

## Public Notice

Smart Energy Research Lab (SERL): Processing of address-level smart meter registration data for sampling and recruitment purposes

### Contact details

The Data Controller for this project is: University College London (UCL), UCL Energy Institute, The Bartlett School of Environment, Energy and Resources. Central House, 14 Upper Woburn Place, London, WC1H 0NN.

Data Processors for this project are: UK Data Archive, University of Essex, Wivenhoe Park, Colchester, CO4 3SQ; Ipsos MORI, 3 Thomas More Square, London, E1W 1YW; CGI IT UK Limited (CGI) 14<sup>th</sup> Floor, 20 Fenchurch Street, London, EC3M 3BY.

Any enquiries relating to data privacy and protection should be sent to the UCL Data Protection Officer:

UCL Data Protection Officer. Legal Services, UCL. Gower Street. London. WC1E 6BT, [data-protection@ucl.ac.uk](mailto:data-protection@ucl.ac.uk) or +44 (0)20 3108 8726

### The purposes of the processing

This public notice is for the processing of address-level smart meter registration data by UCL for the purposes of recruiting participants to the Smart Energy Research Lab, a scientific research project in the public interest.

Information on how UCL processes personal data for general research can be found at the following link <https://www.ucl.ac.uk/legal-services/privacy/ucl-general-research-participant-privacy-notice>

### *Description of project:*

The Engineering and Physical Sciences Research Council (EPSRC) have funded a 5-year project (Sept. 2017-2022) ([EP/P032761/1](#)) to develop an online data portal which will provide the UK research community with access to high-resolution smart meter data and linked contextual data: the Smart Energy Research Lab (SERL - previously called the Smart Meter Research Portal - SMRP).

SERL is a consortium project led by UCL, who are acting as the project's Data Controller. The UK Data Archive (University of Essex) are acting as the Data Processor for the project and are developing the data portal, securely storing all data collected by the project, and will control access to it by the UK research community. There are five further UK universities funded by SERL (Cardiff University, University of Edinburgh, Leeds Beckett University, Loughborough University, University of Southampton) and the Energy Saving Trust who, alongside UCL, will be responsible for conducting initial research using the data collected. Ipsos MORI are also acting as a data processor for the purpose of recruiting participants.

The aims of the project are to:

1. Develop a data portal to provide a secure, consistent and trusted channel for the UK research community to access a confidential, ongoing repository of high-quality smart meter data (collected via the DCC) and linked contextual data for GB households which will facilitate innovative energy research for years to come.
2. Recruit a representative sample of 10,000 GB households who will: provide informed consent to participate in the project, allow collection of their smart meter data, complete a participant survey, and agree to have their data linked to other contextual data we hold.
3. Conduct world-leading energy research to support government policy, kick-start the development of new products, services and energy markets, help provide solutions to the energy trilemma (security, affordability and environmental sustainability).
4. Develop a best practice data governance framework to ensure that all data associated with the project is processed securely, lawfully, ethically, transparently and in support of innovative research.

This public notice relates to the processing of data for the purposes of recruiting participants to the project (aim 2 above).

#### *Public interest benefits of the project*

The Department of Business, Energy & Industrial Strategy (BEIS) recent Review of the Data Access and Privacy Framework (Nov 2018) specifically mentions this project (SERL/SMRP). They stated:

- 'smart metering data has the potential to improve the quality and granularity of the consumption data available for research purposes'
- 'Smart metering energy consumption data has the potential to deliver wider public interest benefits'
- 'that smaller users pursuing public interest benefits may face challenges in meeting the stringent security and technical requirements necessary to become a DCC User'
- 'These challenges may be overcome through the further development of research portals and data repositories, such as SMRP'

The processing of personal data described in this public notice contributes directly towards the realization of the public interest benefits of this project.

