

Information Management Team: **Data Protection Impact Assessment**
Version 2:0

Data Protection Impact Assessment (DPIA)

Project Name:	School Streets
Project Manager or Sponsor (PM):	Tabrez Hussain / Jayne Rusbatch
Name of person completing the DPIA if different to (PM):	
Service Team and Department:	Highways & Parking Services Sustainable Communities
Relevant Director and Executive Director:	Steve Iles Sarah Hayward
Information Management Champion(s) for service area:	
Date DPIA received by the IMT:	
Date approved by DPO:	17 February 2022
Date approved by IMT :	

1 Project Scope

You should describe here the nature, scope, context and purpose of the processed processing. (Include the projects aims, potential impact, all individuals involved in the project and those that may be affected by it. The stakeholders should be as broad as possible so that the list can be edited down after consultation. You should summarise why you identified the need for a DPIA).

The need for a DPIA has been identified as the project will involve public statutory consultation and the collection of their responses to the statutory consultation. This requires the below DPIA.

Once the project is up and running the project will involve collection, processing and retention of Vehicle Registration Marks (VRM) for the purposes of enforcement. The DPIAs for these activities has been carried out by the Parking Enforcement Team as a separate exercise.

The project aims are as follows:

- To address concerns around road safety outside school gates
- To address concerns around pollution and idling vehicles outside school gates
- To encourage the use of active sustainable transport modes when travelling to and from school
- To support Croydon’s Transport objectives and more widely the London Mayor’s Transport Strategy

The potential impacts of this project are as above together with minimal negative impact such as displacement of traffic, parking and minimal impacts on access for delivery vehicles, visitors etc during scheme operational hours.

The following are key stakeholders:

- The public/residents
- The Schools
- Businesses
- Local councillors
- Emergency Services
- Service Delivery vehicles

2 Data Description

Answer the questions below so that there is a clear understanding about how the information will be used, who will use it etc. Remember that it's personal information (i.e. information about individuals) that you need to be concerned with. If you do not have answers to all the questions at this time, simply record what you do know.

<p>Whose information is being used?</p> <ul style="list-style-type: none"> Are there additional concerns that need to be considered due to individuals sensitive/ complex circumstances? i.e. vulnerable person 	<p>We will be processing information provided by those people responding to the statutory consultation. The statutory consultation is voluntary and where participants take part they will be required to provide some personal information.</p> <p>Also Registered keepers information for vehicles for the processing of Penalty Charge Notices for those vehicles contravening the School Streets.</p>
<p>What information is being used?</p> <ul style="list-style-type: none"> Consider the nature of this information E.g. Child's social care file 	<p>Information being used for statutory consultation includes:</p> <ul style="list-style-type: none"> Address Name Email address <p>Personal Data Which May be used by the Council in order to issue and process Penalty Charge Notices and also provide services to customers</p> <ul style="list-style-type: none"> Vehicle Registration Mark, captured by camera and Civil Enforcement Officer, in order to identify a vehicle committing a contravention and used in order to obtain Keeper details. Registered Keeper details provided by the DVLA, in response to a KADOE (Keeper at Date of Offence Enquiry).

