

Privacy Notice for the Heat Network Efficiency Scheme Evaluation



Important details about Winning Moves

Established in 1995, Winning Moves Ltd undertakes research and evaluation for government, publicly funded and other organisations. We primarily operate as a Data Processor – however, on occasion, we may operate as Data Controller (either singularly or joint) depending on the nature of our work.

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- > Information Commissioner Office Registration no | Z6399957

Our commitment to your privacy

Winning Moves Ltd takes your privacy very seriously and we are committed to protecting your personal information and the information you provide whilst conducting research with us. Please read this Privacy Notice carefully and contact us with any questions.

We are committed to meeting relevant laws, codes, registrations and standards



The UK General Data Protection Regulation (GDPR)



Data Protection Act 2018

Data Protection Act 2018



Market Research Society (MRS) Code of Conduct



ISO20252:2019 – the International Quality Standard for Market, Opinion and Social Research



Information Commissioner Office Registration no | Z6399957



Cyber Essentials

As a Market Research Society Company Partner, you can trust that your personal information will be treated with respect, and it will only be used for the purposes that we inform you about. It is not our aim to

sell or promote anything. We conduct market research using scientific methods and we commit, in obtaining your co-operation, not to mislead you about the nature of the research or how the findings will be used. You can verify that we are a bona fide market research consultancy by contacting the Market Research Society (MRS) on freephone 0500 396 999.

Purpose

Background

Winning Moves are part of the consortium, led by RSM, contracted by the Department for Energy Security and Net Zero (the Department) to evaluate the Heat Network Efficiency Scheme (HNES) which provides funding to existing heat networks looking to improve their efficiency. This includes both the demonstrator and main schemes, which are both split into two separate funding streams. These are revenue grants, which provide up to 100% of the funding required for optimisation studies on how the network can be made more efficient, and capital grants which provide up to (but not including) 50% of the funding required to implement these plans (or others developed independent of HNES).

Winning Moves are involved specifically in the collection of data from applicants to support the process evaluation of the application, funding award and monitoring processes, and the interim impact evaluation of the scheme, with the overall aim of improving the process for future applicants and understanding whether the fund has met its objectives. By applying to HNES, applicants agreed to participate in the evaluation.

Data controller and data processors

For the purposes of this project:

1. The Department and Gemserv (delivery partner) are joint data controllers
2. Winning Moves is the data processor
3. RSM and Gemserv (and partners Ramboll and Turner and Townsend) are also data processors

Type of data that will be processed

For this project, we will process the following types of personal data:

1. *Simple data* including your name, email address, organisation name, role in organisation, region telephone number and information relating to your project (such as project name and description, the funding stream and round the project is a part of, whether your application was successful and if you accepted the offer, and progress updates on when key milestones are met).
2. *Behavioural data* including your experience with the application process, monitoring process and overall feedback on the fund, and on the impact this has had on your heat network.
3. *Financial data* including the amount of funding received and the amount of matched funding drawn down, as well as estimated impacts of the fund on finances of the heat network such as operating costs.

How we get the personal data we process

All of your personal information is provided through the following ways:

- > Via a database provided by the Department, which they received from Gemserv. Specifically simple and financial data, contact and demographic information (as above), were provided to Winning Moves as you are a beneficiary of HNES and you agreed to participate in the evaluation when you applied for the grant.
- > Via response to the survey you are invited to participate in. Specifically, this will include any demographic information we wish to verify, and behavioural data around your opinions of various aspects of the Fund.

The legal bases for processing your personal data

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

1. Public task: your contact details were shared with us by the Department as they require us to process your personal data to perform a public task. In this instance, it is to enable them to understand the impacts of HNES.
2. Consent: prior to your completion of a survey, we explicitly seek your consent to collect and process your personal data. Informed consent is always collected by way of an affirmative action such as selecting 'next' to continue with a survey, a recorded verbal agreement when taking part in an interview, or an agreement in writing indicating that you would like to proceed with the research. You can withdraw your consent at any time by emailing dataprotection@winningmoves.com.

