DPIA

Council Tax Arrears Analytics pilot

This document assesses the data protection issues associated with a proposed data sharing pilot run by Indesser on behalf of Fenland District Council.

Step 1: Identify the need for a DPIA

Explain broadly what project aims to achieve and what type of processing it involves. You may find it helpful to refer or link to other documents, such as a project proposal. Summarise why you identified the need for a DPIA.

Context

Council Tax is collected in respect of all domestic property within the district. Local Council Tax Support is available to help those with low incomes, however since 2013 100% support is not available for working age customers meaning that some of the most vulnerable in society have something to pay. In addition, some customers have arrears and then fall into financial difficulty, whether that is through unemployment or illness or another reason, and no longer have the ability to pay.

This creates challenges for the council in the collection of debt owed and also to our residents who due to their personal circumstances may be vulnerable and struggling to pay their debts. Residents may have other debts to public authorities, utilities or private companies, e.g. Housing benefit debt, overdue water bills and credit card debts. There is a consistent need to identify residents facing financial vulnerability and ensure we are providing appropriate support through our debt recovery processes. These needs are ever increasing as more residents face financial pressures as a result of the Covid-19 crisis.

Over the last five years UK Council Tax Arrears have grown by 33%, as of March 2019 the figure was £3.2 billion in comparison to £2.4bn a decade ago. This growth has occurred despite councils collecting more debt in smarter ways than ever before. Our Council Tax Arrears portfolio sits at £5M.

Static collections rates and rising arrears portfolios indicate that free-to-use legislative debt interventions may have an effectiveness cap when collecting aged debt. With a reduction in funding across English Authorities, there is a widespread understanding that without additional funding, councils have limited alternative options to recover this debt.

Various creditors have seen significant success in increasing collections revenues whilst supporting vulnerable individuals through the use of FCA-regulated Debt Collection Agencies however there is no currently available proof of concepts

which demonstrates if this could aid local authorities in revenue maximisation.

Pilot Background

The Government Debt Management Function presented a new proposal to key stakeholders within Her Majesty's Treasury (HMT) and the Ministry of Housing, Communities and Local Government (MHCLG) in Q4 2019. This proposal centred around an alternative collections approach, councils collecting council tax arrears through the use of Debt Collection Agencies (DCAs) parallel to a new budgetary option to allow for the payment of DCAs from collected revenues - a Collections Fund/ General Fund budgetary Switch.

The Cabinet Office Debt Management Function was asked, following initial discussions with HMT to work with local authorities to further develop the proposal and establish a national evidence base. Should the business case provide adequate justification, HMT have agreed to be flexible on the budgeting rules.

Cabinet Office examined a number of options for the proof of concept and determined that a private sector firm with extensive experience of debt analytics would be required to provide HMT with the necessary confidence to approve any budgetary switch. Indesser, as the incumbent provider of the Government's 'Debt Market Integrator', have proven ability to deliver strong analytical predictions.

Indesser stands for Integrated Debt Services. Indesser was founded in 2015 following a competitive tender process run by Her Majesty's Government whereby the winner would manage a Government Framework called the Debt Market Integrator (DMI). Based in Nottingham, Indesser is a private business, jointly owned by the government and TDX Group. Indesser offers public sector organisations an opportunity, via a single integrated entity, to utilise private sector expertise to recover public debt and counter fraud/error. As a partner to the government, a share of Indesser's earnings goes back to the public purse.

Indesser use sophisticated data science and analytical tools to understand the circumstances and behaviours of customers who owe money to the public sector. This work enables Indesser to define and implement fair and effective treatment strategies that are appropriate to each individual. So far, Indesser has already recovered more than £2 billion in public sector debt for 56 Public Sector Organisations.

Indesser provide a comprehensive range of debt management services to government and the wider public sector, including fraud and error, analytics, collection, litigation and enforcement. In addition, Indesser provides data and analytical services to more than 7,000 users across UK government agencies, enabling them to operate more effectively and intelligently.

The Indesser collection model is built on core business beliefs. It is built to be effective and fair. This responsibility is hard-wired into the business and every employee.

Indesser is proud of its commitment to treating customers fairly and goes beyond what is expected in that TDX Group and all of our Debt Collection Agencies are

authorised and regulated by the UK's Financial Conduct Authority.

The Indesser end-to-end collections model is also certified against ISO27001, the international standard for information security management systems.

