



**The future**

# Responding to the Future Needs of Customers – the Value of Lost Load

## Data Privacy Statement

February 2016



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# VERSION HISTORY

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1	19 January 2016	Impact research	Draft	
2	5 February 2016	Kate Quigley Tracey Kennelly	Version 1	Amendments after review of draft

## GLOSSARY

Abbreviation	Term
CCC	Customer contact centre
DECC	Department of Energy and Climate Change
DNO	Distribution network operator
DG	Distributed generation
DPA	Data Protection Act
ECP	Engaged customer panel
GB	Great Britain
ICO	Information Commissioner's Office
LCT	Low carbon technology
MPAN	Meter point administration number
NIA	Network Innovation Allowance
Ofgem	Office of Gas and Electricity Markets
PSR	Priority services register
VoLL	Value of Lost Load
SME	Small and medium enterprises

# 1 EXECUTIVE SUMMARY

The Value of Lost Load (VoLL) project is funded via the Office of Gas and Electricity Markets' (Ofgem's) [Network Innovation Allowance](#) (NIA). The project is due to take place between January 2016 and July 2017.

This project seeks to re-examine the existing model used by distribution network operators (DNOs) to place a value on the loss of electricity supply to customers.

As Great Britain (GB) decarbonises heat and transport, customers will become more reliant on electricity for their energy needs and hence it is likely that the VoLL may change.

The research aims to deliver a comprehensive assessment of customer impacts associated with the loss of electricity supply, how this is valued by specific customer groups and how this might change with the adoption of low carbon technologies (LCTs). It will also examine if VoLL could be influenced by adopting different approaches to managing outages. At present in GB, a single VoLL is used to evaluate what customers would be willing to pay to avoid a supply interruption. This project will investigate if a single uniform VoLL, applied to all customer segments, remains appropriate. The VoLL project itself will not have any direct implications for the network or any aspect of customer power supply.

To enable robust analysis to be undertaken to understand customer perception of VoLL, a range of data, including some personal data, will be collected during the life of the project. 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 (DPA) 1998. This document also addresses the specific points set out by Ofgem in paragraph 4.10 of the Electricity NIA Governance Document v2.

The key points of the VoLL 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 required for the processing and protection of personal data contained within manual files and on computerised systems to comply with the DPA 1998. All personal data collected or used in the VoLL project will be managed in accordance with this policy.
- Some personal data (names, addresses, profile classifications, meter point administration numbers (MPANs) and PSR markers of customers) which is already held by Electricity North West will be used to identify and recruit customers to participate in engaged customer panels (ECPs), depth interviews and customer surveys. 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 such as fault management, proactive updates and for informing customers about planned supply interruptions. All such personal data held by Electricity North West is stored in a secure, confidential and appropriate manner.
- Impact Research, the VoLL project partner, will use this data to recruit customers to participate in the VoLL ECPs and customer surveys. In doing so, Impact Research will comply with all requirements of Electricity North West's data protection policy, as described above.
- The results from the analysis of the ECP group discussions and customer survey will enable Electricity North West to disseminate information about VoLL. All responses will be shown in an aggregated manner, eg by customer segments. Therefore no personal data will be accessible in the public domain in reports containing the survey results.

- As part of the surveys, the scope, objectives and importance of the project will be explained to customers who will be informed that survey results will only be shown in an aggregated manner.
- Consent for use of customers' personal data for the purpose of this project will be obtained as part of the ECP and survey recruitment process (see appendices A and B).
- Electricity North West maintains a priority services register (PSR) of customers who are vulnerable or who may be reliant on electricity for medical reasons. This is classified as 'sensitive data' by Electricity North West and access to this data is restricted.
- The VoLL project is not expected to have any adverse impacts on vulnerable customers. However, all customers including those registered on the PSR participating in VoLL customer research will be provided with contact details of the project team. The team are contactable via a range of methods as outlined in the [VoLL customer engagement plan](#), which forms the framework for all customer communications throughout the life of the project.
- Customers of DNOs other than Electricity North West will be recruited to participate in the customer surveys via online panels. No personal data will be transferred to the project team.

