Data Protection Impact Assessment (DPIA) - Full Assessment

Guidance for the Project Manager and Sponsor

The Data Privacy Impact Assessment (DPIA) will enable you to systematically and thoroughly analyse how your project or system will affect the privacy of the people whose data you are dealing with. This template has been designed to incorporate the legal requirements of the General Data Protection Regulation (GDPR) which comes into force on 25 May 2018 and in anticipation of the Data Protection Act 2018 becoming law. Data processing activities which started before 25 May 2018 and are continuing beyond this date should be assessed using this template if the conclusion of the pre-screening questionnaire is that the processing is high risk.

- The DPIA is a proactive approach to privacy protection;
- It is often the most effective way to demonstrate to the Information Commissioner's Office (ICO) how personal data processing complies with the Data Protection Act and the GDPR and the Data Protection Act 2018 when they comes into force;
- The intended outcome of a DPIA should be to identify risks to privacy and minimise these;
- Conducting a DPIA is a legal requirement under the GDPR particularly if the proposed processing is using new technologies and poses a high-risk to people's data.
- A Pre-Assessment should be carried out to identify whether or not this full assessment is required.

Further information and guidance on the DPIA is also available on the ICO website here: ICO's PIA code of practice and the Article 29 Working Party here.

GOVERNANCE ARRANGEMENTS

The DPIA may be subject to review and audit by Camden's Data Protection Officer (DPO), ICT Project Review Board, Corporate Information Governance Group (CIGG) and the Information Commissioner's Office (ICO). A decision may also be taken to publish the DPIA. You must keep the signed DPIA and all supporting documents with your project file for audit purposes.

1. PROJECT SUMMARY

Project Name	Barriers to acceptance of housing offers by families in temporary accommodation	**Directorate and Service**	Housing Support Services, Temporary Accommodation, Supporting People
Project Sponsor and Position	Rhys Makinson Director of Housing Support Services	**Project Manager and Position** **Lead Officer**	[redacted] Senior Policy and Projects Officer, Corporate Services Karen Swift, Head of Housing Supply, Support and Initiatives, Supporting People
Project Start Date **Project End Date**	15 October 2018 28 February 2019	**Project Go Live Date (anticipated/planned)**	15 October 2018
Third parties involved/associated with the Project:	LSE London Contracted Interpreters/Translators Community Researchers (directly employed by Camden)	**Does this DPIA cover multiple projects?**	No

High Level description of the Project: [a high-level description of the Project, which will help to easily explain the scope of the DPIA in context of the overall project]

Many family households have been staying in temporary accommodation for a long time and have repeatedly turned down offers of housing in the private rented sector. Camden aims to understand why this is and has commissioned research by LSE London through LSE's consultancy arm LSE London to understand how families understand their prospects of:

- moving from temporary accommodation
- the barriers that might be preventing them from moving
- the fears and concerns that they have around moves away from Camden
- what might encourage them to see living in private rented accommodation as a viable housing solution

Scope of the DPIA: [briefly explain which elements of the Project are in scope of the DPIA, for example, data gathering or data sharing exercise]

- Data sharing of special category data and personal data with LSE London who have been contracted via LSE London to deliver the research.

Why is a DPIA required? [this will be with reference to the conclusion from the pre-screening questionnaire i.e., why it is a high-risk Project]

A DPIA is required as this is a new research project/initiative to identify support needs so that residents can move on from temporary accommodation into medium/long term accommodation. In order to do this, Camden is sharing special category and personal data with a third party, LSE London, who will be carrying out the research.

2. DESCRIPTION

Description of the Project:

[In this section include a description of the Project, including the nature, scope and context]

It is a research project aiming to analyse the data patterns of households staying in temporary accommodation and uses interviews to understand why families have turned down offers of housing in the private rented sector. This will inform improved service planning to support residents to move into medium/long term housing.