Pilot Overview

Indesser offered to support the pilot through providing a bespoke new service, free of charge to:

1. Validate and load local authority arrears portfolio data sets
2. Enrich data with their core data suppliers
3. Segment portfolios into a collectability matrix
4. Examine portfolio insights such as unique LA demographics
5. Forecast liquidation expectations per segment
6. Identify the potential return on investment
7. And provide the following key outputs:
    a. **Provide Local Authorities with a financial vulnerability segmentation** – an insight into who are the most financially vulnerable people within their arrears portfolio. A line-by-line report will be provided to each Council for the high-financial vulnerability cohort.
    b. **Provide Cabinet Office with an anonymised, amalgamed view of the national opportunity for debt collection** – benchmark liquidation rates and an analysis of whether council tax arrears portfolios could maximise revenues by utilising the private sector
    c. **Provide a high-level summary report covering each local authority area to each participating local authority.**

DPIA Context

This DPIA is specifically for Fenland District Council and only relates to 6583 Council Tax Arrears debt(s) within our authority.

The other public authorities included in the pilot are as follows: -

- Mid Sussex District Council
- Bath and North East Somerset Council
- Brighton & Hove City Council
- Nottingham City Council
- Cornwall Council
- Oxford City Council
- Preston City Council
- Lancaster City Council
- London Borough of Waltham Forest
- Salford City Council
- Coventry City Council
- London Borough of Enfield
- West Suffolk Council

- East Cambridgeshire District Council
- Breckland Council
- East Suffolk Council
- Norwich City Council
- Halton Borough Council
- Manchester City Council

Data records and PII information for all the individuals in the pilot will be shared and processed under contractual terms established between Fenland District Council and Indesser. This is a zero-cost service contract. This service contract is a 'Call Off Order' (or a 'Change Request' for existing DMI members) from the primary Debt Market Integrator Framework, operated by Crown Commercial Services (CCS). The contractual service agreement provides robust protections for how data will be managed and processed between parties.

The need for a DPIA is due to the personal data used in the analysis being matched from multiple sources, which the ICO has identified as requiring a DPIA. This DPIA complements the contractual terms and data processing agreement outlined in the service agreement which all adhere to the General Data Protection Regulation 2018 (GDPR). Schedule 3.6 (Security Management) outlines the contractual requirements on the levels of security that need to be managed under the Pan Government Accreditation that applies to the DMI Framework. In terms of processing data, the Standard Terms, Section 27, talks about the requirements on Indesser as a data processor.

The Cabinet Office and Indesser have not requested any commitment from Councils to act on the financial vulnerability data (see output a. above) or other data provided:

Fenland District Council plans to utilise the financial vulnerability data (see output a. above) to create or amend existing debt management strategies to ensure that these individuals have the support they need.

For the report to Cabinet Office (see output b. above) Indesser will produce an anonymised and aggregated findings analytical summary. All information contained within the summary report will be aggregated to protect individuals by preventing identification of any individual records and to prevent the potential for the data to be misused. Cabinet Office will review the finding summary and produce a report to be made available to the pilot authorities, the Finance Leaders (debt) Sub-group, HMT, MHCLG and wider government as applicable to the project aims. Cabinet Office will ensure controls are in place on how the report can be used.

For the report to Fenland District Council (see output c. above) Indesser will produce an anonymised and aggregated findings analytical summary. All information contained within the summary report will be aggregated to protect individuals by preventing identification of any individual records. Fenland District Council will use the report for informational purposes only, the data insights may be used to inform future strategies e.g. if a high proportion of 'deceased' records are

noted, Fenland District Council may investigate new strategies and services to identify and manage this portfolio. Fenland District Council will ensure controls are in place on how the report can be used.

No external debt recovery action between Indesser and Fenland District Council will take place on the cases identified through this pilot but a future operational pilot may be established for debt management activity on these records, particularly if the business case provides adequate justification for amendments to budgetary principles and strong potential for liquidation of arrears portfolios. Any future data activity will be subject to agreement from all parties, contractual amendments (new service agreements) and new data processing impact assessments. There is an option for Fenland District Council to submit a change request to the Call Off Order Form to cover debt management activity.

Step 2: Describe the processing

Describe the nature of the processing: how will you collect, use, store and delete data? What is the source of the data? Will you be sharing data with anyone? You might find it useful to refer to a flow diagram or other way of describing data flows. What types of processing identified as likely high risk are involved?

