

# IMPACT

FROM INSIGHT TO INFLUENCE

## NIA: Segmentation of LIV customers

Customer Engagement Plan and Data  
Protection Statement

Prepared by Impact

23/03/2023



All projects are carried out in compliance with the ISO  
20252 international standard for market, opinion and social  
research and GDPR.

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# 1. Introduction and overview

## Project overview

Impact Research were commissioned to undertake NIA-funded research for Electricity North West related to Low Income and Vulnerable (LIV) customers. The aim of this research is to provide Distribution Network Operators (DNOs) and Gas Distribution Networks (GDNs) with a better understanding of the needs of LIV customers in order to develop more efficient, targeted services that will help to deliver lower cost to service, higher social return on investments and a readiness for future vulnerabilities and changing energy markets. With energy being an essential service that affects people's comfort and health, it is imperative to ensure that the needs of all customers are met and that the most vulnerable are adequately protected for the future market, especially in light of the cost-of-living crisis, post Covid-19 and the war in Ukraine.

## Customer Research

Electricity North West are seeking to conduct research into how to best classify LIV customers and to identify their needs, through a programme of extensive customer engagement.

### Customer engagement overview

The customer engagement will be conducted at a nationwide level, ensuring representation of all energy supply regions.

The project is split into two parts, the first of which comprises of a desk review and consultancy work around what is currently being done by DNOs and GDNs when it comes to classifying LIV customers. The second involves customer engagement, which is the focus of this document.

The customer engagement is split into two phases:

1. Qualitative research
2. Quantitative research

## Customer Interaction

This document outlines the proposed customer engagement plan and summarises how Electricity North West and its project partners will interact with, or impact upon relevant customers where any form of engagement is undertaken as part of the project. All customer research activities will be conducted in strict compliance with the General Data Protection Regulations, Electricity North West's Data Protection and Acceptable Usage Policy, NIA governance and in accordance with the professional standards set out in the Market Research Society Code of Conduct.

## 2. Customer engagement

As mentioned above, the customer engagement is split into two phases, qualitative and quantitative. The qualitative phase will be completed first to gain a depth of understanding of the needs of LIV customers, with the quantitative survey following after.

### Qualitative engagement

The qualitative engagement will consist of the following:

- 10 online focus groups with customers in vulnerable circumstances across GB
- 50 in-depth telephone interviews with customers in vulnerable circumstances, or customers that are unable to participate in online focus groups

A percentage of the in-depth interviews will be completed first, as a pilot for the main study. Here, we will conduct 5 interviews, with customers with 5 different types of vulnerability that have been established in the desk research and consultancy phase of the study, conducted prior to the engagement. These vulnerability types will be agreed between Impact, Electricity North West and Energy Systems Catapult (ESC) prior to the recruitment.

Impact will then design a screener that captures the information needed to ensure a respondent is eligible to take part in this research. This will be reviewed and approved by Electricity North West before any contact is made with potential respondents.

Impact will partner with Criteria qualitative fieldwork<sup>1</sup> to recruit the respondents. Criteria will use a variety of different methods to recruit respondents to the study, all of whom have registered in one way or another to hear about market research opportunities. Potential respondents will be given a brief overview of the research, and then be screened for eligibility against the screener, explained above. If they are eligible, they will be booked in to complete an interview at a convenient time for them.

The interviews will then be completed by a member of the Impact team, trained in moderating qualitative research. They will follow a set discussion guide, which, as with the recruitment screener, will be designed by Impact and signed off by Electricity North West, before the discussion takes place. The interview will last between 45 and 60 minutes, and will cover off the needs of individual with regards to the five 'lenses' of vulnerability, identified in the desk research and consultancy phase of the research, laid out below.

