

M O P A C

MAYOR OF LONDON
OFFICE FOR POLICING AND CRIME

MOPAC User Satisfaction Survey

DATA PROTECTION IMPACT ASSESSMENT

October 2019

SECTION 1

Introduction

MOPAC use a third-party research company, Opinion Research Services (ORS), to conduct interviews for the User Satisfaction Survey (USS). Personal information is used to identify potential interviewees from a cohort derived from police recorded information. This is transferred to the research company securely and any information retained by MOPAC is securely stored. MOPAC retain links to police recorded information where respondents provide their explicit permission for us to do so. This data will be retained for a period of 3 years.

MOPAC also collect and store demographic information from respondents to the surveys to measure victim feedback across different groups of people. This allows us to identify gaps in the service received from the police and highlight opportunities to improve service delivery. These gaps and inequalities are shared with the MPS via performance products and relevant boards so they can best decide how to respond and operationalise the findings. The analysis also feeds in to strategy development across MOPAC. Furthermore, the data on inequalities is published on the MOPAC dashboards meaning the public are able to use these insights to hold policing to account. It is important the survey collates information about individual characteristics to ensure the sample achieved via the surveys is representative of London and its communities.

Project Summary

This document is the Data Protection Impact Assessment (DPIA) regarding the impact of data held, shared and analysed by MOPAC for the MOPAC User Satisfaction Survey (USS).

A DPIA was deemed necessary because:

- The USS includes processing of personal data and sharing of personal data to a third party supplier.

The DPIA specifically covers the processes that MOPAC Evidence and Insight Team (E&I) conduct for the MOPAC USS. It relates to the data sharing and processing activities for MOPAC as data controllers for this project. MOPAC is a data controller due to the clear requirement of MOPAC to improve Victim Satisfaction as set out in the Police and Crime Plan 2017-2021.

To exercise this requirement MOPAC are accessing data held by the MPS. The referenced document details how MOPAC is GDPR compliant in its use of MPS data.

Need for a DPIA

Under Article 6, the lawful basis is public task - MOPAC are using personal data as part of its role as a public authority, with the aim to improve the experiences of victims of crime. All victims will be asked for their permission to give feedback. The lawful basis of public task is derived from Article 143 of the Anti-social Behaviour, Crime and Policing Act 2014:

(1)A local policing body may provide or arrange for the provision of—

(b)services that are intended by the local policing body to help victims or witnesses of, or other persons affected by, offences and anti-social behaviour;

Whilst not specifically using criminal offence data for the USS, the project does use victim's data that will contain references to the specific crime. Therefore we have included our basis for processing under Article 10. Our lawful basis for processing under Article 10 is 'official authority', based upon our statutory requirement listed above for Article 6.

Special category data is being collected under Article 9(2):

(g) 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.

This document outlines the potential impact of the organisational information sharing arrangement between the MOPAC and a third party research company (Opinion Research Services - ORS) and any associated risks and resultant mitigations.

The DPIA is intended as a 'live' document which will be updated regularly. It will be reviewed, at the least, annually.

ORS are contracted with MOPAC/MPS to provide research services from April 2019 onwards, and this includes the USS (Ref: GLA 81140 Provision of research requirements for MOPAC and the MPS). GDPR clauses are included in this contract.

Findings

This DPIA concludes that personal and sensitive personal data will be processed, analysed and used for research purposes on a regular and continuous basis. However, safeguards - detailed in Section 2 are in place to ensure compliance with Data Protection principles. Section 4, Risk Assessment outlines the identified data protection risks associated with the activities and the proposed mitigations.

Recommendation

Safeguards are in place as set out in Section 2: Data Processing, of this document. No further recommendations are proposed apart from the continued monitoring for changes to risk and the annual review of the DPIA.

