

Data Protection Full Assessment
Impact Assessment Id: #486**1.0 Screening Information****Project Name**

Household Support Fund

Name of Project Sponsor

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Please give a brief description of the project

The Household Support Fund has been made available to local councils through the Department of Work and Pensioners to support households in the most need; particularly families with children of all ages, pensioners, unpaid carers, care leavers, and people with disabilities who would otherwise struggle with energy bills, food and water bills.

The Household Support Fund (HSF) will provide support to those most in need by providing vouchers or payments to eligible households or making direct provisions to help with food and goods through a variety of mechanisms.

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. Since October 2021, Worcestershire has been awarded £3.95m of funding every six months from Household Support Fund schemes to provide support for residents in need of help with food, fuel and other essential household costs. In the Autumn Statement 2022, the Chancellor confirmed that the Household Support Fund would be extended for a further 12 months starting in April 2023, and this equates to just under £7.9 million for Worcestershire to use to support residents until 31st March 2024.

Confirmation and guidance from the Department of Work and Pensions was received in February 2023.

Government specified parameters for use of these funds over the previous three schemes has included;

- a) HSF 1 – ringfence a minimum of 50% of the grant on households with children with a focus on food
- b) HSF 2 – ringfence a minimum of a third of the grant on households with children and a further third for pensioners with a general support around food and energy and wider linked essentials
- c) HSF 3 – no funding ringfenced to specific cohorts but a larger focus on energy costs

The new fund from April 2023 is intended to provide assistance to vulnerable households in most need of support to help with the increase in living costs linked to energy and food. Whilst the general purpose of the fund is the same as that provided previously in HSF 3, there is a stronger focus on energy and supporting those vulnerable groups that may be facing additional costs such as; families on low incomes with children of all ages, pensioners, disabled people, carers and care leavers.

Upload Business Case or Support documents

No files uploaded

Project Outputs

Briefly summarise the activities needed to achieve the project outcomes.

To provide assistance to vulnerable households across the county in most need of support to help with the increase in living costs linked to energy and food.

Project Outcomes

Briefly summarise what the project will achieve.

Proposals are in line with government grant conditions and are modelled around local understanding of need across different categories, informed by local intelligence and previous delivery of the funds. The majority of the activity is a continuation of the schemes currently in operation in HSF 3. Funding will only be used for schemes that are free to eligible residents.

- Food - Food voucher for all school holidays until the end of March 2024 for children in receipt of free school meals. Dedicated Food bank funding delegated to District Councils

Energy - Extend Act on Energy scheme to support with debt, vouchers and new heating measures for eligible residents. Home visits and minor measure installations through Age UK's in the county. Energy voucher scheme (Warmth on prescription) through primary care for residents with heat affected medical conditions in each district collaborative area.

- Food/Energy - Extend pensioner, carer, person with disability scheme delivered through Worcestershire Advice Network organisations, voucher payment depending on number of criteria met. Care leavers one off winter payment. Shared lives carers one off winter payment. Small appliances fund linked to the growth and skills programme in the council.

- District Councils - District councils to distribution in line with grant conditions. Includes in house support and through external voluntary sector partners.

- Advice Services - Extension of debt workers supporting energy debt applications alongside Act on Energy

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

Existing

Was consultation carried out on this project?

No

1.2 Responsibility

Directorate/Organisation

People

Service Area

Communities

1.4 Specifics

Project Reference (if known)

Not Recorded

Intended Project Close Date *

April 2024

1.5 Project Part of a Strategic Programme

Is this project part of a strategic programme?

No

2.0 Personal Data

Who are you processing data about?

Customers, clients or service users

Claimants

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

No

Other General Identifier

No

Employment:

Work Related Training/Awards

No

Financial:

Income/Financial/Tax Situation

No

Appearance:

Photograph

No

Physical Description

No

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

2.1 Legal basis for Personal Data

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

2.2 Special Data

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;

<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/>

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 for vouchers for those on Pension Credit 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 available for the data to be used for Household Support Fund delivery.

For Free School Meals, school administrators are able to input the details of eligible families directly onto the portal.

Other schemes collect data through referrals, including self-referral.

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 provide support to eligible residents across the different schemes.

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 for people on Pension Credits has already been collected by the Department for Work and Pensions.

Further data will be collected by the county council as part of the project for the other schemes.

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.

There are a range of options to ensure support is targeted at the most vulnerable residents in the county, in line with DWP guidance.

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. The current proposals are felt to be the least intrusive, and feasible. Using the Post Office scheme for cash vouchers means that no personal data would need to be provided such as bank details etc. Cashing at the local post office was felt to be a trusted route to follow. Post Office vouchers are used for the pension scheme, Worcestershire Advice network voucher scheme and Act on Energy voucher element.