What types of processing identified as likely high risk are involved? Combining, comparing or matching personal data obtained from multiple sources and large-scale profiling, as per ICO guidance. This analysis will enrich a range of council tax accounts in debt with various variables under a DPA exemption relating to collection of taxes. These will then be used to segment the cases and group them to determine the overall nature of the portfolio. This does constitute profiling, but this output will not be used by Indesser to facilitate automated decisions. As we are the recipients of the output and the data controller, Indesser expect us to utilise the information to enable case workers to make their own informed decisions on each case to provide the most appropriate treatment to obtain a fair outcome for all parties. As this is being done under a data exemption "the assessment or collection of a tax or duty or an imposition of a similar nature" it is exempt from the GDPR's provisions on the right to be informed.

What is the nature of the processing?
1. As part of our normal debt processes, we gather data on residents' names and addresses, their contact details and details of their debts. The data relating to our debtors is collected as part of the administration of Council Tax, under the Local Government Finance Act (1992), benefits, tax, fines, etc.
2. The data is stored within our secure systems, additionally we also use a

software supplier to administer our Council tax processes, i.e. Capita, which also holds this data, this system complies with GDPR requirements as well as complying with current industry best practice and standards in relation to security.

3. We will prepare a file of all outstanding council tax arrears records, post liability order, with a unique reference per account / billing period and the total balance outstanding.

   a. This data will be pulled directly from Capita system by the System Admin team.

   b. Linked customer details (such as Mr and Mrs) will be separated and a unique customer reference number will be provided so multiple accounts can be linked.

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   d. Data categories have been outlined in **Table 1** within Annex A of this DPIA, this provides an overview of the data items that have been requested as part of the pilot. Mandatory fields are captured in bold text.

   e. We are unable to supply the following categories

4. The file will be sent to TDX Group Ltd. ████████████████████

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5. The following are the core requirements for all web connectivity

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6. █████████████████████████████████████

7. Once TDX Group have confirmed receipt of the file, we will delete in line with GDPR requirements.

8. Indesser will prepare the cases for enrichment. This will include some basic cleansing such as capitalisation and removing of trailing spaces and extracting the input data required (forename, surname, date of birth, last known address).

9. The data file will then by securely transferred ██████████████ ██████████

10. The data will be matched against and enriched with the following datasets from Equifax; Trace and Residency information, closed-user group information held in the Equifax bureau (summary details on credit agreements and searches) and publicly available information (including

summary details on deceased, electoral roll, CCJ, bankruptcy and insolvency

    a. this activity includes profiling - automated processing of personal data to evaluate certain things about an individual, consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, for this pilot this is limited to analysing or predicting aspects concerning that natural person's economic situation and financial behaviour. The modelling used to segment records into the 'financially vulnerable' category will be based on specific account-based characteristics and is not AI generated.

    b. This analysis will enrich a range of council tax accounts in debt with various variables under a DPA exemption relating to collection of taxes. These will then be used to segment the cases and group them to determine the overall nature of the portfolio. This output will not be used by Indesser to facilitate automated decisions, no immediate actions or decisions will be taken by Indesser as part of the pilot. As we are the recipients of the output and the data controllers, Indesser expect us to utilise the information to enable case workers to make their own informed decisions on each case to provide the most appropriate treatment to obtain a fair outcome for all parties. The only new data being provided back to us is a 'Financial Vulnerability Indicator'.

11. The enrichment output will be supplied back to TDX Group by Equifax via ███████████████████████████. Data analytics will be conducted within the secure DMI "Bluezone" data environment by Indesser for each local authority and as a whole. Please refer to Framework Schedule 3.6 (Security Management) for a breakdown on how Indesser and its sub-contractors store, process and transmit customer data.

12. Data will be segmented based on residency, potential collectability and financial vulnerability, derived from the Equifax returned data.

13. An aggregated and anonymised high-level summary report will be supplied to the Cabinet Office via PGP?/Encrypted email?

    a. The Cabinet Office will use the data insights to produce a report to be made available to the pilot authorities, the Finance Leaders (debt) Sub-group, HMT, MHCLG and wider government as applicable to the project aims. Cabinet Office will ensure controls are in place on how the report can be used.

    b. Anonymised reports will not be subject to a retention period as they will not contain personal data only aggregated results and there will be an ongoing need for the report to inform future policy development.

14. Account level data (a report containing the enriched PII data) will be supplied to Fenland District Council where an individual data subject meets the trigger of highly financially vulnerable.

    a. The return will include the name, address and a flag to denote the status as highly financially vulnerable.

