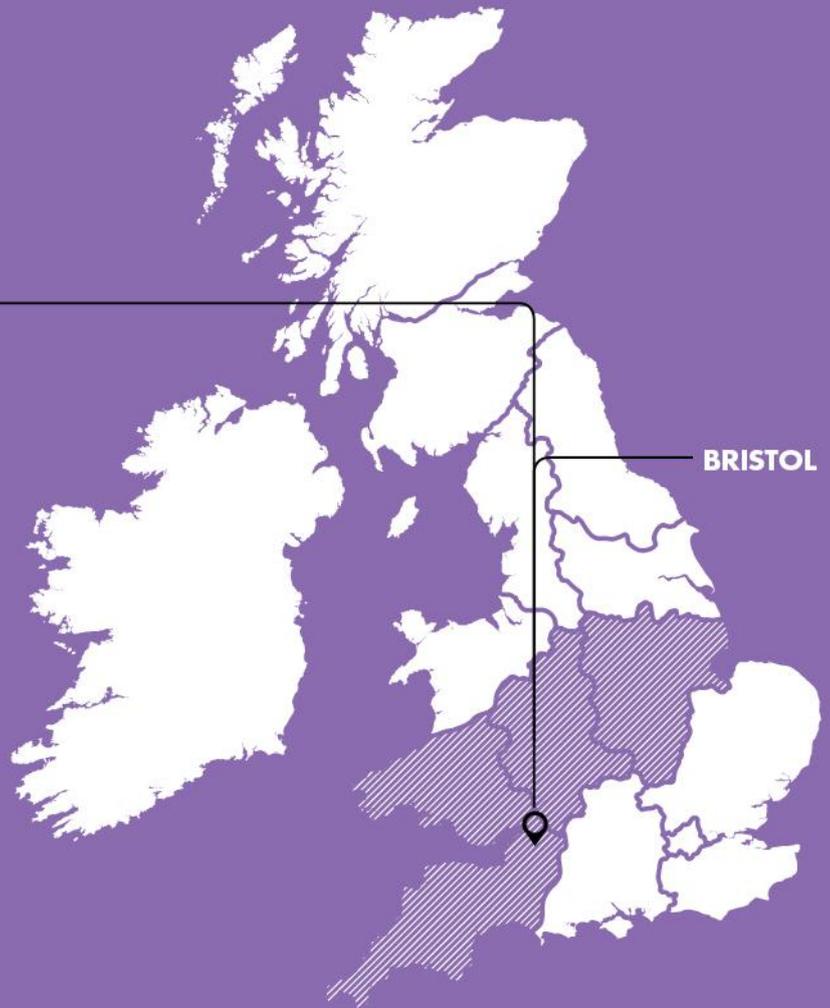


**PROJECT SOLA
BRISTOL**

DATA PROTECTION PLAN

VERSION 1.0



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Executive Summary

This document is a companion to the customer engagement plan and sets out the data collection and retention aspects for the SoLa Bristol project.

Working with Siemens, Knowle West Media Centre, Bristol City Council and The University of Bath SoLa Bristol is looking at customer's electrical data in order to better understand the time of day usage patterns and how these are affected when the customer has a DC battery storage device installed to their Solar PV system. In addition to this there is a variable tariff applied and a small DC network in their homes. The data will also be analysed to better understand how the storage system can affect the local LV electricity network.

The project will collect and utilise data that can be defined as Personal Data in the Data Protection Act 1998.

Customers individual load data will be made available to them through a secure login on a tablet interface. This data will also be available via a third party secure link to the University of Bath. Wider data sharing will be restricted to the project partners, Bristol City Council and Knowle West Media Centre who are involved with the customer engagement, so will have access to name and address data. This data will not be used outside of the project. Both of these companies have experience of managing data securely, including Personal Data.

Siemens do not own any data, but provide the equipment for data capture and transfer.

WPD has adopted the principles set out in the Data Protection Act to ensure that Personal Data is handled appropriately.