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	<ul style="list-style-type: none">• Keeper or Driver name and address, including e-mail address (if supplied) from Informal and Formal Representations against the issue of Penalty Charge Notices.• Customer details from correspondence.• Registered Keeper Name and address details from warrants of control passed to Enforcement Agencies.• Information regarding potential Registered Keeper or Driver vulnerability or financial information disclosed as part of an Informal or Formal Representation made to the council.• ad hoc information received regarding cases (i.e., complaints from drivers, enquiries from Councillors and MPs.• financial information regarding debtors. <p>Personal Data Which May be Shared with the Council by Enforcement Agencies</p> <ul style="list-style-type: none">• Correspondence records;• Evidence provided by debtors to Enforcement Agencies to support dialogue regarding the non-payment of Penalty Charges due to the issuing Authority.• Basic details of goods taken into control, such as the vehicle (vehicle registration number, registered keeper enquiries, vehicle make and model, location of vehicle, estimated vehicle value), other goods of value which the enforcement agent takes into control to sell (to settle the debt)• Basic details about debtors, such as name, address, telephone/mobile number, email address
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	<ul style="list-style-type: none"> • Images and audio recordings of debtors or third parties (not minors) if the enforcement officer has activated their body worn video camera • Financial details or / & disclosed medical information e.g. income and expenditure to inform decision making on whether to continue enforcement, whether repayment options are appropriate & whether to continue to pursue enforcement of the warrant of control where extreme vulnerability may be present • Call recordings and notes/transcripts of telephone calls made to the Enforcement Agency • Emails, text messages, correspondence in relation to any dealings with debtors • Information about debtors obtained by the enforcement agency from credit reference agencies, the electoral roll, Court records, and other publicly available sources <p>Some transaction information if debtors have paid monies towards settlement of the debt</p>
<p>Does it include special category or criminal offence data?</p>	<p>No.</p>
<p>Can an individual be identified easily from the information?</p>	<p>Yes</p>
<p>What is the potential impact on privacy of this information?</p> <ul style="list-style-type: none"> • <i>What are the risks/ impact to an individual if this information was lost, stolen or manipulated?</i> • <i>E.g. could it be sold?</i> 	<p>Personal data collected for the purpose of commenting or objecting to the proposals includes names, addresses and e-mail addresses. The risk to an individual, if this data were lost would include ID fraud.</p> <p>Information for processing Penalty Charge Notices:</p> <ul style="list-style-type: none"> • Could be used to locate an individual's address and potentially allow access to details of other

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	<p>PCNs, which could give information as to the driver’s likely routine, or where a driver has been (risk of stalking etc).</p> <ul style="list-style-type: none"> • Risk of ID fraud if identity details are released. • Sensitive information collected as part of assessing an individual's circumstances could be released. • Risks to individuals if information regarding their vulnerabilities is released.
<p>Will this change the manner in which we handle, use or protect this information? <i>e.g. should it be encrypted?</i></p>	<p>.</p> <p>Personal data with respect to commenting or objecting to public notices is treated carefully to ensure that this is unlikely to leak outside the project team (6 members). Data is retained in an electronic folder only accessible by the project team and retained for sufficient time to enable analyses of the comments.</p> <p>With respect to the processing of Penalty Charge Notices the back-office system ensures security of data, by enabling Enforcement Agencies to receive and return warrants via secure portals instead of by e-mail (which is the current solution).</p> <p>Security in place to protect data held on the system, restricted access, passwords, PC encryption, GDPR training already in place. ICT supplier is contractually obliged to comply with GDPR and information management requirements. Data security has been explored as part of the tender process and the supplier has met or exceeded the council requirements.</p> <p>Back Office System is integrated with a separate existing mail fulfilment solution (Quadient), which ensures outgoing correspondence is complete and addressed to the intended recipient. This eliminates the chance of data loss in this part of the process.</p>

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	<p>External Enforcement Agencies are contractually obliged to comply with a strict code of conduct (including industry code of conduct covering information-handling) and GDPR requirements.</p> <p>Council CCTV staff are all BTEC Trained to Level 2/3 CCTV Traffic Enforcement</p>
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3 Consultation process

Consider how to consult with relevant stakeholders.

When did you consult individuals?	The statutory consultation for the new experimental Traffic Management Order is likely start on 15 March 2022 and will last 6 months.
How did you consult individuals?	As part of the statutory consultation process addresses within the School streets and within an area approximately 200m surrounding the streets will be written to explaining the process and inviting comments or objections to the public notice within a 6 month period. Public notices are also fixed to lamp columns within the School Streets and these will be advertised in the Croydon Guardian and London Gazette. There will also be a link on the Croydon Council’s website.
If not explain why it is not appropriate.	N/A
Who else within the organisation have you consulted with?	This project is largely contained within the Highways and Parking Service. However, other teams within the Sustainable Communities, Regeneration & Economic Recovery directorate have also been made aware of the changes including Strategic Transport which works closely with the Highway Improvement Team.
Do you need to speak with your processor to assist?	N/A
Do you plan to consult information security experts or any other experts?	Processing personal data as part of the consultation process is not deemed to require security experts as there are standard methods available to ensure data is secure – letters secured in lockable