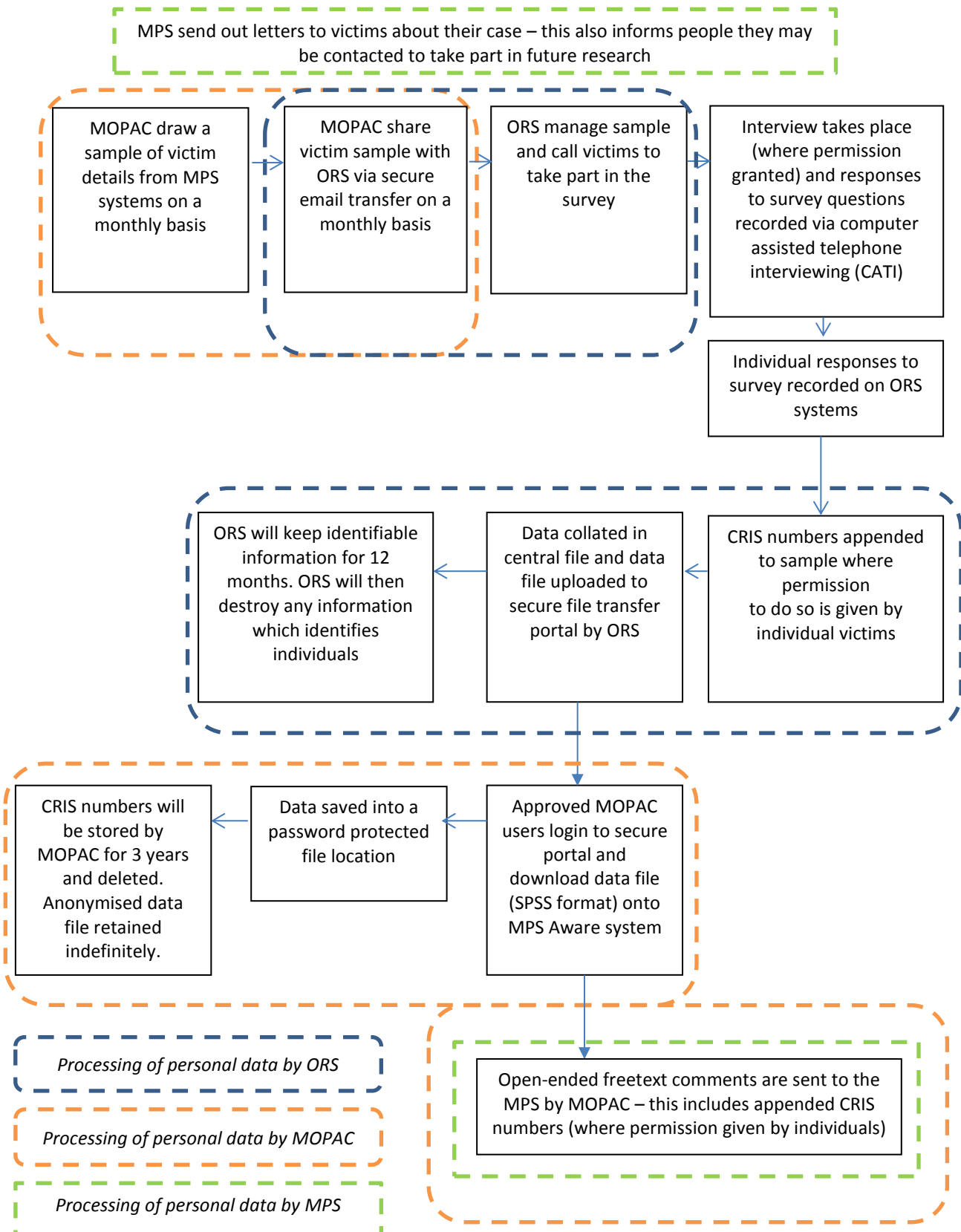
Review Process

This document will be reviewed at inception of the new research contract in April 2019 and then annually. It will also be reviewed if any changes are made to the process.

SECTION 2

Processing

The nature of the processing



2a) THE NATURE OF THE PROCESSING

2.1 How will you collect the data?

2.1.1 There are two stages of data collection in this project:

1. Victim sample

Data for the MOPAC USS sample will be sourced by a MOPAC E&I representative from direct access to MPS data warehouses and systems (i.e. CRIS).

The data collected will be victim data. This will include victim name, crime type, date crime reported, contact details (including phone number). It will also include crime reference number (NB: not an exhaustive list – see Appendix B for more information).

The data will be collected and downloaded monthly.

No special category data will be included.

2. Survey responses

The survey responses will be collected via telephone interviews, conducted by the third-party research company (ORS) on behalf of MOPAC. Computer-Assisted Telephone Interviewing (CATI) will be used for this purpose.

Survey questions refer to experiences of service delivery in relation to a specific crime reporting incident.

Special category (demographic) data will also be collated from respondents, where they agree to providing this information. No individuals will be identifiable from this data – it will be category based data.

2.2 How will the data be used?

2.2.1. The data will be used in different ways depending on the stage of the project:

1. Victim sample

As controllers of the data MOPAC will share the victim sample data with the research company (ORS) for the specific purpose to carry out the USS on behalf of MOPAC. The data will be used to contact victims over the telephone to conduct the USS (i.e. asking questions from the USS questionnaire).

The data will also be used for de-duplication purposes. Each month, ORS will check the victim sample for duplicate individuals, invalid names and invalid telephone numbers. ORS will also remove repeat individuals from the sample so a respondent can only be interviewed once every 6 months (or longer).

CRIS numbers will be taken from the victim sample data and appended to USS survey responses by the research company (ORS) – only where respondents have given explicit permission do so. This is logged by the research company (ORS) in response to the following questions in the questionnaire:

ASK ALL Q54aa SINGLE

Your feedback has the potential to help improve the quality of service for all. Would you allow us to pass back your individual responses about this incident to MOPAC, together with your crime reference number? This means MOPAC will be able to identify you. They will retain this information for 3 years. But, unless permission is given, all your answers will be treated confidentially and in statistical format only.

*> (INTERVIEWER PLEASE STRESS THAT UNLESS PERMISSION IS GIVEN ALL ANSWERS WILL BE TREATED CONFIDENTIAL AND REPORTED IN STATISTICAL
> FORMAT ONLY)*

If necessary = MOPAC use this for analysis purposes, in order to identify areas for improvement and examples of good service.

Yes – my individual responses and crime reference number can be passed on to MOPAC 1 Q54ab

No – I wish my answers to remain confidential and anonymous

ASK IF Q54aa = YES

Q54ab SINGLE

Your feedback has the potential to directly impact on officers' development, and to help improve the quality of service for all. Would you allow MOPAC to pass back your individual responses about this incident to the officers involved in your case, together with your crime reference number? This means that the MPS will be able to identify you. They will retain this information for 3 years. But, unless permission is given, all your answers will be treated confidentially and in statistical format only.