15. An aggregated and anonymised summary report will be supplied back to

Fenland District Council. Which will contain:
   a. An overview of the portfolio, results of the segmentation exercise, treatment recommendations and liquidation expectations.
16. Fenland District Council will use the data and retain as below:
   a. Where a person is identified as at high risk of financial vulnerability, we will amend their collections process having regard to their situation and will offer additional support.
   b. The Data will be held on a drive, password protected which can only be accessed by the appropriate Recovery staff.
   c. The data will be retained in accordance with our data retention policy. Shared data will be kept in a separate folder and recognisable to enable deletion at the end of the pilot and will be password protected. Anonymised reports will not be subject to a retention period as they will not contain personal data only aggregated results and there will be an ongoing need for the report to inform future policy development.
17. A data flow for all pilot activity can be found in Annex A of this document.

What external parties are involved in the data processing?

Indesser
- Supplier

TDX Group
- Prime Sub-Contractor

Equifax
- Analytics Sub-Contractor

Describe the scope of the processing: what is the nature of the data, and does it include special category or criminal offence data? How much data will you be collecting and using? How often? How long will you keep it? How many individuals are affected? What geographical area does it cover?

What is the nature of the data?

The data to be analysed in the pilot relates to individuals who have a record with us.

The full list of data requirements is outlined in Annex A.

Records will be matched against Equifax Credit Reference Agency data:
- Trace and Residency information

- Closed-user information held in the Equifax bureau (summary details on credit agreements and searches)
- Publicly available information (including summary details on deceased, electoral roll, CCJ, bankruptcy and insolvency

The following data will be returned to us

- Primary Debtor Reference (Unique Reference per account, may link multiple invoices)
- Primary Debtor Forename
- Primary Debtor Surname
- Primary Debtor Address and Postcode
- Financial Vulnerability Flag

Does it include special category or criminal offence data?

There will be no specialist category or criminal offence data processed within this pilot.

How much data will you be collecting and using?

We will be sharing our Council Tax arrears portfolio dataset where a liability order has already been issued, this encompasses 6583 records of Council Tax debts.

The pilot considered very carefully whether a sample selection should be used rather than entire arrears portfolios, there were three primary reasons for why a full-data approach is required:

- A pilot aim is to build an HMG evidence base that reflects the £3.2bn national figure as closely as possible, without looking at all the data for arrears debts over all past years, asset depreciation and other metrics will not be captured. Building a sample criterion would require both Cabinet Office and Indesser to access and process the majority of the arrears portfolio data to ensure that demographic, age and localised data variances are captured in sampling criteria.
- Another pilot aim is to provide us with a view of the most financially vulnerable people in our district, if we only select 1000 records (for example) then we'll only find the financially vulnerable people in those records. There is an opportunity for us to identify every single financially vulnerable person who owes an overdue council tax debt – this is vastly better than only finding a small percentage. Selecting all records is a fair and unbiased approach to identifying individuals at risk of financial vulnerability.
- Indesser will be providing an analysis to help us better understand our aged debt portfolio and help to inform debt strategies, this will not be valuable

and truly reflective of our portfolio position if we only use a selection of accounts.

Ultimately, a sample of accounts would not meet the aims of the purpose of the data share.

How often?

- The pilot is a one-off data share.

How long will you keep it?

Indesser
"(UNLESS a requirement under union or member state law to preserve that type of data): At the written direction of the Customer on termination of the relevant Call-Off Agreement, delete or return Debtor Data or Customer Personal Data (and any copies of it) to the Customer in accordance with the provisions of Schedule 4.3 (Exit Management) unless the Supplier is required by Law to retain any Debtor Data or Customer Personal Data or is required by the Customer to complete an erasure request under GDPR requirements"

We can change these data retention terms however, it will have to be done following the Change Control Process.

Local Authority
The enriched data on financially vulnerable individuals returned by Indesser will be retained in accordance with our data retention policy.

Local Authority, Cabinet Office and Indesser
Anonymised reports will not be subject to a retention period as they will not contain personal data only aggregated results and there will be an ongoing need for the report to inform future policy development.

How many individuals are affected?
8865 individuals.

What geographical area does it cover?
We cover the geographical area of Fenland District Council.

Describe the context of the processing: what is the nature of your relationship with the individuals? How much control will they have? Would they expect you to use their data in this way? Do they include children or other vulnerable groups? Are there prior concerns over this type of processing or security flaws? Is it novel in any way? What is the current state of technology in this area? Are there any current issues of public concern

What is the nature of your relationship with the individuals?

The 'nature of the relationship with the individuals' is they are a resident or former resident of ours and are recorded on our systems as such. We exercise a government function in dealing with the customer in administration of their Council Tax.

How much control will they have? Would they expect you to use their data in this way?

They will have no control over the processing performed but will previously have been made aware that their data could be shared for similar or compatible purposes via privacy notices.