Camden has commissioned LSE London via LSE's consultancy arm, LSE London, to lead the research in order to understand how families understand their prospects of:

- moving from temporary accommodation
- the barriers that might be preventing them from moving
- the fears and concerns that they have around moves away from Camden
- what might encourage them to see living in private rented accommodation as a viable housing solution

The project starts in October 2018 and completes in February 2019. It is an action in Camden's Homelessness and Rough Sleeping Strategy to support families in temporary accommodation find medium and long term housing solutions.

LSE London is leading the research, specifying and analysing data, conducting interviews with residents and writing a report on findings. In order to maximise the interview sample size for data reliability, Camden officers are also contacting and conducting interviews with residents in temporary accommodation to increase research resources.

Data flow map(s):

[you may find it useful to use a flowchart, which you can attach at Annex A.

The flowchart should show, for example: Data entry and exit points, location, user categories, data subject categories]

Types of personal data proposed to be processed:

[Identification of categories/types of personal data collected]

Name, address, age, email address, telephone number

- Personal and sensitive data will be shared once residents have consented to Camden sharing their data with a third party, LSE London, who will be conducting the research, and with Camden officers conducting a proportion of the interviews.
- Camden will send a privacy notice and consent form to residents requesting consent to share personal and special category data. Consent will be sought for resident participation in interviews and for their personal contact details to be shared so that either LSE or Camden officers can arrange interviews.

Types of Special Categories/ Sensitive personal data proposed to be processed:

Including: personal data revealing racial or ethical origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning health or data concerning a natural person's sex life or sexual orientation.

- Race or ethnicity, immigration status, employment status
- Disabilities, religion, date of birth, place of birth, health including mental health information may be shared by interviewees at interview. A consent form prior to interview will be given to interviewees.

Types of data subject:

*[*Identification of categories/types of data subject eg residents, people over 60, users of the service etc.]

Families staying in temporary housing paid for by Camden and a small sample of residents who have moved from temporary accommodation into medium/long term accommodation.

3. SCOPE AND DESCRIPTION OF PROCESSING

Description of the processing activities:

[*High level description of processing activities including technical capabilities/functionality*

Assets/technology involved with processing the personal data:

a. Hardware is there any equipment being used?

b. Software – what software will be used?

Information will be gathered from Northgate and the Housing Needs Group database.

2 excel spreadsheets will be shared with LSE. The first pseudonymised spreadsheet will include a list of all families in temporary accommodation without names, addresses and contact data (see below for data fields) and sent electronically to LSE via egress (secure email).

- *Record number – so Camden can identify the application number which will not be shared with LSE*
- *Date applied for temporary housing*
- *Application made before or after the Pre-Localism Act 2011 denoted by Pre or Post Localism*
- *Homelessness Status – Accepted/Under Review*
- *Reasons for Homelessness*
- *Decision date (accepted as homeless)*
- *Part VII decision – accepted in full/not in priority need/referral/not eligible immigration status*
- *Date first placed in TA*
- *Months spent in TA*
- *Name of Borough placed*

- *Type of accommodation e.g. hostel, annexe (private rented accommodation)*
- *Age*
- *Applicant Type e.g. couple/lone*
- *Household size*
- *Dependent Children*
- *Language*
- *Translator Required*
- *Ethnicity*
- *Economic Status and Partner Economic Status*
- *Immigration Status*
- *Bed Need*
- *Housing Status e.g. Suspended/Live*
- *General Housing List Status Reasons e.g. arrears/risk*
- *General Housing List Points and Median Points*
- *Sheltered Housing List Status and Reason e.g. Live*
- *Sheltered Housing List Points*
- *Date of most recent housing plan interview*

Once the sample (approximately 50-60 households) has been selected by LSE they will send the spreadsheet to Camden via egress (secure email). Camden will check for health and safety risks and send a privacy notice to those residents identified explaining the purpose of the

research and requesting consent to participate in the interviews and share their contact data with LSE and Camden officers working on the project, so that interviews can be arranged.

