

Data Protection Full Assessment Impact Assessment Id: #360



Screening Information

Project Name Household Support Fund - Pensioner Support

Name of Project Sponsor Hannah Perrott

Name of Project Manager Louise West

Name of Project Lead Lisa Bedford

Please give a brief description of the project

To deliver a cash voucher scheme via the post office to pension credit recipients with data provided by the Department of Work and Pensions as part of the governments Household Support Fund. This has been deemed the most appropriate route to try and achieve a third of the funding allocated to directly support pensioners across the county with the increased cost of living.

Data Protection screening result

Will require a full impact assessment

Equality and Public Health screening result

Will require a full impact assessment

Environmental Sustainability screening result

Will require a full impact assessment

1.1 Background and Purpose

Background and Purpose of Project?

To support your answer to this question, you can upload a copy of the project's Business Case or similar document.

The Household Support Fund is a government initiative to help vulnerable residents with the rising costs of living, primarily for food, fuel and other essentials. The scheme was launched in October 2021 and extended at the end of March 2022. A further extension has just been announced, the details of which are yet to be confirmed but it is anticipated it will be similar. to the current scheme. An allocation of £3.95 million was confirmed in October for a period of 6 months and at the end of March 2022 a further £3.95million was announced. The criteria has changed in the two separate allocations, the first scheme had to spend at least 50% of the funding on households with children, and from April 2022, the scheme must spend at least 33% on households with children and a further 33% on households with pensioners (those of state pension age by the 31st September 2022). The scheme is operated through countywide schemes and at a more local level by working with our district councils across the county. This includes free school meal vouchers in some school holidays issued through schools, countywide fuel bill support through a programme of schemes delivered by Act on Energy for the council and many local initiatives delivered directly by the district council or through voluntary sector partners in their local areas such as; Citizen's Advice, Food Banks etc.

This specific DPIA is in relation to pensioner support, which will be via a direct approach to pension credit recipients in the county in order to post a voucher which can be cashed at an post office, to assist with the increase in the cost of living.

Upload Business Case or Support documents

No files uploaded

Project Outputs

Briefly summarise the activities needed to achieve the project outcomes.

To provide a one off (or repeat depending on the criteria of an funding extensions) cash voucher to all pension credit recipients in the county.

Project Outcomes

Briefly summarise what the project will achieve.

The project will provide £75 per household for around 11,500 pensioners that are in receipt of pension credit to support with the increase in the cost of living. Vouchers will be issued by post via the post office and can be cashed at the post office upon the submission of specific ID.

Is the project a new function/service or does it relate to an existing Council function/service?

Was consultation carried out on this project?

No

1.2 Responsibility

Directorate/Organisation

Service Area Communities



Specifics

Project Reference (if known) Not Recorded

Intended Project Close Date * April 2023

^{1.5} Project Part of a Strategic Programme

Is this project part of a strategic programme?

No



Who are you processing data about?

Customers, clients or service users Recipients of Benefits

What personal data will be collected?*

The second stage is to list all of the types of personal data that you believe the project/works/additional processing will utilise. Please select yes for as many examples of types of data that are relevant and include any others in the free text at the bottom of the page.

Basic Identifiers:

Name Yes **Date of Birth** No Age Yes Gender No Sex No **Contact Details: Address** Yes **Email Address** No Home Phone Number No

Mobile Phone Number

No

Postcode

Yes

ID Number:

National Insurance Number Yes Driving Licence/Number No NHS Number

Other General Identifier

No

Employment:

Work Related Training/Awards

No

Financial:

Income/Financial/Tax Situation

Appearance:

Photograph

No

Physical Description

Lifestyle:

Living Habits

No

Marital Status

No

Technology:

Login/Username

No

Device MAC Address (Wireless Network Interface)

No

Device Mobile Phone/Device IMEI No

No

Location Data (Travel/GDPS/GSM Data)

No

Online Identifier e.g. IP Address

No

Website Cookies

No

Other Data Types Collected Not Recorded



What is your lawful basis for processing the personal data?*

Please choose one of the following

Data Subject's consent for the purpose No

Necessary for a contract with the Data Subject No

Necessary to comply with a legal obligation No

Necessary to protect the vital interests of an individual(s)

No

Necessary for a task in the public interest or exercise of official authority of Controller Yes

Necessary for legitimate interests of Controller unless interests are overridden by the interests or rights of the individual (only available in limited circumstances to public bodies)

No



What special category personal data (if any) will be collected?*

This section will not apply to all projects and should only be completed if it applies to you.

