



ETTOS Privacy Impact Assessment

1. Identify the need for a PIA

Purpose of the Project: The Energy Theft Tip Off Service (ETTOS) aims help the energy industry solve and prevent energy theft by providing information about potential criminal activity from both the Crimestoppers helpline and a dedicated Energy Theft Tip Off Service.

Additional details can be found in our proposal to the energy industry, 08/01/16. An updated Operating Model is in Schedule 2 of our contract with SPAA and DCUSA.

The need for a PIA was identified as we will be collecting personal information about:

- Potential criminals
- Associates of potential criminals where this information assists a potential investigation
- People contacting us, if they agree.

We will make a decision that the information is relevant to a potential criminal investigation. We will send this information to the energy suppliers or network operators who are responsible for the location identified by the person contacting us, where energy theft is alleged.

2. Describe the information flows

In brief we will collect information from the public via phone or an online form generating an information log. We will assess the information to make sure it is relevant to a criminal investigation and that it provides a start point for an investigation. Using location details supplied we will match the information supplied to a relevant supplier or network operator using systems / companies provided by the energy industry (ECOES and Xoserve). We will then send the information log to the relevant recipient. Information logs will be retained on our database for a defined period.

This is a new service so the exact number of people affected is unknown. We are predicting sending 2,400 information logs per annum (starting Sept 2016), and will share a further 2,000 relevant historic reports on our database.

The process is illustrated on the attached diagram.

Consultation requirements

Crimestoppers' operational staff will be consulted to identify potential privacy risks and solutions. The ETTOS project implementation team will monitor the actions identified and raise any emerging risks during regular project management meetings. The privacy risks identified will be shared with Crimestoppers' information security management system team (Secure 24) and integrated with their risk register and treatment plan.



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The risk assessment will be shared with the industry's ETTOS Working Group for comment. Changes to risks will be reported on monthly during implementation of the ETTOS.

Our overview, process illustration and risk register with associated actions, will be shared with the ETTOS Working Group, who will advise on further industry consultation.

3. Identify the privacy and related risks; identify privacy solutions

The key privacy risks and the associated compliance and corporate risks are recorded on the PIA risk register. The mitigating factors which reduce the risks are noted as are future actions to further reduce risk.

4. Sign off and record the PIA outcomes

Each risk has been assigned an owner, who has responsibility for this area of Crimestoppers' service. They will sign off each risk and agree the outcomes of any actions.

Director of Operations, Roger Critchell, owns the Privacy Impact Assessment and is ultimately accountable for the reasonable mitigation of identified risks.

5. Integrate the PIA outcomes back into the project plan

ETTOS Project Manager, Julie Black, is responsible for integrating the PIA outcomes back into the project plan and updating project management paperwork. All actions will be noted on the PIA risk plan:

- Action to be taken
- Date for completion of actions
- Responsibility for action

Any privacy concerns which may arise in the future should be alerted to the ETTOS Project Implementation team prior to launch in September 2016. Following this, concerns can be raised to the Secure 24 team (security@crimestoppers-uk.org)

Version Control

| Date | Changed by | Changes | Status | Distribution |
|----------|------------|------------------------------------|--------|-----------------------------------|
| 13/06/16 | K. Ogborn | New document | Draft | None - discussed at EWG |
| 27/06/16 | K. Ogborn | Updated consultation with industry | Draft | Internal project team for comment |
| 05/07/16 | K. Ogborn | Approved by R. Critchell | Final | ETTOS Working Group |