

THE POSTCODE ADDRESS FILE ADVISORY BOARD (PAB)

Minutes of meeting held at 13:00 on 17<sup>th</sup> May 2018

At the offices of: Royal Mail Group, Room 4.08, 4<sup>th</sup> Floor,  
185 Farringdon Road, London, EC1A 1AA

PRESENT

Ian Beesley	Chairman
Carolyn Valder	CACI
Ian Paterson	Mail Competition Forum
Iain McKay	Improvement Service, Scotland
Jason Goodwin	Experian
David Heyes	Wigan BC
Dan Cooper	Allies Computing
Darren McDonnell	Mail Users Association
Charles Neilson	Mail Competition Forum
Tim Drye (items 4-7)	Direct Marketing Association

Also in attendance

Scott Childes	AMU
Alasdair MacHardy	AMU
Steve Rooney	AMU
Stephen McCartney (items 1-4)	Data Protection Advisor

Apologies

Martin Taylor	Royal Mail Group
---------------	------------------

Secretariat

Paul Roberts

## 1. Welcome & Introductions

The Chairman welcomed everyone to the 3<sup>rd</sup> PAB meeting for 2018 and introduced Stephen McCartney, a data protection expert who was scheduled to lead a discussion on the expected impacts to PAF of the General Data Protection Regulations (GDPR).

Jason Goodwin advised he was expected to be leaving Experian at the end of June 2018, moving to work for the Landmark Information Group. Jason was hoping to continue as a PAB member; to be advised once his role change had been completed. Paul Malyon, Head of Data Strategy for Experian, would represent Experian on the PAB on an interim basis until Jason's successor had been appointed.

## 2. Matters Arising

PAB (18)2<sup>nd</sup> meeting minutes

Customer Satisfaction with the 2015 PAF licence. The Chairman advised that the draft customer satisfaction survey had been discussed with Ofcom and would be circulated to PAB members for final inputs. The survey was expected to be issued following the Summer school holiday period.

## 3. Chairman's Update

Chairman

PAF Code of Practice Update. The Chairman reported he had met with Marina Gibbs from Ofcom on 10<sup>th</sup> April and had confirmed that PAB did not have any objections to the existing code of practice being continued in its current form. Ofcom advised that they would write to the AMU to confirm their steer on onward use of the code of practice.

The Chairman and Ofcom agreed to meet informally on an annual basis to discuss wider PAF progress and any key issues.

## 4. General Data Protection Regulations (GDPR)

Stephen McCartney

Stephen McCartney led a discussion on GDPR. Stephen had 18 years' experience of data protection, working on data security and compliance with data protection regulations in numerous high-profile organisations.

The main points on GDPR included:

- Work in the European Commission on what became GDPR had started in 2007
- Previous statutes implemented in similar areas (examples – use of cookies and email marketing terms) have not impacted consumers or organisations to the levels expected prior to implementation.
- The regulations for electronic communication and marketing channels would be more stringent than those for post, and consent for use of data [for marketing purposes especially] would have stronger controls for electronic channels.
- Permission for capture and use of data would be at the consent of the individual and affirmative (opt-in rather than opt-out).

- However, where organisations could demonstrate a legitimate interest in keeping personal data this would be sufficient, provided that the organisation had evidence of having reviewed the retention of the data.
- There were certain areas where consent/ permission for capture and use of data would still not be required – example, to meet legal requirements.
- Organisations would need to be specific about the sources of any 3<sup>rd</sup> party personal data used.
- Some 3<sup>rd</sup> party data list providers had exited the data marketplace due to an ongoing need to prove provision of ‘consented data’ lists.
- Breaches of data protection would need to be reported to the Information Commission Office (ICO) and to customers within 72 hours of the breach.
- Organisations would be expected to have documented, applied and audited processes for adhering to GDPR.
- Social media companies would be responsible for any attached 3<sup>rd</sup> party marketing within customers personal threads.
- Records of processing personal data must be kept and made available for audit as required.
- Application of GDPR must be EU wide and consistent.
- If organisations breached GDPR, a maximum fine of 4% of global revenue could be levied or a temporary/ time-bound restriction on data processing activity. It was expected that there would be an ‘embedding period’ where best endeavours demonstrated by organisations would be viewed positively by regulators, in line with similar previous implementations.
- Organisations would be able to keep certain information internally if it underpinned legal requirements on that business or their core duty of care to employees.