1 Definition of Personal Data

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

“Personal Data” is defined as any information which is capable of being used to identify a living individual. In addition to name, address and contact details, this could include individual preferences, transactional history, record of activities or travels, 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.

Data Subject: the individual of which data is being disclosed or held.

From these definitions it follows that some elements personal data will be collected as part of this project.

2 What Data will be collected and how will it be used.

Knowle West Media Centre (KWMC) with the assistance of Bristol City Council (BCC) is looking to recruit 30 domestic customers, 10 schools and an office. The name and address of customers selected is known and shared within these organisations. WPD also have this information in their customer records. Siemens have been provided with the address data so that calculations on cable lengths and types, from each property to the associated substation can be made. All parties will not use any of this data outside of the project.

KWMC will store the personal address data of potential participants in their database. KWMC will only hold the address data for participating customers until the project end.

BCC Council already store their tenants personal address data, and WPD also store their customers personal address data.

Siemens will only hold the address data for participating customers until the project end.

Section 3 lists all data, personal and monitored, collected as part of this project

2.1 Customer Data

KWMC already holds a database of individuals interested in participating in the project. This contains Personal Data such as names, addresses and contact details, and was collected during the customer workshop where interested participants came forward. This information is owned by KWMC, and will be used to Re-engage customers once this Customer Engagement Plan is approved. It will also be used to contact customers during the trial, for knowledge capture purposes and to notify customers of any updates and issues that may occur.

Customers selected for the trial will be cross referenced with BCC customer databases, along with WPD customer address details held in MPAN databases to identify the appointed electricity suppliers. This will allow WPD to contact the supplier to inform them of the trial details in line with section 3.12 of the LCNF Governance document.

WPD also hold data in the Priority Services Register (PSR) to help identify customers with medical or special requirements. This data will also be cross referenced with the participating customers, to ensure no additional risk is being created through trial participation. Should customers be identified on the PSR wanting to take part in the trial, KWMC will act as customer liaison, and WPD will undertake a risk assessment to ensure that the project will not unduly affect the customer. WPD will not share any PSR specific data with KWMC or any other project partners. KWMC involvement in the risk assessment process is as the customer engagement contact only, making the appointments for WPD to visit and carry out the assessment. If, after this, a PSR customer still wishes to participate, they will be assessed on an individual basis for suitability. Information regarding PSR customers will not be shared with any other party, and risk assessment will only focus on how participation in the project could affect the individual customer concerned.

Section 3 lists all data, personal and monitored, collected as part of this project

2.2 Trial Data monitored and captured

During the trial the project will capture specific customer electrical data that will be anonymised and sent to Bath University for analysis. Siemens have designed the data capture and monitoring equipment, and are responsible for the data transfer to The University of Bath. Siemens do not own any of the data. This data will consist of:

- Consumption (KWh)
- PV generated (KWh)
- State of charge of the Battery (%)
- Estimated savings (£)

For network security reasons this data is sent Over a VPN from the Private Asavie APN to the SICAM 230 Data Server using the University of Bath's network. This is in effect a secure network.

Further details of transfer security can be found in **Appendix 1**

In addition to this Customer feedback data will be captured in face to face interviews and via an electronic survey using the Customer Tablet Interface. This data will contain no personal data and will be anonymised, using a house ref no for the face to face interview data, and a unique tablet ID for the electronic surveys'. It will be owned by KWMC and UoB for the duration of the project and then destroyed.

Further details of transfer security can be found in **Appendix 1**

Section 3 lists all data, personal, monitored, and captured collected as part of this project.

