
RESPONSE TO PRIVACY IMPACT ASSESSMENT: ACTION FRAUD PUBLISHED ON 21 DECEMBER 2018

The Fraud Advisory Panel welcomes the opportunity to comment on *Privacy Impact Assessment: Action Fraud* published by the City of London Police on 21 December 2018, a copy of which is available from this [link](#).

This response of 14 February 2018 reflects consultation with the Fraud Advisory Panel's board of trustee directors and interested members from our fraud investigation and legal process. This group brings together representatives from the public, private and voluntary sectors who have specific interest, experience or expertise in this area.

We are happy to discuss any aspect of our comments and to take part in all further assessments on the issues we've highlighted in our response.

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The Fraud Advisory Panel (the 'Panel') is the UK's leading anti-fraud charity.

Established in 1998 we bring together fraud professionals to improve fraud resilience across society and around the world.

We provide practical support to almost 300 corporate and individual members drawn from the public, private and voluntary sectors and many different professions. All are united by a common concern about fraud and a shared determination to do something about it.

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MAJOR POINTS

1. The Fraud Advisory Panel believes that the Private Impact Assessment (PIA) provides a comprehensive assessment of the main privacy risks associated with the new Action Fraud Service.
2. We commend the City of London Police for publishing this PIA to improve transparency in its processes and improve the public's understanding of how their information will be used when accessing the Action Fraud Service.
3. The lawful sharing of information within and between law enforcement agencies is an essential element of effective policing and in solving and preventing crime. The data privacy risks are low, and do not effectively stray far (if at all) outside the norms of investigatory activity.
4. However, in addition to the privacy risks already set out in the PIA we have identified some other wider issues (which extend beyond the introduction of the new system itself) that may merit further consideration – if they haven't already:
 - a. the use of data for research or academic purposes (as distinct to official crime statistics), and
 - b. the sharing of information about victims (especially vulnerable victims) with other public, private and not-for-profit bodies.
5. In respect of the disclosure/sharing of information about vulnerable victims (for example as part of the Economic Crime Victim Care Unit (ECVU) pilot scheme) one risk is that data deployed for purposes other than pure investigation will get into the wrong hands. There are already procedures in place to deal with this, but clearly, the more widely disseminated data becomes, particularly for purposes other than investigation, the higher the risk that it will be compromised.