It is important that you read this section carefully, as these data types require additional care and protection.

If you do pick anything from this list, you will be required to give more details in Section 4 of this form.

You can read more about Special Category Data through this link;

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https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/special-category-data/
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Race No Ethnic origin No **Political opinions** No Religion No **Philosophical beliefs** No Trade union membership No **Genetic Data** No **Biometric Data** No Sex life No Health or social care No

2.3 Legal basis for Special Data

What is the relevant condition for processing the special category personal data?*

You must qualify under one of the below exemptions as well as having a legal basis from the previous question.

Explicit Consent

The data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject; Not Recorded

Employment and Social Security

Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject;

Not Recorded

Vital Interests

Processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent; Not Recorded

Legitimate Interests of:

"a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim".

Processing is carried out in the course of its legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim and on condition that the processing relates solely to the members or to former members of the body or to persons who have regular contact with it in connection with its purposes and that the personal data are not disclosed outside that body without the consent of the data subjects;

Note - this is not often applicable to local authorities.

Not Recorded

Publicly Available Data

Processing relates to personal data which are manifestly made public by the data subject; Not Recorded

Legal or Court Proceedings

Processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity;

Not Recorded

Public Interest - Statutory Necessity

Processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject; Not Recorded

Medical, Health and Social Care Provision

Processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional and subject to the conditions and safeguards referred to in paragraph 3;

Not Recorded

Public Health

Processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject, in particular professional secrecy; Not Recorded

Archiving or Scientific, Historical or Statistical Research Purposes

Processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

2.4 Information Involved

Understanding the information flows involved in a project is essential to a proper assessment of privacy risks.

How will the data be collected?*

This section should be filled in for every project, not just those collecting Special Category data.

The data will be collected via a data download from the DWP secure server. This data is available monthly to download. All permissions and ID checks have been completed and access is now available for the data to be used for Household Support Fund delivery.

What will the data be used for?*

This section should be filled in for every project, not just those collecting Special Category data.

The data will be used to transfer to the post office through a contract to produce and distribute via letter a cashable voucher for £75 to all households where there is a pension credit recipient residing (excluding care and residential home settings or other accommodation where there is no tenancy agreement)

Has data already been collected?

Yes

Are the purposes for which you are collecting the data different?*

If the data you are hoping to use was not collected specifically for this project, please explain in the box below why it was collected. This will include data that you have collected from other teams within WCC.

The data has already been collected by the Department for Work and Pensions. No further data will be collected by the county council as part of the project.

Explain why existing and/or less intrusive processes or measures would be inadequate *

In this section, you should explain why your new method/project is absolutely necessary and show that you have thought about all other options.

All other options were considered in order to try and come up with proposals to reach the more vulnerable pensioners across the county. This included; council tax rebate, online application for support etc.

It was felt that is route is the least intrusive (after council tax rebate as that wasn't feasible), as the support would be provided automatically to pension credit recipients, no personal data would need to be provided such as bank details etc. Cashing at the local post office was felt to be a more trusted route to follow in order to reach the residents of pension age.

3.0 Other organisations

Are other organisations involved in processing the data?

Yes

Please provide details of each organisation that is involved in the processing of Data. Do this by adding to the below list.*

Organisation Name	Post Office Ltd
Data Controller or Data	Data Processor
Processor	
Organisation's Role	Processing the data to produce personalised letter and voucher to all pension credit recipients
Data Sharing Agreement or	No
Contract	
Contract Reference	In process - currently with legal
Number/DSA Name	
Organisation involved reason	After assessing alternative options for delivering vouchers including consulting with district council revenue and benefits partners, this option was deemed the most suitable to reach pensioners across the county with the highest chance of success from the options available.
Disclosure and Security	Secure post office portal with restricted users and ability to manage individual account user access to specific sections of the operation. Council controlled sign up of staff and any third party involved in the distribution.

3.1 Storage detail

How will the information be stored?

Please include details of whether data will be stored outside of the European Economic Area (EEA).

Please remember that cloud storage and back up servers maybe outside the EEA.

Data will be held internally via a restricted access folder on the councils server with only three staff members having access to it. The data will be transferred in a preset format to the post office via a secure web portal where all activity will be undertaken. Only two staff members will have access to that site.

For how long will the data be retained?*

The data will be retained for 6 years.

What is the deletion process? *

The file will be deleted from the server upon reaching the retention end period.