3 List of Data Items

Domestic and commercial customers

No.	Data item name	Source	Purpose	Personal Data	Sharing
1.	MPAN	WPD's MPAS system	Identify the Electricity Supplier for individual customers and notify them of customer participation in SoLa Bristol project.	No	No
2.	Customer Name and Address	WPD's MPAS & PSR BCC customer database KWMC database	Identify customers interested in participating in the trial, and to contact them during the trial if required. Check to see if Priority Services Customers, if so refer to section 4.1. Use to identify contact details. Data will be matched on addresses and in the exceptional cases where this is not sufficient to match, then name data will also be provided.	Yes	Siemens

*

Trials data from Siemens data capture Device

No.	Data item name	Source	Purpose	Personal Data	Sharing
3.	Domestic/commercial Load Profile Consumption (KWh) PV generated (KWh)	Siemens data capture device	To allow quantification of energy use and load profile for the property. Including DC usage/storage and PV generation. Allows quantification of Demand Side Response potential and time of day usage	No	University of Bath WPD
4.	Domestic/commercial Voltage Profile State of charge of the Battery (%) Estimated savings (£)	Siemens data capture device	To understand the system voltage at that property. When combined with substation data will help WPD to understand the state of the network from a voltage perspective. To provide visibility to the customer, through their tablet, of how their battery is performing and the monetary savings accrued.	No	University of Bath WPD
5.	Customer feedback from Face to Face interviews	University of Bath KWMC	To meet the criteria of Knowledge capture and Dissemination within the project	No	WPD
6.	Customer feedback from Tablet surveys	Customer Interface Tablet	To meet the criteria of Knowledge capture and Dissemination within the project	No	WPD, UoB, KWMC.

4 Consent for data use and prior information

As part of the project registration process, customer consent will be gained to relating to the use of address and load profile data as part of the trial. This consent will be collected and stored by KWMC. Information will be provided to customers during the registration process as to the data items that will be collected, and used by the project partners.

Customers wishing to participate in the project will be asked to sign the customer agreement letter. See **Appendix 2**.

5 Priority Services Register Customers

Potential participants will be cross referenced with WPD's Priority Services Register (PSR). Participant data will be matched with PSR primarily on addresses and in the exceptional cases where this is not sufficient to match then name data will also be provided. This will allow suitable risk assessments to be made prior to project commencement to ensure that no customer is put at additional risk through the scheme.

6 Who owns the personal data

Customer Name and Address data is owned by WPD, KWMC and BCC within their existing data bases.

7 Who owns the other data

The electrical data captured will be stored on the UoB server and owned by them until the project end and then destroyed.

The customer feedback data captured by Face To Face interviews will be owned by UoB and KWMC until the project end and then destroyed.

The data captured through the Customer Interface Tablet Surveys' will be owned by KWMC until the project end and then destroyed.

8 How long will personal data be retained

Personal Data that has been exchanged with third parties is retained until the end of the project. Personal data held by WPD and BCC will be retained and dealt with under their existing policies and procedures. The data owned by KWMC is project specific and will only be retained until project end.

9 Managing Personal Data on a privacy by design approach

The Information Commissioners Office Data Sharing Code of Practice was used to inform the approach to data sharing.

WPD processes data in accordance with its ICO notification and in compliance with its data protection policy.

The Data Protection Principles have been considered as follows.

<p>1. “ Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless-(a) at least one of the conditions in Schedule 2 is met, and (b) in the case of sensitive personal data, at least one of the conditions in Schedule 3 is also met”.</p>	<p>Sensitive personal data for PSR Customers is held in existing WPD database. This will not be shared. The condition within schedule 2 that is met is that the data being shared for a valid business purpose. i.e. to pursue the legitimate interests of the data controller.</p>
<p>2 “Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes”.</p>	<p>The purpose for which the data may be used by the contractors is clear and bounded by contractual arrangements.</p>
<p>3 “Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed”.</p>	<p>Personal data has been limited to that which is required. .</p>
<p>4 “Personal data shall be accurate and, where necessary, kept up to date”.</p>	<p>There are normal processes for sharing updates to address data within the industry.</p>
<p>5 “Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes”.</p>	<p>Contractual clauses require the data to be returned or destroyed at the end of the project.</p>
<p>6 “Personal data shall be processed in accordance with the rights of data subjects under this Act”.</p>	<p>This data processing and sharing does not contravene the rights of data subjects.</p>
<p>7 “Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data”.</p>	<p>Secure methods of data transfer and storage will be used and obligations placed on contractors to do the same. See APPENDIX 1 FOR Siemens data protection overview</p>
<p>8 “ Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data”.</p>	<p>Data will remain within the EEA.</p>

