**Department for the Economy**

**DATA PROTECTION IMPACT ASSESSMENT REPORT**

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| **DPIA Reference Number** | |
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| **Project / Issue Name** | |
| **Insolvency (Amendment) Bill** | |
| **Business Area** | |
| **Insolvency Service (Management Services and Regulation Division)** | |
| **Information Asset Owner** | **Project / Issue Owner** |
| **Richard Monds** | **Jack Reid** |

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| **Step 1 IDENTIFY THE NEED FOR A DPIA** |
| *Explain what is trying to be achieved, why and the types of processing involved.* |
| **The Insolvency Service proposes to introduce a Bill in the Northern Ireland Assembly which will contain amendments to Northern Ireland insolvency legislation replicating amendments already made to that applying in England and Wales.**  **The amendments which are relevant for the purposes of this DPIA are,**   1. Under existing legislation creditors in insolvency proceedings have the right to vote for or against certain proposals and decisions. Up until now this right could only be exercised by voting at a physical meeting. Provision was included in the Insolvency (Amendment) Act (Northern Ireland) 2016, which would have given insolvency office-holders the option of ascertaining creditors’ wishes by means of remote meetings, using for example, electronic communications or telephone or video conferences. However it has been decided not to bring this provision into operation as associated subordinate legislation (Rules) would have been required. Meantime further measures have been taken in England and Wales to reduce the use of physical meetings with the inclusion in the Small Business, Enterprise and Employment Act 2015 of provision obliging office-holders in insolvency proceedings to use what are termed decision procedures or deemed consent procedures to ascertain creditors’ wishes.   The office holder will be able to seek a decision about any matter,   * In company insolvency proceedings, from the company’s creditors or members, by using what is termed a qualifying decision procedure. * In individual insolvency proceedings, from the creditors, by using what is termed a creditors’ decision procedure.   The procedures which are prescribed for use in seeking decisions are listed in accompanying Insolvency Rules as,   * correspondence * electronic voting * virtual meetings * physical meetings * any other decision making procedure which enables all creditors who are entitled to participate to do so on an equal basis.   Physical meetings are only permitted if a minimum number of creditors, or in the case of companies, members, request one in writing. The minimum number is, in the case of companies,   * 10% in value of the creditors or members. * 10% in number of the creditors or members. * 10 creditors or members, and   in the case of individuals,   * 10% in value of the creditors. * 10% in number of the creditors. * 10 creditors.   It will also be possible in both corporate and individual insolvencies for most decisions to be made by what is termed a deemed consent procedure. This will involve creditors, and in the case of corporate insolvency proceedings, the company members, being notified by the office-holder of the decision he or she is proposing to make and the procedure for objecting to it. If less than 10% in value of the creditors, or as the case may be, of company members object the decision will be treated as having been made.  In keeping with the Insolvency Service’s policy of maintaining parity with insolvency legislation in England and Wales it is intended to include provision in a proposed Assembly Bill to make corresponding amendments to insolvency legislation in Northern Ireland, thereby obliging insolvency office-holders in Northern Ireland to seek decisions from creditors and company members using a decision or deemed consent procedure unless that a minimum number of creditors or company members request a physical meeting.  The only aspect of this mandatory switch from the use of physical meetings to decision procedures or deemed consent procedures as a means of ascertaining creditors’ or company members’ wishes which the Department will need to ensure is compliant with data protection requirements is the appointment of insolvency practitioners to act as trustees and liquidators.  Under current legislation the Official Receiver is automatically the liquidator if the High Court makes an order to wind a company up. However in a bankruptcy he has to go through an interim period as receiver and manager before he can be appointed trustee. The Bill will change this by providing that he becomes trustee automatically immediately a bankruptcy order is made.  The Official Receiver is a civil servant in the Department for the Economy’s Insolvency Service.  The Official Receiver can decide that a private sector insolvency practitioner should be appointed to take over from him as liquidator or trustee. Under current legislation one way in which he can do this is by calling a physical meeting of the creditors (and in the case of a company a meeting of the company members) to make the appointment. The Bill provides that he will instead ask the creditors and company members to use a decision making or deemed consent procedure to make the appointment.  The procedure will entail the Official Receiver collecting, recording, storing, retrieving and disseminating data.  This DPIA addresses the need for the Official Receiver’s conduct of the decision making or deemed consent procedure to appoint a replacement liquidator or trustee to be compliant with data protection requirements.  All other decision making and deemed consent procedures will be conducted by private sector insolvency practitioners. While insolvency practitioners are generally appointed by DfE they are not employees of the Department, they are not contracted to it and they act independently of it.  