REAL CCS Data Sharing Policy

Version 2

This document sets out information about technical data that Renewable Energy Assurance Limited (REAL) holds through the administration of the Compost Certification Scheme (CCS) and how this data may be used and shared. CCS participants are the compost producers partaking in the scheme and producing *quality compost*.

The term 'data sharing' within the context of this document is intended to be the supply of CCS data to third parties, at REAL's discretion.

To read about the personal data we hold about individuals, please read our Privacy Policy available on our website: http://www.qualitycompost.org.uk/privacy.

1. The Compost Certification Scheme

The CCS provides assurance to consumers, farmers, food producers and retailers that quality compost produced from composting processes is safe for human, animal, and plant health. You can find full details about the CCS at https://www.qualitycompost.org.uk/.

2. The technical data we hold

REAL collects and retains technical data through our role as the CCS administrator. Within our online database, we collate and manage data related to all composting processes registered on the CCS. The database includes technical information about certified processes (input material types, process types, annual tonnages of input materials, etc.) and information about certified compost grades and associated tonnages. REAL holds technical data from 1st January 2015, and full PAS 100 test result data from 1st January 2020.

All technical data we hold have been provided to us by the Certification Bodies or Approved Laboratories. The CCS Scheme Rules set requirements which include the supply of technical data to Certification Bodies and REAL. When CCS participants sign the Certification Bodies' agreements, they confirm that all the terms and conditions and requirements specified in the CCS Scheme Rules have been read and agreed to.

3. How we use technical data

REAL holds data for the following purposes: reporting to the industry, listing products certified under the CCS on the BCS website, calculating fees applicable to CCS Participation, and understanding the CCS's contribution to organics recycling in the UK.

The CCS Annual Report provides the industry with information on the estimated quantity, in tonnes, of biodegradable materials and/or biowaste recycled through certified composting processes and the estimated quantity, in tonnes, of certified compost produced annually.

REAL may publish statistical reports which draw upon aggregated CCS data. These reports will be shared with CCS participants and stakeholders and may be shared with the wider organics recycling industry as publicly available reports.

We may use anonymised, aggregated test result data to inform government policy relating to the production of compost in the UK.

REAL stores PAS 100 test results, which are generated for certification purposes, in our online database. The collection of test results in our online database contributes to the robustness of the CCS. These test results are accessible to the Certification Bodies all year round. The Certification Bodies are also notified of test failures allowing them to contact CCS Participants, in accordance with REAL guidance, to enquire about the actions that have been taken in the event of test failure. This is carried out to monitor conformance with PAS 100 more frequently, outside of the annual audit.

4. **The conditions for sharing data**

REAL may share anonymised, aggregated technical data with third parties following the assessment of a data request via our data request form, found in annex A. If we determine that the purpose for which the data is to be used is valid, we will share the data subject to the conditions described in sections a to d below.

Data will not be traceable back to individual CCS applicants or CCS Participants. REAL will remove personal and company data (organisation name, address, phone number etc.) in all cases when data is shared. REAL will remove any reference to the composting process number or sample that can be traced back to the company and a random ID will be allocated for each process. Data will always be shared in excel or CSV format and we will not share test results in pdf format, as this format may contain specific company and/or personal data.

a. **Data sharing requests**

When REAL is contacted with a request to share technical data, we will ask the applicant to provide a brief proposal on how they wish to use the data via the data request form in Annex A. This form asks for the objectives for using the data, the type of data being requested, and the start and end times for using the data. This will form the basis of a Data Sharing Agreement (Section c), which the applicant will be required to sign.

b. **Charges for processing and sharing data**

It is important that the data is prepared in such a way that individuals or parties using the dataset have a clear understanding of what the data means, so that it can be used appropriately. Processing the data may involve extracting specific data from a large dataset and identifying the appropriate data in line with the request. This preparation may require time and resource for data processing.

In most cases, REAL will charge for the processing of data to be shared. However, data requests will be considered for a charge exemption. The charge will be based on the number of hours spent by REAL personnel in processing the data and may include additional costs associated with programming if necessary. REAL will seek to ensure that the data shared is representative and the costs are appropriate. We will provide a quote of the likely costs before a Data Sharing Agreement is signed.

c. Data Sharing Agreements

To ensure that technical data provided by REAL is used appropriately, REAL may devise a Data Sharing Agreement that indicates the conditions for use. The agreement may specify limitations on the use of the data and conditions around applicants publishing analysed data.

If a Data Sharing Agreement is put in place, the recipient of the data must sign it and consent to meet the conditions of use. This is to ensure that the recipient takes responsibility for using the data in the terms agreed by REAL, and to prevent the misuse of data.

If the data is not used according to the conditions for use specified in the Data Sharing Agreement, REAL will take appropriate action as set out in the agreement. REAL takes these matters very seriously and does not condone data misuse

d. Conditions for rejecting data requests

If REAL has doubts over the validity of the purpose for which the data requested will be used, this will be discussed with the applicant. If we identify any potential issues on receipt of the request and these cannot be resolved, REAL will refuse the request in writing. The applicant may submit a further data sharing request in the future. In such a case, REAL will consider and assess it as new.

REAL will assess each proposal based on the nature of purpose for which the data is to be used on a case-by-case basis.

5. Protecting our data

The CCS website and the CCS database are protected and have a high level of security. We are committed to ensuring that CCS data is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic, and managerial procedures to safeguard and secure the information we collect online.

6. Transferring our data

We will not transfer data outside the European Economic Area (EEA) under any circumstances. However, due to the global nature of the internet, holding technical data online may result in it being processed outside the EEA. If this were to be the case, the data

will always be held securely and in line with the requirements of UK data protection legislation.

7. How you will know if we decide to change this Data Sharing Policy

Should we decide to change this policy in any way, we will add a notice to our website to inform you of the changes and what their significance could be for you.

We will also make this information available in all communications we send to individuals who may be affected.

The date on which this Data Sharing Policy statement was adopted is 01 April 2022. Additionally, there is a Version Control number at the start of the document so that amendments (with dates) can be easily traced.

ANNEX A - REAL DATA REQUEST FORM

First Name: _____

Last Name: _____

Company
Name: _____

Company
Address: _____

Phone Number: _____

Email Address: _____

Date: _____

What dataset do you require?

[   ]

What will the data be used for?

[   ]

When do you wish to receive data by?

Start and end times of using the data:

Please email this request form to: info@realschemes.org.uk