After receiving consent from residents, a second spreadsheet containing the data fields on the first spreadsheet together with the names, addresses, telephone numbers and email addresses of selected households will be sent to LSE via egress (secure email) and Camden officers working on the project. This is so that LSE and Camden officers working on the project can contact residents directly to arrange interviews.

Excel data spreadsheets will be sent via egress so there is secure transfer between Camden and LSE.

During interviews records will be taken on word or notepad.

c. Networks – will the processing be on the council's network, or shared with another organisation eg the CCG?

Processing will be on the LSE university network and on Camden's network. The final research report will be shared via Camden and LSE websites and other online platforms but will not contain any personally identifiable information, unless residents have given written consent for this to be included e.g. a photo.

d. People – who will do the processing? Council staff or contracting out? What areas of workers in the organisation that is doing the processing?

Camden Council project staff including officers from Housing Needs, Housing Partnerships, the Temporary Accommodation Group, Strategy and Change will produce data, process data, project manage and interview families.

LSE will be analysing the data and using it to contact families and conduct interviews. Camden officers carrying out the research will also be using the data to contact families and conduct interviews.

(Although LSE is the lead research organisation conducting the research, a mixture of LSE staff and graduate students and Camden staff will be working together to interview residents.)

e. Paper – will you be having paper records?

Both paper and electronic records will be used by LSE and Camden Council to record interview content. Signed interview consent forms will be scanned and stored by LSE and Camden so that both organisations have interview consent forms.

f. Paper Transmission Channel(s) – how will paper records be handled?

Paper records will not be transmitted.

Paper records will be scanned in. Camden will upload consent forms into a shared folder with project team restricted access. Interview notes will be uploaded onto a shared folder with interviewer restricted access only. Only Camden officers who are interviewing will have access to the interview notes and no other project team member as this data will only be shared with the LSE research team. Notes and consent forms will be emailed to LSE via secure email egress.

LSE will upload scanned documents onto the cloud LSE network where data is stored securely with password protected access. Similarly LSE will send consent forms to Camden via secure email egress.

Both organisations will store consent forms.

g. Mobile Devices (not Camden issued laptops – other devices if any)

h. Cookies – if you are providing web services will you be using cookies? If so, what type (eg persistent) N/A

i. Other such as cloud, data warehouses etc. – will you be storing data in the cloud eg is the provider* SAAS *(software as a service)

All data from Camden will be held on our network.

LSE will store data on the LSE cloud network with password protected access.

Purpose and Benefits:

- The research data will enable the Camden to understand the profile of families in temporary accommodation, what their hopes and aspirations are, what their barriers and fears are about private rented accommodation and what might encourage them to see living in private rented accommodation as a viable housing solution.
- This information will be used to support residents to move on from temporary accommodation into medium/long term housing.

[Describe the purpose of the processing and the benefits of the intended processing to the data subjects and/o the Council]

Phase 1: Data Sharing

An excel spreadsheet containing data of families living in temporary accommodation will be sent to the lead researcher at LSE. This will not contain any names or addresses but will contain other housing and immigration status data (see section 3b). LSE will select the sample for interview and use data provided to respond to research questions identified in the research brief. After sending privacy notices to residents and receiving consent, Camden will then provide LSE and Camden project officers with the names, addresses, emails and phone numbers of the selected sample so they can contact individuals for interview. This will ensure that LSE only has personal data on the sample they select for the purpose of interview and not the entire temporary accommodation records of all individuals.

Phase 2: Interviews

LSE and Camden designated officers will contact the sample of individuals for interview using the personal data provided and conduct interviews. Written and electronic records of interviews will be made and interpreters/translation will be used where needed.

Phase 4: Findings Report

Research findings and analysis will be presented in a short report and the link will be circulated publicly. The project findings will be presented at a round table for Camden staff and other stakeholders. Information and data from individual interviewees will be anonymised so that individuals cannot be identified, unless an individual provides written consent to be identified e.g a photo for insertion into the report.

