

**Ealing Council**

Eva Blum-Dumontet  
[eva@privacyinternational.org](mailto:eva@privacyinternational.org)

Ealing Council  
Freedom of Information  
3<sup>rd</sup> Floor, North East  
Perceval House  
14-16 Uxbridge Road  
London W5 2HL  
Tel: (020) 8825 5000  
Email: [foirequests@ealing.gov.uk](mailto:foirequests@ealing.gov.uk)

|           |                |                      |                                    |
|-----------|----------------|----------------------|------------------------------------|
| Your ref: | Our ref:       | Extension:           | Date:                              |
|           | <b>19/1190</b> | <b>0208 825 8367</b> | <b>16<sup>th</sup> August 2019</b> |

Dear Eva Blum-Dumontet,

**FREEDOM OF INFORMATION ACT 2000 - INFORMATION REQUEST**

Thank you for your request for information received by the Council on 19<sup>th</sup> July 2019.

Your request:

**I am writing to you under the Freedom of Information Act 2000 ("FOIA") to request the following information from the borough of Ealing in regard to the London Counter Fraud Hub.**

- 1. Have you been using the London Counter Fraud Hub? If yes, since when? If you have only trialled the Hub, when and for how long did the trial last?**

The trial started August 2017 and ended October 2018.

- 2. What is the legal basis for processing personal data (under Articles 6 and 9 of the General Data Protection regulation ("GDPR") and of the Data Protection Act 2018 ("DPA")) through the Software (i.e. the analytics part of the Hub) and the Hub and for what purposes is data processed?**

Article 6 (1) (e) GDPR and S.8 DPA 2018.

For the performance of a task carried out in the public interest and in the exercise of official authority vested in the controller.

- 3. What type of fraud is the London Counter Fraud Hub used for? Is it only used for identifying single occupancy tax discount fraud or is it used for other fraud detection as well? If yes, what type of fraud is used for?**

Council tax single person discount (SPD), Housing and Business Rates.

**4. What are the sources of the data processed by the London Counter Fraud Hub, including the names and information of third-party data sources?**

Council data and third-party data sources e.g. Ordnance Survey, Equifax, CIFAS & Halo

**5. What types and categories of data sources are then processed by the Software (i.e. the analytics part of the Hub)?**

Business rates data  
Commercial permits  
Commercial waste  
Council Tax  
Council Tax Reduction Scheme  
Electoral register  
Housing Benefit  
Housing Tenancy  
Housing Waiting List  
Revenues  
Trading Standards data

**6. With regard to the data processed by the Software and/or the Hub:**

- **6.1. Does the software and/or the Hub process any protected characteristics (under the Equality Act 2010) such as ethnicity, gender, political opinions, age or relationship status?**

Yes [https://www.ealing.gov.uk/info/201045/data\\_protection/1420/privacy\\_notice/6](https://www.ealing.gov.uk/info/201045/data_protection/1420/privacy_notice/6)

- **6.2. Does the software and or the Hub process any special category personal data (as defined in Article 9 of GDPR) such as racial or ethnic origin, political opinions, religious beliefs?**

Yes [https://www.ealing.gov.uk/info/201045/data\\_protection/1420/privacy\\_notice/6](https://www.ealing.gov.uk/info/201045/data_protection/1420/privacy_notice/6)

**7. Does the Software and/or the Hub process geographical data (except borough), such as ward or postcode?**

Yes

**8. Is data about children processed by the Software and/or the Hub? If yes, what is the accuracy rate in each small geographical area e.g. postcode or ward?**

No

**9. Who has access to the Hub and the information provided therein?**

The participating authorities

**10. What is the role of each of the companies listed as the Hub's Partners on the website, including BAE systems and Equifax, including any correspondence with these companies?**

They support and/or provide core analytics interfaces/services

- 11. With whom is the data generated through the Software shared with, on what basis and what measures are in place, including any data sharing agreements?**

CIPFA and participating authorities as covered under the Main agreement and Data Processing Agreement.

- 12. With regard to the automated decision-making process:**

- 12.a. Are claimants advised that an automated decision (e.g. an alert) has been taken about them in line with Article 22 of the GDPR and sub-section 14(4) of the DPA?**

Live phase has not been implemented

- 12.b. How many requests have you received to (i) reconsider the decision and/or (ii) take new decision not based solely on automated processing?**

Live phase has not been implemented

- 12.c. Please provide information as to any "profiling" as (defined in Article 4 (4) of GDPR) by the Software and the Hub and steps taken to comply with GDPR and DPA requirements.**

Live phase has not been implemented

- 13. What data was the model tested on? Was the failure rate determined based on real data from the London boroughs in scope? Was the model trained on data from all boroughs? If not, which boroughs did the data come from?**

Historic Council data was used during the Pilot Phase.

Model trained on data provided by the 4 Pilot authorities Camden, Croydon, Ealing and Islington.

- 14. Has the Software and/or Hub been evaluated to determine if the rate of false positives and false negatives is consistent across different groups of people based on their characteristics as protected by law (for example, age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and/or sexual orientation)?**

No

- 15. Was there a Data Protection Impact Assessment done in relation to the Software and the Hub? If so, please provide us with a copy and any related information.**

Yes

- 16. Was there an Equality and Human Rights Impact Assessment done in relation to the Software and the Hub? If so, please provide us with a copy and any related information.**

Following completion of an initial equalities impact assessment no adverse impact was identified. However, the equalities impact would continue to be reviewed if the project moved in to the live phase.

**17. Could you please share with us documents pertaining to the London Counter Fraud Hub (including but not limited to procurement documents, contracts, instruction and training manuals, promotional documents and resources from the Chartered Institute of Public finance & Accountancy)?**

The Council considers that to disclose the information you have requested, at this stage, would prejudice the commercial interests of the parties concerned and this information is therefore exempt from disclosure under section 43 of the Freedom of Information Act.

You are free to use this information for your own use, including for non-commercial research purposes. It may also be used for the purposes of news reporting. Any other type of re-use, for example publishing the information, issuing copies to the public or marketing, will require our permission as copyright holder. If you intend to re-use this information in this manner you must apply to us.

If you are dissatisfied with the handling of your request, you can request an internal review. Details of the Freedom of Information complaints process can be found at:

[http://www.ealing.gov.uk/info/200640/freedom\\_of\\_information/1550/making\\_a\\_complaint\\_or\\_appeal](http://www.ealing.gov.uk/info/200640/freedom_of_information/1550/making_a_complaint_or_appeal)

Your request for an internal review should be submitted to us within 40 working days of your receipt of this response. Any such request received after this time will only be considered at our discretion.

If you remain dissatisfied by the outcome of the Internal Review you have the right to submit your complaint to the Information Commissioner at:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire SK9 5AF

Yours sincerely,

Stuart O'Brien  
Information Governance Officer