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	<p>cabinets and e-mails only viewable by certain officers dealing with similar consultation on a daily basis including the project team (6 members). Relevant expertise was enlisted in drafting the tender specification and subject experts were part of the evaluation panel for the ANPR and processing software for the issuing and processing of Penalty Charge Notices.</p>
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4 Assessment of necessity and proportionality of data usage

<p>What is your lawful basis for processing?</p>	<p>The lawful basis for processing is the consultation being a task carried out in the public interest or in the exercise of official authority, principally it being an activity that supports or promotes democratic engagement, in accordance to GDPR Article 6(1)(e). Members of the public that comment or object to the public notice are informed, by return, that their personal data will only be used for the purpose of the formal consultation and retained for as long as necessary to enable this process to take place in accordance with GDPR.</p> <p>Relevant Statutes/Regulations associated with the enforcement and processing of Penalty Charge Notices using ANPR:</p> <ul style="list-style-type: none"> ○ Traffic Management Act 2004 ○ London local Authorities Act 1996 (as amended) ○ London Local Authorities Act 2000 ○ London Local Authorities and Transport for London Act 2003 ○ London Local Authorities Act 2007 ○ London Local Authorities and Transport for London Act 2008 ○ The Civil Enforcement of Parking Contraventions (England) General Regulations 2007 ○ The Civil Enforcement of Parking Contraventions (England) Representations and Appeals Regulations 2007 ○ The Taking Control of Goods Regulations 2013 ○ The Taking Control of Goods (Fees) Regulations 2014 ○ Road Traffic Regulation Act 1984 ○ Tribunals, Courts and Enforcement Act 2007
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	<ul style="list-style-type: none"> ○ The Secretary of State's Statutory Guidance to Local Authorities on the Civil Enforcement of Parking Contraventions ○ CCTV code of Practice for CCTV Traffic Enforcement <p>Compliance with the information Commissioners Code of Practice for CCTV</p>
<p>Is consent being relied upon to share the information? Has explicit consent been obtained? Are data subjects able to opt out from giving consent?</p>	<p>No. This is a statutory consultation and voluntary for public to take part. However whilst it is voluntary the council will process any personal information in accordance with GDPR (those making comments or objecting are informed that their personal data will only be used for the purpose of the consultation and retained for as long as necessary to complete this process).</p>
<p>Does the processing actually achieve your purpose?</p>	<p>Yes, it enables us to refine the analysis of the consultation responses and assists with validation.</p>
<p>How will the information be collected? Verbally, forms, intranet, interview, 3rd party, anonymous)</p>	<p>The information will be collected via an online forme-mails and letters. Acknowledgements will include a comment that personal data will only be used for the consultation process and retained fo as long as necessary to complete this process.</p>
<p>Is there another way to achieve the same outcome?</p>	<p>Statutory consultations must be carried out in line with regulations.</p>
<p>How will the information be used? <i>e.g. to write a report</i></p>	<p>The information will be used to produce a report on the results of the consultation. Processing of PCNs is by trained Council Officers. To enable the issue of PCN's and other Statutory Documentation. Reviewing of contraventions captured by CCTV (ANPR) by Qualified CCTV staff all BTEC Trained to Level 2/3 CCTV Traffic Enforcement. Enforcement of unpaid PCNs by external Enforcement Agencies to collect monies</p>