Responsibility for complying with data protection requirements when conducting decision making or deemed consent procedures will therefore rest with individual insolvency practitioners, not the Department.   1. Under existing legislation a statement of a company’s affairs has to be laid before a meeting of its creditors,  * by the directors in a creditors’ voluntary liquidation, * by the liquidator in a members’ voluntary liquidation if he or she discovers that the company is not going to be able to pay its debts plus interest in full.   In line with changes to the law in England and Wales the directors or the liquidator will instead be required to send a copy of the statement of affairs to the creditors. As this change only affects directors of companies in the private sector and private sector insolvency practitioners it is not considered further in this assessment.   1. Existing legislation requires the liquidator on completing a winding-up to lay an account of it,  * in a members voluntary liquidation, before a meeting of the company, * In a creditors’ voluntary liquidation, before meetings of the company and creditors.   If the liquidator In a compulsory liquidation, is a private sector insolvency practitioner he or she has to lay an account of the winding up before a meeting of the creditors.  Trustees in bankruptcy who are private sector insolvency practitioners have to present a report to a meeting of the creditors on completing their administration of the bankruptcy.  In line with changes to the law in England and Wales the liquidator or trustee will instead be required to send a copy of their account or report to the company members or creditors. Again, as this change only affects private sector insolvency practitioners it is not considered further in this assessment.  The benefits of the above changes, including the use of a decision making or deemed consent procedure to appoint an insolvency practitioner to succeed the Official Receiver as liquidator or trustee, will accrue mainly to creditors and company members. They will be able to engage in decision making without having to spend time and money travelling to a physical meeting. This will be especially beneficial in the case of overseas creditors. There will be financial savings through venues no longer having to be hired for the purpose of holding meetings. It is to be expected that office-holders and their staff will not need to spend the same amount of time conducting electronic decision making processes as they would superintending physical meetings. The resulting cost-savings can be expected to be passed on to the creditors in the form of a higher dividend. |
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| **STEP 2 DESCRIBE THE PROCESSING** |
| **Describe the nature of the processing:** How will you collect, use, store and delete data? What is the source of the data? Will you be sharing data with anyone? You may find it useful to refer to a flow diagram or other way of describing data flows. What types of processing identified as potentially high risk are involved?  The information flows consist of a series of two-way exchanges of information between creditors or company members and the Official Receiver. It is intended that this exchange of information will take place by email. No data will be shared with anyone else.  The process to appoint an insolvency practitioner to take over from the Official Receiver as liquidator or trustee consists of two main stages. First of all the creditors and in the case of companies, the members are asked to make suggestions (proposals) as to which insolvency practitioner should be appointed. The Official Receiver then sends a list of the names of those suggested by creditors to every creditor and in the case of companies, a list of the names of those suggested by company members to every company member. The creditors and in the case of companies, the members, are asked to vote on which of the insolvency practitioners who have been suggested should be appointed.   1. Company winding up   Either the Official Receiver himself or the creditors can start the process to have an insolvency practitioner appointed to take over from the Official Receiver as liquidator of a company.  If it is the creditors who start the process the first piece of data which the Official Receiver will receive is a request from one or more of the creditors to have an insolvency practitioner appointed to take over from him as liquidator. The Official Receiver does not have to comply with such a request unless the debt owed to the creditor or creditors making it amounts to at least one-quarter of the total debt owed by the company. The creditor’s request therefore has to include a statement of the amount of debt due to them or, if they are making the request with the concurrence of other creditors, their names and the sum due to each.  The processing involved in having an insolvency practitioner appointed is the same irrespective of whether the appointment is being made at the request of creditors or at the Official Receiver’s instigation.   * The official receiver sends a notice by email to each creditor and to each company member inviting them to propose an insolvency practitioner to act as liquidator. * If any of the creditors or members knows of a particular insolvency practitioner and would like to have them appointed as liquidator they will reply to the Official Receiver by email. Their reply will contain the following data, * the name and contact details of the person they are proposing should act as liquidator, and * a statement that the proposed liquidator is qualified to act as an insolvency practitioner in relation to the company and has consented to act as its liquidator. * If the Official Receiver receives any proposals from the creditors he has to seek a decision from the creditors as a whole as to which of the practitioners whose names have been put forward should be appointed. * If the Official Receiver receives any proposals from the company members