How we will use your personal data

- > Winning Moves will have access to the full, non-anonymised data for analysis purposes, however all reporting will be aggregated.
- > The data will be aggregated and the anonymized analysis reported to the Department policy staff and the delivery team (Gemserv and partners Ramboll and Turner and Townsend). Where sample sizes are five or fewer, the results will not be reported to protect the anonymity of respondents.
- > Pseudo-anonymized data will be shared within the research consortium (RSM) for the purpose of the evaluation and future data collection purposes, and with the Department analysts for future data collection purposes.
- > To link data from this survey to other information sources such as project monitoring data and subsequent surveys that we will invite you to participate in in 2024.
- > For market and social research purposes: this includes carrying out analysis on behalf of the client who has commissioned the survey.
- > For quality control purposes: we may telephone you to validate your responses.
- > Provided you have given consent, to recontact you about follow-up research.

Will we share your personal data?

Your personal data will be shared with the following third parties:

- > The Department Analysts will receive pseudo-anonymized data, so data can be linked to other data already stored/collected in the future via other means, for the purpose of the evaluation. Any information shared with the Department policy team will be anonymous and aggregated.
- > RSM will also receive pseudo-anonymized data as they will be triangulating data for the evaluation.
- > Gemserv, the delivery partner, will receive aggregated, anonymous survey responses, although it is possible that respondents may be identifiable by their responses.
- > Our sub-processors who may carry out some of the processing on Winning Moves' behalf, and under Winning Moves control. An example of this might include the service provider who hosts our survey platform, IdSurvey

Any third party must also process the personal information as set out in this Privacy Policy and as permitted by the UK's Data Protection Act/laws.

How we will keep your personal data

Your information will be securely stored in our survey software IdSurvey and on Microsoft Office 365. We will protect the confidentiality of your information in accordance with our normal data handling procedures and all legal requirements. We will not use it for any purposes other than those which are set out in this Notice. We are committed to keeping personal data secure and take all reasonable technical and organisational measures to protect personal data from loss, misuse or alteration.

The length of time we hold your personal information varies depending upon the type of information and its use. We will hold your personal information on our systems only for as long as necessary to provide research services to our clients, and will anonymise data where possible, securely deleting personal data associated with it at the earliest possible point. For this project, we intend to keep all personal information for 12 months post project, in case follow ups are required, therefore data will be deleted in November 2027. We will then dispose of your information by secure digital deletion; however, this will be anonymised at project completion, which is currently estimated at November 2026.

Where your personal data will be processed

Data will predominantly be processed in the UK or EEA. Our survey platform emailer uses MailChimp which has servers based in USA. Your name, email and the funding stream you applied for, capital or revenue, will be of relevance to the emailer.

A recent adequacy decision from European Commission states that US organisations can self-certify their participation in the EU US Data Privacy Framework (DPF) facilitating cross-border transfer of personal data in compliance with EU law. Self-certification is a public commitment to comply with the DPF principles which are enforceable under US law. These safeguards therefore also facilitate the use of other tools, such as standard contractual clauses and binding corporate rules. Our survey platform, IdSurvey has a standard contractual clause in place.

Your Rights

Co-operation in research is voluntary at all times regardless of what the research is about or who our client is. You are entitled at any stage to ask that your personal data, or part or all of the record of your survey responses, be destroyed or deleted and we will carry out such a request. This can be requested during the interview itself or afterwards. You have the right to access any personal data that we process relating to you. We may ask for verification of your identity before releasing any information to you.

How to complain

If you have any concerns about our use of your personal information, you can contact the data controller:

Phone	Email	Address
N/A	dataprotection@energysecurity.gov.uk	Data Protection Officer Department for Energy Security and Net Zero 1 Victoria Street London SW1H 0ET

If you wish to contact Winning Moves:

Phone	Email	Address
0121 285 3800	dataprotection@winningmoves.com	Winning Moves 102 Colmore Row Birmingham B3 3AG

You can also complain to the ICO if you are unhappy with how we have used your data:

Phone	Website	Address
0303 123 1113	https://www.ico.org.uk	Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