10 Appendices

Appendix 1 – Siemens data protection overview

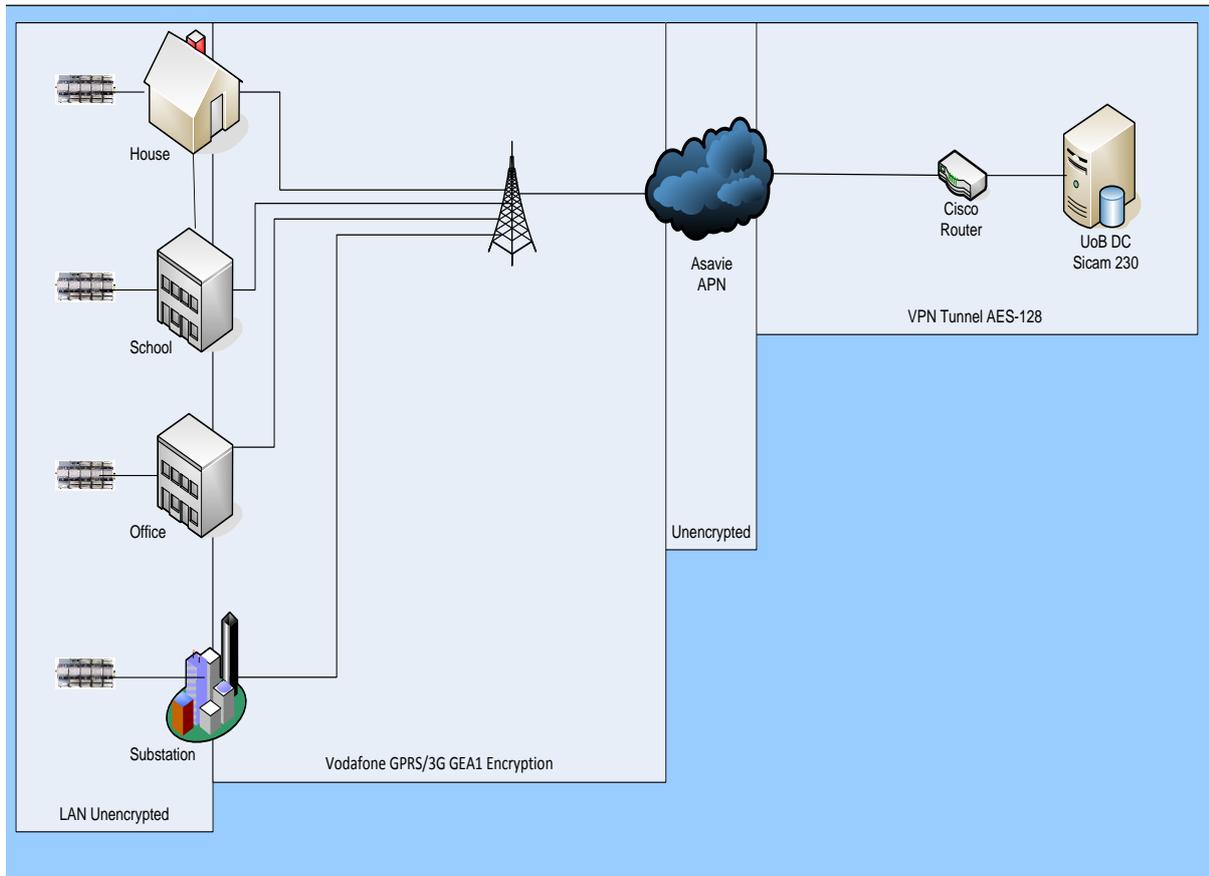
Appendix 2 - So La Bristol Participation Agreements

Appendix 1 – Siemens data protection overview

Data Protection

There are four areas over which data for the Bristol SoLa trial is transmitted.

