



NINES – Northern Isles New Energy Solutions

Data Protection Strategy

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## **1 Introduction**

As part of our work to provide a reliable and sustainable energy supply for Shetland, Scottish Hydro Electric Power Distribution (SHEPD) is working with Hjaltland Housing Association (HHA) to install new 'smart' storage heating systems in approximately 250 homes.

The Northern Isles New Energy Solutions (NINES) project aims to increase the contribution that local, smaller scale renewable generation makes to meeting Shetland's energy needs. This is part of a bigger plan, known as 'Shetland Repowering' which will ensure a reliable and sustainable supply of electricity for Shetland in the future.

An important part of NINES is the installation of 'smart' storage heaters and water heating in around 750 homes across Shetland. This will help us manage electricity demand on the energy network and allow us to connect more renewable energy to the Shetland network.

The first homes to receive the new heating system are owned by Hjaltland Housing Association (HHA). We have plans to make the heating system available to private homes in 2013. This document relates to the roll out to HHA homes only. A separate Data Protection strategy will be submitted in relation to the commercial model for the open market.

The purpose of this document is to describe NINES compliance with the Data Protection Act 1998. This document will provide readers with an understanding of the approach NINES is taking when dealing with personal data and how this is aligned with the both the data protection act and SSE Group information security policies. It lays out SHEPD's principles for handling personal data and the data security mechanisms that we will implement to ensure security of personal data.

If any aspects of the data protection strategy change during the lifecycle of the project, a revised version of the document will be submitted for review to Ofgem and internal stakeholders. Where a change to the data protection strategy has a direct effect on the customers, or it impacts on the agreed terms and conditions customers will be notified directly from the NINES project team.

## 2 SHEPD Data Principles

*Personal data refers to data that relates to a living individual who can be identified from these data or from those data and other information that is in the possession of or is likely to come into the possession of, the data controller.*

### 2.1 Principles for Handling Personal Data

To ensure SHEPD have a robust and consistent approach, we have defined a set of principles for handling personal data. We have adopted a number of principles to protect the customer's privacy, along with SHEPD's business.

The principles are defined as:

- We will store your data in a secure and safe manner
- We will protect your data against risks such as modification, destruction or loss
- We will explain the purpose of collecting your data and make it clear what your data will be used for
- We will make it easy for you to request a copy of the data we hold relating to yourself
- We will not hold data for longer than necessary and will dispose of your data in a safe and secure manner
- Your data will only be shared with authorised partners and personnel
- We will seek written consent from you to collect any personal data
- Data will not be collected or used for purposes other than specified in the consent letter

Please note our principles are aligned to the 8 principles defined in the Data Protection Act 1998. <sup>1</sup>

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<sup>1</sup> For the Data Protection Act Principles see:

<http://www.legislation.gov.uk/ukpga/1998/29/schedule/1>

### **3 NINES Approach to Handling Customer Data – Key Questions Answered**

The NINES project will see customer data being collected in one of two ways; Customer survey or automated data collection via monitoring equipment installed in the customer's home. This document describes the data protection measures for personal data to be undertaken by SHEPD and project partners to collect, analyse and model using the data.

#### **What personal data will be collected for the purposes of the project?**

To gain a customer's consent to participate in the project we will collect customer contact information – including customer name, phone number/email address etc. This data will be used to establish and maintain a direct relationship between SHEPD and the customer. Therefore we will be responsible for the collection and storage of this data. Access to this data will be limited to SHEPD staff working on the NINES project. Alongside the customer contact information we will collect and store electricity meter readings, which will be provided to us by customers. Where possible these will be collected for three months prior to installation and three months post installation of the smart storage heaters and water heating (referred to as “storage devices” from here on in this document). HHA has a requirement for collection of the data relating to the meter readings. To minimise the inconvenience for the customer we have provided the customer with the option of allowing the meter readings we collect to be shared with HHA. The customer can indicate if they agree to sharing this data by completing a tick box on the meter reading request form.

The project will run a monthly report from our current internal systems to show us the preferred supplier of the MPAN(s) which relate to the customers' properties. This is to ensure we comply with the NINES Customer Engagement Strategy where we have committed to customers that as part of them participating in the project we will notify their preferred energy supplier.

The project will collect data relating to storage device characteristics via communication equipment which has been installed within the customer's home. The data collected will be in relation to the heating energy used by that home, including values such as remaining storage capacity, internal temperatures and appliance operational status.

In addition to the above storage device characteristics a sub-sample of approximately 35 homes has been selected for the purpose of more detailed monitoring, which will be used by the University of Strathclyde to inform the simulation models of the Shetland Network, These homes will see the installation of additional

monitoring equipment and communications processing. The data being collected will include water flow rates, water mix temperature and temperatures from additional rooms.