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	<p>due, or to construct an affordable payment plan, or to make an informed decision about an individual's circumstances.</p>
<p>Do the individuals know and understand how their information will be used? If there are changes to their information does the privacy notice need to be amended?</p>	<p>No. This is a statutory consultation and voluntary for public to take part. However whilst it is voluntary the council will process any personal information in accordance with GDPR.</p> <p>However as this statutory consultation published on the council's website there will be a Privacy Notice provided explaining that those that comment or object give information voluntarily, consent to it being processed and are aware of the GDPR rights. Personal data will be removed once the analysis is completed.</p> <p>Parking Services provide a privacy notice when processing Penalty Charge Notices.</p>
<p>How will it be stored, kept up to date and disposed of when no longer required? <i>e.g. stored in locked cabinet/securely shredded</i></p>	<p>The data will be stored on the Council's servers within a folder that can only be accessed by the project team only. Data on Penalty Charge Notices issued to drivers entering the School Streets during the restricted hours is held on the Parking back-office ICT system and also on Enforcement Agencies back-office systems</p>
<p>How will you ensure data quality and data minimisation?</p>	<p>The participation in the scheme consultation is voluntary and the extent to which a participant provides data is voluntary. For valid comments or objections to be received and processed a name and address is the minimum data required and an e-mail address if the responder uses this as a means to communicate and requires an e-mail response. Investigating officers keep PCN processing information up to date as they become aware of any changes during investigations. Any linked cases are updated at the same time. If cases are with Enforcement Agencies, debtor files</p>

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	<p>are updated in real time. Data received from the DVLA as a result of a mismatch is deleted from the system. CCTV (ANPR) contraventions are reviewed by staff Trained to BTEC Level 2/3 CCTV Traffic Enforcement to ensure that the Council has reasonable grounds for believing a contravention has occurred before requesting Keeper details from the DVLA.</p>
<p>Who will have access to the information within LBC?</p> <ul style="list-style-type: none"> • <i>Include approximate number of users</i> 	<p>The project team (6 members) PCN Processing Officers, Permit Staff (for processing permits for those that can enter the School Streets during the restricted periods such as residents living in the road and Parking Management – approximately 26 staff. CCTV staff and Management - approximately 15 staff. Infrastructure Team – 6 Staff Enforcement Team –7 Staff (Manager, Supervisors and Dispatch Controllers). However, staff are only able to access information appropriate to their role.</p>
<p>Are there new or significant changes to the way we manage, use, handle or collect this information?</p> <ul style="list-style-type: none"> • <i>Include any identified concerns for the individuals, would these changes heighten risks involved</i> 	<p>No. There is a standard approach to the processing of comments or objections to a public notice. This includes collating comments and objections, analysing and responding to these to determine whether the experimental scheme should be retained as implemented, amended or withdrawn depending on the level of objections and affects on the School Streets and surrounding area. Once this data is used and included in a report (not including personal data) then personal information such as names, addresses and e-mail addresses can be destroyed.</p>
<p>Will individuals within an existing database be subject to new or changed handling?</p> <ul style="list-style-type: none"> • <i>If yes amendments need to be made to the privacy notice and these individuals need to be informed.</i> 	<p>No.</p>
<p>What are the internal arrangements for processing this information? <i>e.g. number of staff who will have access</i></p>	<p>The project team (6 members – same as listed in 5a below) will process this consultation data.</p>

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	Currently around 54 staff within Parking Services could be involved with the issue and processing of any Penalty Charge Notices and issuing permits to those that qualify (i.e. residents and businesses within the school zones)
How will the information be updated? <i>e.g. monthly check</i>	There is one planned analysis of the data at the end of the consultation period. No further updates will be required. Once the comments and objections are analysed then personal data can be destroyed.
Does the project involve the exchange of information outside of the UK and are there set standards for how the information will be treated? How will you safeguard international transfers?	No
How will you prevent function creep?	By keeping access to the data to the project team and ensuring that they are aware of the content of this DPIA and of the need to prevent function creep. Personal data is only retained for sufficient time to enable analyses to take place. For the processing of Penalty Charge Notices data is only used for the purpose enforcing and collecting outstanding Penalty Charges and providing parking permits. No changes to the ICT system can take place by the supplier unless authorised by Parking Management and without completing and submitting an approved change request / work order form.

5 Assessment of the risks to the rights and freedoms of data subjects

You must describe the source of risk and the nature of potential impact upon individuals and identify any additional measures to mitigate those risks.