## 2 THE VALUE OF LOST LOAD PROJECT

### 2.1 Background and context

Electricity supply interruptions ('lost load') have financial and social impacts on customers.

VoLL is defined as:

"A measure of the economic value given to an amount of electricity that is prevented from being delivered to consumers (ie is 'unserved') as a result of a planned or unplanned outage of one or more components of the electricity supply chain."<sup>1</sup>

This measure of economic value can take a number of forms:

- The amount that customers are willing to pay in order to avoid an outage
- The amount they wish to be compensated in the event of an outage
- The actual financial cost they incur as a consequence of an outage.

Previous research into VoLL has identified variations in the social and financial impacts of supply interruptions on customers by season, time of day, customer load and customer type. However, it is still the practice to use a single uniform VoLL based on existing customer energy usage and assigned value.

Improving or maintaining reliability of supply to customers requires significant and continuous investment in distribution assets by distribution network operators (DNOs). VoLL is an input to DNOs' investment choices and this research will identify if differential VoLL rates may be more appropriate in investment decisions where relative customer needs can be considered.

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<sup>1</sup> Electricity Authority – Te Mana Hiko, 2012, Investigation into the Value of Lost Load in New Zealand – Summary of Findings.

## 2.2 VoLL in a low carbon future

As GB decarbonises heat and transport, customers will become increasingly reliant on electricity for their energy needs and hence it is likely that the VoLL may change. This future VoLL will be influential in informing issues such as network reliability standards, design policy for low carbon technology intensive networks and service standards.

In GB, small and medium enterprises (SMEs) and domestic electricity customers cannot currently express dissatisfaction with their VoLL by switching from one DNO to another (known as 'revealed preferences'). A practical alternative is to gather 'stated preferences' through a survey.

Customer research designed to measure VoLL in this way has been undertaken in a number of countries and utility sectors, most notably for Ofgem and the Department of Energy and Climate Change (DECC) in 2013<sup>2</sup>. This study observed how VoLL can vary by season, time of day, customer load and customer type (for example, urban/rural, worst-served).

The biggest challenge for this project, and possibly its most significant contribution to understanding VoLL, is how to measure the likely changes in VoLL in the future, particularly in relation to the adoption of low carbon technologies (LCTs). Further information on the proposed method for addressing this challenge is published in a separate methodology statement.

The aim of the project is to quantify VoLL to customers by customer segment at the present time and how this might change in the future. This will be achieved by answering the following research questions:

1. What is the impact on customers of lost load?
2. What is the value of this impact, expressed as the financial and social cost to customers in £ per kWh?
3. How does this vary by customer type?
4. How can Electricity North West and key stakeholders mitigate the costs of lost load to customers?
5. How will this vary with LCT adoption?

## 2.3 The solution which will be enabled by solving the problem

The VoLL method will encompass three phases of customer and stakeholder engagement to acquire a detailed understanding of variations in VoLL over time and by customer segment. Other DNOs will be able to embed a revised VoLL model into their future investment planning by using the outputs that will be generated and shared throughout the VoLL project.

The project success criteria and the ways in which outputs relating to them will be shared are:

- An understanding of customer impact, how value is defined and how this might be influenced (eg better communications)
- A credible segmentation and future VoLL model by key customer groups to guide investment decisions

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<sup>2</sup> London Economics, 2013, The Value of Lost Load (VoLL) for Electricity in Great Britain, Final Report for Ofgem and DECC.

- A demonstration of how these values would help Electricity North West and other DNOs to better plan their network investment strategy
- Guidance on customer compensation strategies.

## 2.4 The role of data in the VoLL project

Customer data will be collected during the project to enable robust analysis to assess the variations in VoLL by customer segment and how these might change over time. The following steps will be taken:

- Existing Electricity North West customer data will be utilised in order to contact and recruit customers to take part in the customer surveys.
- Customers of other DNOs will be approached for interview using panels of GB respondents who have previously agreed to take part in research of this nature. Contact with panel respondents will be made by the panel provider so personal information will not be provided to the research team.
- New data will be collected during the administration of the customer survey when answers to the classification, perception and attitude-based questions are recorded.