Participant feedback will be collected via a number of different methods, depending on the participant and resources available. This could include written survey, face to face, telephone or email interviews, and focus groups.

To facilitate sharing data with our project partners we will assign each address with a unique identifier, this will ensure the data cannot be linked to an individual person.

### **How will the personal data be used?**

The customer contact details will be used to maintain a relationship with customers, allowing us to respond to any queries they have, for fault management purposes and to allow us to issue the ex-gratia payment to customers who have agreed to participate in the project.

The electricity meter readings which the customer will provide to SHEPD will be analysed and used by the NINES team to provide us with assurance that the new heating system has had no adverse effect on the customer's electricity usage and to not only ensure the customer is receiving maximum benefit from their new heating system but also provide us with assurance that the heating system is working as expected.

The asset details of the communication and monitoring equipment installed within the home, i.e. asset serial number, IP address, will be collected and stored allowing us to issue control signals to the devices in the home. The control signals include items such as the optimum charging schedule for the next 24 hours, these signals will be issued from the Active Network Management (ANM) system which will actively monitor items such as the weather, the demand and generation on the Shetland Network, and use this data to make intelligent decisions (using the simulation models produced by the University of Strathclyde), assisting SHEPD's Network Management Centre to monitor, balance and control the Shetland network.

In addition the data being collected via the communication equipment and the additional monitoring equipment will provide the University of Strathclyde with an optimum data set to validate and adjust their set of simulation models which will provide a view of the Shetland electricity network. In addition the simulation models produced will provide SHEPD and industry with knowledge and learning from the project. In the dissemination of knowledge and learning, data will remain anonymised.

The data collected via feedback surveys will be used to understand how the technology and the project is performing, and if there are things we can do differently in future projects involving domestic customers or

demand side management. Feedback may also be used for status updates and promotional ideas; however this data will remain anonymised unless explicit informed consent is received from the customer.

## **How will consent for use of the personal data be obtained?**

All customers invited to participate in the project will be provided with a NINES consent letter. This will be provided at face to face contact or issued directly to the home address. The letter lays out the benefits of NINES, the project contact details and the terms and conditions of agreeing to participate in the project. For details and a copy of the consent letter please refer to Northern Isles New Energy Solutions Customer Engagement Plan.

By agreeing to participate in the project customers will be giving their consent for SHEPD and the identified project partners to process their personal data. The contracts which SHEPD have in place with project partners will specify that the data shared as part of the project will not be used for any purposes other than those agreed with the customer. For example the data shared will not be used for marketing purposes nor will the customer or heating usage data be shared with their electricity supplier.

Where we or our project partners have a specific need to gain access to the same data item, we will minimise the number of requests to the customer by assuming the role of the data collector.

## **What information will be provided to the customer prior to consent being sought?**

Customers being invited to participate in the project will be provided with details of:

- Background to NINES
- The community benefits of NINES
- Project Partners and their role in the project
- Overview of the process they can expect to go through

Please refer to the Customer Engagement Plan for further information on the types of communications we will use when engaging with customers.

## **If priority services register customers are included in the project, how will their personal data be obtained?**

Priority Service Registered (PSR) customers will not be specifically targeted to participate in NINES, however any PSR customers who participate in the project will have agreed to take part and thereby agreed to their

data being used during the project. These customers will be covered by the terms and conditions in the consent letter, and will be treated as described in the NINES Customer Engagement Plan.

## **Who owns the personal data? How long will the personal data be retained?**

SHEPD takes responsibility as the Data Controller for storing personal data being used for the purposes of NINES. It will be our role to control, manage and facilitate access to data as and when required by our project partners. This limits the need to share data with partners unnecessarily, which could lead to weakening the protection of personal data. SHEPD will act as the holder of non personal data such as flow temperatures. Customers will retain ownership of the personal data which directly relates to themselves and will be able to request amendments and access to their personal data at any time.

To ensure compliance with the Companies Act 2006 any data relating to financial payments will be kept for 6 years from the date on which they are made. The data retained will allow us to manage any customer queries in relation to financial payments..

Customers who wish to leave the project may request that their data is deleted and will be informed of the risks. If this request is made then all data specifically identifiable to that customer will be removed.

Following completion of the project SHEPD and its partners will anonymise any personal data, which does not relate to financial payments, permanently deleting the remaining personal data from records and any related systems.