Sources of the personal data: where are you obtaining the data from?

[for example: Feeds from systems (internal/external)

- Collected directly from data subjects]

Personal data is used from Camden's databases (HNG and Northgate) which has been collected directly from data subjects.

Data processed includes the following for the first data set followed by inclusion of names, addresses, email, telephone number (contact details) once the sample has been selected.

- Year applicant applied for housing

- Pre or Post Localism – i.e. affects their statutory rights to type of housing
- Accepted or not or under review as homeless
- Reason for homelessness (by category)
- Decision date
- Decision
- Date placed in temporary accommodation (TA)
- Length of time in TA
- Borough placed in
- Type of TA e.g. hostel/annexe
- Age of applicant
- Household size
- Dependent children
- Language spoken
- Ethnicity
- Immigration status
- Employment Status and Partner
- No of bedrooms needed
- Housing status + reasons e.g. arrears
- Housing points
- Most recent housing plan interview
- Those who have left TA and where they have been located – (removing address in the first spreadsheet until the sample has been identified)

Length and frequency of processing:

[How long will the processing be taking place for, and how often?]

Data processing will start from October 2018 to January 2019.

Interviewing families will start from October to December 2018.

Processing volumes:

[Volumes of Data subjects and records

497 records on spreadsheet 1 (this does not include names, addresses and contact details etc.)

See section 3b for data fields.

Volumes of certain types of data subject (such as children, other vulnerable individuals)

After LSE has selected the sample – approximately 50-60 records will be available on spreadsheet 2, which will include number of dependent children data from spreadsheet 1 .

Volumes - users and type

Family households in temporary accommodation paid for by Camden.

Type of users - internal, external (such as partners)]

Internal Camden staff working on the project and external LSE London staff will be using the data. A data sharing agreement will be used between LSE and Camden.

Data minimisation:

[Identify what thought you have given to data minimisation (such as certain types of data subject not included in scope, types of data/fields collected minimised, data flows minimised, de-identification techniques used).Show that the amount of personal data collected and processed is the minimum you need to deliver the project]

The fields included in section 3b are relevant to the research project and do not contain information which exceeds research brief requirements. Only details of residents in temporary accommodation will be included in this project.

The application number of each applicant has been removed so that unnecessary data is not shared with LSE.

LSE will select the sample and we will then provide them with the names and addresses so they can contact them for interview on a separate spreadsheet. This will ensure that LSE only has personal data on the sample they select for the purpose of interview and not the entire temporary accommodation records of individuals.

The data spreadsheet will be sent via egress for secure data transfer.

4. BASIS OF PROCESSING

Fair, Lawful and Transparent Processing (Article 5(1)(a))

Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject. Processing shall be lawful only if and to the extent that at least one of the requirements in Article 6(1) applies.
You must meet one of the conditions below to process the data lawfully.
Please note if you meet another condition you do not need consent. Most of the council's processing is done under numbers 1 and 4 below. There are few occasions where the council actually relies on consent.

If you are processing special categories of data then you need to satisfy one of the conditions in Article 6 **and** one of the conditions in Article 9(2)

	Lawfulness of Processing (Article 6)		
1	Is the processing necessary for compliance with a legal obligation to which the Council is subject? In other words does the council have to do this processing because there is law that says we must do so If 'yes', please identify the legal obligation and explain why the processing is necessary.	YES	Article 6(1)(c) Legal obligation "processing is necessary for compliance with a legal obligation to which the controller is subject.". Namely our public sector duties under the ***Housing Act 1996 Part VII (as amended by the Homelessness Act 2002), the Localism Act 2011 & the Homelessness Reduction Act 2017.***