The data exemption "the assessment or collection of a tax or duty or an imposition of a similar nature" it is exempt from the GDPR's provisions on the right to be informed.

Do they include children or other vulnerable groups?

No data relating to children, as defined by GDPR (Article 8 (1)) will be included in the analysis. There is a wide variety of individuals who fall into arrears with their council tax and this demographic may naturally include some vulnerable individuals but no specialist category data will be included or processed in the analysis.

Are there prior concerns over this type of processing or security flaws?

There are no 'prior concerns' over the type of processing to be performed in the pilot and no security flaws have been identified.

Is it novel in any way?

The analysis is not 'novel' being standard processing for authorities and Indesser using proven and well-established technology within a secure environment.

What is the current state of technology in this area?

The technology is well established, in operational use and secure.

Are there any current issues of public concern that you should factor in?

No 'current issues of public concern' have been identified that need to be considered.

Are you signed up to any approved code of conduct or certification scheme (once any have been approved)?

Authorities are required to adhere to DPA 2018 and the terms of the contractual agreement with Indesser.

Describe the purposes of the processing: *what do you want to achieve? What is the intended effect on individuals? What are the benefits of the processing - for you, and more broadly?*

What do you want to achieve?

The aims of the pilot are to: -

- Provide HMG with an anonymised, amalgamed view of the national opportunity for debt collection and subsequently inform a business case which will determine the value in HMG sponsoring new budgetary options to allow for the payment of Debt Collection Agencies from collected revenues (Collections Fund/General Fund Budgetary Switch).

- Provide individually participating Local Authorities with a high-level summary report showing the segmentation of debt within their council tax arrears portfolios alongside a comprehensive analysis of whether they could maximise revenues in council tax arrears portfolios by utilising the private sector (Benchmark Liquidation Rates).

- Provide individually participating Local Authorities with a financial vulnerability segmentation – an insight into who are the most financially vulnerable people within their council tax arrears portfolio. (High-financial vulnerability cohort).

What is the intended effect on individuals?

No effect during the pilot, this will inform the Cabinet Office and participating authorities with a better, more complete understanding council tax debt owed to local government, as well as a more comprehensive view of the financial circumstances of those individuals who are in debt.

HMG sponsors of the pilot have not asked for any commitment from Councils to act on the financial vulnerability data. There is nothing stated in the contract between us and Indesser that requires any further action on any of the data insights provided as part of the pilot. The COOF does allow any participating organisation to use any of Indesser's other services in the future should they wish to do so. This can be achieved by submitting a change request to the COOF to amend the service that Indesser are supplying to us under the DMI Framework.

For the individuals identified as financially vulnerable, our aim is to use this insight to adopt supportive Council Tax recovery practices and ensure that these individuals have the support they need.

What are the benefits of the processing - for you, and more broadly?

The pilot would enable us to have an in-depth view of residents that are facing or at high risk of financial vulnerability. We would use the data to better understand debtor circumstance and adjust treatment strategies, to ensure the most appropriate action is taken prior to collection activity/intervention commencing.

This approach has been proven in many settings by improving the relationship of organisations to debtors, ensuring consistent and improved liquidation of debts as well as improving the overall customer journey/wellbeing of citizens.

The pilot provides us with a data enrichment and segmentation service utilising Credit Reference Agency data to provide unique insights into our portfolio, this type of service usually comes with a fee in the 10s of thousands and by participating we are gaining this service alongside the financial-vulnerability cohort identification for free. Normally signing up to the DMI involves agreeing to a 'sole route to market' ("SRTM") i.e. a Local Authority won't be able to engage other private sector firms to provide the services that they've asked Indesser to supply. As part of this pilot, Indesser have waived all DMI clauses relative to SRTM, this means we are free to engage other providers - whether this is the firm who was successful in securing the new government 'Debt Market Services' contract in May 2020 or any other firms that we wish to engage with for debt services.

The pilot acts as a first step in supporting a government wide initiative in improving the funding and budgetary options available to local authorities to use alternative collections methods. The pilot will provide an overview of the national opportunity of using FCA-regulated debt collection for council tax arrears portfolios – there are currently no robust case studies covering this collections method which outline the potential yield/ liquidation opportunity.

Step 3: Consultation Process

Consider how to consult with relevant stakeholders: *describe when and how you will seek individuals' views - or justify why it's not appropriate to do so. Who else do you need to involve within your organisation? Do you need to ask your processors to assist? Do you plan to consult information security experts, or any other experts?*

Describe when and how you will seek individuals' views - or justify why it's not appropriate to do so.

