

Privacy Impact Assessment - Step one

All IT systems, data processes, LBC projects and Governance Boards which collect and/or process personal data, whether staff or citizen related, must be subject to a privacy impact assessment (PIA). All PIA's will be approved by the Information Governance (IG) Steering Group to ensure that they comply with current technical and information governance requirements.

All data processing activity **MUST** comply with the General Data Protection Regulations (GDPR) 2018. The Privacy Impact Assessment process helps managers identify how the collection and use of people's personal data may affect their privacy and work out way to protect citizen's privacy at all times.

The form should be completed* by the service but support can be provided by the Information Governance Team (6398). Please return the completed form to feedback@luton.gov.uk for approval.

*One assessment should be completed for each system/process

Project type	IT System, data process, LBC project	Project name	Debt Project
Service/Team	Customer Services/Revenues and Benefits	System name	Academy Revs and bens/Civica Financials/Open Housing/Parking System
Lead officer	Sue Nelson/Scott Walker	Directorate	Customers and Contracts
Telephone		IG lead officer	Yvonne Salvin
Email		Telephone	01582 547 062
Data subject type	Citizen, employee etc	Email	Yvonne.salvin@luton.gov.uk
Planned start date	1/4/2018		

1: List all personal and sensitive data that you will be collecting as part of this project?

***Personal Data:** information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier*
***Sensitive Data:** consisting of racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation*

1. Name
2. Address including Post code
3. Telephone Number
4. Mobile Number
5. Email address
6. Debt owed to the council for each system

2: Why are you collecting this data and how do you intend to use it?

- List each purpose.

1. This data is being collected to
2. Assist LBC to collect amounts due from clients and service users.
3. Trace service users and clients,
4. Contact and visit Service users,
5. Profile service users to enable the correct focus on debt collection techniques to be implemented for particular groups
6. Obtain one view of service users in terms of all debt owed so that vulnerable people can be identified
7. Obtain a holistic view of service user to aid debt collection strategy.
8. Allow a focused, efficient and effective strategy for debt collection to be provided that would be in the best interests for service users as well as LBC.

This is an exercise where we are using data on existing systems to aid the collection of the various types of debt in the council. Data that we are specifically bared from using will not be used.

Specifically we will not be using DVLA data to collect any debt apart from Parking Debt as agreed with the DVLA. We will also not using Benefits data to collect other debt.

3a: Do you have a lawful basis for collecting/processing this data? - List all relevant acts			
No	<input type="checkbox"/>		
Yes	<input checked="" type="checkbox"/>	Please list lawful basis for each processing activity	1. Public Task
3b: If you do not have a lawful basis will you be getting explicit consent for each processing activity?			
No	<input type="checkbox"/>	Why not?	
Yes	<input type="checkbox"/>		
Will you obtain consent at the point of collection?			Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
4: Have individuals been given the opportunity to refuse us permission to use their data for this project?			
No	<input checked="" type="checkbox"/>	Why not?	LBC already has the information within various systems. Service users know we have the information. The idea is to have it all in one place that can be accessed by debt collection operatives to collect other debt owed.
Yes	<input type="checkbox"/>	How will this impact their ability to access the service?	
Will you inform individuals of the consequences of refusing permission?			Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
5: Is automated decision-making and profiling included?			
No	<input type="checkbox"/>		
Yes	<input checked="" type="checkbox"/>	How?	Service users will be profiled into bands based on their propensity to pay and potential ability to pay as well as persistent offenders and vulnerable service users. This will aid in the collection of the debt and actions of debt collection operatives.
6: Do you have a process for deleting data if an individual requests to be forgotten or restrict processing?			
No	<input checked="" type="checkbox"/>	Why not?	This data are on systems held by the council. This information is required to manage the services provided by the council. There will be individual procedures for deletion of data from the various individual systems if and when required.
Yes	<input type="checkbox"/>	How?	
7: Are you planning to share this personal data with any other internal service? - List each internal service and the reason for access.			
<p>Yes.</p> <p>Council Tax – This data will be used for tracing and contacting debtors</p> <p>Business Rates – This data will be used for tracing names of people who own or run the businesses</p> <p>Housing Benefits Overpayments – This data will be used for tracing and contacting debtors</p> <p>Adults Residential Care – Personal data required for contact and overall view of debtor</p> <p>Adults Non Residential Care- Personal data required for contact and overall view of debtor</p> <p>Direct Payments and Contracts- Personal data required for contact and overall view of debtor</p> <p>Other Sundry Debt - Personal data required for contact and overall view of debtor</p> <p>Car Parking - Personal data required for contact and overall view of debtor</p>			

Housing Rents - Personal data required for contact and overall view of debtor
 Temporary Accommodation - Personal data required for contact and overall view of debtor

8a: Are you planning to share this personal data with any other external service?
 - List each external service and the reason for access

Yes
 Credit Reference Agencies (Equifax) – these agencies will be providing information of service users propensity and ability to pay their debts.