*> (INTERVIEWER PLEASE STRESS THAT UNLESS PERMISSION IS GIVEN ALL ANSWERS WILL BE TREATED CONFIDENTIAL AND REPORTED IN STATISTICAL
> FORMAT ONLY TO THE MPS)*

Yes – my individual responses can be passed on to the MPS 1 NQ54ba

No – I wish my answers to remain confidential and anonymous to the MPS

The purpose of this is to allow further analysis using data from the MPS systems for related research questions. It is also to enable learning and insight within the MPS and also provides the opportunity for feedback to individual officers on cases.

2. Survey responses

Research and analysis will be conducted on the USS survey responses. This involves presenting results at an aggregated level or split by key demographic groupings (e.g. age, ethnicity) or location (e.g. borough). In addition, freetext

comments provided by respondents in the survey are presented by borough and these are analysed by MOPAC E&I and also shared with the MPS.

The lawful basis of Public Task applies - MOPAC are using this data as part of its role as a public authority with the aim to improve the experiences of victims of crime. The MPS also use this data for learning and improvement and reward and recognition.

- 2.2.2 There are 2 core staff in E&I involved in running the USS sample query from MPS systems to generate the victim sample for the USS – one member of staff is routinely responsible for this task and a further member of staff provides resilience to cover absence. Two other members to staff are involved in the wider sample preparation including QA processes. The handling of data is restricted to these individuals.

2.3 How will the data be stored?

- 2.3.1. The victim sample data is always stored on the MPS IT system - data is never transferred to MOPAC systems. The victim sample is drawn from MPS systems as described at 2.1.1. It will be stored on the MPS Foundation environment in the shared drive (S drive). All extracted/downloaded personal information is stored within password protected folders.
- 2.3.2 The survey responses will be stored on the MPS Aware environment. Files will be stored in an area of the shared drive (S drive) with access limited to only the members of the E&I unit. Furthermore, all extracted/downloaded personal information will be stored within password protected folders.

2.4 How long will the data be retained for and why?

- 2.4.1. The victim sample will be stored each month on the secure MPS Aware system in a password protected file with restricted user access. The sample file will be deleted by the end of the following quarter of fieldwork (maximum 7 months) to cover any data issues during or following fieldwork.
- 2.4.2 MOPAC will share the victim sample with ORS on a monthly basis. ORS will keep victim sample information for 12 months. In line with the retention period, victim sample that MOPAC provided more than 12 months prior to the current month is deleted by ORS on a monthly basis. On deletion of the victim sample, ORS will send an email confirmation to MOPAC. The anonymised survey responses will be kept for statistical purposes (i.e. for analysis, back of data etc).
- 2.4.3 Where a victim is happy to be identified to MOPAC/MPS, ORS will provide the CRIS number only (no other personal details will be included) back to MOPAC. ORS will only provide identifiable data to MOPAC (when agreed by respondent) but NOT to MPS; this includes the verbatim report. Where individuals have given their permission for their CRIS number to be passed back to the MPS, MOPAC E&I will arrange secure sharing of this data via the MPS Aware system.

- 2.4.4 Where CRIS numbers are appended to survey responses, the CRIS numbers will be stored by MOPAC for 3 years and deleted. This is clearly stated to respondents in the survey. Data files containing CRIS numbers will be stored on the secure MPS Aware system in a password protected file with restricted user access. Anonymised survey responses will be kept indefinitely for research and analysis purposes. This will not contain any personal information.
- 2.4.5 All parties carrying out the functions set out in this DPIA must adhere to their organisation's record management policies and procedures specifically in relation to retention and destruction of data. Such policies and procedures must be GDPR compliant.

2.5 What is the source of the data?

- 2.5.1. The source of the victim sample data is the MPS CRIS system.
- 2.5.2 The source of the survey response data is telephone interviews with victims.

2.6 Who will the data be shared with?

- 2.6.1 MOPAC E&I as Data Controller for this project will access data as is necessary for the completion of the task – as outlined in 2.1.1. MOPAC E&I will share this personal data with the third party research company (ORS) with the explicit purpose to carry out the USS. This will be done on a monthly basis (approx. the 18th day of each month). The data will be shared with the research company (ORS) via secure email transfer (CJSM). The file will be passworded and the password will be sent via a separate email. The data will then be deleted from emails once sent and received by ORS.
- 2.6.2 A data file containing all survey responses, and crime reference numbers (where respondents give explicit consent for this data to be shared), will be uploaded by ORS to the ORS secure members' area where only designated users with allocated permissions are able to download files. All user accounts are allocated to individuals with individual user names and passwords. An E&I representative will download the data file and save this to a secure location on the MPS Aware system as earlier described (see 2.3).
- 2.6.3 Processing assurances have been provided by ORS around how they are upholding the principles and rights of GDPR in relation to the handling of the USS source data (victim sample) in particular. This covers issues such as data retention, deletion, privacy, access, transparency etc.
- 2.6.4 Where individuals give permission to do so, CRIS numbers will be appended to comments from the survey and shared with the MPS. This will be shared on a monthly basis.