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 Processor	Data Processor
Organisation's Role	Processing the data to produce personalised letter and voucher to all pension credit recipients
Data Sharing Agreement or Contract	No
Contract Reference Number/DSA Name	In process - currently with legal
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.

Organisation Name

Age UK Worcester and Malvern

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Data Controller or Data Processor	Data Processor
Organisation's Role	Processing referrals for eligible residents
Data Sharing Agreement or Contract	Yes
Contract Reference Number/DSA Name	Unknown
Organisation involved reason	Age UK Worcester and Malvern process referrals of eligible residents, using the Post Office voucher scheme. They also administer home energy checks.
Disclosure and Security	Referrals from partner agencies and self-referral

Organisation Name	Bromsgrove District Council
Data Controller or Data Processor	Data Processor
Organisation's Role	Processing the data of eligible residents, based on the criteria set by the district in line with DWP guidance
Data Sharing Agreement or Contract	Yes
Contract Reference Number/DSA Name	Memorandum of Understanding
Organisation involved reason	To be able to target support at those most in need at a local level
Disclosure and Security	District councils are able to use their discretion in identifying and supporting those most in need to help those who are struggling to afford food, energy and water bills and other related essentials. Schemes involve referrals, including self-referrals. A Memorandum of Understanding, which includes an Information Sharing Protocol is in place.

Organisation Name	Redditch District Council
Data Controller or Data Processor	Data Processor
Organisation's Role	Processing the data of eligible residents, based on the criteria set by the district in line with DWP guidance
Data Sharing Agreement or Contract	Yes
Contract Reference Number/DSA Name	Memorandum of Understanding
Organisation involved reason	To be able to target support at those most in need at a local level
Disclosure and Security	District councils are able to use their discretion in identifying and supporting those most in need to help those who are struggling to afford food, energy and water bills and other related essentials. Schemes involve referrals, including self-referrals. A Memorandum of Understanding, which includes an Information Sharing Protocol is in place.

Organisation Name	Malvern Hills District Council
Data Controller or Data Processor	Data Processor
Organisation's Role	Processing the data of eligible residents, based on the criteria set by the district in line with DWP guidance.
Data Sharing Agreement or Contract	Yes
Contract Reference Number/DSA Name	Memorandum of Understanding
Organisation involved reason	To be able to target support at those most in need at a local level
Disclosure and Security	District councils are able to use their discretion in identifying and supporting those most in need to help those who are struggling to afford food, energy and water bills and other related essentials. Schemes involve referrals, including self-referrals. A Memorandum of Understanding, which includes an Information Sharing Protocol is in place.

Organisation Name	Worcester City Council
Data Controller or Data Processor	Data Processor

Organisation's Role	Processing the data of eligible residents, based on the criteria set by the district in line with DWP guidance
Data Sharing Agreement or Contract	Yes
Contract Reference Number/DSA Name	Memorandum of Understanding
Organisation involved reason Disclosure and Security	To be able to target support at those most in need at a local level District councils are able to use their discretion in identifying and supporting those most in need to help those who are struggling to afford food, energy and water bills and other related essentials. Schemes involve referrals, including self-referrals. A Memorandum of Understanding, which includes an Information Sharing Protocol is in place.

Organisation Name	Wychavon District Council
Data Controller or Data Processor	Data Processor
Organisation's Role	Processing the data of eligible residents, based on the criteria set by the district in line with DWP guidance
Data Sharing Agreement or Contract	Yes
Contract Reference Number/DSA Name	Memorandum of Understanding
Organisation involved reason Disclosure and Security	To be able to target support at those most in need at a local level District councils are able to use their discretion in identifying and supporting those most in need to help those who are struggling to afford food, energy and water bills and other related essentials. Schemes involve referrals, including self-referrals. A Memorandum of Understanding, which includes an Information Sharing Protocol is in place.

Organisation Name	Wyre Forest District Council
Data Controller or Data Processor	Data Processor
Organisation's Role	Processing the data of eligible residents, based on the criteria set by the districts in line with DWP guidance
Data Sharing Agreement or Contract	Yes
Contract Reference Number/DSA Name	Memorandum of Understanding
Organisation involved reason Disclosure and Security	To be able to target support at those most in need at a local level District councils are able to use their discretion in identifying and supporting those most in need to help those who are struggling to afford food, energy and water bills and other related essentials. Schemes involve referrals, including self-referrals. A Memorandum of Understanding, which includes an Information Sharing Protocol is in place.

Organisation Name	Edenred
Data Controller or Data Processor	Data Processor
Organisation's Role	Processing the data to provide food vouchers to families eligible for free school meals during holidays
Data Sharing Agreement or Contract	Yes
Contract Reference Number/DSA Name	Unknown
Organisation involved reason Disclosure and Security	Edenred have been appointed as the provider as part of a Crown Commercial framework for a closed loop voucher scheme. Secure portal with restricted users and ability to manage individual account user access. Council controlled sign up of users. School administrators are set up as users to directly input the details of eligible families for e-vouchers to be sent.