The project methodology requires only minimal use of and need for personal data.

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

## 2.5 The time period over which data will be collected in the VoLL project

The VoLL project will take place between January 2016 and July 2017. Data will be collected from customers between April 2016 and December 2016, predominantly during the summer and winter seasons.

Customer perception of VoLL is likely to vary by the season in which a supply interruption occurs, as indicated by previous research (see the project's [methodology statement](#)) which indicated that, in general, planned interruptions are more acceptable to customers during warm, summer months compared to winter, when they can be extraordinarily disruptive. By consulting customers during both the summer and winter seasons, it is more likely that the impact of seasonal variations on VoLL perceptions will be observed and accurate values derived.

# 3 DATA BEING COLLECTED FOR THE VOLL PROJECT

## 3.1 What is 'personal data'?

The following definitions are taken from the DPA 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, transaction history, records of activities or travel, profiles or credit scores.

'Sensitive personal data' is defined as 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.

### **3.2 What personal data is Electricity North West processing for VoLL?**

Electricity North West holds relevant personal data about its customers such as names, addresses and details on connection, equipment and consumption. The company also maintains a PSR of elderly and other 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.)

Activities that will be undertaken during the VoLL project that may involve measurement and/or data collection are outlined below:

#### **Engaged customer panel (ECP)**

The ECP will comprise a small but representative group of customers, convened to discuss perceptions of supply provision and the social and financial impact of present and future supply interruptions. The ECP will influence the development of the survey instruments and associated materials to maximise their suitability, applicability and ease of understanding. It is envisaged that ECP members will be recruited by telephone using customer data provided by Electricity North West.

Electricity North West will provide Impact Research with a limited amount of personal data (addresses and contact details) derived from the MPAN database to facilitate ECP 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 convening 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 Electricity North West. 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. They will be required to provide written consent to their information being used for the stated purpose prior to their participation, including consent to the interview being recorded by 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 number of pilot surveys will be conducted to ensure that the customer survey instrument is robust, clear and can be easily understood by customers.

Personal data (addresses and contact details) will be issued to the project partner, Impact Research, from the MPAN database to facilitate this. No further personal data will be collected during the pilot. Any personal data stored as part of this engagement activity (customer names and contact details) will not be shared with any organisations outside Electricity North West and all pilot survey results will be anonymised.

Consent for use of customers' personal data will be obtained as part of the survey recruitment process (see Appendix B).

#### **Customer surveys**

A number of surveys will be undertaken to assess customer perception of VoLL. Personal data (addresses and contact details) of customers within Electricity North West's operating region will be passed to Impact Research to enable them to recruit participants and conduct these customer surveys. This information will be derived from the customer MPAN database

and the list of customers with distributed generation (DG) in Electricity North West's operating region.

Survey participants outside Electricity North West's operating region will be recruited by Impact Research using online panels of individuals who have previously agreed to participate in research of this nature. Participants who self-administer the customer survey online will have previously completed a double opt-in process when registering to take part in market research surveys. A double opt-in refers to the process by which a check is made to confirm that the person joining a panel or database wishes to be a member and understands what to expect (in advance of participating in an actual survey). Participants taking part in this manner will be provided with further information about how their data will be used and shared and asked to digitally indicate their acceptance before completing the survey. No further personal data will be collected during the surveys. 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.

The surveys will seek to assess customer perceptions of the value of a supply interruption to their household or business. Impact Research will collect data from survey participants about any specific classifications of vulnerability, such as reliance on medical equipment, in order to assess VoLL for customers who have such individual requirements. Customers will be given the opportunity to opt out of providing sensitive data of this nature if they prefer. This sensitive data will not be shared with any organisations outside Electricity North West and all survey results will be anonymised.

Some of the quantitative surveys will be administered by a professional interviewer in the comfort of the customer's own premises. Participants who are interviewed at their own premises will be asked to sign a consent form and, by doing so, will consent to providing access to a professional interviewer and agree to their information being used for the stated purpose. Consent for use of customers' personal data and entering a customer's premises will be obtained as part of the recruitment process (see Appendix B).