#### *The need for this processing*

Recruiting a representative sample of 10,000 GB households with smart meters is one of the most critical aims of the project to realize the full potential of its public interest benefits, yet it is also one of the most difficult to achieve due to the low penetration rate of eligible smart meters that are enrolled in GB's smart metering infrastructure (known as 'SMETS2' meters). As of April 2019, less than 5% of households had SMETS2 meters. The aim of recruiting a large and representative sample is only practically possible if UCL can identify addresses that already have SMETS2 meters installed before inviting them to participate in the SERL project.

This public notice therefore relates to the processing of personal data by UCL to identify addresses that have SMETS2 smart meters installed and who are eligible to be recruited to the Smart Energy Research Lab.

To do this UCL selects a random sample of addresses from a register of the population of GB addresses. UCL sends a query to the DCC to discover which of these households have SMETS2 smart meters installed to determine which are eligible for recruitment.

The processing of smart meter registration data is necessary for UCL to identify a sample of households who already have SMETS2 meters installed, and so who are eligible to recruit onto the project. **NB.** UCL will not collect energy consumption data from smart meters without the informed consent of households who have been invited to participate in SERL.

The alternative of sending letters to addresses where UCL does not know if SMETS2 meters are installed will receive such low response rates of eligible households that the difficulty of achieving the large sample of households necessary for producing empirical observations of sufficient precision for it to be useful from a public interest perspective would be disproportionate in relation to the effect that identifying eligible households has on the individuals at the address. Not identifying eligible households would also increase the overall burden on the population as UCL would be required to send letters to a much larger number of addresses, most of whom would be ineligible to participate.

Alternatively, a third-party Data Controller of address data may share a list of addresses with UCL for the purpose of UCL recruiting households at these addresses to SERL where there is a lawful and ethical basis for doing so e.g. where the household has provided consent to be recontacted for future research. UCL will identify which addresses have smart meters and are eligible to recruit and the third-party Data Controller may provide UCL with the name of the occupants of these addresses for UCL to contact for recruitment.

#### *How the data is stored*

All data will be securely stored at UK Data Archive or UCL and access to the data will be controlled so that it is limited to authorized users only.

#### **The lawful basis of the processing**

The purpose of SERL is scientific research in the public interest. UCL will be the data controller for personal data processed for this purpose. UCL has categorised research generally as being one of its 'public tasks' ([https://www.ucl.ac.uk/legal-services/sites/legal-services/files/ucl\\_statement\\_of\\_tasks\\_in\\_the\\_public\\_interest\\_-\\_august\\_2018.pdf](https://www.ucl.ac.uk/legal-services/sites/legal-services/files/ucl_statement_of_tasks_in_the_public_interest_-_august_2018.pdf)) and has issued guidance ([here](#)) that states that for the vast majority of research undertaken at the university Article 6(1)(e), i.e. the 'public task', is the appropriate legal basis for processing personal data.

All personal data processed by UCL as part of SERL will rely on public task as its lawful basis.

#### **The categories of personal data obtained**

UCL processes the following categories of personal data:

- Address
- Name
- UPRN – unique Property Reference Number
- MPxN – unique identification number for gas or electricity meter

- Device ID – unique identification number for a smart meter Device i.e. (a) an Electricity Smart Meter; (b) a Gas Smart Meter; (c) a Communications Hub Function; (d) a Gas Proxy Function; (e) a Pre-Payment Meter Interface Device; (f) a HAN Connected Auxiliary Load Control Switch; and (g) any Type 2 Device e.g. an in-home display.
- Device Status – indicates whether the device is part-way through the installation process, operating ('commissioned'), or withdrawn/suspended etc. due to faults or other issues.
- Date device was commissioned.

No special category data or criminal offence data is obtained or processed.

No smart meter data will be collected without the informed consent of households who have been invited to participate in SERL.

### **The source of the personal data**

To create a sample of addresses, address data and UPRN are sourced from Ordnance Survey AddressBase

Alternatively, a third-party Data Controller may provide UCL with address, UPRN, or name.