4 Consultation details

Consultation can be used at any stage of the DPIA process and is important to allow people to highlight privacy risks and solutions based on their own area of interest or expertise. For further assistance and information please visit the consultation toolkit section on Ourspace.

Explain what practical steps you are going to take to ensure that you identify and address privacy risks *

No formal consultation will be undertaken. Ensuring the contract with the post office reflects the privacy standards we require and seeking guidance from the information governance team.

Who should be consulted, internally and externally? Do you need to seek the views of members of the public?*

The proposal has been developed in consultation with internal and external partners through the district councils and the Worcestershire Advice Network. Views from members of the public are not required.

How will you carry out the consultation?*

(You should link this to the relevant stages of your project management process) No formal consultation planned.

⁵ Risk register

At this stage you should identify the possible privacy risks together with their likelihood, severity and overall level, and for high risks the measures taken to reduce the risk. Add any risk to the relevant sections below.

Fair and Lawful Processing

Data must be processed lawfully, fairly and in a transparent manner. Please also consider

- Have you identified at least one lawful basis for the personal data processed as part of the project?
- Does at least one Controller involved have a lawful power to act?
- Do you need to create or amend a privacy notice?
- · How is your processing going to be transparent?

Risk that processing is not transparent, and individuals are unaware that data is being collected or why it is processed

Unmitigated Risk Likelihood - Unlikely Severity - Minimal Impact Score - Low Mitigation/Solution As this is a welfare support scheme, the DWP are able to make the data available to local authorities to delivery the Household Keep it Green, Keep it on the Screen

Support Fund.

A press release will be issued to let people know that a letter with a voucher will arrive for those households on pension credit

Mitigated Risk

Likelihood - Unlikely Severity - Minimal Impact Score - Low **Result** Reduced

Risk that information is being processed unlawfully

Unmitigated Risk

Likelihood - Unlikely Severity - Minimal Impact Score - Low

Mitigation/Solution

As above, as welfare data it is able to be processed for the purposes of providing welfare support, which is what the Household Support Fund is. The data will only be processed for one sole purpose, which will be to produce a spreadsheet in order to pass on to the Post Office for letter and voucher distribution.

Mitigated Risk

Likelihood - Unlikely Severity - Minimal Impact Score - Low Result

Reduced

Specific, explicit and legitimate purposes

The purpose for which you process personal data must be specified, explicit and legitimate. Personal data collected must not be processed in a manner that is incompatible with the purpose for which it was originally collected. Please also consider

- Does your project plan cover all of the purposes for processing personal data? If not your plan needs amending accordingly.
- Are all elements of the processing compatible with the original reason and justification for the processing?
- What are these specific, explicit and legitimate purposes?

Risk of 'mission creep' and information is used for different, or incompatible purposes to that identified when originally collected

No Risk

Adequate, relevant and not excessive

Personal data processed must be adequate, relevant and not excessive in relation to the purpose for which it is processed. Please also consider

- Is the quality of the information adequate for the purposes it is used?
- If not, how is this to be addressed?
- Are measures in place to ensure that data is limited to that which is needed to fulfill the aim of the processing?
- Which personal data elements do not need to be included without compromising the needs of the project?

Risk of loss of control over the use of personal data

Unmitigated Risk Likelihood - Unlikely Severity - Minimal Impact Score - Low

Mitigation/Solution

The data has very restricted access and will only be used for the purposed of welfare support for pension credit households as part of the governments Household Support Fund.

Mitigated Risk

Likelihood - Unlikely Severity - Minimal Impact Score - Low

Result

Risk that inadequate data quality means the information is not fit for the identified purpose(s) potentially leading to inaccurate decision making

No Risk

Risk that any new surveillance methods may be an unjustified intrusion on individuals' privacy

No Risk

Accurate and timely

Personal data processed must be accurate and, where necessary, kept up to date, and every reasonable step must be taken to ensure that personal data that is inaccurate is erased or rectified without delay. Please also consider

- If you are procuring new software does it allow you to amend data when necessary?
- · How are you ensuring that personal data obtained from individuals or other organisations is accurate?
- Do you have processes in place to keep data up to date?
- If any data sets are to be merged, what checks are carried out to ensure that the right data records are matched/merged together?

