

**CONSIDERATION OF A PILOT HOUSEHOLD RECYCLING INCENTIVE SCHEME
 PRIVACY IMPACT ASSESSMENT STATEMENT**

Appendix 2

	CONSIDERATION	COMMENT	LEVEL OF RISK		MITIGATION
			Severity	Probability	
1.	Does the project involve new or inherently privacy-invasive technologies?	Yes, data linked to individual properties to provide rewards to be issued to households relating to amount of waste generated/recycled. Could be used to identify behaviour patterns and consumer habits	3	3	1. Information agreement 2. Privacy Statement Policy 3. Data access & retention guarantees 4. Fully aware i.e. Fair processing Notice.
2.	Is the justification for the new data-handling unclear or unpublished?	No – Full PR/production campaign and personal letter to all participants to be issued. Choice is discretionary.	3	1	Householder will be made fully aware of choice
3.	Does the project involve an additional use of an existing identifier?	Yes – we are making use of the identification of the householder	3	3	Identification device enabled with permission – signed agreement
4.	Does the project involve an additional use of a new identifier for multiple purposes?	No	0	0	Info sharing as ref. 1 above
5.	Does the project involve new or substantially changed identify authentication requirements that may be intrusive or onerous?	No	0	0	N/A

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6.	Will the project result in the handling of a significant amount of new data about each person, or significant change in existing data-holdings?	Yes – not ‘person’ specific relates to householders	3	3	See 1 + 2 above
7.	Will the project result in the handling of new data with data in other collections, or significant change in data-linkages?	Yes – First and second phases of project involves up to 7,500 households – data not previously held	3	3	See 1 + 2 above
8.	Does the project involve new or changed data collection policies or practices that may be unclear or intrusive?	Yes – RBWM (data controller) = VES (data processors/controller) = RecycleBank (data processors) = Retailers (Reward Partners)	3	3	See 1 + 2 above
9.	Does the project involve new or changed data collection policies or practices that may be unclear or intrusive?	No – Full information and choice to participate on behalf of householder.	0	0	N/A
10.	Does the project involve new or changed data quality assurance processes and standards that may be unclear or unsatisfactory?	No.	0	0	Check change of occupancy procedures
11.	Does the project involve new or changed data security arrangements that may be unclear or unsatisfactory?	Potentially – need to secure agreement and satisfactory arrangements in place	3	2	See 1 + 2 above + Check identification device transmission

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					holding of data process + Access to data
12.	Does the project involve new or changed data access or disclosure arrangements that may be unclear or permissive?	New data access – Yes. Need to secure disclosure restrictions guarantee. Need to secure (RBWM) access to data if requested by householder.	3	3	See 1 + 2 above
13.	Does the project involve new or changed data retention arrangements that may be unclear or extensive?	No	0	0	See 1 + 2 above
14.	Does the project involve changing the medium of disclosure for publicly available information in such a way that the data becomes more readily accessible than before?	Potentially, yes. Info about the 'scheme' will be put on web site/Media of RBWM + Partners (link access)	3	2	See 1 + 2 above
15.	Will the project give rise to new or changed data-handling that is in any way exempt from legislative privacy protections?	No.	0	0	