



Privacy Issue	Probabil-ity	Impact	Risk to individuals / compliance or organisation	Risk Level	Priority	Mitigation	Risk Owner	Action Y/N	Action Required	Who	recorded	when by	when done	Result and Evaluation
Ref: 1	Personal information stored on Crimestoppers' database is retained for an inappropriate length of time.	2	3	Individuals / compliance	6		Database system to auto delete records after an agreed period of time.	Roger Critchell (Director of Operations)	Y	Agree with energy industry an appropriate length of time Crimestoppers should hold information. NB this cannot be done on an individual basis as we are not party to details of the investigations	KO	12/04/2016	31/07/2016	05/07/16: 1 year data retention proposed to EWG. NO data retention rules have been established for TRAS to date. 14/06/16: The Ettos Working Group report there is no retention date in the industry's theft code of practice. Electralink are exploring retention periods for TRAS to help inform us.
Ref: 2	Personal information stored on Crimestoppers' secure email system is retained for an inappropriate length of time.	2	3	Individuals / compliance	6		The Secure Email System will automatically delete any emails after 60 days of receipt. Crimestoppers and the ETTOS working group will review each month the recipients accounts that have not been accessed in order that they are prompted to log on and review.	Louise Peers (Head of Contact Centre Services)	Y	EWG proposed an email alerts system so recipient could be informed when they have received information. This is now subject to a contract change notification: ETTOS 004. If CCN is approved the auto- delete timescale will be reduced to 40 days after receipt.	KO	10/05/2016	31/07/2016	05/07/16: 40 day retention period proposed to EWG
Ref: 3	Disclosing caller / online form user's personal information when anonymity is requested on the ETTOS service.	1	5	Individual / compliance / organisation	5		Anonymity is assumed as default. Crimestoppers' staff well trained in protecting anonymity of the people who contact us. Each information log created is reviewed by a senior staff member prior to dissemination.	Louise Peers (Head of Contact Centre Services)	N					
Ref: 4	Personal information is accessed by Crimestoppers' IT and web consultants while managing Crimestoppers' database, secure email system and online form system (AIS)	1	5	Individual / compliance / organisation	5		Crimestoppers' consultants subject to our information security policies, and managed through our Supplier Relationship Policy including requirements to sign non-disclosure agreements, and vetting of staff when risk indicates this is appropriate.	Bob Booker (Director of Finance)	N					
Ref: 5	Personal information recorded by Crimestoppers' staff in notes is shared inappropriately.	1	5	Individuals / compliance	5		All notes prepared by Crimestoppers' staff are shredded at the end of their shift. Notes are generated on coloured paper to help identify them. Shredding done on site by police approved supplier.	Louise Peers (Head of Contact Centre Services)	N					
Ref: 6	Personal information recorded by Crimestoppers' online form system (AIS) is shared inappropriately.	1	5	Individuals / compliance	5		Information received by online form into the Crimestoppers' AIS system are auto deleted after 24 hours. Submissions which include an opt into the '2-way' system will auto delete when either manually closed by Crimestoppers' staff, or when inactive for a period of 6 weeks.	Louise Peers (Head of Contact Centre Services)	N					
Ref: 7	Personal information stored is overly intrusive as Crimestoppers' staff member records personal information irrelevant to potential criminal investigation	1	4	Individual / compliance / organisation	4		All information received by Crimestoppers is subject to a relevancy 'test' as outlined in the ETTOS Operating Model. This ensures compliance with Section 29 of the DPA. Each information log created is reviewed by a senior staff member prior to dissemination.	Roger Critchell (Director of Operations)	Y	Reinforcement of relevancy 'test' to be included in ETTOS training	LP	12/04/2016	31/07/2016	05/07/14: RC to produce guidance for shift leaders to cascade training.