Any data matching or linking, including whole data sets may link wrong records together

Unmitigated Risk Likelihood - Unlikely Severity - Minimal Impact Score - Low Mitigation/Solution The monthly data set provided by the DWP will be cross referenced each month to ensure households are added or removed as required to ensure all eligible at the point of distribution receive the support they are entitled to. Mitigated Risk Likelihood - Unlikely Severity - Minimal Impact Score - Low Result Reduced

Storage limitation

Personal data must be kept for no longer than is necessary for the purpose for which it is processed. Appropriate time limits must be established for the periodic review of the need for the continued storage of personal data. Please also consider

- What are the risks associated with how long data is retained and how they might be mitigated?
- Has a review, retention and disposal (RRD) policy been established?
- How does the software enable you to easily act on retention criteria does it enable bulk review/destruction; set review periods; extract for long-term preservation/retention of the corporate memory?

Risk information is retained for the wrong length of time (both too long and too short)

Unmitigated Risk
Likelihood - Unlikely
Severity - Minimal Impact
Score - Low
Mitigation/Solution
The information will be added on to the team dataset list to ensure it is maintained for the time period required and deleted at the
relevant point.
Mitigated Risk
Likelihood - Unlikely
Severity - Minimal Impact
Score - Low
Result
Reduced

Risk information is not securely destroyed when its retention period has been reached

Unmitigated Risk

Likelihood - Unlikely Severity - Minimal Impact Score - Low

Mitigation/Solution

The data will be managed in line with council policy and process and will remain on the dataset list for the team to be co-ordinated and actioned as appropriate.

Mitigated Risk

Likelihood - Unlikely Severity - Minimal Impact Score - Low

Result

Reduced

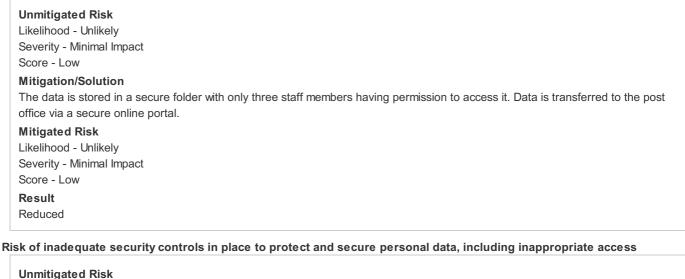
Security

Personal data must be processed in a manner that ensures appropriate security of the personal data, using appropriate technical or organisational measures (and, in this principle, "appropriate security" includes protection against unauthorised or unlawful processing and against accidental loss, destruction or damage).

Please also consider

- What technical and organisational measures are in place to ensure that the data is protected to an adequate level?
- What training on data protection and/or information sharing has been undertaken by relevant staff?
- What access controls are in place to enforce the 'need to know' principle?
- What assurance frameworks are utilised to assess adequacy of security measures in place e.g. NHS DSPT; Cyber Essentials Plus; PSN Certification?

Risk of loss of confidentiality



Likelihood - Unlikely Severity - Minimal Impact Score - Low Mitigation/Solution Data stored in a secure folder with only three staff with access Mitigated Risk

Likelihood - Unlikely Severity - Minimal Impact Score - Low Result

Reduced

Risk that workers processing the data are not aware of their data responsibilities

Unmitigated Risk Likelihood - Unlikely Severity - Minimal Impact Score - Low **Mitigation/Solution**

Staff accessing have all undertaken GDPR and information governance training and are used to dealing with personal data.

Mitigated Risk Likelihood - Unlikely Severity - Minimal Impact Score - Low Result

Reduced

Risk that information is distributed using inappropriate methods

No Risk

Risk of re-identification of pseudonymized or anonymised data (e.g. collecting matching and linking identifiers and information may result in information that is no longer safely anonymised)

No Risk

Risk that information is transferred to a 'third country' without adequate safeguards

Unmitigated Risk
Likelihood - Unlikely
Severity - Minimal Impact
Score - Low
Mitigation/Solution
The contract with the post office will ensure that data is managed in an appropriate way with adequate safeguards in place.
Mitigated Risk
Likelihood - Unlikely
Severity - Minimal Impact
Score - Low
Result

Reduced

Financial and reputational

Risk of identity theft or fraud

Unmitigated Risk

Likelihood - Unlikely Severity - Minimal Impact Score - Low

Mitigation/Solution

A third party will be able to cash the voucher, but they will have to provide the recipients ID and sign on the letter to confirm who they are and what their relationship is to the recipient.

Mitigated Risk

Likelihood - Reasonably Unlikely Severity - Some Impact Score - Medium

Result Accepted

Risk of financial loss for individuals or other third parties

Unmitigated Risk

Likelihood - Unlikely Severity - Some Impact Score - Low

Mitigation/Solution

The voucher is intended to be cashed by the individual providing ID, a third party can cash the voucher on their behalf but they must have the ID of the recipient and sign to say who they are and their relationship to the recipient.