- Safety
- Finance
- Technology
- Electricity and gas supply
- Customer relations

Once the pilot interviews have been completed, Impact will create a short summary document containing the findings, for discussion. Here, we will agree the make-up of the focus group sessions and remaining depth interviews, but it is likely there will be the following:

- Five group sessions focusing on one each of the five 'lenses' mentioned above, containing respondents from a range of different vulnerable circumstances
- Five group sessions with respondents from five different circumstances of vulnerability, focusing on one 'lens' specifically

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<sup>1</sup> <https://www.criteria.co.uk/>

- 45 depth interviews with respondents from a range of different circumstances of vulnerability, covering off their needs across the five ‘lenses’

Respondents for the in-depth interviews will be recruited for in the same way as for the pilot sessions.

Recruitment for the focus groups will be approached in the same way, except respondents will be recruited into fixed session date and time, which will be agreed between Impact, Electricity North West and ESC.

As with the recruitment, the moderation process for the in-depth interviews will be the same as for the pilot. The one minor change is the moderation interviews are being split between the Impact and ESC teams.

A very similar process is followed for the focus groups, with the moderator coming from the Impact team. The session will last 90 minutes, and will contain up to eight respondents. again, the moderator will follow a discussion guide that was designed by Impact and ESC, before being signed off by Electricity North West.

Respondents will be incentivised for participating in this research, £40 for the online focus group and £50 for the telephone in-depth interview.

## Quantitative engagement

Once the qualitative engagement is completed, we will move on to a round of quantitative engagement. This will consist of the following:

- Online survey with domestic energy users across GB
- Face-to-face surveys with energy users in vulnerable circumstances

As with the qualitative stage, the first step in the quantitative engagement is designing the materials that will be used. Here, Impact will draft the first version of the quantitative survey instrument, which will include screener criteria, to ensure representativeness across all DNOs regions in GB. Impact will design the first draft, and send to Electricity North West and ESC, for feedback and then approval.

To deliver the fieldwork, Impact will be partnering with Prodege<sup>2</sup> for the online survey, and Central Fieldwork<sup>3</sup> for the face-to-face surveys. Each will be responsible for scripting the survey, then completing the interviews.

To participate in the online survey, respondents need to be registered on Prodege’s online panel. They use a wide range of recruitment channels including social media, online and offline advertising and member referrals. For the face-to-face surveys, Central Fieldwork will use a combination of methods, recruiting customers there and then, in local areas. This involves a mix of on-street recruitment, and visiting community centres and other focal points within the community.

The online survey will take a maximum of 20 minutes, and the face-to-face will take no longer than 25 minutes.

## Customer feedback

In line with best practice, we make it easy and accessible for customers to provide feedback or raise queries with the project team through various channels. These include calling the Impact office, emailing Impact or contacting Impact by post. Contact details for the Market Research Society and the Electricity North West project manager are also given. Details of these contact methods are provided in Appendix A. We will provide these to those who are part of the project.

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<sup>2</sup> <https://www.prodege.com/>

<sup>3</sup> <https://www.centralfieldwork.com/>

## Customer consent

Customers participating in the focus group, in-depth interviews, online or face-to-face surveys will be fully informed before signing up about how their data will be used and shared. Those participating in the focus groups and depth interviews will be asked to sign a consent form, as personal data is required in order for them to take part. By doing so, they will agree to their information being used for the specified purpose.

The process for obtaining customer consent is outlined in Section 4.

### 3. Communications strategy

#### How will customers be engaged with after the in-depth interviews and focus groups?

Customers participating in the in-depth interviews and focus groups will be provided with an appropriate monetary incentive for their participation. This will be provided as either a BACS payment or a charity donation and, in line with ISO 20252 standards, will be paid within 28 days of the end of the fieldwork period.

#### Queries, compliments and complaints

A process will be implemented by Impact to capture and record all queries or concerns raised by customers relating to this research. This will ensure that any enquiries or complaints are handled promptly and appropriately, and resolved to the satisfaction of the customer. During recruitment, all participants will be provided with a general enquiries telephone number and email for the relevant duration of the project. It is anticipated that any customer enquiries will be resolved during the initial contact. However, those which are not resolved at the first point of contact will be managed centrally by the project team. The complaints procedure and log held by the customer researcher are described in Appendix A.