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 DPA 1998, registration number is Z2226132.

### **PSR customers**

There is a requirement for Impact Research to specifically target a sample of PSR customers to take part in the customer surveys, although no information relating to any particular vulnerability within the household will be shared with our research partner.

The following personal information will be extracted from Electricity North West's existing customer database and used for the purpose of recruiting PSR customers for customer survey participation: names, addresses and PSR marker of customers within Electricity North West's operating region.

No 'sensitive' personal data will be passed to organisations outside Electricity North West.

### **Vulnerable customers**

Questions will be included in the survey to assess whether any vulnerable customers reside at the property. This question set will help the team understand any potential differences in perceptions of VoLL held by this group compared to other customer segments.

If a vulnerable customer agrees to participate in the customer survey, any information regarding their vulnerability will be provided on a voluntary basis. Any such information gathered during the customer survey will only be used at an aggregated level for analysis and will not be passed to organisations outside Electricity North West.

Impact Research, which is a company partner of the Market Research Society, will abide by the guidelines shown in Figure 3.2 with respect to recruiting customers into the customer engagement activities.

Figure 3.2: Market Research Society guidelines and the VoLL customer engagement process

Market Research Society guidelines	VoLL customer engagement process
<p>Members must ensure that participants give their informed consent where personal data are collected directly from them.</p>	<p>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' in to the online survey) a consent form to confirm their acceptance.</p>
<p>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.</p>	<p>Impact Research will process personal data supplied by Electricity North West in the form of an MPAN customer database and DG list. Data will be handled fairly and lawfully in line with the DPA 1998 and customers will be given the opportunity to opt out of future communications relating to market research. Data collected from respondents outside Electricity North West's area will not include personal information.</p>
<p>Members must ensure that participants are provided with sufficient information to allow informed consent to be given. This includes:</p> <ol style="list-style-type: none"> <li>a. The name of the organisation or individual responsible for data collection</li> <li>b. The general subject of the data collection</li> <li>c. The purpose of the data collection</li> <li>d. Whether the data collection is to be recorded and/or observed</li> <li>e. Who is likely to have access to live or recorded information</li> <li>f. The likely length in minutes of the data collection, if asked</li> <li>g. Any costs likely to be incurred by the participant</li> <li>h. An assurance that the activity is being conducted in accordance with the MRS Code of Conduct.</li> </ol>	<p>Customers will be provided with a consent form that provides sufficient information, drafts of which are included in Appendices A and B.</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 acquired.</p>

Market Research Society guidelines	VoLL customer engagement process
<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>Audio recordings created at 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 project 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:</p> <ol style="list-style-type: none"> <li>Demonstrate that they have taken all reasonable steps to ensure that the data will only be used for the purpose for which the data was collected</li> <li>Inform participants as to what will be revealed, to whom and for what purpose.</li> </ol>	<p>Draft consent forms are included in Appendices A and B. This informs participants about what will be revealed, to whom and for what purpose. Electricity North West is committed to using the data only for the agreed purpose of contacting customers (where informed consent has been obtained) to engage them further about the VoLL project.</p>
<p>Members must ensure that a participant's right to withdraw from a project at any stage is respected.</p>	<p>Impact Research will give all customers with whom it engages the opportunity to opt out of engagement and/or future communication regarding the VoLL project. In doing so it will keep a log of customers that have opted out and share this with Electricity North West.</p>
<p>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:</p> <ol style="list-style-type: none"> <li>In-person visits to private homes</li> <li>Calls to household landline telephone numbers</li> <li>Calls to mobile telephone numbers</li> <li>Messages via SMS or other direct message facilities to mobile telephones.</li> </ol>	<p>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. Engagement relates to:</p> <ol style="list-style-type: none"> <li>In-person visits to private homes</li> <li>Calls to household landline telephone numbers</li> <li>Calls to mobile telephone numbers</li> <li>Messages via SMS or other direct message facilities to mobile telephones.</li> </ol>

A list of data items being processed in connection with the VoLL project is detailed in Appendix C.

