



Response to Request for Information

Reference FOI 003711
Date 25 June 2019

Payment Cards

Request:

1. Who is the data controller for personal data relating to payment cards? [Prepaid Financial Services \(PFS\)](#), (the card Holder), is the data controller therefore we cannot provide the information in the subsequent questions in relation to information that is held by them..
 - If it is the card provider, is there a contract in place covering this data processing? [Yes](#)
2. Who has access to the data? [PFS, the Council and people in receipt of Adult Social Care.](#)
 - What data protection training have these staff had? [We can only answer this question in respect of information held by the Council and can confirm that Council staff are required to undertake mandatory data protection training every two years.](#)
 - What organisational measures – policies and procedures etc. - are in place to ensure that data is kept safe and not accessed by anyone without authorization? [We can only answer this question in respect of information held by the Council. Our policies and procedures are held here:
<https://www.wolverhampton.gov.uk/your-council/information-governance/what-is-information-governance>](#)
 - Please provide a copy of any written policies and procedures. [As above.](#)
3. Have payment card users been asked to sign a privacy notice? [In respect of information held by the Council, our overarching privacy notice is held here:
<https://www.wolverhampton.gov.uk/your-council/our-website/privacy-and-cookies-notice>](#)

[Our Adults and Children's Services privacy notice is held here:
\[https://www.wolverhampton.gov.uk/sites/default/files/pdf/Joint Adults and Children%2527s Services Privacy Notice GDPR July 20182.pdf\]\(https://www.wolverhampton.gov.uk/sites/default/files/pdf/Joint_Adults_and_Children%2527s_Services_Privacy_Notice_GDPR_July_20182.pdf\)](#)

[In respect of PFS privacy notice their details can be found here:
<https://prepaidfinancialservices.com/en/privacy-policy>](#)

- What formats is the privacy notice available in?

- Please provide a copy of the privacy notice.
4. What steps have been taken to keep payment card data secure?
Following reasonable enquiries, it has been established that the Council does not hold the above requested information.

Consequently, we are unable to provide any information relating to the above, and are informing you as required by Section 1(1) (a) of the Freedom of Information Act 2000 ("The Act"), that states:

"Any person making a request for information to a public authority is entitled to be informed in writing by the public authority whether it holds information of the description specified in the request".

To explain further, this information is the responsibility of the provider.

- What protections are in place to guard against fraud?
 - How is the cardholders information (including information as to the account holder as well as any purchases) stored?
 - What technical and organisational measures are in place in respect of the payment card platforms and any associated network and information systems, e.g. to prevent cyber- attacks?
 - What action is taken in the event of a data breach?
 - What arrangements are in place to enable access to funds in the event of a system failure?
5. Have you carried out a Data Protection Impact Assessment? No, however prior to the General Data Protection Regulation (GDPR) coming into force last year, the Council contacted all of its contracted suppliers and contractors to obtain compliance assurance from them in relation to the new Regulation.
- What risks have you identified? And what mitigating action are you taking?
 - If you have identified any high level risks that you are unable to mitigate what action are you taking as a result?
6. What processing operations do you actually carry out on the personal data collected? The Council does not process information in relation to pre-paid cards.
- Who reviews the data and how often?
 - Are reviews ad hoc or routine?
 - If ad hoc, what triggers a review.
 - Are card holders notified of a review?
7. Which organisations, if any, is this data shared with? In relation to pre-paid cards information, this is not shared with any third party organisation.
- Have you drawn up an Information Sharing Agreement (ISA) to govern this sharing activity?