Organisation Name	Act on Energy
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Data Controller or Data Processor	Data Processor
Organisation's Role	Processing referrals for support with energy, using the Post Office voucher scheme for those people that paying the energy provider directly is not possible.
Data Sharing Agreement or Contract	No
Contract Reference Number/DSA Name	In process - awaiting signature
Organisation involved reason	Act on energy have expertise in engaging and supporting vulnerable households with their energy needs. This specialist, local expertise puts them in a unique position to deliver this service.
Disclosure and Security	Referrals from partner agencies and self referral. Contract specifies data protection and confidentiality agreements.

10 records

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 limited staff members having access to it. 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. Only four staff members have access to the Edenred portal.

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 contract with the other organisations involved 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

A press release will be issued to let people know what support is available the the different Household Support Fund schemes and information will also be available to the council website. The updated privacy notice will be published.

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

Welfare data it is able to be processed for the purposes of providing welfare support, which is what the Household Support Fund is. Data will only be processed to provide support to eligible residents. The updated privacy notice will be published.

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?

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Risk of loss of control over the use of personal data**Unmitigated Risk**

Likelihood - Unlikely
 Severity - Minimal Impact
 Score - Low

Mitigation/Solution

Data has restricted access and will only be used for the purpose of providing support to eligible residents as part of the governments Household Support Fund.

Mitigated Risk

Likelihood - Unlikely
 Severity - Minimal Impact
 Score - Low

Result

Reduced

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

No Risk

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**Unmitigated Risk**

Likelihood - Unlikely
 Severity - Minimal Impact
 Score - Low

Mitigation/Solution

The data is stored in a secure folder with limited staff members having permission to access it. Data is transferred to the post office and Edenred via a secure online portal.

Mitigated Risk

Likelihood - Unlikely
 Severity - Minimal Impact
 Score - Low

Result

Reduced

Risk of inadequate security controls in place to protect and secure personal data, including inappropriate access**Unmitigated Risk**

Likelihood - Unlikely
 Severity - Minimal Impact
 Score - Low

Mitigation/Solution

Data stored in a secure folder with limited staff 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

Contracts and Memorandum of Understandings 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

For the Post Office voucher scheme, 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 Post Office voucher scheme 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 funds to run the different schemes are transferred to the relevant organisations. Monitoring information shows how the money has been spent, in line with DWP guidance.

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

There are a range of schemes to deliver Household Support Fund to the most vulnerable residents of Worcestershire. These have been co-produced with district councils to ensure local knowledge of need is taken into account. The proposed schemes are felt to be the most appropriate way of using the funds to support people identified as a priority in the DWP guidance.

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 for people on Pension Credit set is owned by the DWP and managed through the welfare provision.
The data set of families eligible for free school meals is owned by the individual schools.

Individuals will be aware of referrals to the various schemes, or will self-refer and be aware of their right to be informed.
The updated privacy notice will be published.

Mitigated Risk

Likelihood - Unlikely
Severity - Minimal Impact
Score - Low

Result

Reduced

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 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 for individuals on Pension Credit set comes from the DWP so any inaccuracies would have to be addressed directly. The dataset on families eligible for Free School meals comes directly from schools so would need to be addressed directly with them.

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

For individuals on Pension Credit that hear about the vouchers and do not wish for their information to be processed their details can be deleted from the database and/or the voucher cancelled if it has already been issued.
For families eligible for Free School meals they can inform their school that they do not want their information to be processed.
The updated privacy notice will be published.

Mitigated Risk

Likelihood - Unlikely
Severity - Minimal Impact
Score - Low

Result

Reduced

Inability to meet individuals' right to object

No Risk

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

Keep it Green, Keep it on the Screen

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

20/03/2023 14:09:38

Screening Submitted Date Time

16/03/2023 17:00:35

Last Reopened Date Time

No Date Recorded

Full Impact Submitted Date Time

20/03/2023 14:09:38

Approved/Rejected Date Time

20/03/2023 14:12:26

Current User Dashboard Request Status

Complete

8.0 People with access to the original screening

[Carla Kesterton \(CKesterton@worcestershire.gov.uk\)](mailto:CKesterton@worcestershire.gov.uk)

[Lisa Bedford \(LBedford@worcestershire.gov.uk\)](mailto:LBedford@worcestershire.gov.uk)

8.1 People with access to this data protection assessment

[Carla Kesterton \(CKesterton@worcestershire.gov.uk\)](mailto:CKesterton@worcestershire.gov.uk)

[Lisa Bedford \(LBedford@worcestershire.gov.uk\)](mailto:LBedford@worcestershire.gov.uk)

9 Direct Questions

No Questions Asked