

eva@privacyinternational.org

23rd August 2019

Dear Ms Blum-Dumontet,

FREEDOM OF INFORMATION REQUEST REF No: **497507**

Thank you for your information request, received on 19/07/2019.

You requested the following information: I am writing to you under the Freedom of Information Act 2000 ("FOIA") to request the following information from the borough of Islington 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.

If you would like this document in large print or Braille, audiotape or in another language, please telephone 020 7527 2000.

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.islington.gov.uk/about-the-council/information-governance/data-protection/privacy-notice>

- 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?

No

<https://www.islington.gov.uk/about-the-council/information-governance/data-protection/privacy-notice>

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.

If you are not satisfied with the way in which your request has been handled or the outcome, you may request an internal review within two calendar months of the date of this response by contacting: Information Complaints, Information Governance Team, Resources, 4th Floor, 7 Newington Barrow Way, Islington, N7 7EP. Email: infocomplaints@islington.gov.uk

Further information is also available from the Information Commissioner's Office, at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. Telephone: 01625 545 700. Web: www.ico.org.uk

Yours sincerely,

Information Governance Team