1. Within the monitored building on the local Ethernet LAN
 2. Over Air transmission from the monitored building LAN to a private APN using Vodafone GPRS/3G
 3. Within the Asavie Private APN routing infrastructure within the Vodafone network
 4. Over a VPN from the Asavie APN to the SICAM 230 Data Server using the University of Bristol network
-
- Data Traffic on the local LAN at the House, School, Office or Substation is un-encrypted
 - Data Traffic between the House, School, Office or Substation and the Asavie APN is encrypted using the standards GPRS/3G GEA1 Encryption Standard.
 - The encryption key is embedded in the device SIM and also stored in the HLR (Home Location Register) of the telecoms provider (Vodafone)
 - Data routed within the APN is un-encrypted.
 - But is secured by the telecoms security standards
 - Data egressing from the Asavie APN to the Data Server is via a VPN and encrypted using the AES 128 encryption standard
 - On demand archive data exported from the Data Server onto a USB drive is unencrypted.



- LAN – Local Area Network
- APN – Access Point Name
- GPRS – General Packet Radio Service
- VPN – Virtual Private Network
- AES – Advanced Encryption Standard
- HLR – Home Location Register
- GEA1 – GPRS Encryption Algorithm 1
- USB – Universal Serial Bus

Appendix 2 – So La Bristol Participation Agreements



So La Bristol Participation Agreement (Domestic)

Thank you for agreeing to join the So La Bristol project. Please read the information below carefully and sign and return the form to the installer.

Background

The So La Bristol project aims to provide participating Bristol City Council (BCC) tenants in Knowle West with free solar electricity, which can also be stored using a battery system and used in the home when needed. The stored energy will be used directly to power the lighting and to charge appliances such as computers and mobile phones.

Western Power Distribution (the local electricity distribution network) is leading the project. Bristol City Council is installing the solar PV panels and batteries, Knowle West Media Centre is coordinating community engagement while Siemens is providing the technology and the University of Bath is looking at the data generated from the project.

The project is implemented in 2 phases:

- Phase 1 – has involved the installation of the solar panel system, which took place last summer and provides you with free electricity when the solar panels are generating.
- Phase 2 - will be conducted in partnership with Western Power Distribution and will involve the installation of the battery storage as well as changes to your home's lighting circuit to make it more efficient. You will also be given the tablet computer. The installation of this phase will take place between October and December 2013 and take approximately 2-4 days to complete.

The project is due to end in November 2014.

Our Responsibilities

- Provide and install solar panels and other equipment (So La System), which will remain the property of BCC but the tenant will receive the electricity the solar panels generate free of charge while a tenant at the property. BCC will claim the Feed-in-Tariff.
- To arrange maintenance of the So La System.
- Explain how the equipment works and provide a tablet computer so you can see how much energy the solar panels generate and what is being used.
- Provide a helpline for support:
 - For all electrical enquiries call the BCC Repairs Helpline: Tel: 0117 922 2200 (select option 1)
 - For general enquiries related to the tablet and participation in about the project contact Sue Mackinnon or Jen Rolfe at Knowle West Media Centre Tel: 01179030444 Email: sue@kwmc.org.uk or jen.rolfe@kwmc.org.uk

Your Responsibilities

- To participate in both Phase 1 and 2 of the project as outlined above.
- Ensure care is taken when handling the equipment to avoid damage.
- Ensure access to your home for installation of the So La System and any repairs (with prior appointments). The tenant will not be liable for any maintenance or repair costs of the system unless caused by willful damage.
- Tenants participating in the project will receive a tablet computer to access information about the project; the tenant can keep this on the completion of Phase 2 of the project.
- If the property is purchased by the tenant in the future, they will have the following options:
 1. To continue with the existing scheme (the So LA equipment will remain the property of BCC).
 2. To withdraw from the scheme and have the system removed.

Publicity

With prior consent, some households may be invited to take part in promotional activities.

Data Protection

Your personal information will be held and used in accordance with the Data Protection Act 1998. The So La Bristol project will not disclose such information to any unauthorised person or party outside of the So La Bristol project partnership.