#### Potential Impacts to PAF:

Stephen advised that PAF was viewed as an address file which did not fall under the range of personal data (some exceptions, such as farms including people’s surnames were identified). PAF was seen as existing to help enable effective provision of a legally required (universal service obligation) postal service and was also classified as supporting wider public interest.

Making the core PAF dataset available for sale was a requirement under the Postal Services Act.

Classification of extra datasets outside of core PAF data would be determined on whether the data was about a property/ building itself (e.g. a block of flats) or linked to a personal item of data (e.g. a dog at house number x, which could subsequently be used for marketing purposes).

The PAB questioned whether the postcode could be classified as personally identifiable information and therefore non-disclosable. Stephen advised that the current view was that the postcode only became personal when attached to any information which allowed an individual to be identified.

The Board thanked Stephen for a very informative and engaging discussion.

**ACTION:** The Secretary to circulate the GDPR presentation to PAB members.

## **5. Pricing Update**

**AMU**

The AMU advised that changes to PAF licence prices had been published on 29<sup>th</sup> March, in line with the three-month advance notification of changes, which were due to come into effect from 1<sup>st</sup> July.

Minimal Solution Provider (SP) feedback indicated that the price changes appeared reasonable and therefore were unlikely to cause any undue problems once implemented.

The Board questioned whether there was any restriction on future price increases. The AMU advised there was no restriction but that any price changes would be subject to a 3-month notification prior to implementation.

## **6. AMU Customer Relationship Manager (CRM) Case Study**

**AMU**

Alasdair MacHardy, Senior Relationship Manager for the AMU, gave a presentation covering the remit of the AMU CRMs and examples of customer journeys for 2 customers under the CRMs care.

Headline role responsibilities included:

- Account management of the top 40 Solution Providers, including structured visits to the providers (frequency to the providers preferences) covering multiple elements such as issues and risks, returns processes, onward account opportunities.
- Overseeing desk bound management of all SPs, some managed proactively, others on a reactive basis.
- Running a nursery programme to onboard new customers.
- Working with some direct end users if there were any issues to resolve
- Management of 10 corporate account customers
- Working with BEIS and the Scottish Government on the PSL
- Overseeing the external data quality audit processes.
- Advising the Direct Marketing Association on PAF developments
- Investigation of licence anomalies
- Identification of new opportunities for PAF development (for example an idea for a demolished buildings file).
- Assure compliance to the terms of PAF licences
- Provide input to the AMU Commercial Licensing team of emerging customer and marketplace requirements or issues

### Customer journey 1 – maturing customer

- A customer signed to a developer licence in 2013
- Through proactive AMU CRM opportunity management and identification of the organisation's anticipated future requirements, the customer signed as a Solutions Provider in 2014 and became directly account managed in 2016
- As a result, the customer has grown in terms of file usage and revenue, with no ongoing customer issues

### Customer journey 2 – Nursery Customer

- An organisation was selling addressing data and advertising that they did not need PAF
- One of the AMU CRMs identified an opportunity to drive benefit to the organisation in using PAF and worked with the company to agree mutual benefits
- The company became a direct end user of PAF which, in turn, led to them becoming a Solutions Provider, and they made their first PAF return in April 2018

### The Board questioned:

- *Whether RMG was one of the Corporate licence customers.* The AMU responded they were and were managed to the same standards and terms as all other similar licence customers.
- *How engagement worked with managed customers.* The AMU advised that engagement style and frequency was mutually agreed with each customer, dependent on customer requirements
- *What the processes were for managing customer information that the CRMs received (example, any issues applying across multiple customers).* The AMU reported that the CRMs held monthly meetings with the Commercial Licensing team to agree action and fed any items that required escalated decisions into a monthly executive team meeting. The key themes were captured, and actions tracked. The Board advised that this type of information would be very useful as an input to the PAB strategy day scheduled for November 2018.
- *What were the top issues the CRMs currently faced.* The AMU advised 2 main areas that customers regularly questioned – why licences were issued on a certain basis (e.g. end user vs transactional), and why transactions needed to be reported up-front rather than retrospectively.

**ACTION:** The Board invited the AMU to share the CRM presentation with PAB members.

**At this point the meeting was interrupted by a fire alarm and the building evacuated. Outstanding items were deferred to the next PAB meeting.**

## **7. Next meeting**

13:00 on 19<sup>th</sup> July 2018

At the offices of Experian, Friars House, 160 Blackfriars Road, London, SE1 8EZ