

UNC Modification 0668S - Enabling permissions for the provision of information to Alt Han Company to support smart metering roll-out, and iGT UNC Modification 116 Enabling permissions for the provision of information to Alt Han Company to support smart metering roll-out

Workgroup Privacy Impact Assessment

Appendix to Modification 0668 and 116 Work Group Report –

[date]

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PART ONE

1. Explain what the project aims to achieve, what the benefits will be to the organisation, to individuals and to other parties.

This PIA has been prepared to support the developments of UNC Modification 0668S and iGT UNC Modification 116. The purpose of the project is set out in the modifications.

2. You may find it helpful to link other relevant documents related to the project, for example a project proposal.

The following is from the modifications:

The Alternative Home Area Network (Alt HAN) arrangements are set out in Section Z of the Smart Energy Code (SEC) and there are two key mechanisms that facilitate the delivery of the arrangements.

The Alt HAN Forum makes decisions required to carry out the activities and services of the Alt HAN Company (AlthANCo). In doing so it can delegate and give direction to the AlthANCo.

The Forum is made up of Relevant Supplier Parties, who operate in the GB Smart Metering market, nominated and elected in accordance with the processes detailed in Section Z of the SEC.

<https://www.althanco.com/>

3. Also summarise why the need for a PIA was identified (this can draw on your answers to the screening questions).

The following tests were applied to determine whether a PIA was required.

- a) Will the project involve the collection of new information about individuals?
No
- b) Will the project compel individuals to provide information about themselves?
No
- c) Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information?
Yes, information will be disclosed to the AlthANCo service provider (the appointment process is ongoing)
- d) Are you using information about individuals for a purpose it is not currently used for, or in a way it is not currently used?
Yes, the information is to be used to consider whether the premise may require an alternative home area network.
- e) Does the project involve you using new technology that might be perceived as being privacy intrusive? For example, the use of biometrics or facial recognition.
No
- f) Will the project result in you making decisions or taking action against individuals in ways that can have a significant impact on them?
No
- g) Is the information about individuals of a kind particularly likely to raise privacy concerns or expectations? For example, health records, criminal records or other information that people would consider to be private.
No

- h) Will the project require you to contact individuals in ways that they may find intrusive?
No
- i) Will the disclosure of information utilise new technology for Xoserve?
No.
- j) Will the disclosure include information that identifies a vulnerable customer?
No
- k) Will the disclosure release mass data to a party?
Yes. Information will be provided for all supply meter points within a live confirmation (circa 24m)
- l) Will the disclosure include information that identifies an occurrence of theft of gas?
No
- m) Will the disclosure require a fundamental change to Xoserve business
No

The PIA will highlight, the risks and the mitigating actions to minimise issues associated with the risk.

PART TWO

1. **The collection, use and deletion of personal data should be described here and it may also be useful to refer to a flow diagram or another way of explaining data flows. You should also say how many individuals are likely to be affected by the project.**

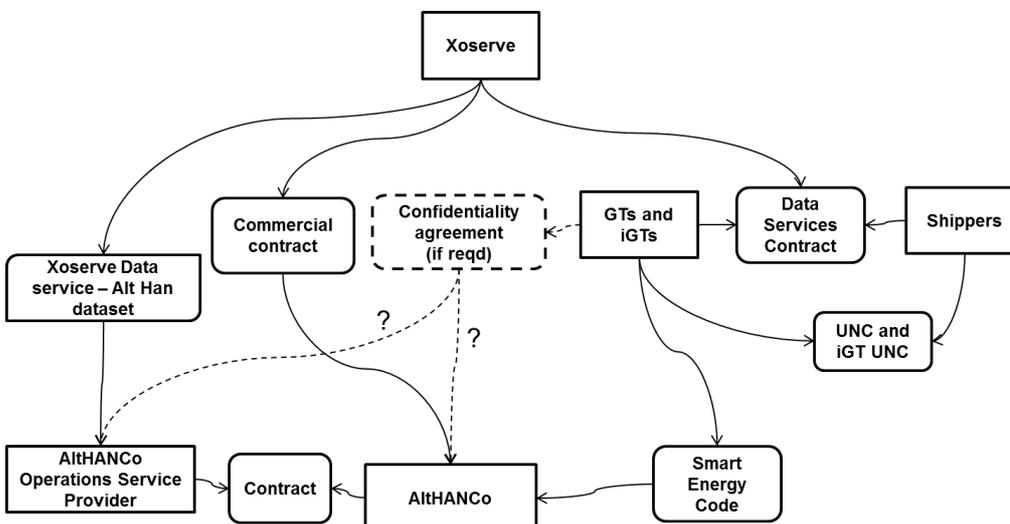
Xoserve shall provide a dataset to the AltHANCo service provider on a quarterly basis. The dataset will be provided via a shared area download facility e.g. Huddle. The AltHANCo service provider will use the data in accordance with the permitted purpose set out in the commercial arrangements. The AltHANCo service provider will be required to delete the data once the exercise is completed. It is not expected that any individuals will be affected solely by the dataset from Xoserve. It is however, expected that individuals will benefit from the overall service provided by the AltHANCo service provider in the form of a more efficient smart metering roll-out.