he also has to seek a decision from the company members as a whole as to which of the practitioners whose names they have put forward should be appointed. * The Official Receiver can use either a decision procedure or a deemed consent procedure. If using a decision procedure the Official Receiver would email a notice to each creditor and member listing the names of the insolvency practitioners who have been proposed to act as liquidator and asking the creditor or member to reply stating which insolvency practitioner they would prefer to have appointed. If using a deemed consent procedure the Official Receiver would email a notice to each creditor and member stating the name of the insolvency practitioner who he is proposing should be appointed as liquidator and advising that unless 10% or more of the creditors or members by value object by a specified date that person will be treated as having been appointed. * If the Official Receiver uses a decision procedure the data which he will collect as a result will consist of email replies from creditors and members stating which of the insolvency practitioners who have been proposed they would prefer to have appointed as liquidator. * If the Official Receiver has used a deemed consent procedure he will not receive any data in reply unless that any of the creditors or members wish to object to the Official Receiver’s choice in which case the Official Receiver will receive notice of their objections by email.   If the Official Receiver uses a decision procedure the liquidator will be the person chosen by the creditors unless that they either did not propose anyone, or did make proposals but did not exercise their right to vote to select a candidate. If this happens the person chosen by the contributories becomes liquidator.  If the vote is split with no candidate receiving a clear overall majority of the votes in their favour the decision procedure has to be repeated with the candidate who had received the fewest votes eliminated.  Once the candidate with the majority vote is identified, the Official Receiver sends an email to that person to ask them to submit a statement confirming that they are an insolvency practitioner who is duly qualified to be the liquidator and that they consent to act.  The Official Receiver will receive the statement from the insolvency practitioner by email.  The Official Receiver then prepares, authenticates and dates a certificate of the insolvency practitioner’s appointment. The certificate has to,   * Identify the company. * Identify and provide contact details for the person appointed as liquidator. * State the date on which the liquidator was appointed. * State that the appointee, * has provided a statement that they are qualified to act as an insolvency practitioner in relation to the company, * has consented to act, and * was appointed as liquidator of the company.   The Official Receiver emails the certificate to the liquidator and keeps a copy.  Bankruptcy  Either the Official Receiver himself or the creditors can start the process to have an insolvency practitioner appointed to take over from the Official Receiver as trustee of a bankrupt’s estate.  If it is the creditors who start the process the first piece of data which the Official Receiver will receive is a request from one or more of the creditors asking him to instigate a creditors’ decision procedure to have himself removed as trustee. The Official Receiver does not have to comply with such a request unless the debt owed to the creditor or creditors making it amounts to at least one-quarter of the total debt owed by the bankrupt The creditor’s request therefore has to include a statement of the amount of debt due to them or, if they are making the request with the concurrence of other creditors, their names and the sum due to each.   * The Official Receiver sends a notice to each creditor by email asking the creditor to reply stating whether or not they wish him to step down as trustee and stating the date by which their decision is to be made. * The creditors submit their replies by email to the Official Receiver.   If a majority in value of those voting are in favour of the Official Receiver stepping down their decision is treated as having been made but it only takes effect once the creditors appoint another person to succeed him as trustee.  Appointment of an insolvency practitioner to replace the Official Receiver can be done in two ways.   1. The creditors can engage in their own decision making process to appoint a replacement.   If they do so the person who acted as convener or chair of their decision making process has to prepare, authenticate and date a certificate of the insolvency practitioner’s appointment and send it by email to the Official Receiver. The certificate will contain the following data,   * Identification details for, * the proceedings, and * the bankrupt. * Identification and contact details for the person appointed as trustee. * The date on which the creditors made the appointment. * A statement from the insolvency practitioner that he is qualified to act as an insolvency practitioner in relation to the bankrupt, that he has consented to act, and that he has been appointed as trustee of the bankrupt’s estate.   When the official receiver receives the certificate he forwards it by email to the person appointed as trustee and keeps a copy.    (ii) If the creditors decide to remove the Official Receiver without themselves engaging in a process to appoint a trustee the Official Receiver has to carry out a process to have one appointed.   * The official receiver sends a notice by email to each creditor inviting them to propose an insolvency practitioner to act as trustee. * If any of the creditors knows of a particular insolvency practitioner and would like to have them appointed as trustee they will reply to the Official Receiver by email. Their reply will contain the following data, * The name and contact details of the person they are proposing should act as trustee. * A statement that the proposed trustee is qualified to act as an insolvency practitioner in relation to the bankrupt and has consented to act as trustee. * If the Official Receiver receives any proposals from the creditors he has to seek a decision from the creditors as a whole as to which of the practitioners whose names have been put forward should be appointed. * The Official Receiver can use either a decision procedure or a deemed consent procedure. If using a decision procedure the Official Receiver would email a notice to each creditor listing the names of the insolvency practitioners who have been proposed to act as trustee and asking the creditor to reply stating which one they would prefer.to have appointed. If using a deemed consent procedure the Official Receiver would email a notice to each creditor stating the name of the insolvency practitioner who he is proposing should be appointed as trustee and advising that unless 10% or more of the creditors by value object by a specified date that person will be treated as having been appointed. * If the Official Receiver uses a decision procedure the data which he will collect as a result will consist of email replies from creditors stating which of the insolvency practitioners who have been proposed they would prefer to have appointed as trustee. * If the Official Receiver has used a deemed consent procedure he will not receive any data in reply, unless that any of the creditors wish to object to the Official Receiver’s choice in which case the Official Receiver will receive notice of their objections by email.   If the Official Receiver uses a decision procedure he will use the votes received to determine which of the insolvency practitioners proposed should be appointed as trustee.  If the vote is split with no candidate receiving a clear overall majority of the votes in their favour, the decision procedure has to be repeated with the candidate who had received the fewest votes eliminated.  Once the candidate with the majority vote is identified the Official Receiver sends an email to that person to ask them to submit a statement confirming that they are an insolvency practitioner who is duly qualified to be the trustee and that they consent to act.  The Official Receiver will receive the statement from the insolvency practitioner by email.  The Official Receiver then prepares, authenticates and dates a certificate of the insolvency practitioner’s appointment. The certificate has to contain,   * Identification details for the proceedings. * Identification details for the bankrupt. * Identification and contact details for the person appointed as trustee. * The date on which the creditors made the appointment. * State that the appointee, * has provided a statement that they are qualified to act as an insolvency practitioner in relation to the bankrupt, * has consented to act, and * was appointed as trustee of the bankrupt’s estate.   The Official Receiver emails the certificate to the trustee and keeps a copy.  The Official Receiver is required to keep a record of the decisions made by creditors and company members as part of the records of the liquidation or bankruptcy.  The minimum statutory requirement is for a record to include,   * In the case of a decision procedure by creditors, a list of the names of the creditors who participated and their claims. * In the case of a decision procedure by company members, a list of the names of those who participated. * A record of the decision made and how creditors voted.   If the appointment was made using the deemed consent procedure, the record would have to,   * State whether or not the decision was taken. * Contain a list of the creditors or company members who objected to the decision, and in the case of creditors, their claims.     In practice the Official Receiver would retain all correspondence as part of the case records, including   * The request from the creditors to have the Official Receiver replaced as liquidator or removed as trustee. * Any notice inviting proposals for an insolvency practitioner to be appointed as liquidator or trustee. * Any notice to creditors and company members inviting them to decide which of the insolvency practitioners proposed should be appointed or deeming their consent unless a specified percentage object. * Replies from creditors and members. * The certificate of the liquidator or trustee’s appointment.   In practice the appointment of insolvency practitioners to take over from the Official Receiver as liquidator or trustee is currently normally done by the Department from a rota. It is expected that use by the Official Receiver of decision making or deemed consent procedures involving creditors and contributories to appoint an insolvency practitioner as liquidator or trustee will be a rare event, as little as two cases per year. . There could be years in which no appointments would be made in this way.  The records relating to the appointment of an insolvency practitioner as trustee or liquidator will be retained as part of the records for each company or bankruptcy dealt with by the Official Receiver. They will be held in digital form on the electronic records system used by the Insolvency Service. In accordance with relevant disposal schedules the entire set of records for each case will be destroyed after 25 years following a review by the Information Asset Owner.  No data will be shared with anyone else.  None of the data being processed is high risk. It will consist of the names and addresses of creditors and which insolvency practitioner they voted for and names and contact details for insolvency practitioners. The contact details for insolvency practitioners are already in the public domain. Since information about their choice to act as insolvency practitioner will be emailed to the Official Receiver by individual creditors and company members they will not have the opportunity to see other’s choices. |