2	Is the processing necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract? In other words does the council have to process the data to do things it has contracted to do with the data subject? If 'Yes', please explain why the processing is necessary.	NO	
3	Is the processing necessary in order to protect the vital interests of the data subject or of another natural person? It is intended to apply in 'life or death' situations, such as providing medical information to a hospital when a patient is incapable of giving consent. There won't be many times this applies for the council.	NO	
4	Is the processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller? In other words: are you doing council work that is in the public interest and you need to do the processing to carry out the work properly? If 'Yes', please identify the statutory powers that you are relying on and identify the task.	YES	Article 6(1)(e) Public Task "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller" Again, processing is carried out in line with our duties under the ***Housing Act 1996 Part VII (as amended by the Homelessness Act 2002(, the Localism Act 2011 & the Homelessness Reduction Act 2017.*** Research is being conducted to help the Council carry out its statutory duties to residents who have been accepted as homeless or in the process of being assessed. The aim is to support those accepted as statutory homeless to move from temporary accommodation into medium/long term accommodation. The research findings will inform the identified actions for the Council's Homelessness and Rough Sleeping Strategy where Cabinet approval will be sought in 2019.

5	Are you relying on the individual to provide consent to the processing of their personal data for one or more specific purposes (as grounds for satisfying Article 6)? Please note if you meet another condition you do not need consent. Most of the council's processing is done under numbers 1 and 4. There are few occasions where the council actually relies on consent. If you rely on consent, the individual may withdraw consent at any time. You would then have to stop processing the data, unless there is another ground to rely on. An example of when consent is not needed is processing children's data for carrying out safeguarding work- this is a legal duty. An example of when consent would be the right option would be eg when carrying out sexual health testing. If YES then how and when will this consent be obtained? If NO then what alternative legitimate arrangements are in place? Is the consent in accordance with the requirements in the GDPR?	YES	Article 6(1)(a) – Consent**:** the individual has given clear consent for you to process their personal data for a specific purpose Residents will be contacted to ask for their consent to share personal data i.e. name, address and contact numbers for LSE and Camden officers to carry out 1-2-1 interviews with individuals. A privacy notice will be posted by Camden to selected residents in temporary accommodation explaining the purpose of the research, informing that LSE is the lead organisation conducting research on behalf of Camden and asking if they would like to participate in interviews. Consent Form - If yes they will be asked to provide consent for Camden to share their personal contact details with LSE and Camden project staff so they can be contacted to arrange an interview. An interview consent form will be presented for signing prior to the interview and interviewers will explain to residents that their participation is voluntary, that they can withdraw at any time, and that they will suffer no adverse consequences from refusing to take part or cutting short their interviews. Interviewees will also be provided with information about the project (again translated into their languages where needed) and how the data will be used,

			providing them with information about how to contact the research team if needed. Before any visits take place and before providing the sample of personal data to LSE, Camden Council will check records for any health and safety issues and assess risk. Camden will make LSE interviewers or its own officers aware, if paired interviews are required for safety reasons, or whether an alternative interviewee should be used in the interests of safety. Enhanced disclosure and barring checks will be required for anyone interviewing alone.
6	Is the processing necessary for the purposes of legitimate interests pursued by the Council or by a third party? Are these interests overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child? If there are legitimate interests, please explain what these are. If the exercise of these may impact on the rights and freedoms of the data subject, please explain the potential impact. *Note that the Council can only rely on this basis in limited circumstances, when it is not carrying out one of its 'tasks'. If you think this applies to your project, you must seek advice from the Data Protection Officer at dpo@camden.gov.uk	NO	
7	Will you be collecting **Special Categories of data**, e.g. data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual	YES	Race, ethnic origin and health data Article 9(2)(g) – public task: processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable

	orientation? The Council also considers financial data and electronic signatures to be special category data. **YES:** **NO:**		and specific measures to safeguard the fundamental rights and the interests of the data subject; Processing is carried out in line with our duties under the Housing Act 1996 Part VII (as amended by the Homelessness Act 2002(, the Localism Act 2011 & the Homelessness Reduction Act 2017.
8	Special Category data must only be processed if at least one of the grounds in Article 6 (outlined in numbers 1-6 above) is met and in addition, one of the requirements in Article 9(2) can be met. Which basis in Article 9(2) are you relying on to process Special Category Data?	Yes	Article 9(2)(a) *Consent*; The data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provides that the prohibition referred to in paragraph 1 may not be lifted by the data subject.
9	If you are relying on a different basis for different categories of Special Category Data (e.g. a different basis for each type of data to be processed) then please explain here:	NO	
10	Will you be processing personal data relating to criminal convictions and offences or related security measures? YES: NO: If YES, Article 10 may apply. You must seek advice from the Data Protection officer at dpo@camden.gov.uk	NO	

11	The council has to comply with the Human Rights Act. Article 8 is the right everyone has for respect for their private and family life, home and correspondence. The council can't interfere with this right except as the law allows and is necessary to ensure national security, public safety or the economic well-being of the country, for the prevention of disorder or crime, for the protection of health or morals, or for the protection of the rights and freedoms of others. You need to be sure that the processing you will do will not breach these requirements. Have you considered the requirements of Article 8 and will your actions interfere with the right to privacy under Article 8? Have you identified the social need and aims of the project? Are your actions a proportionate response to the social need? Are you sure the processing will be in accordance with Art 8? If you are in doubt contact the legal team for advice. In most cases if the outcome of the DPIA is that there are no high risks remaining after mitigations are in place (see below) then there should be no breaches of Art 8.	YES	
12	Is any of the personal data being processed held under a duty of confidentiality, e.g. client confidentiality? If YES please detail	NO	
13	Is any of the proposed processing subject to any other legal or regulatory duties? If YES please list the additional legal or regulatory duties and how you will comply with these.	NO	

14	**Fair Processing and Transparency** If you have obtained information from data subjects or from a third party, there is certain information that you must provide to data subjects to comply with Articles 12, 13 and 14 of the GDPR. There are corporate policies and procedures on fair processing in place to cover these situations [provide a link]. You must read these. Indicate here how you will comply with them.	YES	A privacy notice will be sent to the resident sample of (approximately 50-60) in temporary accommodation and we will ask for their consent to take part.
Purpose Limitation. Article 5(1)(b) **Personal data shall be collected for specified, explicit, legitimate purposes, and shall not be further processed in any manner that is incompatible with those purposes or those purposes.** ***Note that further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with Article 89(1), not be considered to be incompatible with the initial purposes.**			
15	**Uses of Personal Data within the Organisation** Will you have a procedure for maintaining an up to date record over the collection and use of personal data?	YES	If the interviewees inform the interviewers that data held by Camden is incorrect it will be updated on Camden's systems. Either LSE or Camden staff interviewers will record the corrected contact information and send to 2 designated housing officers who will update the information on the Camden database. For LSE interviewers they will inform

			the LSE Project Coordinator who will email the 2 designated Camden Housing Officers. Only changes to contact data will be referred by interviewers to Camden's housing officers. If there are any other updates such as changes in circumstances, the resident must contact Camden Housing Officers directly. Housing Officer contact details will be made available during interviews.
16	**Use of Existing Personal Data for New Purposes** Do you know the purposes for which the data was originally collected? **Does the project involve the use of existing personal data for new purposes?** If NO then go to question 13 If YES, how will you inform data subjects that you intend to process for new purposes (so as to comply with Articles 13 – where the data was originally collected from the data subject and 14 GDPR – where the data was originally collected from a 3rd party)	YES YES	Data was originally collated for housing purposes by Camden Council. Residents in temporary accommodation selected as part of the sample will be sent a privacy notice and consent form to share personal data with LSE and Camden project officers working on the research project.
17	What checks have you made to ensure that processing of personal data is compatible with its original purpose?		Personal data is held on Camden's Northgate and HNG database for housing purposes. No personal data will be shared without consent.
18	**Disclosures of Data** Who will you routinely share the data with? **Recipients:** *Organisation Name: LSE London*	YES	Data will be shared between Camden project officers and the lead researcher at LSE. A data sharing agreement will be produced. Project meetings will be held to track progress including data sharing