Contractual arrangements

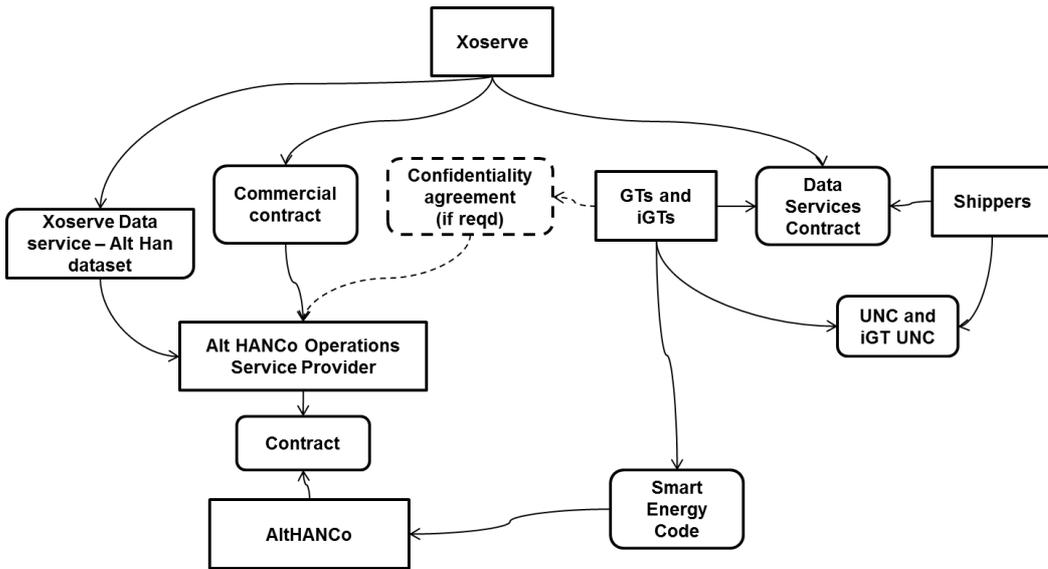
The following contractual arrangements are in place for the provision of the service.

To be confirmed, one of two models will be applied

This one



Or this one



In either case the permitted purpose for the use of the data will be set out in the commercial arrangements and it will be a condition that the AltHANCo service provider complies with this.

2. Explain what practical steps you will take to ensure that you identify and address privacy risks. Who should be consulted, internally and externally? How will you carry out the consultation? You should link this to the relevant stages of your project management process.

The modification working group is requested to identify any risks associated with the service. The modification workgroup are responsible for the PIA.

Consultation of the PIA will be carried out via the UNC Modification process, as the PIA will form part of workgroup report.

PART THREE

1. Identify the key privacy risks and the associated compliance and corporate risks. Larger scale PIAs might record this information on a more formal risk register.
2. Describe the actions you could take to reduce the risks, and any future steps which would be necessary (e.g. the production of new guidance or future security testing for systems).

DESCRIPTION OF RISKS TO PRIVACY	RISK IDENTIFIED BY	RISK ASSOCIATED TO; INDIVIDUAL, COMPLIANCE, ORGANISATION / CORPORATE RISK	PROPOSED SOLUTION	RISKS ELIMINATED / REDUCED OR ACCEPTED.	IS THE SOLUTION A JUSTIFIED, COMPLIANT AND PROPORIONATE RESPONSE TO THE AIMS OF THE PROJECT
The AltHANCo service provider may use the data for other purposes.	Xoserve	Individual	Include Permitted Purpose clause and consequence of breach in commercial arrangements. Request AltHANCo		

			also has similar terms in its contract with their service provider		
AltHANCo has requested data for all 24m supply meter points. Should those supply meter points that Xoserve could determine will not need an AltHAN be excluded from the extract?	Distribution Workgroup	Individual	To be determined		

PART FIVE

1. Who has approved the privacy risks involved in the project? What solutions need to be implemented?

Risk	Approved solution	Approved by

PART SIX

1. Who is responsible for integrating the PIA outcomes back into the project plan and updating any project management paperwork? Who is responsible for implementing the solutions that have been approved? Who is the contact for any privacy concerns which may arise in the future?

Action to be taken	Date for completion of actions	Responsibility for action

2. Contact point for future privacy concerns

Appendix

1. Confidentiality Agreement

Key provisions

2. Service Agreement

Key provisions