## 4 HOW PERSONAL DATA WILL BE USED IN THE VOLL PROJECT

The project will utilise names, addresses, profile classifications and the PSR marker of customers from the existing Electricity North West customer database to contact a sample of customers to ascertain whether they would be willing to participate in the VoLL ECP and/or customer surveys.

Electricity North West will not pass names, addresses or any other personal customer data to third parties other than to those partners who have a specific need for this information as part of the project. All project partners are committed to adhere to the DPA as part of their contractual obligations.

The customer's location will be provided by reference to a substation name and number, circuit reference, MPAN and premises address.

Aggregated data and the results of the research will be shared with interested parties, including other DNOs, key stakeholders (Ofgem, DECC and Citizens Advice) and electricity suppliers at the end of the project, and as part of disseminating the learning and outcomes. There will be no personal data included in any data shared with interested parties or published for general readership. 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.

## **5 OBTAINING CONSENT FOR THE USE OF PERSONAL DATA**

Customers' participation will be through their agreement to take part in the ECPs or customer surveys. Customers who agree to participate will be fully informed by the market research provider about how their data will be used and shared before signing up. Both Electricity North West customers and customers of other DNOs will be asked to sign a consent form and, by doing so, will agree to their information being used. Drafts of the relevant consent forms are detailed in Appendices A and B.

Participants outside of Electricity North West who self-administer the customer survey online will have previously completed a double opt-in process when registering to take part in market research surveys. A double opt-in refers to the process by which a check is made to confirm that the person joining a panel or database wishes to be a member and understands what to expect (in advance of participating in an actual survey). Participants taking part in this manner will be provided with further information about how their data will be used and shared and asked to digitally indicate their acceptance before completing the survey.

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

## **6 INFORMATION PROVIDED TO THE CUSTOMER PRIOR TO CONSENT BEING SOUGHT**

A sample of Electricity North West customers will be approached and asked if they wish to participate in the ECP or customer survey. Customers who agree to participate in any form of customer engagement will be fully informed about how their data will be used before signing up and completing a consent form.

Participants outside of Electricity North West who self-administer the customer survey online will have previously completed a double opt-in process when registering to take part in market research surveys. A double opt-in refers to the process by which a check is made to confirm that the person joining a panel or database wishes to be a member and understands what to expect (in advance of participating in an actual survey).

## **7 PRIORITY SERVICES REGISTER CUSTOMERS**

Vulnerable customers, who may or may not be registered on the PSR, will not experience any negative impact on the quality or reliability of their power supply as a result of the VoLL

project. This research project does not involve any technical or operational interventions or techniques at either customers' premises or on the network. Consequently, there are no plans to contact PSR customers individually or as part of a general awareness campaign to discuss their specific requirements.

The vulnerable customers who consent to participate in the ECP and/or customer surveys will simply be asked to provide feedback about their perception of VoLL in the context of their unique and specific requirements. Any such information gathered during the customer survey will only be used at an aggregated level for analysis and will not be passed to organisations outside Electricity North West.

The VoLL project is not expected to have any adverse impacts on vulnerable customers. However, all customers including those registered on the PSR participating in VoLL customer research will be provided with contact details of the project team. The team are contactable via a range of methods as outlined in the [VoLL customer engagement plan](#), which forms the framework for all customer communications throughout the life of the project.

No sensitive personal data will be passed to organisations outside Electricity North West.

## **8 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.

## **9 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 included in Appendix D.

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 and quantitative customer surveys. This data will be used to undertake analysis to assess participants' perceptions of VoLL. Customers who participate in any customer engagement with Impact Research will be fully informed about 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 VoLL 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.

## 10 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.

This project complies with Electricity North West's existing data protection policy which is based on the DPA. This is based on the DPA's eight Principles of Information Handling. Electricity North West is registered with the UK ICO for the use of personal customer data.

The VoLL project has taken account of the principles of Privacy by Design and the DPA 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 VoLL 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 in addition to the need to understand variations in VoLL by customer segment now and in the future.
- When data collected is shared with partner organisations in connection with the project, 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.