## **How will data be securely transmitted?**

The following security measures have been put in place:

- All spreadsheets will be password protected with the password transferred separately to the spreadsheet
- All data being manually transferred will be done so by using a secure SFTP
- Personal data will be sent separately to other data

With respect to the data transmitted via the communication links from the in home devices, the following checks have been put in place:

- The core DSM devices are situated in an enclosed box located within the customer's home.
- Encryption and secure protocol will be employed for any data being sent external to the home using a private network

- Data being transferred between SHEPD systems will use a local private network

## How will data be stored securely?

All personally identifiable data will be stored in systems certified internally or externally as appropriate for the purpose for which they are used. This means within SHEPD, data storage will be limited to existing contact or customer management systems or third party solutions with appropriate accreditation.

Personal data will only be accessed by personnel who: have been vetted in accordance with SHEPD employment practices (credit and address checks); are working on the NINES project; and are therefore approved to handle personal data.

As SHEPD is part of the SSE Group, data transfers to project partners will be risk assessed and performed in accordance with SSE Group data protection and information security policies. No unencrypted transfers of personally identifiable data will be made over public networks.

## How will data or analysis be published?

Results, data or analysis will be published in an anonymous format and will only be published with permission of SHEPD.

## 4 Compliance with Data Protection Act and SSE Group Data Security Policies

*‘Smart’ personal data is defined as any data collected from domestic properties utilising ‘Smart’ technology (remotely accessible data collection devices) that can be associated with a living individual, in line with the Data Protection Act definitions.*

Due to the sensitive nature of personal data collection it is imperative to SHEPD that NINES has all the correct security measures and processes to ensure compliance with the Data Protection Act 1998. Safety and security is a top priority to SHEPD and is at the forefront of everything we do. It is with this in mind that we ensure the NINES project has considered and adopted appropriate security policies.

SHEPD under the SSE Group are governed by the Group’s Information Security Policies; therefore NINES complies with the SSE Group’s documented and auditable processes in place for personal data management and handling, including what SSE define as Smart Data (see above).

SSE Group's policies are available on request, with the following policies having a direct governing impact on the NINES project;

- Information Security Policy Statement and Governance
- The Information Handling Standard
- The Data Protection Policy
- The External Parties Security Standard

Overview of Policy Documents;

### **Information Security Policy Statement and Governance**

The overarching policy and governance framework of SSE Information Security is defined in the Information Security Policy Statement and Governance Document. This document defines the Information Security Policy Statement and the Information Security framework relating to the collection, storage and processing of information.

### **Information Handling Standard**

The Information Handling Standard specifies the obligations of internal information owners and information custodians as well as external data processors.

### **The Data Protection Policy**

This policy explains the steps required for SSE to adequately protect Personal Data under its control and to meet its legal obligations under European Data Protection legislation.

### **The External Parties Security Standards**

The External Parties Security Standard sets out the stringent policies and processes SSE have in place to ensure any external party with access to SSE owned data handle said data in accordance with the relevant European Data Protection legislation.

## **5 Project Partners Handling Personal Data**

Data required during the NINES project will be collected, processed, transmitted and analysed by:

- Scottish Hydro Electric Power Distribution (SHEPD)
- Hjaltland Housing Association (HHA)
- The University of Strathclyde
- Smarter Grid Solutions
- Airwave

- SSE (Meter Operator)
- Wireless Logic Ltd

The table below gives the data classes and details of who will be collecting, transmitting, storing and using it. If any other partner or subcontractor collects or uses data they must do so in accordance with this strategy and with permission from SHEPD.

Table 1: Project Partners Handling Personal Data

Data	Who Collects the Data	How is data recorded	Who Transmits the data	Where is the data stored	Who will use the data
Customer Contact Details	SHEPD	Customer Consent Letter	Customer HHA	SHEPD secure database	SHEPD
Site/Address Information	HHA	Home Surveys	HHA	SHEPD secure database	SHEPD University of Strathclyde SSE (MOP)
Electricity Supply Information	SHEPD	Manual Input from data recorded in ECOES	SHEPD	SHEPD secure database	SHEPD
Electricity Meter Readings	SHEPD MOP	Meter Reading Request Form	Customer	SHEPD secure database	SHEPD HHA
Asset Details of communication and monitoring equipment	SHEPD	Installation Record	HHA	Element Manager	SHEPD
Storage Device characteristics (i.e. storage capacity available)	Airwave	Automatic Updates of collected data	Airwave	Local Interface Controller Element Manager	SHEPD Airwave University of Strathclyde
Monitoring data	Logic Energy Ltd	Automatic Updates of collected data	Mobile Network Provider	Local Data Logger Logic Energy Encrypted Server	University of Strathclyde SHEPD
Customer Project Feedback	SHEPD/HHA	Feedback Forms, face to face, Workshops, phone	SHEPD HHA	SHEPD Secure server	SHEPD HHA
Customer Service Enquires	SHEPD	Record of enquiry customer raised		SHEPD Secure Database	SHEPD