There will be no consultation with the individuals who have the outstanding debts used in the analysis – i.e. the 'data subjects'. The Pilot intends to better inform future policies and processes to improve fair treatment of debtors and maximise and therefore possible future impact on subjects of this pilot would be positive.

In the planning of this pilot engagement has taken place with senior stakeholders and representatives from MHCLG, HMT, Cabinet Office. The Cabinet Office Digital Economy Act secretariat and some members have provided input to the pilot aims and scope during a consultation period. Additionally, data guardians and operational delivery experts at Indesser and Cabinet Office have been consulted and involved in the design and delivery of elements of the pilot.

Who else do you need to involve within your organisation? Do you need to ask your processors to assist? Do you plan to consult information security experts, or any other experts?

We will consult with our data protection team on DPA and GDPR compliance.

We have completed this DPIA and sought procurement advice on the service contract established to cover the data processing activity.

We have involved our DPO, and system administrators need to be involved.

Processors will be asked to assist.

Furthermore, all processing will be in line with relevant legislation, as shown in 'Step 4' below.

Information available to the individual will take the form of a Privacy Notice outlining the potential uses that may be made of their data. Links to pilot our Privacy Notices are below, which include details or reference to details of how to exercise data subject rights under the legislation: -

https://www.angliarevenues.gov.uk/privacy-statement.cfm

Step 4: Access necessity and proportionality

Describe compliance and proportionality measures, in particular: what is your lawful basis for processing? Does the processing actually achieve your purpose? Is there another way to achieve the same outcome? How will you prevent function creep? How will you ensure data quality and data minimisation? What information will you give individuals? How will you help to support their rights? What measures do you take to ensure processors comply? How do you safeguard any international transfers?

What is your lawful basis for processing?

The lawful basis is under either of the following: GDPR Article 6:

(c) processing is necessary for compliance with a legal obligation to which the controller is subject;

(e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;

In making this determination, we have consulted the Information Commissioner Officer website and this section specifically.

All processing of personal data will also be in line with Schedule 2, Part 1, Paragraph 2 of the Data Protection Act 2018. This allows personal data to be processed 'for the assessment or collection of any tax or duty or of any imposition

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of a similar nature' and GDPR as noted above.

Does the processing actually achieve your purpose?

Yes, the pilot is anticipated to achieve the purpose.

Is there another way to achieve the same outcome?

No other way to achieve the same outcome has been identified.

How will you prevent function creep?

We will avoid function creep by adhering to the remit of this DPIA, the contractual data usage agreement and services outlined in the Call Off Order Agreement then performing only the analysis necessary to provide the required level of understanding.

Should the initial results suggest that further analysis or further operational pilots could be beneficial then this will be the subject of a new pilot/service agreement and a new DPIA.

How will you ensure data quality and data minimisation?

The data request has been designed to ensure data received by Indesser is limited to only that which is required for the purposes of this analysis. This request also highlights mandatory fields so that the personal data received is sufficient for the data enrichment process.

The data enrichment process includes steps to exclude data deemed incomplete or inaccurate, uses well-proven matching routines and automated validation are applied upon completion. Processing is delivered in line with the fulfilment of identified requirements only, with outputs limited to originally supplied data, a Financial Vulnerability flag and anonymised reports.

Only the exact data required will be extracted from Capita using a pre-prepared and tested script for identifying only those accounts which meet the criteria. No additional data will be provided.

What information will you give individuals?

None.

How will you help to support their rights?

Their rights will be supported by ensuring that the processes and data used will be in line with DPA, GDPR and the contractual terms.

What measures do you take to ensure processors comply?

We have to comply with the above requirements and Indesser their supplier's staff are trained in DPA and GDPR requirements. Framework Schedule 3.6 also outlines personnel security.

The staff at our authority receiving, processing and transmitting the data are limited to Local Authority recovery staff, IT data extractors and their immediate managers. All such users sign data disclosure agreements before system access is granted. All our staff have had DPA and GDPR training.

How do you safeguard any international transfers?

No international transfers will be required as part of the pilot.