The source for the remaining personal data is the Data Communications Company (DCC). The DCC is the national communications infrastructure for smart meter data, allowing authorised DCC Users to access data from individual smart meters as defined by the Smart Energy Code. Under the Smart Energy Code, UCL (as a DCC Other User) has the right to access the Smart Metering Inventory via the DCC Self-Service Interface and make SRV 8.2 Read Inventory requests via a DCC Adapter service through the DCC Gateway. UCL has procured a DCC Adapter service from CGI to do this. This means that UCL can access smart meter registration data for an address provided it has a lawful basis for processing this data. UCL's lawful basis is 'public task' under GDPR (see above).

### **The recipients or categories of recipients of the personal data**

The recipients of the personal data will be UCL employees working on SERL and UK Data Archive (the Data Processor for SERL) employees working on SERL. Ipsos MORI (a Data Processor for SERL) will receive a list of addresses with SMETS2 meters in order to contact potential participants. CGI may receive a list of addresses for which UCL wishes to receive smart meter registration data. The other SERL consortium partners will not process this personal data.

Where a third-party Data Controller provides UCL with a list of addresses for the purpose of UCL recruiting households at these addresses to SERL, then UCL may provide the third-party Data Controller with a list of the addresses UCL wishes to recruit, or the types of Devices present in these addresses.

### **The details of transfers of the personal data to any third countries or international countries**

No personal data will be transferred to any third country or international country.

This data will not be disclosed or sold to any other third party or commercial organisation.

### **The retention periods for the personal data**

The personal data described here will be retained for the duration of the research project. Once the project terminates, all personal data will be deleted.

### **The rights available to individuals in respect of the processing**

If you wish to exercise any of the rights below, please contact the Data Protection Officer using [data-protection@ucl.ac.uk](mailto:data-protection@ucl.ac.uk) or +44 (0)20 3108 8726.

Please note that, for the purposes of the Smart Energy Research Lab, UCL may be exempt from the obligations below if a number of conditions are met including if complying would prevent or seriously impair the achievement of scientific research purposes.

#### *Right to be informed*

Individuals have the right to be informed about the collection and use of their personal data. This public notice documents the privacy information that should be provided to individuals. UCL assesses that the effort involved in providing this information to every address where the personal data described above is held by UCL would be disproportionate in relation to the effect this has on the individuals at these addresses:

- There is no effect for addresses that are ineligible to be recruited (those without SMETS2 smart meters).
- For addresses that are eligible to be recruited the effect is that UCL may choose to send a letter by post 'to the occupier' at the address, inviting them to consent to participating in the research project. Recruitment material will include a statement explaining that their address has been selected at random from a national register of households with smart meters, or that they are being contacted based on their stated preferences e.g. they agreed to be recontacted for future research.

UCL has conducted a Data Privacy Impact Assessment regarding the purposing of this data and has made privacy information publicly available via this public notice on its website.

#### *Right of access*

Individuals have the right to know if personal data is held concerning them, whether the data are transferred to a third country or international organisation, to access a copy of the data for free, and to obtain detailed privacy information.

#### *Right of rectification*

From GDPR Article 16: 'The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.'

#### *Right to erasure*

Individuals have the right to request personal data held concerning them is erased (the right to be forgotten).

### *Right to restrict processing*

According to GDPR Article 18: 'The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:

1. the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
2. the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
3. the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
4. the data subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override those of the data subject.'

### *Right to object*

Individuals have the right to object at any time to the processing of their personal data under public task. In this case, the controller shall no longer process the data unless they demonstrate compelling legitimate grounds for overriding the individual's rights.

### **The right to lodge a complaint with the ICO**

You have the right to lodge a formal complaint with the UK Information Commissioner's Office. Full details may be accessed on the complaints section of the ICO's website: <https://ico.org.uk/make-a-complaint/>