## 4. Data Protection Requirements

The following protections are in place, for this project.

### Customer consent

Consent for the use of personal data will be via the agreement to participate in the focus groups and in-depth interviews. Participants will be asked to sign a consent form or provide verbal during recruitment. Participants will be fully informed by the customer researcher about how their personal data will be used and shared before they sign the consent document. The customer researcher will inform the participant customers that their personal data will not be used nor shown in any analysis in a disaggregated manner.

If a customer wishes to withdraw consent at any point during the recruitment process, they can contact the recruitment company and request to do so. If this happens, we will ensure any data collected by the recruitment company is disposed of in a timely manner.

### Data Privacy Statement

To enable robust analysis to be undertaken to understand how current and possible future changes in voltage control and voltage profiling will/could affect customers, 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 Data Protection Act 2018 (GDPR) and has been developed in line with Electricity North West's privacy policy, specially section 11.3 Innovations, available here: <https://www.enwl.co.uk/misc/privacy-policy/>.

### Personal data being collected for the project

One of our responsibilities is to be transparent in our processing of personal data and explain the different ways in which we will collect and use each respondent's personal data as part of this project.

The project will collect name, address, telephone number, profiling data (e.g., age and social grade) and email address during recruitment for the qualitative engagement. This data is necessary to meet the objectives of the project to ensure that a representative sample has been included in the engagement and the customers are residents in the appropriate DNO region. During the quantitative survey, only profiling data (e.g., age and social grade) will be captured on each respondent, and nothing will be personally identifiable.

### How will personal data be used in the project

The project will use names, addresses and profile classifications (e.g., age and social grade) to recruit the right type of participant to the study. This information will be anonymised in all reporting documents, ensuring no individual can be identified. For reporting purposes respondents will be categorised by their type (e.g., circumstance of vulnerability), and not by anything personal.

Impact 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.

### Obtaining consent for the use of personal data

All participants in the qualitative research will provide explicit consent to take part in the research either via email or completing an online form in Appendix B.

Suppliers related to Impact will handle the recruitment and have signed a Service Level Agreement (SLA) and agreement to adhere to ISO 20252 and this document. Details of participants will not be shared with anyone else

other than supplier and Impact and will not be used for any other purpose other than those agreed with the customer for this project.

### **Information provided to the customer prior to consent being sought**

All customers sought to participate in this study will be provided with details and purposes of the project.

In line with GDPR we will ensure that all respondents are given the right to be informed, this includes the following:

- Objectives of the project
- The identities of the project partners
- Funding for the project
- A brief summary of how they can be involved in the project, including information on the customer research sub-contractor, their obligations as a participant, and the timescales of the Project.

The full engagement strategy is given in the Customer Engagement section 2 above. Impact 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.

### **Ownership of personal data**

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

Personal data provided by third parties will be owned by the individual to whom it relates and held by Impact and third parties that are involved in the recruitment process.

Suppliers in the form of specialist recruiters will be used to recruit respondents and they will be data processor with Impact being data controller.

### **Retaining personal data**

Electricity North West will not have access to any personal data collected during this project.

Anonymised technical data will be retained by Impact so documentation shared to project partners is without personal data.

Impact will collect data from recruitment for the qualitative engagement. This data will be used to ensure we are engaging with the right customers for this project. Customers who participate in any customer engagement with Impact will be fully informed about how their data will be used when they sign up. All recruitment data will be stored in a secure, confidential and appropriate manner and accessible only to the Impact 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.

As part of the Project's close down procedure, all personal data will be anonymised and the original personal data will be permanently deleted. Following the Project's close-down, project partners may only retain anonymised results of their analysis.