Step 5: Identify and Assess Risks

Describe source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary.	Likelihood of harm Remote, possible or probable	Severity of harm Minimal, significant or severe	Overall risk Low, medium or high
1. There is a risk that our residents/customer data could be lost during the pilot, leading to them being adversely affected.	Remote	Significant	Medium
2. There is a risk that our residents/customers could be adversely affected due to errors in the data matching applied in the analysis resulting in incorrect conclusions if actioned upon.	Possible	Minimal	Low
3. There is a risk that our residents/customers could be adversely affected due to results of the analysis being misinterpreted and incorrect conclusions being drawn.	Remote	Minimal	Low
4. There is a risk that our residents/customers could be adversely affected due to an authority using the results of the analysis to affect how an individual is treated.	Remote	Minimal	Low
5. There is a risk that our residents/customers could be adversely affected due to Indesser inadvertently sending personal data to the Cabinet Office.	Remote	Minimal	Low
6. There is a risk that our residents/customers could be adversely affected due to inaccuracies or poor quality in the initial data file supplied to Indesser.	Remote	Minimal	Low
7. There is a risk that our residents/customers could be adversely affected due to parties	Remote	Significant	Medium

involved in the pilot activity misusing the data for purposes not specified or agreed.			
8. There is a risk that our residents/customers could be adversely affected due to non-administrative searches being applied to their credit files in error.	Remote	Significant	Medium
9. There is a risk that our residents/customers could be adversely affected due to data being retained outside of agreed retention periods.	Remote	Minimal	Low
10. There is a risk that our residents/customers could be adversely affected due to incorrect tagging of individuals as financially vulnerable.	Remote	Minimal	Low

All these risks could result in the individual suffering distress or unfavourable treatment due to unauthorised use of the results of the analysis and the wrong treatment being applied based on the incorrect conclusions.

There is therefore the risk of penalties under Data Protection Act, GDPR and / or civil procedures, as well as reputational risk to all parties taking part in the pilot. We accept this residual risk in view of the expected benefits from the Pilot.

Step 6: Identify Measures to Reduce Risk

Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 5

Risk	Options to reduce or eliminate risk	Effect on risk Eliminated, reduced or accepted	Residual risk Low, medium or high	Measure approved Yes / no
1. There is a risk that our residents/ customer data could be lost during the pilot, leading to them being adversely affected.	We have worked with Indesser to ensure that the transfer systems are secure and that there are checks in place prior to data transfer. The data will be kept in secure locations (folders/databases) only accessible to people authorised to do so.	Reduced	Low	Yes
2. There is a risk that our residents/customers could be adversely affected due to errors in the data	Data matching routines that Indesser use in the analysis are well-proven, with an average match rate of 95%. Of The remaining 5%, the majority	Reduced	Low	Yes

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matching applied in the analysis resulting in incorrect conclusions if actioned upon.	won't be actionable due to transient/erroneously entered data, with a significantly smaller portion potentially being mismatched. Fenland District Council plans to utilise the financial vulnerability data (see output a. above) to create or amend existing debt management strategies to ensure that these individuals have the support they need. Action will be taken on a case by case basis to provide support to the customer/resident and no adverse impacts are expected.			
3. There is a risk that our residents/customers could be adversely affected due to results of the analysis being misinterpreted and incorrect conclusions being drawn.	The results of the analysis will be reviewed by subject-matter experts at Indesser. The chance of all parties involved in the pilot misinterpreting the results of the analysis and drawing incorrect conclusions from them is considered very small. The data contained in the summary report supplied by Indesser to the Cabinet Office will contain no personal data.	Reduced	Low	Yes
4. There is a risk that our residents/customers could be adversely affected due to an authority using the results of the analysis to affect how an individual is treated.	The data contained in the summary report supplied by Indesser to the Cabinet Office will be anonymised and contain no personal data. No decisions or action will be taken by Indesser based on the results of the analysis.	Reduced	Low	Yes

	Fenland District Council plans to utilise the financial vulnerability data (see output a. above) to create or amend existing debt management strategies to ensure that these individuals have the support they need. Action will be taken on a case by case basis to provide support to the customer/resident and no adverse impacts are expected.			
5. There is a risk that our residents/customers could be adversely affected due to Indesser inadvertently sending personal data to the Cabinet Office.	A manual check by Indesser on the content of the summary report prior to it being supplied to the Cabinet Office will be performed in order to ensure that it is as agreed, that the data is anonymised, and that the report contains no personal data.	Reduced	Low	Yes
6. There is a risk that our residents/customers could be adversely affected due to inaccuracies or poor quality in the initial data file supplied to Indesser.	A pre-determined and tested script will be used to extract data directly from the capita database. A manual check will be performed to ensure that only the required data has been included and meets the criteria for selection	Reduced	Low	Yes
7. There is a risk that our residents/customers could be adversely affected due to parties involved in the pilot activity misusing the data for purposes not specified or agreed.	Contractual terms and pilot data specifications provide limitations for how data can be processed throughout pilot. Misuse of data for purposes other than specified will be considered a contractual breach. The data contained in the summary report supplied by Indesser to the Cabinet Office will be anonymised and contain no personal	Reduced	Low	Yes