Ref: 8	The person giving information is put at personal risk due to Crimestoppers' staff tasking the caller to get additional information	1	4	Individuals	4		Crimestoppers' staff are well trained to avoid 'tasking' the people who contact us. Supervision monitors this.	Louise Peers (Head of Contact Centre Services)	N					
Ref: 9	Information report is sent via Crimestoppers' system to a non-industry / non police recipient meaning personal data is shared inappropriately.	1	4	Individuals / compliance	4		All recipients are automatically shown on the information log. ETTOS recipients will be selected following the matching process described in the Operating Model. ETTOS recipients have a secure email system dedicated to them. ETTOS recipients can raise concern about inappropriate dissemination by forwarding the report back to Crimestoppers through the secure email system.	Louise Peers (Head of Contact Centre Services)	N					
Ref: 10	Personal information is accessed inappropriately by unauthorised users of Crimestoppers' secure email system	1	4	Individuals / compliance / organisation	4		ETTOS Secure email system has password controlled access for named users only. This will be audited annually with Industry members. The system set up has been penetration tested.	Louise Peers (Head of Contact Centre Services)	N					
Ref: 11	Personal information is shared inappropriately by forwarding emails within the Crimestoppers' secure email system outside of approved recipients.	1	4	Individuals / compliance	4		The secure email system is set up so emails can only be forwarded to a pre-defined Crimestoppers' email account. Replying to emails is not possible.	Louise Peers (Head of Contact Centre Services)	N					
Ref: 12	Personal information stored and disseminated is incorrect as information given is malicious	1	3	Individuals	3		Crimestoppers' staff are well trained in cognitive interview methods which helps them identify inconsistencies that may indicate malicious content supplied. Supervision monitors this. ETTOS recipients will need to further investigate information received to check validity prior to action.	Louise Peers (Head of Contact Centre Services)	N					
Ref: 13	Personal information stored and disseminated is incorrect as information given is factually incorrect	1	3	Individuals	3		Crimestoppers' staff are well trained in cognitive interview methods which helps them test and check validity of information supplied. Supervision monitors this. ETTOS recipients will need to further investigate information received to check validity prior to action.	Louise Peers (Head of Contact Centre Services)	N					
Ref: 14	Personal information stored and disseminated is incorrect as Crimestoppers' staff member makes a mistake	1	3	Individuals / organisation	3		Crimestoppers' staff are well trained in taking information and accurately creating a log. Senior staff review every log prior to dissemination. Shift leaders support all staff day to day and asses any training needs.	Louise Peers (Head of Contact Centre Services)	N					
Ref: 15	The information report is sent to the wrong supplier or network operator due to an error in the matching process linked to the accuracy of the matching databases used. Personal information is shared inappropriately	1	3	Individuals / compliance	3		The industry have made available to Crimestoppers systems providing up to date supplier information via ECOES and Xoserve. Recipients can alert Crimestoppers' to a wrongly disseminated report through the Secure Email system for re-dissemination to correct supplier which they can identify	Louise Peers (Head of Contact Centre Services)	N					
Ref: 16	Information report is sent to the wrong supplier or network operator due to a Crimestoppers' staff member making an error in the matching process. Personal information is shared inappropriately.	1	3	Individuals / compliance	3		ETTOS recipients will be selected following the matching process described in the Operating Model. Dedicated Crimestoppers' staff are allocated to this process and trained accordingly. Recipients can alert Crimestoppers' to a wrongly disseminated report through the Secure Email system for re-dissemination to correct supplier which they can identify	Louise Peers (Head of Contact Centre Services)	N					
Ref: 17	Personal information about energy suppliers is accessed from Matching systems inappropriately and shared.	1	2	Individuals / compliance / organisation	2		Dedicated Crimestoppers' staff are allocated to this process and trained accordingly. ECOES system allows for named user access allowing audit trail if necessary.	Louise Peers (Head of Contact Centre Services)	N					
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Total Risk Level	69
average	3.83
highest	6
lowest	2