### **Data collection and storage summary**

As per the Market Research Society (MRS) Code of Conduct, Impact staff are obligated to ensure that:

- Market researchers never allow personal data they collect in a market research project to be used for any purpose other than market research.
- Research conforms to the national and international legislation relevant to a given project including the Data Protection Act 2018.

- Employees take reasonable steps to ensure that all hard copy and electronic lists containing personal data are held securely in accordance with the relevant data retention policies and/or contractual obligation.
- Employees take reasonable steps to ensure that all parties involved in the research are aware of their obligations regarding security of data.
- Employees take reasonable steps to ensure that the destruction of data is adequate for the confidentiality of the data being destroyed. For example, any personal data must be destroyed in a manner which safeguards confidentiality.
- All spreadsheets will be password protected with the password transferred separately to the spreadsheet; only anonymised data will be handled in this way; they will only be passed between project partners and sub-contractors as a measure of last resort and via secure password protected online storage.
- All transfer of data will be via secure password protected online storage e.g., on Microsoft OneDrive.

Audio recordings created at the focus groups and in-depth interviews will not be used for any purpose other than research, such as promotion or direct sales activities. Recordings will be deleted at the latest two years after the research. 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 Impact project team will go through the recordings first to delete any references to people's names or anything else that could identify them.

Data is stored on individual machines, Microsoft servers and Attachmore. All external suppliers (Microsoft and Attachmore) are major players in their field with industry-standard security systems. Impact IT Systems & Procedures (available upon request) details the methods Impact uses for the storage of and accessibility of data.

Impact's data storage and transfer is subject to the following:

- Any personal information such as sample information is deleted within 3 months of the end of the project.
- All primary data records (e.g., interview transcripts, data files, recordings) are deleted at the latest two years after the research is completed.

## Risks

Identify and Assess Risks		
<p>Password protected and encrypted personal customer data could be accessed by an individual outside of the research team through sophisticated hacking techniques that penetrate the security measures.</p>	<p><b>Low</b></p>	<p>Our backend servers are protected behind a secure perimeter. Firewalls are used to filter traffic and anti-virus and proxy solutions are used to inspect incoming data. Remote access for system support is controlled by two-factor authentication and user credentials.</p>

## Identify and Assess Risks

<p>Password protected and encrypted personal customer data could be sent to an individual outside of the research team through human error.</p>	<p><b>Low</b></p>	<p>If sent in error, access could not be granted unless the password is known or having access to a description key.</p>
<p>An authorised user misuses his access privileges to extract personal data and pass it on to a third party – either from the web interface, or from SQL queries on the backend database.</p>	<p><b>Low</b></p>	<p>Access is role-based and restricted to a small team. Employment contracts, company policies and disciplinary procedures act as a deterrent to misuse of the system. However, this would not deter a disgruntled or motivated employee. Line management and supervision ensure no misuse of the system. Logs are retained separately to assist in forensic investigation but this would be after the event.</p>
<p>An errant employee of Electricity North West, Impact Research or third party (outsourced by Impact Research to facilitate computer aided telephone interviews, computer aided personal interviews/online access panel) gains unauthorised access to personal data and uses the data or shares it with a third party.</p>	<p><b>Low</b></p>	<p>Impact Research has robust mechanisms in place to ensure the professional conduct of their employees and GDPR compliance, which includes training, management and monitoring of personnel. Impact employees are subject to the terms of contractual employment agreements. It is also responsible for all services in connection with the project that are outsourced and only works with suppliers that adhere to the MRS Code of Conduct (or international equivalent standards).</p>

## 5. Conclusions and next steps

This Customer Engagement Plan sets out this project's approach for communication and engagement with customers throughout the Project. All Electricity North West project partners will adhere to the plan and the basic principles outlined. There will, however, be learnings and lessons learnt as the project progresses.

