

Post Occupancy Evaluation, Chobham Manor Phase 1

Privacy Notice

Last updated: 05/June/2020

1. What activity does this Privacy Notice relate to?

This Privacy Notice relates to a Post Occupancy Evaluation (POE) project for Phase 1 properties located at Chobham Manor, Olympic Park Avenue, Stratford, London E20 1FT (“Chobham Manor POE”).

We anticipate that the collection of resident data for the Chobham Manor POE will commence from June 2020 and be completed by July 2021. Anonymised findings are anticipated to be available by Sept 2021.

2. Who are we and what do we do?

The London Legacy Development Corporation (LLDC) was created by the Mayor of London on 1 April 2012 to regenerate east London, including maximising the benefits of Queen Elizabeth Olympic Park and the London 2012 Olympic Games and Paralympic Games.

As the local planning authority, LLDC was responsible for preparing the statutory Development Plan (Local MasterPlan 2015) for the Legacy Corporation area. Planning conditions of the Chobham Manor development require LLDC to collect energy, water and wider POE data such as surveys and focus groups to assess the sustainability performance of Chobham Manor.

We (LLDC) have commissioned the Chobham Manor POE because we are the Data Controller of all Personal Data collected from residents.

You can contact the Data Protection Officer at the Legacy Corporation:

Data Protection Officer
Level 10, 1 Stratford Place
Montfichet Road, London, E20 1EJ
dataprotection@londonlegacy.co.uk
tel: 020 3288 1800

3. What is the purpose of the Chobham Manor POE?

The initial design concept of Chobham Manor sought to ensure that the residential properties met the highly aspirational sustainability performance targets imposed by Local Masterplan 2015 planning conditions. The aim of the Chobham Manor POE is to assess the sustainability performance of a sample of Phase 1 Chobham Manor properties. The POE is designed to assess the performance of design features and areas of interest such as operational energy and water use.

Before we collect your Personal Data we are legally required to identify something called the “lawful basis of processing”. This defines the use of the Personal Data and why it is allowed. For the Chobham Manor POE the lawful grounds of processing is that you have given your explicit consent by signing a consent form.

4. Who is eligible to participate in the Chobham Manor POE?

All residents/occupiers of Phase 1 properties are eligible to participate in the Chobham Manor POE. We are aiming to conduct the Chobham Manor POE on 20% of households (35-40 properties).

5. What data will we collect from you?

Personal Data means any information about a living individual from which that person can be identified (but not data where the identity has been removed, like anonymous data).

We may collect, use, store and transfer different kinds of your Personal Data including:

- Identity data such as full name
- Contact data including Address, email and telephone number
- Ethnicity
- Age
- Health/disability information (i.e. does anyone in your household have their day-to-day activities limited because of a health problem or disability)
- Length of time in local area and how long you are planning to live in the area
- Number of occupants sharing your home, household typology and tenure
- Employment status and average time spent at home
- If you own a car and/or have a private garden/space
- Perceptions of your neighbourhood, block and home (both functionally and socially)
- Technical data about your home, including electricity, water and district heating energy use, solar photovoltaic panel electricity generation, type of heating controls installed, spot readings of noise/light levels, thermographic photographs showing heat loss through walls/windows.

All questions in the Chobham Manor POE are optional and it is your decision if you share this information.

Sensitive data such as health/disability is being collected as part of the Chobham Manor POE to understand if this impacts on resident satisfaction with accessibility in their homes/local area. Ethnicity is being collected in to provide us with data on the percentages of residents who completed the user survey from each ethnic group.

6. How will we collect this data?

We will collect data from you in a number of different ways, depending on how you choose to interact with the Chobham Manor POE project team.