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| **Describe the scope of the processing:** What is the nature of the data, and does it include special category, criminal offence data or financial data? How much data will you be collecting and using? How often? How long will you keep it? How many individuals are affected? What geographical area does it cover? |
| The data collected will consist of,   * the names and contact details of creditors in bankruptcies, * the names and contact details of creditors and company members in company liquidations, * for creditors initiating a process to have the Official Receiver replaced as trustee or liquidator, the debts due to each creditor, * in the case of other creditors if they have not already submitted a proof of the amount of their debt they will be required to do so, * who each creditor or company member suggested should be appointed to act as trustee or liquidator, * which insolvency practitioner the creditor or company member voted to appoint, and * the certificate of appointment for the trustee or liquidator.   No Special Category or criminal offence data will be collected.  Financial data will be collected. It will consist of the amount of debt owed by the bankrupt or company to individual creditors.  The data collected will be used to,   * check that individuals are bona fide creditors or company members, and * appoint an insolvency practitioner to replace the Official Receiver as trustee or liquidator.   The volume of data collected in an individual case will depend on,   * the number of creditors, * how many respond with proposals for an insolvency practitioner to act as trustee or liquidator, and * how many take part in the vote to select an insolvency practitioner to act as trustee or liquidator.   The number of cases per annum will be in low single figures.  The data will be held for 25 years.  The data collected will be from creditors and company members across Northern Ireland and beyond. |
| **Describe the context of the processing:** What is the nature of your relationship with the data subjects? How much control will they have? Would they expect you to use their data in this way? Do they include children or other vulnerable groups? Are there prior concerns over this type of processing or security flaws? Is it novel in any way? What is the current state of technology in this area? Are there any issues of public concern that you should factor in? |
| The Official Receiver is responsible under statute for conducting procedures to enable creditors and company members to appoint an insolvency practitioner to act as trustee or liquidator.  Creditors and company members can be either natural persons or corporate bodies. Personal data will consist of,   * The names and addresses of creditors who are natural persons, and in some cases, what debt is due to them from the bankrupt or company in liquidation. * The names and addresses of insolvency practitioners.   The number of creditors in a case could range from one to several thousand.  There is no upper limit on the number of members a company can have but the figure would normally be two or three.  The annual number of cases in which creditors and company members would take part in a process to appoint a liquidator or trustee is expected to be in the low single figures.  .The Official Receiver already prepares and holds a list of the names and contact details for creditors in bankruptcies and a list of the names and contact details for creditors and company members in company liquidations. This is to enable him to comply with existing statutory requirements to send a reports to the creditors and company members on the bankrupt’s or company’s affairs. The list includes details of debts due to creditors, where this is known.  The creditors and company members would expect their data to be held and processed in this way.  The data subjects do not include children or other vulnerable groups.  No concerns have been raised about existing use of email to communicate with creditors, company members and insolvency practitioners.  Emails to creditors and company members under the proposed procedure would be sent in such a way that recipients would not be made aware of other’s email addresses.  While communication with the data subjects by email already takes place the proposed use of emailing instead of physical meetings in the process they use to make appointments is novel. |
| **Describe the purposes of the processing:** What do you want to achieve? What is the intended effect on individuals? What are the benefits of the processing – for the Department or more broadly? |
| The benefits of these changes are that creditors and company members will be able to engage in the process to have an insolvency practitioner from the private sector appointed to replace the Official Receiver as liquidator or trustee without having to spend time and money travelling to a physical meeting.  In practice, it is very rare for meetings to be held under current legislation to appoint trustees and liquidators. In the vast majority of cases such appointments are made by the Department from a list of insolvency practitioners.  It is anticipated that use of the new decision making and deemed consent procedures will be equally rare. |

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| **STEP 3 CONSULTATION PROCESS** |
| **Consider how to consult with relevant stakeholders:** Describe when and how to seek data subjects’ views - or justify why it is not appropriate to do so. Who else needs to be involved within the Department? Do you need to consult with data processors? Do you plan to consult with information security experts or any other specialists? |