2b) THE SCOPE OF THE PROCESSING

2.7 What types of data are you using?

- 2.7.1 Data accessed and analysed as part of the USS will be that of victims of certain crime types in London (including victims of burglary, robbery, vehicle, assault and hate crime). The data will be either details of victims to take part in the survey or the survey responses to the USS questionnaire. Individual level personal data– such as names, phone numbers etc.- will be accessed to generate the victim sample to interview. CRIS numbers will be appended to survey responses by ORS where respondents indicate they are happy to do so.

Information analysed by E&I will include anonymised survey responses aggregated at a pan-London and lower level (e.g. borough, crime group). These results will be shared within MOPAC, the MPS and publicly on the MOPAC Public Voice Dashboard:

<https://www.london.gov.uk/what-we-do/mayors-office-policing-and-crime-mopac/data-and-statistics/public-voice-dashboard>

- 2.7.2 Anonymised survey responses were also historically shared on the Data Archive Hub: <https://archiveshub.jisc.ac.uk/>. Following a review of practices in line with GDPR, the data has been embargoed since 23/01/19 whilst agreements are confirmed.
- 2.7.3 The data files of survey responses with appended CRIS numbers will be made available to restricted MOPAC E&I and MPS users (where permission is given by the respondent). Access to personal data will be restricted on a need to know basis i.e. to provide the victim sample to the research company (ORS) or to use CRIS numbers to conduct further analysis.

2.8 Does the data include special category and/or criminal offence data?

- 2.8.1 Whilst not specifically using criminal offence data for the USS, the project does use victim's data that will contain references to the specific crime. Therefore, we have included our basis for processing under Article 10. Our lawful basis for processing under Article 10 is 'official authority', based upon our statutory requirement listed previously for Article 6.
- 2.8.2 The survey response data does include special category data. Data is collected around a number of demographic questions e.g. ethnicity, religion etc. The questionnaire script has been amended to introduce respondents to the questions and to reiterate that questions are optional:

Under the Equalities Act 2010, the Metropolitan Police Service as an organisation has a duty to prevent discrimination and ensure a fair service to all. Therefore we'd like to ask the following questions about you. Please note, all of these questions are entirely optional.

- 2.8.3 Special category data is being collected under Article 9(2):

(g) 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.

- 2.8.4 All respondents are asked for their permission to take part in the survey at the outset when the interviewer makes the telephone call. This is logged. Where this is not provided, the interview will not take place and data will not be collected. Furthermore, it is stressed in the questionnaire script that all demographic questions are entirely optional and all questions have a 'refused' option.

2.9 How much data will you be collecting and using and how often?

- 2.9.1 The sampling for the survey gathers details from 15,000-20,000 victims and occurs on a monthly basis. Interviewing takes place throughout the year on an ongoing basis.
- 2.9.2 Survey responses will be gathered from approx. 13,000 respondents. The interview lasts approx. 15 min and responses will be collected from approx. 50 questions.

2.10 How many individuals are affected?

- 2.10.1 Approx. 15,000-20,000 victims' details are obtained for the sample each month to ensure approx. 1,110 interviews are achieved on a monthly basis. This level of sample is necessary to ensure sufficient interviews are conducted across all quotas (e.g. crime type, borough), taking into account response rates. This means approximately 13,000 respondents will be interviewed for the survey across the year.

2.11 What's the geographical area?

- 2.11.1 London – interviewing takes place with victims who have reported crime across all of the MPS' 12 Borough Command Units (BCUs) (and via the Telephone Digital Investigation Unit – TDIU).

2c) THE CONTEXT OF THE PROCESSING

2.12 What is the relationship with the data subjects?

- 2.12.1 Data subjects are respondents to the survey (interviewees). These respondents are victims of certain crime types who have reported their crime to the MPS. Individuals are informed that their data may be used for research and evaluation purposes. This is signposted on contact letters sent out by the MPS following the report of crime. Individuals will then be contacted by telephone by ORS and asked to their permission to take part.

2.13 How much control will the data subjects have?

- 2.13.1 Data subjects (respondents) are asked their permission to take part in the survey at the outset. They are also free to withdraw during the survey. The survey is optional and this is explained when interviewers make contact with respondents by telephone.

2.14 Would they expect you to use their data in this way? How are you ensuring that the unexpected doesn't happen for the data subject? Do they know their data will be used in this way? How are you ensuring transparency?

2.14.1 We are addressing the point of transparency via the MPS letters sent to victims. To ensure victims are informed, the following is included in the letters to warn people that they may be contacted to take part in the survey.

"To help us improve, you may be contacted by us, the Mayor's Office for Policing & Crime (MOPAC), or a company working on our behalf, to voluntarily answer some questions about the service you received from us. The MPS/MOPAC are sharing your information with a research company as part of our role as a public authority with the aim to improve the experiences of victims of crime. We keep this data for a maximum of three years and your personal details will only be stored with your feedback where you give your explicit consent."

2.15 Do the data subjects include children or other vulnerable groups?

2.15.1 Respondents are aged 16 and over. The survey seeks to obtain a wide-reaching victim voice. However, certain exclusions are applied to the sample. These include:

- Domestic abuse linked to the incident
- Any sexual element to the incident
- MPS-recorded vulnerabilities that are flagged on the CRIS system

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

2.16.1 No known security flaws.

2.17 Is it novel in any way?

2.17.1 No, the methodology follows a similar approach to that taken by other forces. The survey was originally mandated by the Home Office for all forces in England and Wales (mandate removed for 2017/18 onwards).