	Address: Queens House (2.01) London School of Economics and Political Science Houghton Street London WC2A 2AE UK *Role*: Research Lead (Camden has contracted LSE London to conduct research) *Data to be disclosed:* Personal and special category data *Role of the recipient:* Research Lead Organisation *Reasons for disclosure:* Temporary Housing Research Project *Agreements.* Data Sharing Agreement and Research Brief *DPIAs* *Monitoring arrangements/contract management* *Repeat for each recipient*			

19	How will your team be made aware of the requirements for sharing with third parties?		The data sharing agreement and DPIA will be circulated to the project team. Personal and special category data will be sent securely via egress.
20	How will you make data subjects aware of their rights?		Residents will be provided with an interview consent form at the beginning of the interview and the interviewer will explain each part of the form. Interviewees will be informed that participation is voluntary, that they can withdraw at any time, and that they will suffer no adverse consequences from refusing to take part or cutting short their interviews. The informed consent form will be translated into interviewees' languages where appropriate and will ensure that both interviewees and interviewers understand the procedures for securing informed consent. Interviewees will also be provided with an information form about the project (again translated into their languages where needed) and how the data will be used, providing them with information about how to contact the research team if needed.

'Data Minimisation' Article 5(1)(c) :

Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

21	**Adequacy and relevance of Personal Data** What arrangements/procedures/ measures are in place to determine the adequacy and relevance of the personal data being collected and processed for each purpose, and to ensure that it is not excessive (e.g. ensuring that only minimum required amount of data is collected and processed)?		A research brief has been agreed between London Borough of Camden and LSE and a data sharing agreement will be produced. A spreadsheet containing 497 records of housing applicants will be sent to LSE for selection of clients to take part. See section 3b for fields which were requested by LSE with some data fields added by Camden so that LSE can carry out the required research.
22	What arrangements/ procedures/ measures are in place to ensure that data collection and processing procedures are and will remain adequate, relevant and not excessive in relation to the purpose for which data is being processed?		Project Team will track project progress and data sharing agreement at project meetings. A working group has been set up, including representatives from both LSE and Camden, to agree information required and interview questions.
Accurate and up to date Article 5(1)(d): **Personal data shall be accurate and, where necessary, kept up to date.**			
23	Have you assessed the risk to the individual and the Council with respect to the consequences that could be caused through; 1) Inaccuracy of data and; 2) Holding data that is out of date? If NO then please explain.	YES	Any inaccurate contact data held will become known as interviewees are contacted to schedule interviews or during interviews. Where information is found to be inaccurate it will be updated. Where inaccurate contact data is reported to housing officers by researchers i.e. such as the person is no longer living at the address, the Council will investigate. Any other discrepancies will be looked into if they are reported to the designated housing officers by the resident. Additional children or people in the household may have changed during their stay in temporary

			accommodation since their application and not updated. This may affect their housing points. Health conditions may have changed e.g. there may be a disability since the time of application and not be recorded – this may affect their housing points. Mitigation: 2 housing officers have been identified for interviewees to discuss their individual housing cases if they wish to. Residents can inform the interviewer who will email accurate contact details to the housing officers and/or residents can notify the housing officers directly. (LSE interviewers will inform LSE Project Coordinator who will email Camden Housing Officers via egress). If an applicant's circumstances have changed and the resident notifies the Housing Officer contact provided, the information will be updated on Camden's database and a reassessment conducted where appropriate. Any changes will be communicated to the applicant/resident via the Housing Officer. Interviewers will not be providing housing advice during interviews or pass on information on change of circumstances to housing officers. Residents must communicate any changes in circumstances directly to the housing officer contacts where applicable. Aside from inaccurate contact details, housing officers will only investigate changes that residents themselves tell them about.
24	What arrangements are in place to check the accuracy of the data with the individual?		The interview process will be one way of checking the accuracy of data. However, the purpose of interviews is to listen to the experiences and feedback of residents