If you opt into the 'Basic POE':

- Our team will email you a link to complete an online user survey. This will be hosted on the CheckMarket website. If you would prefer to fill out the survey in person, we will provide a walk-in centre at the L&Q management office or Timber Lodge for this on designated days.
- Our team will undertake monthly meter readings of your electricity and water meters, facilitated by L&Q. We plan to only access meters that can be read without needing to disturb you (i.e. meters that can be read in communal areas, or meters that can be read without needing to enter your home, such as those in the cupboard outside your front door).
- District heating data will be obtained with your consent from East London Energy (ELE). We also ask for your consent to have electricity and water data issued on your behalf to the POE team by your supplier, if necessary.
- Focus groups will be held to discuss the local community and neighbourhood. Attendance at these sessions is completely optional.

Alternatively, if you opt into the 'Detailed POE':

- All items in the 'Basic POE' will be carried out, plus:
- Home interviews (approximately 1 hour in length) will be held at your home and if you are able to, will also include a walk around the immediate vicinity. With your permission, audio transcripts will be taken to transcribe the conversation.
- Our team will install up to two temperature/humidity sensors in your home to measure temperature and air quality for approximately 1 month in summer and 1 month in winter. Our team will install a stand-alone data logger to your electricity meter to measure electricity usage at a higher granularity to monthly meter readings.
- Spot readings of noise / light levels in your home will be undertaken in areas where you give permission.
- A visual inspection of your heating controls will be carried out.
- Thermographic photos will be undertaken of your home to identify areas of heat leakage to outside.

For the online consent form and user survey, the CheckMarket website is being used. When surveys are completed on this platform the following information is captured: Date responded, completion time, browser, operating system, IP address, location (via IP address). More information on CheckMarket can be found in their privacy notice and data processing agreement:

- <https://www.checkmarket.com/privacy-policy/>
- <https://www.checkmarket.com/kb/data-processing-agreement/>

7. Who will collect the Chobham Manor POE data?

The Legacy Corporation and its partners in this project are committed to processing your data securely and keeping it safe.

The Chobham Manor POE Project Team include the following third parties who will collect and process your Personal Data:

- **Buro Happold** - an independent engineering and advisory consultancy leading the POE and data processing activities for LLDC.
- **Hawkins Brown** - an independent architectural company working as a sub-data processor for Buro Happold leading on user engagement.
- **SOAP retrofit** - an independent building performance company working as a sub-data processor for Buro Happold leading on technical monitoring elements of the project.

8. How will we use your Personal Data?

We will only use your Personal Data for the purpose for which we collected it, which includes the following:

- To understand what is working well and could be improved in the local area
- To understand particular design features in homes/blocks/neighbourhoods that work well and could be embedded into future housing schemes
- To analyse the energy/water efficiency of Chobham Manor Phase 1 properties and gain insights to inform future planning policy.

9. Who will data be shared with?

We will not share your Personal Data outside of the Chobham Manor POE Project Team. We will not share your Personal Data with any third party for direct marketing or any other purpose.

In order to facilitate the Chobham Manor POE, the following service providers / third parties will have some interaction in the study, as detailed below. Please note, the term 'pseudonymise' means that any identifiable data (e.g. property address) would be replaced with a unique reference number.

Who is it shared with?	Why?	Approach
CheckMarket is being used to store user survey data that is identifiable	CheckMarket is an established survey platform for securely holding data in line with the GDPR (General Data Protection Regulation).	Survey data will be collected directly into the CheckMarket website, as this is the platform identified as being the most suitable for carrying out the online surveys.
Microsoft Office 365 SharePoint is being used to store pseudonymised and/or anonymised POE data	Some POE data is not possible to store on CheckMarket. Therefore a secure 365 SharePoint site has been created.	Only anonymised and/or pseudonymised data will be held in this location. Permissions to view and/or edit data will be set and external sharing will be limited only to those in the POE team through the use of controlled logins and secure passwords
L&Q (London & Quadrant housing) will be providing support facilitating the POE team (e.g. assisting	Physical meter readings will be undertaken by our POE team with a L&Q representative present on all site visits. L&Q	L&Q are provided with the list of contact details for consented homes via a dedicated log-in provided by LLDC on the CheckMarket website. L&Q will be required to apply two-