2.18 What is the current state of technology on this area?

2.18.1 CATI technology is used to interview respondents over the telephone.

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

2.19.1 Interviewers from a third-party research company will contact victims to take part in the survey. The risk of people not expecting to be contacted is mitigated by informing people they may be contacted to take part in research as outlined in the MPS letters sent to victims following their report of crime to the police.

2.19.2. It would not be appropriate to contact all victims of crime in this way. Therefore, certain exclusions are made to the sample (see 2.15.1).

2.20 Are there any approved codes of conduct or certification schemes that you can sign up to? (once approved)

- 2.20.1 ORS is a Market Research Society Company Partner and are fully compliant with the MRS Code of Conduct. All ORS' research activities and systems are fully certified to ISO 27001:2013, ISO 9001:2015 and ISO 20252:2012. ORS fieldwork procedures are fully IQCS accredited and all field and telephone interviewers are fully trained to IQCS standards.

2d) THE PURPOSES OF THE PROCESSING

2.21 What do you want to achieve?

- 2.21.1 A representative voice of victims of crime and their satisfaction with policing. This is achieved by using MPS data to identify respondents to invite to take part in the survey.

2.22 What is the intended effect on individuals?

- 2.22.1 The intended effect is to provide individuals with a voice on policing in the capital. It should empower individuals to give their views which in turn should help police understand how best to support and deliver a service to victims.

2.23 What are the benefits of the processing? (For MOPAC, the individual and wider)

- 2.23.1 Benefits of processing include:

For MOPAC/MPS – Feedback on service delivery and measures of victim satisfaction are captured in a robust and meaningful way. Priorities are understood by police and partners and resources can be aligned to relevant areas of service delivery. Capturing an understanding of how best to support victims of crime.

For the individual – to be able to have a say in policing and communicate their satisfaction/dissatisfaction and the reasons behind this. To ensure their voice is heard.

SECTION 3

Consultation process – consider how to consult with relevant stakeholders

3.1 Describe when and how you will seek views, or justify why it's not appropriate to do so

- 3.1.1 MOPAC E&I hold an annual consultation process where the USS is discussed alongside the wider public voice survey portfolio. Key stakeholders are invited including MPS, GLA, TFL. Survey methodologies, approaches, questions, analysis etc are discussed.
- 3.1.2 A review is underway for the USS for FY 20/21 to ensure changes in crime and reporting, such as TDIU and online reporting are best reflected in the survey. Regular meetings are held between MOPAC E&I and relevant MOPAC and MPS stakeholders. We are also in close contact with ORS to ensure methodological issues are considered.

3.2 Who else do you need to involve in your organisation?

- 3.2.1 Procurement/finance/contract management colleagues are required for the setup of the research contract (2019/20 onwards). GDPR project manager has been consulted.

3.3 Do you need processors to assist?

- 3.3.1 The market research company (ORS) are the processors for this project.

3.4 Do you plan to consult information security experts or any other experts?

- 3.4.1 No.

SECTION 4

Assess necessity and proportionality – describe compliance and proportionality measures

4.1 What is your lawful basis for processing?

- 4.1.1 Under Article 6, the lawful basis is public task - MOPAC are using personal data as part of its role as a public authority, with the aim to improve the experiences of victims of crime. All victims will be asked for their permission to give feedback. The lawful basis of public task is derived from Article 143 of the Anti-social Behaviour, Crime and Policing Act 2014:

(1)A local policing body may provide or arrange for the provision of—

(b)services that are intended by the local policing body to help victims or witnesses of, or other persons affected by, offences and anti-social behaviour;

- 4.1.2 Whilst not specifically using criminal offence data for the USS, the project does use victim's data that will contain references to the specific crime. Therefore we have included our basis for processing under Article 10. Our lawful basis for processing under Article 10 is 'official authority', based upon our statutory requirement listed above for Article 6.

- 4.1.3 The MPS are controllers of the source data (CRIS system). MOPAC has a specific mandate in law to provide oversight of the MPS:

Police Reform and Social Responsibility Act 2012:

CHAPTER 2

METROPOLITAN POLICE DISTRICT

3 Mayor's Office for Policing and Crime

(6) The Mayor's Office for Policing and Crime must—

(a) secure the maintenance of the metropolitan police force, and

(b) secure that the metropolitan police force is efficient and effective.

(7) The Mayor's Office for Policing and Crime must hold the Commissioner of Police of the Metropolis to account for the exercise of -

(a) the functions of the Commissioner, and

(b) the functions of persons under the direction and control of the Commissioner.

4.1.4 Special category data is being collected under Article 9(2):

(g) 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.

The survey collects demographic information from respondents including ethnicity, gender, religion etc. Please note that the respondent does not have to answer these questions and they are made aware that they do not have to answer.

4.1.5 The lawful basis for conducting the survey is stated in the questionnaire script to respondents taking part:

"The MPS/MOPAC are sharing your information with a research company as part of its role as a public authority with the aim to improve the experiences of victims of crime. What we learn from this feedback helps us make sure we are providing the best service possible to you".