Mitigated Risk

Likelihood - Unlikely Severity - Some Impact Score - Low

Result Accepted

Risk of financial loss for the Council (including ICO fines)

Unmitigated Risk Likelihood - Unlikely Severity - Minimal Impact Score - Low

Mitigation/Solution

The financial risk is minimal as the total value of vouchers will be transferred to the post office before the scheme starts. The management information from the Post Office will show all vouchers issued and redeemed so there should be no issue with responding to any queries about vouchers not being issued etc.

Mitigated Risk

Likelihood - Unlikely Severity - Minimal Impact Score - Low **Result**

Reduced

Risk of reputational damage to the Council, partners, and processors

Unmitigated Risk

Likelihood - Unlikely Severity - Minimal Impact Score - Low

Mitigation/Solution

The proposed delivery route using the Post Office was chosen as it was felt to present the most trustworthy route for delivering a cash voucher scheme with older residents. The scheme is used by district councils within Worcestershire and many other local authorities for a variety of reasons including the council tax rebate scheme, therefore it was felt like the approach was tried and tested and robust for use at scale.

Mitigated Risk

Likelihood - Unlikely Severity - Minimal Impact Score - Low **Result**

Reduced

Health, safety and wellbeing

Risk of physical harm to individuals

No Risk

Risk of physical harm to staff and workers

No Risk

Risk of discrimination

No Risk

Risk of other significant economic or social disadvantage

No Risk

Individuals Rights

Data protection legislation gives data subjects' various rights (listed below). Limiting or restricting any of these rights is likely to be a significant impact so the justification for any restriction, as well as mitigations, must be fully outlined.

Inability to meet individuals' right to be informed

Unmitigated Risk Likelihood - Unlikely Severity - Minimal Impact Score - Low Mitigation/Solution The data set is owned by the DWP and managed through the welfare provision. Mitigated Risk

Inability to meet individuals' right of access

Unmitigated Risk

Likelihood - Unlikely Severity - Minimal Impact Score - Low

Mitigation/Solution

The data set will be available through the three members of staff with access to confirm if people wish to know what data the council holds on them as an individual.

Mitigated Risk Likelihood - Unlikely Severity - Minimal Impact Score - Low

Result Reduced

Inability to meet individuals' right to rectify inaccurate data

Unmitigated Risk

Likelihood - Unlikely Severity - Minimal Impact Score - Low

Mitigation/Solution

The data set comes from the DWP so any inaccuracies would have to be addressed directly. This scheme is in relation to giving a £75 cash voucher to eligible households and therefore less likely to cause a significant impact

Mitigated Risk

Likelihood - Unlikely Severity - Minimal Impact Score - Low

Result

Reduced

Inability to meet individuals' right to restrict processing

Unmitigated Risk

Likelihood - Unlikely Severity - Minimal Impact Score - Low

Mitigation/Solution

In the unlikely event that a resident reads the press release and does not want to received the £75 cash voucher, their details can be deleted from the database and/or the voucher cancelled if it has already been issued.

Mitigated Risk

Likelihood - Unlikely Severity - Minimal Impact Score - Low Result

Reduced

Inability to meet individuals' right to object

Unmitigated Risk

Likelihood - Unlikely Severity - Minimal Impact Score - Low

Mitigation/Solution

As this data is provided by the DWP as part of our welfare support role, this would be an issue for resident to take up with the DWP and not the council directly.

Mitigated Risk

Likelihood - Unlikely Severity - Minimal Impact Score - Low **Result** Reduced

Inability to meet individuals' rights relating to automated decision making and profiling

No Risk

Additional project specific risks

No additional risks recorded

6 Declaration

I confirm to the best of my knowledge that the information I have provided is true, complete and accurate * Selected

I confirm that I will make sure that data protection has been and continues to be considered throughout the project life cycle and should circumstances change in the project to include any processing of personal data a further Data Protection Impact Assessment Screening will be carried out *

Selected

7 Application Details

Last Updated Date Time

01/06/2022 13:04:30

Screening Submitted Date Time 31/05/2022 13:16:18

Last Reopened Date Time No Date Recorded

Full Impact Submitted Date Time 01/06/2022 12:04:30

Approved/Rejected Date Time 01/06/2022 14:54:48

Current User Dashboard Request Status

Complete



Lisa Bedford (LBedford@worcestershire.gov.uk)



Lisa Bedford (LBedford@worcestershire.gov.uk)

9 Direct Questions

No Questions Asked