## Customer Engagement Consent Form

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.**

### 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 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.

### What data will you collect from me?

You will be asked to provide Impact Research with your contact details so that we are able to confirm your attendance at the focus group meetings.

You will also be asked to take part in two group discussions and share your perception, attitudes and behaviour with respect to the electricity supply at your property.

### How will data be collected and stored?

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

### Will data be shared with 3<sup>rd</sup> parties?

The Data Protection Act requires that Impact Research 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 any other 3<sup>rd</sup> parties without your permission.

In most cases the audio and video recordings will be heard/watched and the transcription read **only by the transcriber and researchers from Impact Research** for research purposes. 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 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. 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. Any other material or information generated by you, such as ideas written down on paper, will be subject to the same strict controls.

We would like to ask your permission to use soundbites and/ or video footage from the group discussions at industry learning events about this project. This may range from anonymized sounds bites of what people at the groups were saying to actual clips from the video recording.

You will not be identified by name or by the name of the company you work for. It will not be possible to protect the anonymity of those who can be seen or heard in the video footage eg by blurring out people's faces.

The tapes will not be used for commercial purposes, such as promotion or direct sales activities. Are you happy for us to use:

Audio clips of your comments	Yes	No
Video clips of your comments	Yes	No

I am happy to have the feedback I give through participating 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.....

## Customer Engagement Consent Form

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.**

### 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 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.

### What data will you collect from me?

You will be asked to provide Impact Research with your contact details so that we are able to re-contact you. We will only ever re-contact you for specific purpose(s), should you agree to them at the end of this form.

You will also be asked to provide us with details about your household, such as the number of people living in your household. Any answer you give will be treated in confidence in accordance with the Code of Conduct of the Market Research Society. This means that all of the information we collect will be used for research purposes only.

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.

Should you, or anyone in your household have a disability, medical equipment, mobility problems or are seriously ill or have visual or hearing impairment, we shall, with your permission, record this in our database, but we will not require you to disclose specific details such as the type of illness, medical equipment or medical history..

## How will data be collected and stored?

Data will be collected via an online customer survey, administered by a professional interviewer, using an electronic device. The data will be stored in a secure restricted access database and not locally on the device.

## Will data be shared with 3<sup>rd</sup> parties?

The Data Protection Act requires that Impact Research collects and uses the information you provide to it in a manner that respects and protects your confidentiality.

Your personal data (such as name, address, phone number) will not be disclosed to any other 3<sup>rd</sup> parties without your permission.

Research data will not be personally attributed to individuals and shared with 3<sup>rd</sup> parties without their explicit permission to do so.

## Informed consent

I am happy to have the feedback I give through participating 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 customer survey, if I had any reservations. I also agree that I authorised an interviewer to conduct the interview in my own property.

Name ..... Signed .....

Date.....

## Appendix C: Data being processed for the VoLL project

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	Electricity North West customer database or provided by third parties*	Yes	To serve as a unique identifier and prevent duplication	Yes (to Impact Research)
Supplier name	Electricity North West customer database or provided by third parties*	No	n/a	No
Customer name	Electricity North West customer database or provided by third parties*	Yes	Customer engagement	Yes (to Impact Research)
Customer address	Electricity North West Customer database or provided by third parties*	Yes	Customer engagement	Yes (to Impact Research)
Customer profile classification	Electricity North West customer database or provided by third parties*	No	Customer engagement	Yes (to Impact Research)
PSR marker	Electricity North West customer database or provided by third parties*	Yes	Customer engagement	Yes (to Impact Research)

\* Customer data has generally been provided to Electricity North West by electricity suppliers. This personal data is held as part of day-to-day operations in the CCC to help identify customers and provide 'business as usual' services such as fault management, proactive updates and for informing customers about planned supply interruptions. Other personal data may have been provided directly by customers eg PSR information or by third parties representing customers ie G83/2, G83/1-1 and G59/2 requirements to register the connection of DG.

## **Appendix D: 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 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.