the POE team when taking physical meter readings and also sending texts to residents informing them when meter reads and other activities will be taken). L&Q will therefore need to be made aware of which households have consented to participate in the POE study as well as their contact details.	will have keys to the metering cupboards. Many residents already receive texts from L&Q, so the outreach is being extended to contact all residents participating in the POE study.	step authentication to the account. LLDC will set permissions so that L&Q cannot see any other data (e.g. resident user survey responses).
ELE (East London Energy) will be sharing district heating data for Chobham Manor Phase 1 with the survey team. To facilitate this, ELE will need to be made aware of which households have consented to participate in the POE study.	ELE will be asked to release district heating data for consented homes, 'Phase 1' of Chobham Manor as a whole and at block level. Anonymised data for all Phase 1 homes will also be requested.	ELE are provided with the list of contact details for consented homes via a dedicated log-in provided by LLDC on the CheckMarket website. ELE will be required to apply two-step authentication to the account. LLDC will set permissions so that L&Q cannot see any other data (e.g. resident user survey responses). With the address data and unique identifiers, ELE will then be asked to provide the POE team with the district heating data via a secure link in the office 365 Sharepoint site. ELE will be required to pseudonymised the data for consented homes using the unique identifiers provided.
Electricity/water suppliers may be contacted for those households who have consented to the study.	Electricity/water suppliers may be contacted to release electricity data from consented homes on behalf of the resident. An example of when this may occur is if physical meter readings are not possible.	The POE team would follow the instructions of the electricity / water supplier, or propose an approach as per the district heating methodology described above.

10. Where will Personal Data be stored?

Our servers where we will store your Personal Data are located in the European Economic Area. If we ever need to transfer your Personal Data outside the EEA we will follow the rules that govern that.

11. How will we keep your Personal Data secure?

Once we have collected your Personal Data we will take steps to pseudonymise or anonymise the POE data associated with it so you cannot be identified as coming from you.

The words of your questionnaire feedback or any the broader POE data being collected will not be attributed to you or your property in any publications / summary reports.

User survey data from the questionnaire and a 'unique referencing list' for pseudonymising addresses associated with POE data will be held on CheckMarket.

Anonymised or pseudonymised POE data will be held in a secure Office 365 SharePoint site. Permissions to view and/or edit data will be controlled and external sharing will be limited only to those in the POE team (Buro Happold, Hawkins Brown and SOAP retrofit). This data will be transferred to LLDC on completion of the project.

A risk register is in place covering procedures in the event of any data loss / suspected security breaches and we will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

12. How long will we keep your Personal Data?

We will only keep and use your information for as long as necessary to complete the Chobham Manor POE study. We anticipate that we will have completed this by Sep 2021.

Once the POE has been completed, your Personal Data will be retained for six months (this will enable queries to be resolved should they arise). Your Personal Data will then be securely deleted. You can also request deletion of your Personal Data in advance of this.

13. What are your legal rights?

As the data subject, you have specific rights in relation to your data and how it is processed.

You have the right to:

- Request a copy of the information which is held about you
- Request a details of how your information is used
- Withdraw your consent, if it has been used as the basis of collecting your data
- Request your data is deleted, unless there is a legal reason for it to be retained
- Object to the way in which your data is used
- Make a complaint about how your data is being processed.

Further details of legal rights can also be found on Information Commissioner's Office website: www.ico.org.uk

14. Changes to this Notice

We may change this Privacy Notice and if we do, we will notify all those who are taking part in the POE study.

15. How to Contact the Legacy Corporation about Data Protection

If you have any questions about data protection, please don't hesitate to contact us.

Data Protection Officer

London Legacy Development Corporation
Level 10, 1 Stratford Place
Montfichet Road
London
E20 1EJ

Email: dataprotection@londonlegacy.co.uk

Telephone: 020 3288 1800

If you have a complaint or concern about your Personal Data, you can also contact the Information Commissioner's Office directly.

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Email: casework@ico.org.uk

Online form: <https://ico.org.uk/global/contact-us/email/>

Telephone: 0303 123 1113

Textphone: 01625 545860