4.2 Does the processing actually achieve your purpose?

4.2.1 Yes, robust and representative views are achieved and key satisfaction and user experience data is captured, providing trend data for a number of core measures. The survey generates key insights into victim satisfaction with the service provided by the police. This allows MOPAC and the MPS to address key issues as detailed in the Police and Crime Plan. It generates learning and opportunities to identify successes and areas for improvement. Ultimately this will lead to improved service provision to victims.

4.3 Is there any other way to achieve the same outcome?

4.3.1 There are alternative methodologies which could be considered e.g. online survey. However a telephone survey using victim sample data ensures a robust and representative set of data from people who we know have had an encounter with the police. It also ensures sufficient interviews are conducted to enable further analysis and insights into differences between groups e.g. ethnicity gap in satisfaction.

4.3.2 It is necessary to utilise victim's personal data in the way outlined in this DPIA. Without a generated sample of victims to contact, it would not be possible to conduct the survey as there would be no identified population of respondents.

4.4 How will you prevent function creep?

4.4.1 Specific questions are included in the survey – the survey is fixed to a maximum of 15min. The questions focus on one specific incident of reporting a crime and the

experience of the victim in relation to the service provided by the police. Victim sample data is obtained only for the purpose of conducting the USS and is deleted by ORS after the retention periods outlined in this document.

4.5 How will you ensure data quality and data minimisation?

4.5.1 ORS adhere to data quality standards.

4.5.2 The data downloaded from MPS systems is necessary for the delivery of fieldwork and analytical purposes. **Names** and **Telephone** details are required for contact purposes. **Owning Borough** is obtained for the market research company to manage sample distribution.

In addition, **Victim Address Postcode** is required for the purposes of attaching data such as ACORN and IMD to the dataset. We would not be able to include a deprivation measure in analysis without this data. Capturing this information also allows us to conduct deeper analysis of victim location. This is important as an individual may report their crime in one part of London but reside in another. **Address Postcode** (incident location) is also downloaded to understand if offending is away from the home. Address information is only used by ORS to match variables, MOPAC do not receive this information in returning data files.

4.5.3 MOPAC will receive survey responses with CRIS numbers appended only where respondents have given their permission for this to be shared with MOPAC.

4.6 What information will you provide to individuals and will you ensure they understand it?

4.6.1 Victims of crime who report their crime to the MPS receive a letter/email to inform them of the progress of their case e.g. investigation complete, continuing investigation. Information about being contacted to take part in surveys/research is included in the letter/email. This informs victims that they may be contacted by a third party research company (ORS). This letter should be received in advance of the interviewing window (6-12weeks). It reads as follows:

To help us improve, you may be contacted by us, the Mayor's Office for Policing & Crime (MOPAC), or a company working on our behalf, to voluntarily answer some questions about the service you received from us. The MPS/MOPAC are sharing your information with a research company as part of our role as a public authority with the aim to improve the experiences of victims of crime. We keep this data for a maximum of three years and your personal details will only be stored with your feedback where you give your explicit consent.

4.6.2 To ensure a layered approach to keeping individuals informed, the interview script at the beginning of the survey also includes key information about the survey, it's purpose, what is expected of people and the respondents' rights to take part/refuse. There is a clear section referring to GDPR:

GDPR

The MPS/MOPAC are sharing your information with a research company as part of its role as a public authority with the aim to improve the experiences of victims of crime. What we learn from this feedback helps us make sure we are providing the best service possible to you.

Any information that you provide will be processed by ORS in line with the requirements of the UK Data Protection Act and the EU General Data Protection Regulation (GDPR).

ORS will destroy any information which identifies you as an individual by mmm yyyy but the rest of your responses will be kept for statistical purposes. For more information, please go to london.gov.uk/mopac-privacy-policy or contact MOPAC at enquiries@mopac.london.gov.uk.

4.7 How will you support their rights?

- 4.7.1 All individuals have the right to decline to take part in the survey - it is an optional survey. They also have the right to refuse to answer questions which collect special category data.

4.8 What measures do you take to ensure processors comply?

- 4.8.1 MOPAC E&I hold regular review phone meetings where key issues are discussed. MOPAC E&I receive management information about number of surveys taking place, length of surveys etc. We will also consider auditing of the processor during the contract.

4.9 How do you safeguard any international transfers?

- 4.9.1 N/A

SECTION 5

Roles and responsibilities

5.1 Who are data controllers and who are processors for the project? Do all parties share this understanding and is this confirmed in writing and defined in the contract?

- 5.1.1 Data controller and processor relationships are as follows. Please note this differs depending on the stage of the project.

The MPS are the controller for the source data – the MPS CRIS system (containing victim details).

MOPAC are the controller for the USS project – including the victim sample data once obtained.

ORS are the processor for the USS project – including the victim sample data.

MOPAC gather a sample of victims from the source data and pass this to ORS who act as a processor for the data on behalf of MOPAC.

ORS use the sample information (name, phone etc) to contact respondents to take part in the survey.

ORS provide the anonymised survey response data to MOPAC. They also pass CRIS numbers back to MOPAC where respondents have given them permission to do so.

MOPAC is a data controller for the responses collected as part of the survey due to the clear requirement of MOPAC to improve victim satisfaction, as set out in the Police and Crime Plan 2017-2021.