5a Security

Who will be responsible for the control for this information?	Jayne Rusbatch/Tabrez Hussain/Waheed Alam/Claire McWatt/Clare Harris/Diana Salmon
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	For issuing and processing Penalty Charge Notices; Croydon Back Office ICT Provider (currently Conduent) Croydon, Parking Services (data controller)
How will the access to this information be controlled?	Only the named officers making up the project team (6 members) will have access to the data entered into the online consultation on the Council website. With respect to the issuing and processing Penalty Charge Notices; Authorised access, secured by password protection
Is the data correctly managed to reduce the risk of collateral intrusion to the data subject?	Once downloaded from the online consultation platform, the data will be held on the councils servers in a folder that can only be accessed by the project team. The folder can only be accessed from a council laptop which is Bitlocker and password protected or via Office 365 requiring a password and access code. With respect to the issuing and processing Penalty Charge Notices; all officers with access to the data have had GDPR training and are aware of their responsibilities. Data is only disclosed to persons who have a legitimate reason to see it, such as the data subject, Enforcement Agencies collecting debt on our behalf or officers dealing with casework.
Are there adequate provisions in place to protect the information? If so what are they? <i>e.g. Process, security</i>	See above With respect to the issuing and processing Penalty Charge Notices; security such as egress, SFTP, password protection. Access to back-office systems and portals are secured by password protection and are role specific.

5b Sharing

Who is the information shared with, why are we sharing the information with this organisation?	The information on objections and comments to the public notice is not to be shared with any third party. With respect to the issuing and processing Penalty Charge Notices;
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	<ul style="list-style-type: none">• London Tribunals - Environment and Traffic Adjudicators. Statutory function to rule on Appeals against PCNs made by Keepers and are in place instead of the Court System now that parking and traffic contraventions are decriminalised. The Council is obliged to submit a copy of the evidence it is relying on to prove the contravention for consideration by the Traffic & Parking Adjudicator (also sent to the Appellant).• Traffic Enforcement Centre (Northampton County Court), in order to issue Warrants of Control and enforce non-payment of PCNs.• External Enforcement Agencies: In order to collect outstanding debt as in the process specified in the Traffic management Act 2004 and other parking legislation• Internal Enforcement Agency, Internal Debt Recovery Team, & Croydon Gateway: In order to collect outstanding debt as in the process specified in the Traffic Management Act 2004 and other parking legislation• Evidence may be provided to the Local Government Ombudsman following a complaint by the Registered Keeper.• The Registered keeper, who may request information from the council.• Council External Legal – should we need to defend claims.
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	<ul style="list-style-type: none"> • Back Office ICT provider when data is entered / uploaded onto the ICT system.
<p>What purpose does the information we are sharing have to the third party?</p> <ul style="list-style-type: none"> • <i>Ensure that we only share relevant information and not excessively</i> 	<p>N/A for the statutory consultation With respect to the issuing and processing Penalty Charge Notices; please see box above, listing the third parties, and the purposes for which they are expected to use the shared information.</p> <p>Information needed in order to issue Warrants of Control and for the Council to fulfil its obligations under parking legislation</p>
<p>Who will have access to the information, externally?</p> <ul style="list-style-type: none"> • <i>Include approximate number of users</i> • <i>Describe any sharing arrangements and what the level of access is. It may help to produce a diagram to show the data flows.</i> 	<p>No one with respect to the statutory consultation. For issuing and processing Penalty Charge Notices only those who have a legitimate need & under parking legislation.</p> <ul style="list-style-type: none"> • LGO • London Tribunals • External Enforcement Agencies Data (information) is uploaded by Croydon onto a secure portal, which is accessed by the agencies • ICT Provider
<p>How will it be transmitted to third parties and when? How often?</p>	<p>For issuing and processing Penalty Charge Notices only when required, this will depend upon the steps taken or not taken by the Registered Keeper. This will be by uploading onto a secure portal, electronically by SFTP, and by post. Where e-mail is used by Enforcement Agencies use e-mail to pass data back to the Council, this is required to be secured by Egress. Where the Council needs to transmit data by e-mail, this will be encrypted using the functionality available in the on-line version of Outlook. Moving forward, the Council is changing to Microsoft OME (encrypted</p>