Name:

Signature:.....

Address:.....

.....

.....

.....

Date.....

Installer Signature:.....



So La Bristol Participation Agreement (schools)

Thank you for agreeing to join the So La Bristol project. Please read the information below carefully and sign and return the form to Bristol City Council (BCC).

Background

The So La Bristol project aims to provide participating schools with a 24V battery storage system, linked to a DC network. The stored energy will be used directly to power the lighting and computers in an IT suite within your school.

Western Power Distribution (the local electricity distribution network operator) is leading the project. Bristol City Council is installing batteries through their contractor Avonline, and leading the schools engagement strategy, while Siemens is providing the technology and the University of Bath is looking at the data generated from the project. Gallomanor are designing a project specific debate kit as an educational package for participating schools.

Project Implementation

- The project will involve the installation of an external cabinet
- Internal lighting circuits and fittings will need to be modified for DC, along with changes to the IT equipment within the selected room.

The project is due to run for one year from the date of installation and all equipment will be decommissioned and removed on project end.

Our Responsibilities

- To liaise with all parties for the installation and maintenance of the So La System.
- Explain how the equipment works and provide an interface so you can monitor and work with the data produced.
- Provide a helpline for support:
 - For all electrical enquiries call the BCC Repairs Helpline: XXXXX
 - For general enquiries related to the tablet and participation in the project contact Jon Brooks or James King XXXXX

Your Responsibilities

- Ensure care is taken when handling the equipment to avoid damage.
- Ensure access to your school for installation of the So La System and any repairs (with prior appointments). Your school will not be liable for any maintenance or repair costs of the system unless caused by willful damage.
- Schools participating in the project will receive a tablet computer to access information about the project; the school can keep this on the completion of the project.

Publicity

With prior consent, some schools may be invited to take part in promotional activities.

Data Protection

Your personal information will be held and used in accordance with the Data Protection Act 1998. The So La Bristol project will not disclose such information to any unauthorised person or party outside of the So La Bristol project partnership.

Name:

Signature:

Address:

.....

.....

.....

Date

Installer Signature:



SoLa Bristol Participation Agreement (Office)

Thank you for agreeing to join the So La Bristol project. Please read the information below carefully and sign and return the form to Bristol City Council (BCC).

Background

The So La Bristol project aims to provide your participating office with a 24V battery storage system, linked to a DC network. The stored energy will be used directly to power the lighting and computers in an agreed location within your office.

Western Power Distribution (the local electricity distribution network operator) is leading the project. Bristol City Council is installing batteries through their contractor Avonline, and leading the commercial customer engagement strategy, while Siemens is providing the technology and the University of Bath is looking at the data generated from the project.

Project Implementation

- The project will involve the installation of an external cabinet
- Internal lighting circuits and fittings will need to be modified for DC, along with changes to the IT equipment within the selected room.

The project is due to run for one year from the date of installation and all equipment will be decommissioned and removed on project end.

Our Responsibilities

- To liaise with all parties for the installation and maintenance of the SoLa System.
- Explain how the equipment works and provide an interface so you can monitor and work with the data produced.
- Provide a helpline for support:
 - For all electrical enquiries call the BCC Repairs Helpline: XXXXX
 - For general enquiries related to the tablet and participation in the project contact Jon Brooks or James King XXXXX

Your Responsibilities

- Ensure care is taken when handling the equipment to avoid damage.
- Ensure access to your office for installation of the So La System and any repairs (with prior appointments). Your office will not be liable for any maintenance or repair costs of the system unless caused by willful damage.
- Your office will receive a tablet computer to access information about the project; you can keep this on the completion of the project.

Publicity

With prior consent, you may be invited to take part in promotional activities.

Data Protection

Your personal information will be held and used in accordance with the Data Protection Act 1998. The So La Bristol project will not disclose such information to any unauthorised person or party outside of the So La Bristol project partnership.

Name:

Signature:

Address:.....

.....

.....

.....

Date.....

Installer Signature:

