECP. In doing so, Impact Research will comply with all requirements of Electricity North West's data protection policy, as described above.
- Analysis of the ECP group discussions and surveys will enable Electricity North West to disseminate information about Smart Street. 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 for the purposes of this Project will be obtained as part of the survey process.

- 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; access to this data is restricted.
- The Smart Street Trials are not expected to have any adverse impacts on PSR customers. However, PSR customers in the Trial areas will be provided with contact details of the Project team. The team are contactable via Electricity North West's customer contact centre (CCC), by telephone on 0800 195 4141, by SMS/text messaging facility, by email or by a postal address for written correspondence.

1 THE SMART STREET PROJECT

1.1 Background and context

Current trends towards a significant increase in electricity demand driven by greater levels of low carbon technologies (LCTs), combined with an increased uptake of renewable and low carbon energy generation, will present new challenges to operators of electricity networks in Great Britain (GB). These trends have the potential and would traditionally necessitate expensive capital investments, which are carbon-intensive in terms of manufacture and installation and cause considerable customer and traffic disruption.

Innovative approaches are therefore required to manage electricity networks, maximise the use of existing assets and defer or negate network reinforcement costs, which are inevitably passed on to customers.

Electricity North West is leading a number of innovative projects including Smart Street, which will demonstrate a low cost, rapidly deployable solution that applies innovative and active voltage management to provide a range of demand response capabilities and network voltage regulation services. Through the application of novel solutions, the Smart Street Project aims to introduce low voltage (LV) network control and visibility and co-ordinate network configuration and voltage optimisation across high voltage (HV) and LV circuits. This will be achieved via innovative equipment, dynamic voltage control and network reconfiguration methodologies which will deliver short, medium and longer term benefits for the customers of GB distribution network operators (DNOs).

Smart Street has the potential to minimise the need for costly asset-based interventions and make a positive contribution to a low carbon future.

Smart Street is funded by Ofgem's Low Carbon Networks (LCN) second tier funding mechanism. The Project is being delivered by Electricity North West in partnership with key industrial and academic Partners (Siemens, Kelvatek and Impact Research) and key suppliers – The Tyndall Centre, Queen's University, Belfast and the University of Manchester. Formal notification of selection for funding was received from Ofgem on 29 November 2013. The Project is due for completion by 31 December 2017.

Some of the current challenges faced by electricity network operators, which are expected to increase if current trends in demand continue, are outlined below. Smart Street is seeking to address these problems by exploring new network management and voltage methodologies.

1.2 Voltage management in a low carbon future

Traditionally there has been limited voltage regulation on distribution networks with none on the low voltage part of the network. The introduction of multiple LCTs with their differing operating regimes will result in complex network flow patterns making managing the real time network voltage within statutory limits a considerable challenge. DNOs must therefore adapt the design and operation of their networks to facilitate efficient connection of new LCTs, while maintaining power quality and network voltage within mandated limits.

As LCT volumes increase, HV and LV networks will require effective and efficient intervention techniques that are a viable alternative to traditional reinforcement to enable the networks to manage the thermal, harmonic and voltage challenges created by LCTs.

As a response to this requirement, Smart Street is a first intervention technique which is fast, releases significant network capacity and controls network voltages and harmonics within designated limits. The innovative voltage management technologies used by Smart Street can, in addition, deliver true cost savings to customers beyond network costs, namely reducing losses and reducing energy consumption.

1.3 LV network management and interconnection

The Smart Street Method combines the concepts of interconnection of networks, developed within the Capacity to Customers (C₂C) Project, and voltage control, developed within CLASS (Customer Load Active System Services). Previous projects focused on EHV (extra high voltage) and HV networks. Smart Street extends these technologies and their benefits down the voltage levels to encompass HV and LV networks. Smart Street utilises advanced real time optimisation software to simultaneously manage all EHV, HV and LV network assets to respond to customers' changing demands in the most efficient end-to-end manner.

The three key incremental steps in the Smart Street Method are the application of:

- Co-ordinated voltage control, using on-load tap changing transformers and capacitors across EHV, HV and LV networks
- Interconnecting traditionally radial HV and LV circuits and assuming control of these networks within the central control room
- Real-time co-ordinated configuration and voltage optimisation of HV and LV networks.

The four-year Smart Street Project, starting January 2014, will employ these techniques to demonstrate that a network operator can quickly release capacity and voltage headroom to facilitate the connection of LCTs and, at the same time, operate a cost, carbon and energy efficient distribution network.

The themes of LV network management and interconnection, HV and LV voltage control and network configuration and voltage optimisation are the key interlinking aspects of the Smart Street Method.

1.4 The Solution which will be enabled by solving the Problem

The Smart Street Solution is a novel method to deliver additional benefits to customers through the use of existing assets. It is quick to implement and will define the optimum order of a series of low cost interventions to be applied to networks as customers adopt LCTs. Many of the carbon losses and energy benefits of Smart Street can be obtained by applying the technology to existing networks now. Throughout the Smart Street Project a number of outputs will be generated. The sharing of these outputs will allow other DNOs to quickly and effectively implement the Smart Street Solution.

The key learning outcomes are:

- *Installation methodologies:* Smart Street will publish detailed installation methodologies for the retrofitting of network management and voltage regulation equipment onto the Trial networks.
- *Network management system configuration:* Smart Street will publish the functional specifications for LV network management and automation and the new interface arrangements with the optimisation software.

- *Transforming LV radial networks:* Smart Street will develop a methodology for interconnecting LV networks, including design considerations, the selection and deployment of voltage regulation equipment and the protection arrangements required for safe interconnected operation, particularly for fault scenarios and cold load pick-up.
- *Change proposals for design and operational standards:* Smart Street will propose changes to existing industry standards, such as ENA ER P5-5 and ACE Reports Nos.3, 49 and 105, on the design and operation of low voltage distribution networks including the optimal number of interconnection points.
- *Safe working practices:* Smart Street will publish the changes required to Electricity North West's existing engineering policy documents, code of practices and authorisation procedures facilitating LV network management.
- *HV and LV voltage control:* Smart Street will deliver the results of the study on co-ordinated optimisation of voltage across HV and LV networks using on-load tap changer capabilities and capacitors.
- *Network configuration and voltage optimisation:* Smart Street will publish the functional specifications, settings and configuration parameters required to optimise the operation of the distribution networks to deliver a range of specified outcomes such as carbon, losses and energy reduction.
- *Customer engagement and feedback:* Smart Street will describe the method for engaging customers in the Smart Street Trials and detail their feedback, testing the hypothesis that customers are not affected.

1.5 The role of data in Smart Street

To enable robust analysis to be undertaken to assess the effects and viability of the Smart Street concept, a range of data will be collected during the life of the Project.

The majority of the data collected will be technical in nature and assessed at a network level.

The Smart Street technique and Project methodology means there will be only minimal use and need for personal data.

The types of data that are relevant to Smart Street are described in greater detail in the subsequent sections.

1.6 The time period over which data will be collected in Smart Street

The Smart Street Trials will take place over a two year period. The Trial design for Smart Street is to operate the distribution networks as normal for a defined period and then apply the Method for the same length of time. This OFF/ ON arrangement, applied over a two-year period will result in a full year's worth of network data under normal operating conditions and a year's worth of corresponding data showing the network profile when the Smart Street Method is applied. This direct comparison will provide a robust end-to-end data set for analysis, which will effectively demonstrate any changes in the two operating regimes. The OFF/ ON Trial design and network monitoring, negates the need to conduct measurement in customers' premises. This benefit avoids any interference with the programme of smart meter roll-out and prevents sensitising customers which might result in changes in their behaviour.

2 DATA BEING COLLECTED FOR THE SMART STREET 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 Smart Street?

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 activities that will be undertaken during the Smart Street Project that may involve measurement and/or data collection are outlined below:

- **Customer surveys:** A relatively small number of surveys will be undertaken with the engaged customer panel to assess whether customers observe any changes to their electricity supply. To recruit customers and conduct surveys during the Smart Street trials, a limited amount of personal data (customer names and addresses) from customers in the trial areas will be passed to Project Partner, Impact Research. 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 most customers joining the ECP will be recruited via telephone by Impact Research using the customer data provided by Electricity North West. During the actual surveys, no further personal data will be collected. The surveys will seek to assess customer perceptions of power quality following Trial periods eg "Thinking specifically about the lighting in your home, have you noticed any of the following: dimming of lights, flickering of lights or brightening of lights?", rather than seeking to obtain any personal information from them. In order to assess the impact of the Smart Street Trials on customers who rely on medical equipment, Impact Research will collect data from survey participants about any such individual requirements. However, this sensitive data will not be shared with any organisations outside of Electricity North West and all survey results will be anonymised.

Any customer data 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. 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 Trials will identify PSR customers connected to Smart Street circuits in order to inform them of any impact the Trials may have on them. No sensitive personal data will be passed to organisations outside of Electricity North West. The following personal information will be extracted from Electricity North West's existing customer database and used for the purposes of general customer communication. This is consistent with the purpose for which it was provided.
 - Names, addresses and PSR status of customers connected to selected substations
 - Names and addresses and PSR status of customers connected to selected feeders.

The company's PSR database holds details of special requirements for individual PSR customers. This sensitive data will not be shared with any 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 Smart Street Project is detailed in Appendix A.

- **LV network management and interconnection:** The LV network configuration control will be established using a new retrofit LV vacuum circuit breaker, the WEEZAP, and retrofit remote control link box switch, the LYNX. The WEEZAP and the LYNX can be operated both locally (on-site), and remotely from Electricity North West's control room. In addition to remote operation, WEEZAPs will provide network monitoring (voltage, current, power flow and harmonics) and advanced adaptive protection coupled with network fault detection capability and automatic fault reclose functions. The data collected by the WEEZAP will be used to analyse network operation during the Trials. No personal data is collected, used, shared or in any way relevant to this process.
- **Mitigating against anomalies in network metered data:** In Smart Street the following data will also be recorded and tracked so that any anomalies in the network metered data can be explained:
 - Network performance data (eg faults, customer complaints, voltage complaints etc) to understand extraneous impacts. In the event of a customer complaint, a name and address will be collected in line with standard business practises to ensure the issue is handled appropriately, in line with the company's published procedures; the outcome is communicated back to the customer.
 - Monthly consumption of local grid and bulk supply points to check whether the Trial networks are seeing the same local consumption patterns / trends. This contains no personal data.
 - Standard weather data (hourly observations of temperature, wind speed, cloud cover, precipitation and humidity at north and south weather stations) for normalising the recorded consumption data. This contains no personal data.
 - Economic data (eg gross domestic product, salaries, electricity and gas prices and retail price index) to understand extraneous changes in behaviour from economic activity, using metrics appropriate to the North West of England where possible. This also contains no personal data.

- **Technology effectiveness:** The effectiveness of the technology will be trialled by installing monitoring equipment on selected Trial circuits and taking real time data from the network. This allows the Smart Street team to monitor the actual performance and conduct a series of network simulations and modelling exercises while quantifying the extent of any changes in power quality provided to the end customer. This contains no personal data.

3 HOW PERSONAL DATA WILL BE USED IN SMART STREET

The Project will use names and addresses and PSR status of customers from the existing customer contact database to write to them to explain the scope and impact of the Smart Street Project.

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

In addition to engaging with customers in the Trial areas to explain the scope and impact of Smart Street, Electricity North West will also send prior written notification to all customers on the Trial networks who will experience an unavoidable planned supply interruption during the installation of enabling Smart Street equipment. This activity will involve using addresses of customers from the existing customer contact database. These customers will receive written notification, in accordance with planned supply interruption Guaranteed Standards of Service and business as usual procedures. The Smart Street team will also use the priority services register to identify vulnerable customers and contact them by telephone, in addition to sending the standard written notification.

Electricity North West will not pass customer names and addresses to third parties, other than to 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 DPA 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, including 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 marketing or any other activity. Electricity North West will not use this Project data 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 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 the engaged customer panel. Customers who agree to participate 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 and, by doing so, they will agree to their information being used. A draft of the consent form is detailed in Appendix B.

Impact Research will also inform customers that their personal data will not be included or shown (in a disaggregated manner) in any customer Trial analysis.

5 INFORMATION PROVIDED TO THE CUSTOMER PRIOR TO CONSENT BEING SOUGHT

The Trial process will identify customers connected to Trial circuits in order to make them aware of the scope of the Smart Street Trials and inform them of any impact the Trials may have on them. Customers who agree to participate in the engaged customer panel and surveys will be fully informed about how their data will be used prior to signing up.

6 PRIORITY SERVICES REGISTER CUSTOMERS

The Trial process will identify PSR customers connected to Trial circuits so they can be made aware of the scope of the Trials and informed of any impact the Trials may have on them. 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 PSR status, as this is held for normal business purposes to provide electricity distribution 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.

Only anonymised technical data will be retained. This will not contain any personal data.

Impact Research will collect data from various customer groups through a number of qualitative customer surveys. This data will be used to undertake ongoing analysis to assess participants' perceptions of any impact of the Smart Street Trials. Customers who participate in any customer engagement with Impact Research will be fully informed of how their data will be used when they sign up. All data will be stored in a secure, confidential and appropriate manner and will be accessible only to the Smart Street Project team for the duration of the Project. All data relating to the Project will be retained until 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 PSR status in accordance with the ICO data protection public register.

Electricity North West's IT systems are secure and managed in line with the principles of ISO27001. Data is managed according to its IT security policies. The policies are reviewed annually and employees are regularly reminded of their responsibilities.

Data monitors left installed on the Smart Street networks after the Trials may continue to provide network data to Electricity North West and the captured data may assist in the development of a smart grid. This equipment does not collect personal data. The data provided to any other third party 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 Smart Street 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 Smart Street 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 using secure means such as secure file transfer and file encryption. 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 – DATA BEING PROCESSED FOR SMART STREET

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 market research Partner – Impact Research)
Supplier name	Electricity North West customer database or provided by third parties*	No	n/a	Yes (to market research Partner – Impact Research)
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
Voltage at substation	Equipment at Electricity North West Substation	No	n/a	Yes
Voltage at points on the network	Equipment installed on Electricity North West network	No	n/a	Yes

* Customer data is provided to Electricity North West by electricity suppliers. This personal data is held as part of day-to-day operations in the customer contact centre to help identify customers and provide business as usual services eg fault management, proactive updates and planned supply interruptions etc.

APPENDIX B - RESEARCH PARTICIPATION CONSENT FORM

Research Participation Consent Form:

The group discussion or interview you take part in will be:

- Audio recorded
- Video recorded
- Observed by people in the room/from another room/location

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 tapes will be heard/watched and the transcription read **only by the transcriber and researchers from the research company.** The transcript will only be read/audio tape listened to/video tape watched for research purposes and only to pursue the aims of the study. Excerpts from the transcripts or tapes may be used to illustrate the research findings. This will always be done in a way to protect your identity (eg comments will not be attributed to you personally).

The tapes will not be used for non-research purposes, such as promotion or direct sales activities. The tapes will be dated and deleted, at the latest, two years after the research is completed. **In exceptional cases** the audio tape will be listened to/the transcription read/the video tape watched by employees at Electricity North West working on this Project. In these circumstances, the Smart Street team will go through the tapes first to delete any references to people's names or anything else that could identify them.

Anyone from Electricity North West who reads the transcript or listens to/watches the audio/video tape will sign an undertaking that they will respect the anonymity of those taking part. Thus, if anyone recognises you, (s)he will immediately stop reading, listening or watching. Any other material or information generated by you, such as ideas written down on paper, will be subject to the same strict controls.

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 extrapolating 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 a series of focus group discussions. Any answers you give in the group discussions or surveys 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.

You will also be asked if you or anyone in your household have a disability, medical equipment in your household, mobility problems, are seriously ill or have visual or hearing impairment. This sensitive personal data is asked to understand if customers falling into any of these categories have different dependency or perceptions regarding their electricity supply. You will have the opportunity to opt out of answering questions of this nature.

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.

Name Signed

Date.....

APPENDIX C – Electricity North West’s Data Protection Policy

- Purpose
- Scope
- Policy statement
- Definition of data
- Complying with data protection principles
- Disclosure and processing of personal Information
- Responsibility
- 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 Electricity North West and consequential damage to the company’s reputation.

Electricity North West holds 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

Electricity North West 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 company 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 it 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 emails 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 (eg Health and Safety)
- Processing is necessary to protect the data subject's 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 its 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 company employees to conform to the policy and procedures and to accept and carry out company 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 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 email and internet policies
- Employee monitoring.