All outputs and learning gained from customer engagement activities will be made available to other DNOs. Specifically, all findings and suggestions for engagement with LIV customers developed in the project will be publicised. All relevant learning will be shared at learning events, through trade magazines and in other appropriate forums.

All of the deliverables for this project will be reported on an aggregate level, and all participants' personal data will be collected and used in a manner that respects and protects their confidentiality. Personal information held by Impact will be deleted within 12 weeks of the end of the project, and all research materials will be dated and deleted at the latest two years after the research is completed.

## 6. Appendix

### Appendix A: Management of customer complaints specific to the research (example)

#### Complaints Handling Process

If, unfortunately things have gone wrong then you can use the following process to let us know.

#### How to contact us

The easiest and quickest way to resolve a complaint is to telephone us and ask for a member of the Impact project team, Monday to Friday 9.00am to 5.30 pm:

Impact: 01932 226 793

Alternatively, if you are unable to telephone or would prefer to write, you can contact us by post using the addresses detailed below, or by email.

[Address: Impact, 3 The Quintet, Churchfield Road, Walton-on-Thames, Surrey, KT12 2TZ]

[Email: [Utilities@impactmr.com](mailto:Utilities@impactmr.com)]

The Market Research Society is the regulatory body for Market Research. If you would like to check the validity of this research or seek reassurance that Impact is a responsible organisation that will keep the information you give it safe, you can do so by calling the Market Research Society UK Freephone verification service free\* on:

0500 39 69 99 or visiting <http://www.theresearchbuyersguide.com/freephone/alpha/all>

\*Calls to Freephone made from outside the UK may incur charges.

#### Complaint escalation

If you are unhappy with the outcome having been in contact with the researcher, you can contact the project team at Electricity North West.

[INSERT CONTACT DETAILS FOR PROJECT MANAGER]

#### Complaint Handling Statement

Sometimes things can go wrong, so we have produced this Complaint Handling Statement to show what will happen if you have cause to complain to us.

#### Our Process

In the first instance, Impact will endeavour to resolve your enquiry as quickly and easily as possible. As part of resolving your complaint, we will offer you an explanation and an apology.

#### Step 1 – Aim to resolve your problem within 10 working days

If you contact us with a problem, we aim to resolve matters with you directly, as soon as possible within 10 working days. However, if we cannot resolve your complaint fully or have not agreed a form of resolution within 10 working days of your first contact, then we will escalate your complaint to Electricity North West, the project lead.

#### Step 2 – Aim to resolve your problem within the next 10 working days after escalation

If unresolved, your complaint will be passed to the project manager at Electricity North West who will do everything possible to address your concern and reach a positive conclusion.

## Appendix B: In-depth Interview - Customer Consent Form (example)

Dear xxx,

Thank you for agreeing to take part in the in-depth interviews. As stated in the recruitment stage, this interview is being conducted by Impact, on behalf of Electricity North West. The in-depth interview you take part in will be:

- Audio recorded
- Video recorded
- Observed by people from another location

**The Data Protection Act requires we (Impact) collect and use the information you provide to us in a manner that respects and protects your confidentiality.** Your personal details (name, email address, telephone number) will not be disclosed to anyone else without your permission other than to Impact.

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

The recordings will not be used for non-research purposes, such as promotion or direct sales activities. The recordings 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/the video recording watched 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 full names or anything else that could identify them.

Anyone from who reads the transcript or listens to/watches the audio/video recording will sign a form 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?

Impact 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 2018.

‘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 with your contact details so that they are able to re-contact you to take part in the in-depth interviews. Any answers you give in the in-depth interview or survey 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, or anyone you are a carer for, have a disability, medical equipment in your household, mobility problems, are seriously ill or have a hearing impairment, and will be asked to specify this.

### **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. 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.

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

I am happy for my anonymised data to be passed to Electricity North West for research purposes.

Please circle: YES/NO

I am happy for Impact 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 in-depth interview, if I had any reservations.

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

Date.....