8b: If you are planning to share this data with external services do you have an approved Information Sharing Agreement (ISA) in place?
 - You will need to send a copy with this form

No	<input type="checkbox"/>	Why not?	
Yes	<input checked="" type="checkbox"/>	ISA Reference?	There a contract in place with Equifax and other agencies used?

9: What are the benefits to the individual of their personal data being used for this project?

The individual benefits are

1. Better communication with the service users.
2. Better customer service
3. Tailored services to individual debtors
4. Better understanding of the potential vulnerability of debtors leading to more effective engagement

10: What are the organisational benefits of the individual’s personal data being used for this project?

1. Improved debt collection
2. More targeted debt collection
3. Better understanding of customer base
4. Focus on propensity to pay and ability to pay. Therefore better strategy for collection
5. Development of tailored services
6. Better customer care and services

11: What are the potential negative impacts to the individual of their personal data being used?

1. Potential feeling of harassment from increased personal contact
2. Feeling of the council being “ Big Brother”
3. Intrusion into privacy
4. Dislike of profiling with perceived potential for discrimination

12: How will you make sure that the personal data you are using is kept accurate and up to date?

Who will have access to the system and how will that access be controlled? Give description of potential users and authorisation process.
 Include process used when users leave employment and how the account will be disabled

Continuous review and update of the data from relevant systems to the central database. Ensuring source systems are always up to date.

13: How will you ensure that all users have attended mandatory/follow up data protection training

All users have to attend a staff induction course when they start. All users will attend update sessions set up by IG on a regular basis.

14: How long will you need to hold the personal data for?			
Until the service user ceases to be a service user or debtor According to legislation. Is deleted from the source system according to normal procedure			
15: Is the corporate retention schedule up to date? - Make sure you copy a link to the schedule here			
No	<input type="checkbox"/>	Why not?	
Yes	<input checked="" type="checkbox"/>	Link to retention schedule:	
16: Does the process/system enable timely location and retrieval of personal data to meet Subject Access request requirements?			
Describe retrieval process. If the process refers to another paper or electronic system then this process is also required, e.g. tracing of paper case notes by an electronic system:			
No	<input type="checkbox"/>	Why not?	
Yes	<input checked="" type="checkbox"/>	Retrieval process description:	<ol style="list-style-type: none"> 1. Request made 2. Data retrieved from central database

Information Governance Team's risk assessment of this project's overall compliance with GDPR and likelihood of non compliance

Risk score	Low
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Likelihood score	Medium
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Information Governance Team's conclusions regarding this project's overall compliance with GDPR

Risk = **Low** – no special category data is being processed

Likelihood = **Medium** quality of data needs to be continually verified to ensure only residents in debt are contacted and vulnerable customers are provided with appropriate safeguards

See below for recommended actions

Information Governance Team's recommendations for changes / refinements to the project which are required to ensure compliance.

- Debt collection needs to be included as a purpose within the council's main privacy notice – Completed YS
- YS to seek advice on whether we need to include debt collection in all relevant service specific privacy notices - Completed YS
- Project needs to implement specific safeguards to verify data quality checks are in place
- Appropriate checks to safeguard vulnerable residents
- Project to ensure that data is kept up to date and where bad debt is written off the database is updated quickly
- Retention schedule needs to be reviewed and updated as appropriate
- Data to be deleted regularly in line with the retention schedule

PIA reference number	
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Approval

As lead officer, I confirm that the information recorded on this form is, to the best of my knowledge, an accurate and complete assessment of the potential privacy impacts of this project.

Name	Signature	Date
Yvonne Salvin		April 2018

Please return your signed and dated form to:

Information Governance Team
Luton Council
feedback@luton.gov.uk

If you have any questions about the Privacy Impact Assessment process, or if you need any help completing this form, please contact us using the email address, above, or by telephoning the Information Governance on 018582 546398

Privacy Impact Assessment reviewed and approved by Luton's Data Protection Officer:

Name	Signature	Date
Yvonne Salvin	Yvonne Salvin	24.05.2018