5.2 Do all parties understand their role and responsibilities as a controller or processor?

5.2.1 Yes.

5.3 How will Subject Access Requests be handled?

5.3.1 Subject Access Requests (SARs) about data on the USS project will be managed by the research company (ORS).

5.3.2 SARs about data held on individuals about policing will be referred to the MPS to handle.

5.3.3 All SARs will be discussed with MOPAC to decide who should deal with them.

5.4 How will data breaches be minimised and dealt with if one occurs?

5.4.1 Any data breach of victim data will be reported by ORS to MOPAC E&I. E&I will alert the MOPAC DPO. E&I will also report any breach from the MOPAC perspective to the MOPAC DPO.

5.4.2 Data breaches will be minimized by transferring victim sample data from MOPAC to ORS via secure email transfer (CJSM). The file will be password protected. A separate email will be sent containing the password.

SECTION 6

Identifying and assessing risks – identify risks to the individuals and the organisation describing the source of the risk including associated compliance and corporate risks and their mitigations

	Identified risk	Potential impact on the data subject	Likelihood	Mitigation
1.	Loss or compromise of data (either victim sample data or data file of collated survey responses).	Personal information could be accessed by a third party and victim status could be identified and individuals' views about the service they received would be known.	Low	<p>Data will be shared via online secure portal, with passworded account access. Victim sample will be shared via secure email transfer (file will be passworded and password sent via separate email).</p> <p>All stakeholders (MOPAC, ORS, MPS) must follow their local policies on reporting a compromise or loss of data. MOPAC must be notified as soon as the compromise / loss is identified. MOPAC E&I will refer any security breach to the MOPAC Data Protection Officer immediately so the correct protocols can be invoked.</p>
2.	Misuse of victim data (i.e. victim contact details) by ORS.	Victims could be contacted for other reasons than USS which would compromise individuals' privacy and would not be under MOPAC's lawful basis of public task.	Low	ORS are operating under contractual agreement and extension of MOPAC's lawful basis of public task. ORS will use the victim data for the sole purpose of conducting the MOPAC USS.
3.	MOPAC or ORS do not follow data retention policies.	Data could be kept when individuals have been informed it would be deleted. The individual has a right to be forgotten.	Low	All parties carrying out the functions set out in this DPIA must adhere to their organisation's record management policies and procedures specifically in relation to retention and destruction of data. Such policies and procedures must be GDPR compliant.

				<p>ORS will keep identifiable information for 12 months. ORS will then destroy any information which identifies individuals.</p> <p>CRIS numbers will be stored by MOPAC for 3 years and deleted. Anonymised data file retained indefinitely.</p>
4.	Misuse of victim data (i.e. CRIS numbers and appended freetext comments) by MPS.	Could cause upset/distress if identifiable comments are not used for their stated purpose i.e. to improve service delivery	Low	<p>MOPAC will only share freetext comments with CRIS numbers appended:</p> <ol style="list-style-type: none"> 1) where permission has been given by individuals 2) to an identified MPS user. <p>MPS are responsible for their use of data and bound by their organisation Information Governance processes.</p>
5.	Victim information (i.e. CRIS numbers) is shared from ORS to MOPAC where permission is not granted by the individual victim.	Sharing of personal information back to MOPAC without permission would compromise the privacy of the individual and views given in confidence would be attributable to individuals.	Low	Names and addresses are not included in the returned information to MOPAC. Only CRIS numbers and select victim sample information (e.g. sum of goods stolen/recovered) are included in the data file shared with MOPAC – and only when permission is granted by the individual.
6.	Data is shared/ accessed by someone who is not eligible to view the data.	The data could be used outside of the purposes of the project and users may be able to access personal data or identify individuals. Compromise of privacy.	Low	ORS share files via the secure online members portal rather than email/courier to minimise the risk of non-eligible users accessing the data. Members of E&I have personal passworded logins to access to the data and download. The data is then stored in a secure area on the MPS Aware system.
7.	Individuals are identified via personal information.	Impact on privacy as individual may not want data to be shared in this way.	Low	No personal information (i.e. CRIS numbers) will be published or shared beyond MOPAC or MPS. Permission for this is explicitly asked of respondents in the survey:

				<p><i>Your feedback has the potential to directly impact on officers' development, and to help improve the quality of service for all. Would you allow us to pass back your individual responses about this incident to the officers involved in your case?</i></p> <p><i>Sometimes the Metropolitan Police or the Mayor's Office for Policing And Crime contact victims back in relation to the service they have received from police to ask their views on how victims should be dealt with in the future. Do you consent to somebody from the Metropolitan Police contacting you in relation to this incident and the comments you have made?</i></p> <p><i>And do you consent to somebody from the Mayor's Office for Policing And Crime (MOPAC) contacting you in relation to this incident and the comments you have made?</i></p> <p>All publicly viewable results are anonymised and displayed as aggregated results on the MOPAC public voice dashboards.</p>
8.	Complaint from individuals when they are contacted to take part in the survey	Could involve feelings of upset or intrusion for the victim.	Low	<p>The issue of transparency is addressed via MPS letters sent to the victims in which individuals are informed they may be contacted to take part in research.</p> <p>ORS hold a list of contact numbers for those people who do not wish to be contacted to take part in the research and individuals will be offered the chance to be removed from the sample and any further contact.</p>
9.	Too many variables/ unnecessary data is taken from the MPS systems and	Data minimisation – this could result in personal information being gathered which is not necessary for	Low	<p>Routine system queries are used to generate the victim sample each month. Only the date fields are changed unless a review of methodology is undertaken (e.g. new crime</p>