	data.			
8. There is a risk that our residents/customers could be adversely affected due to non-administrative searches being applied to their credit files in error.	Controls in place to ensure administrative checks remain solely as audit footprints, which are not visible to public or to other creditors. No adverse impacts or hard searches to credit files will occur.	Reduced	Low	Yes
9. There is a risk that our residents/customers could be adversely affected due to data being retained outside of agreed retention periods.	Contractual terms in place to define data retention periods.	Reduced	Low	Yes
10. There is a risk that our residents/customers could be adversely affected due to incorrect tagging of individuals as financially vulnerable.	The impact on accuracy of analysis should be minimal and quality control checks for the analysis will work to avoid systemic errors that would have greater impact.	Reduced	Low	Yes

Step 7: Sign Off and Record Outcomes

Item	Name/Date	Notes
Measures approved by:		Integrate actions back into project plan, with date and responsibility for completion
Residual risks approved by:	Anna Goodall	If accepting any residual high risk, consult the ICO before going ahead
DPO advice provided:	Anna Goodall 02/09/2020	DPO should advise on compliance, step 6 measures and whether processing can proceed
Summary of DPO advice: I am satisfied that the Council Tax Arrears Analytics Pilot can proceed, that the lawful basis for processing is effective.satisfied and that risk mitigation is proportionate and		
DPO advice accepted or		If overruled, you must explain your

overruled by:		reasons
Comments:		
Consultation responses reviewed by:		If your decision departs from individuals' views, you must explain your reasons
Comments:		
This DPIA will kept under review by:		The DPO should also review ongoing compliance with DPIA

Annex A

Table 1: Council Tax Arrears Analytics Pilot Data Request Template Guidance

Type	Field Name	Example	Notes
Account Details	**UniqueInvoiceID**	123456789	Unique bill reference (one per liability/record)
	OutstandingBalance	£656.71	Current balance outstanding for specified billing period
	LiabilityOrderGrantedDate	31/03/2017	Date liability order granted
	AccountID	1122334455	Unique reference per account (may link multiple invoices)
	AccountOpenDate	01/04/2016	Account creation date (customer move in date)
	PaymentDataLevelFlag	I	Level that the 3 payment fields that follow are provided at: I = Invoice level A = Account level D = Debtor level (in order of preference)
	TotalPayments	£50.00	Total value of customer payments since liability order
	LastPaymentDate	15/07/2018	Last payment date
	LastPaymentAmount	£10.00	Last payment amount
Primary Debtor Details	**PrimaryDebtorReference**	654321	To link customers with multiple accounts
	PrimaryDebtorTitle	Mr	Title
	PrimaryDebtorForenames	James	Firstname(s)
	PrimaryDebtorSurname	Spencer	Surname
	PrimaryDebtorDOB	28/09/1960	Date of birth
	PrimaryDebtorPhoneHome	01159531278	Most recent home phone number
	PrimaryDebtorPhoneMobile	07945678213	Most recent mobile phone number
	PrimaryDebtorEmail	jds123@gmail.com	Most recent email address
	PrimaryDebtorAddress1	1 High Street	Most recent customer address details
	PrimaryDebtorAddress2		
	PrimaryDebtorAddress3		
	PrimaryDebtorAddressTown	Old Town	
	PrimaryDebtorAddressCounty	Derbyshire	
	PrimaryDebtorAddressPostCode	DE34 9JS	
Secondary Debtor Details	SecondaryDebtorReference	654322	Secondary debtor details
	SecondaryDebtorTitle	Mrs	
	SecondaryDebtorForenames	Jane	
	SecondaryDebtorSurname	Spencer	
	SecondaryDebtorDOB	26/03/1958	
	SecondaryDebtorPhoneHome	01159531278	
	SecondaryDebtorPhoneMobile	079456203765	
	SecondaryDebtorEmail	jms123@gmail.com	
	SecondaryDebtorAddress1	1 High Street	
	SecondaryDebtorAddress2		
	SecondaryDebtorAddress3		
	SecondaryDebtorAddressTown	Old Town	
	SecondaryDebtorAddressCounty	Derbyshire	
	SecondaryDebtorAddressPostCode	DE34 9JS	
Previous Activity	NumberDoorstepVisits	4	Number of doorstep visits
	NumberOfLetters	3	Number of letters sent
	LegalActionFlag	1	Legal action undertaken (Yes/No)
	LastActivityDate	05/01/2019	Date of last collections activity

Diagram 1: Council Tax Arrears Analytics Pilot Exemplar Data Flow