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	<p>email) service (estimated end of April / May) this will allow the whole council to use encrypted email.</p>
<p>Is there a data sharing agreement in place?</p>	<p>For issuing and processing Penalty Charge Notices external Enforcement Agencies and ICT Supplier are contractually obliged to handle data securely. A data sharing agreement is included within these contracts and available on request. Additionally, the Council is required to comply with the DVLA's own data security requirements.</p>
<p>At what stage will the information be transferred?</p>	<p>For issuing and processing Penalty Charge Notices only at the appropriate point in the PCN Processing Cycle – When dealing with an Appeal, following the issue of Warrants of Control, following authorisation from Northampton County Court (TEC), or when there is a legitimate need to do so e.g., following a complaint to the LGO.</p>

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5c Identified Risks and assessment:

You should take into account the sensitivity of the information and potential harm that inappropriate disclosure or use of the information could cause to any individuals concerned. You should also consider the reputational loss to the Council and the potential for financial penalties being imposed by the ICO.

To assess the level of risk you must consider both the **likelihood** and the **severity** of any impact on individuals. A high risk could result from either a high probability of some harm or a lower possibility of serious harm.

The severity impact level and likelihood should be scored on a scale of 1 to 10 with 1 being low severity and 10 high. The two scores should be **added** together. The RAG status is derived from the following scale:

Score:

- 15 to 20 = Red (High)
- 8 to 14 = Amber (Medium)
- Below 8 = Green (Low)

To be completed by Project Sponsor

Risk Identified	Severity of Impact	Likelihood of harm	Overall RAG rating
Statutory Cosultation: Information being lost or stolen which leads to views expressed from an individual household becoming public. This carries risk to members of the individual household, reputational risk to the Council potential financial penalty	3	1	4 (Low)
Information being lost or stolen which leads to special category data from an individual household becoming public. This carries risk to members of the individual household, reputational risk to the Council potential financial penalty	0	0	0
Process personal data without providing a privacy notice directly to the individual leading to reputational risk and potential financial penalty. Please note that respondents objecting and commenting on the experimental School Street schemes will be informed that their personal data will only be used for the	9	1	10 (Medium)

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purpose of the statutory consultation process and information destroyed once this exercise is completed.			
Issuing and processing Penalty Charge Notices: Data sent to Enforcement Agency back-office system by Parking Services is inappropriately accessed by Enforcement Agency staff. Regular training will reduce the likelihood of this occurring.	7	1	8
Data held on the back-office system is inappropriately accessed by council staff. Regular training will reduce the likelihood of this occurring.	7	1	8
Information is disclosed by Enforcement Agency staff to someone other than the Registered Keeper. This would be a data breach that would be required to be disclosed to the Council's Data Protection Officer.	7	3	10
Information is disclosed by council staff to someone other than the Registered Keeper. This would be a data breach that would be required to be disclosed to the Council's Data Protection Officer.	7	3	10
Potential Data loss during storage by Enforcement Agency.	7	1	8
Risk of Misuse of Information by Enforcement Agency	7	1	8
Risk of Misuse of Information by Council Staff	7	1	8
Risk of accidental data loss by documents being sent to someone other than the intended recipient. This would be a data breach that would be required to be disclosed to the Council's Data Protection Officer.	7	3	10

6 Identify measures put in place to reduce risk.

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You must now identify additional measures you could take to reduce or eliminate any risk identified as medium or high risk in step 5.

To be completed by the Project Sponsor

Risk Identified	Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved
Process personal data without providing a privacy notice directly to the individual leading to reputational risk and potential financial penalty	Linked provide in the online survey to the privacy notice when/where respondents are asked to consent to us holding their information	Eliminates	Removed	Yes

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Sign off and Record sheet

Item	Name/date	Notes
Measures approved by:		Integrate actions back into project plan, with date and responsibility for completion.
Residual risks approved by:		If accepting any residual high risk must consult ICO before going ahead.
DPO advice provided:		<p>Summary of DPO advice:</p> <p><i>(DPO should advise on compliance, measures to mitigate risk and whether processing should proceed)</i></p>
Consultation responses reviewed by:		If your decision departs from individuals views you must explain your reasons.
DPIA to be keep under review by:		

If you require further guidance to complete this DPIA please contact:

Information Management Team (IMT)

Ext: 47777

Email: information.management@croydon.gov.uk

Data Protection Officer

Email: DPO@croydon.gov.uk