

Cheltenham Safe business crime reduction partnership

DATA PROTECTION IMPACT ASSESSMENT

This document identifies all possible impacts of the processing of Offenders' personal data by the Cheltenham Safe business crime reduction partnership (the Scheme) on the rights and freedoms of those Offenders.

The need for a Data Protection Impact Assessment

The Scheme processes data under the lawful basis of Legitimate Interest. This obligates the Scheme to conduct a Data Protection Impact Assessment and Balance of Interest Assessment to confirm the Scheme's lawful basis of Legitimate Interest.

Processing operations and purposes

The nature, scope and context of the Scheme's processing operations and processes are defined in the Scheme's *Personal Data Processing Documentation*.

Consultation process

The Board of Management considers it inappropriate and impractical to consult with Offenders on this *Data Protection Impact Assessment*.

Necessity and Proportionality of processing

The necessity and proportionality of the Scheme's processing is defined in the Scheme's *Legitimate Interest Statement*.

Risk Assessment

Source of risk	Likelihood of harm Remote, Possible, Probable	Severity of harm Minimal, Significant, Severe	Overall risk Low, Medium, High
1 Offender may suffer distress if information about his/her involvement in a relevant incident is shared among his/her community, peer group etc	Possible	Minimal	Low
2 Offender may suffer distress if information about his/her exclusion is shared among his/her community, peer group etc	Possible	Minimal	Low
3 Offender may be incorrectly associated with an incident reported by a Members	Possible	Significant	Low

Measures identified to reduce/mitigate risk

Source of risk See Risk Assessment above	Option to reduce or eliminate risk	Effect on risk Eliminated, Reduced, Accepted	Residual risk Low, Medium, High	Measure approved
1	Maximise technical and operational security; ensure Members' compliance with <i>Rules & Protocols</i>	Accepted	Low	Yes
2	Maximise technical and operational security; ensure Members' compliance with <i>Rules & Protocols</i>	Accepted	Low	Yes
3	Reporter submits Offender in compliance with <i>Rules & Protocols</i> ; Data Controller processes personal data only if confident in Member's compliance	Accepted	Low	Yes