| The main stakeholders are,   * The Official Receiver. His role is to administer the process to have a trustee of liquidator appointed. * The creditors. Their role is to engage in a process resulting in the appointment of a private sector insolvency practitioner to replace the Official Receiver as trustee in bankruptcy or company liquidator. * Insolvency practitioners. The process should result in one or more members of this profession being appointed to carry out the work of administering the bankruptcy or liquidation and receiving remuneration for doing so.   The Insolvency Service intends to carry out a full policy consultation on all aspects of the proposed Bill, and this assessment will form part of the consultation package.  Insolvency practitioners and trade bodies such as the Federation of Small Businesses and the Institute of Directors will be invited to respond. The Official Receiver and his staff will also be included in the consultation. |
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| **STEP 4 ASSESS NECESSITY AND PROPORTIONALITY** |
| **Describe compliance and proportionality measures:** What is your lawful basis for processing? Does the processing actually achieve your purpose? Is there another way to achieve the same outcome? How will you prevent function creep? How will you ensure data quality and data minimisation? What information will you give individuals? How will you help to support their rights? What measures do you take to ensure processors comply? How do you safeguard any international standards? |
| The lawful basis for processing the data is Legal Obligation  The processing required for this will allow the Official Receiver and the creditors to appoint an Insolvency practitioner.  Insolvency practitioners can be appointed in a different way. The legislation allows the Official Receiver to apply to the Department to have an insolvency practitioner appointed. The Department maintains a list, or rota, of insolvency practitioners who take Northern Ireland cases and the next person on that list will be appointed. However it may be appropriate in those rare cases where there are significant assets to allow the creditors to choose the insolvency practitioner since the return to the creditors will depend on how well that person does his or her job.  As previously mentioned, it is practice to keep Northern Ireland insolvency legislation in parity with that applying in England and Wales. Decision making processes for the appointment of insolvency practitioners identical to those we are proposing are already included in legislation applying in England and Wales. It would be unsatisfactory for them to be available to creditors there but not in Northern Ireland.  The steps to be gone through by the Official Receiver to appoint an insolvency practitioner as trustee or liquidator and the information he has to seek in order to do so will be precisely laid down in legislation. There is therefore no scope for function creep, and there will be no incentive to seek more data than has to be obtained to comply with legislation governing the appointment of an insolvency practitioner.  Processors will not be used in the procedure.  The names and addresses of insolvency practitioners are already in the public domain.  Creditors and insolvency practitioners will be covered by the Insolvency Service’s Privacy Notice, which lists the Insolvency (Northern Ireland) Order 1989 as among the legislation under which processing is necessary for compliance with a legal obligation. Provision to enable the Official Receiver to carry out the process to enable creditors and company members to appoint an insolvency practitioner will be inserted into the Insolvency (Northern Ireland) Order 1989 by the Bill we are planning to make. |

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| **STEP 5 IDENTIFY AND ASSESS RISKS** | | | |
| **1.** Personal data not held securely therefore causing data subjects damage / distress. | **Likelihood of harm**  *Remote, possible or probable* | **Severity of harm**  *Minimal, significant or severe* | **Overall risk**  *Low, medium or high* |
| **2.** Staff unaware of compliance issues / requirements. | **Remote** | **Significant** | **Low** |

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| **STEP 6 PROPOSED PRIVACY SOLUTIONS** | | | | |
| **Risk No** | **Measures to reduce or eliminate** | **Effect on risk** (Eliminated, Reduced or Accepted) | **Residual risk** (Low, Medium or High) | **Measure Approved?**  (Yes/No) |
| **1.** | * All personal data held by Insolvency Service on a government secured server. * Only approved DfE email accounts will be used to send and receive related correspondence. | **Reduced** | **Low** | **Yes** |
| **2.** | * Staff engaged in the process to appoint an insolvency practitioner will have received appropriate training including data protection training. * Insolvency Service has detailed procedures in place that relevant staff are aware they need to follow when appointing insolvency practitioners. | **Reduced** | **Low** | **Yes** |

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| **STEP 7 APPROVAL PROCESS** | | |
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|  | **Name/Date** | **Notes** |
| Measures approved by: | **Richard Monds (IAO)** | Integrate actions back into project plan, with date and responsibility for completion |
| Residual risks approved by: | **Richard Monds (IAO)** | If accepting any high residual risk, consult the ICO before going ahead |
| DPO advice provided: | Yes, processing can proceed. | DPO should advise on compliance, Step 6 measures and whether processing can proceed |
| Summary of DPO advice: Staff must have completed data protection training before being permitted to process personal data. Robust policies / procedures in place is essential – staff following these is also essential. The processing of personal data must be monitored by line managers. | | |
| DPO advice accepted/overruled by: | **Accepted, Richard Monds (IAO)** | If overruled, you must explain your reasons below |
| Comments | | |
| Consultation responses reviewed by: |  | If your decision departs from individuals’ views, you must explain your reasons below |
| Comments | | |
| This DPIA will be kept under review by: | **Richard Monds (IAO)**  **DIAM, IMU** | The DPO should review ongoing compliance with the DPIA |