	included in the victim sample	the purposes of the project – impact on privacy.		groups). A comprehensive list of sample variables is included at Appendix B.
10.	Telephone call from the research company (ORS) to vulnerable respondent.	This could put the respondent in danger, cause/exacerbate vulnerability or cause upset/distress.	Low	<p>Certain exclusions are applied to the victim sample to mitigate this risk at the outset. When ORS call the victim they will ask to speak to the individual but will not disclose the reason for the call so information about victim status is not shared with other people who may answer the call.</p> <p>The research company (ORS) will inform MOPAC E&I of any concerns following an interview and MOPAC E&I will liaise with the MPS to flag these concerns. All respondents will be asked at the start of the survey if they give their permission to take part. If this is not given, the telephone call will be brought to an end.</p>
11.	Telephone call from the research company (ORS) to the wrong person/number.	This could be a compromise of privacy.	Low	When ORS call a victim they will ask to speak to the individual but will not disclose the reason for the call so information about victim status is not shared with other people who may answer the call.
12.	Misuse of victim data by MOPAC.	Intrusion of privacy if victim data and identifiable comments not kept secure and used only for the purposes of USS.	Low	<p>Only approved MOPAC E&I users will have access to the data files in a secure area on the MPS Aware system.</p> <p>All MOPAC E&I employees are Counter Terrorism Clearance security checked. MOPAC E&I will abide by MOPAC's Information Governance Policy.</p>

SECTION 7

Sign off

Item	Name and date	Notes
Measures approved by:		
Residual risks approved by:		
DPO advice provided:	James Bottomley	
Summary of DPO advice: Document is adequate. Should be reviewed 31 March 2020.		
DPO advice accepted or overruled by:	Accepted	
Comments:		
Consultation responses reviewed by:		
Comments:		
This DPIA will be kept under review by:	Project Manager	

For and on behalf of **MOPAC**

Signed:

Position: DPO

Date: 20/01/20

SECTION 8

Review schedule

Review date	Reviewed by	Next review date
15 October 2019		31 March 2020

Appendix A – MPS Victim Letter



Crime Reference number:
Date:

(add recipient's name)
(add recipient's address)

Dear

We are sorry to hear that you have been the victim of crime and we are working hard to catch those responsible. A Metropolitan Police officer is investigating your case and will make contact with you soon to find out more about what happened. This is important for your case, giving the officer as much information as possible so they can identify and find those responsible. What the officer finds out can also help us in investigating other cases; identifying links between different crimes; and making sure police and other agencies know where problems are happening so they can take action to protect other people from becoming victims.

Please note that due to the varied nature of a police officer's job – such as working different shifts and dealing with emergencies - it may be a few days before they are able to get in touch with you. If you have not been contacted within 7 days of receiving this letter, or if you have any questions in the meantime, you can contact us by visiting our website: www.met.police.uk/contact-us

If you need support or advice on coming to terms with your experience, the independent charity Victim Support is here to help. You can call the national Victim Supportline on **0808 168 9111** at any time of day or night. Alternatively, you can contact London Victim Support on **0808 168 9291** (8am-8pm Mon to Fri, 9am-5pm Sat). You can also visit their website www.victimsupport.org.uk

We follow the Code of Practice for Victims of Crime, a set of guidelines which is designed to make sure victims of crime are given the best advice and support from the moment they report a crime to the sentencing of an offender. You can find out more about this at www.met.police.uk/victimsupport

To help us improve, you may be contacted by us, the Mayor's Office for Policing & Crime (MOPAC) or a company they appoint to ask questions about the service you received. The MPS/MOPAC are sharing your information with this research company in its role as a public authority to improve the experiences of victims. You will be asked for your consent to give feedback. What we learn helps us ensure we are providing the best service. Your identifiable information will only be stored for a maximum of three years.

Thank you for your cooperation as we work to solve this case.

Yours sincerely,

Crime Assessment Team
Crime Management Services

For further Information or Support:	To update this crime or for further information about the investigation	www.met.police.uk/contact-us
	You can request a copy of your report, by contacting the Information Rights Unit	Tel: 0207 161 3500 www.met.police.uk/request
	To find out about policing in your local area	www.met.police.uk/your-area
	For useful crime prevention advice	www.met.police.uk/crimeprevention
	To help prevent mobile phone crime, please register your handset	www.immobilise.com
	To tell us what you think and help us improve	www.londonvoice.org.uk/myvoice

Appendix B – List of variables downloaded for victim sample

Crime No
 VIW No
 VIW Title
 VIW Co/Forenames
 VIW Surname
 VIW Telephone Home
 VIW Telephone Mobile
 VIW Telephone Other
 VIW Telephone Business
 Victim Address Postcode 1
 Victim Address Postcode 2
 Owning Borough
 GEN Committed on/from Date
 Address Postcode 1
 Address Postcode 2
 SUM Total Value Stolen
 SUM
 Total Value Recovered
 CLASS CR Status Desc
 SUPV Screening History Decision
 TIU (TDIU – calculated from a number of fields and flags and shown simply as a Y/N here)
 SUSP Known by VIW?
 VIW Willing for VSS to be Informed?
 VIW Injury Degree Desc