			and not to check the accuracy of housing records held by Camden. Residents will be referred to Camden's Housing Officers for updating their housing records. Contact records can be updated when arranging interviews when the interviewer notifies the designated housing officers.
25	Will accuracy checks cover free text fields including comments about individuals?	NO	
26	How will you determine when and how often personal data would require updating?		When interviewees provide alternative contact details at point of contact or during the interview process.
27	What arrangements are in place to for individuals to notify you if they believe their data to be inaccurate?		Interviewers will provide residents with the contact details of Camden's 2 designated housing officers so residents can notify the housing officer directly.
28	How will you ensure that inaccurate or out of date data is erased or rectified without delay?		2 designated housing officers will update contact details on the database.
Storage Limitation Article 5(1)(e): **Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;** personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject			
29	Is the data in question intended to be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes? If YES, how will you satisfy the requirement in Article 89(1)?		It is in the public interest as data will be used to include actions in the Homelessness Strategy which will identify support needs for move on accommodation. The residents in temporary accommodation and move on accommodation will not be identified individually

			unless consent is provided – e.g photo in final publication.
30	**Retention Policy** Is there a corporate data retention policy that covers the data processed under this project? If YES then go to question 27. If NO then seek advice from the Information and Records Management Team	YES	Camden will retain individual data 7 years from the date of the last interview. LSE will retain research data for a period of 7 years from the end date of the research project.
31	How will you determine when the data is no longer necessary for the purposes for which it was collected? Who will be responsible for reviewing the data?		LSE will be responsible for reviewing the data gathered during the research project as the lead research organisation and will retain for 7 years. The interview data will not be used to assess housing cases and will be uploaded onto a shared folder only accessible by the research team conducting interviews and not housing officers.
32	If the data is held on an IT system then will this system flag records that due for review/deletion? If NO then please explain	NO	Data held by Camden will be stored on a shared drive and retained for 7 yrs. A spreadsheet with date of deletion will be reviewed and used to flag up records due for deletion. LSE retains data in password protected cloud storage only accessible to the project team for 7 yrs. An inventory is kept of data with dates recorded for data deletion.
33	Will there be any exceptional circumstances for retaining certain data for longer than the normal period? If YES then please explain.	YES	In the event of a legal challenge documents may be retained as long as needed e.g. consent forms.
	Destruction of personal data	YES	Shredder and confidential waste for paper records

34	Are there arrangements over the secure deletion/destruction of personal data? If NO then please explain.		Deletion of records on software after 7 years.
'Integrity and Confidentiality'. Article 5(1)(f): **Personal Data should only be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures**			
35	When answering the questions below, you need to consider what technology is available and how much this would cost to put in place. You need to balance that against the type and amount of processing and the nature and severity of risks to the data subjects to ensure that the GDPR will be complied with (particular reference to Article 24). For example, where there is extensive processing and higher risk, it would be appropriate to implement a much more costly solution than if the processing was minimal or negligible risk.		
36	**Security Measures** Outline the technical or organisational measures that covers the protection of personal data and processing activities under your project		Data subject rights will be dealt with in accordance with standard Council policy and practice. An agreement will also be put in place with the supplier as stated above.
37	Who will be responsible for enforcing compliance with the council's corporate security policy?		Karen Swift, Head of Housing Supply, Initiatives and Partnerships, Sheen Anyanwu, Head of Temporary Accommodation, Shaun Flook, Head of Housing Needs and [redacted], Senior Policy and Projects Officer. This is because each service is represented as part of the project team.

38	**Contingency planning - Accidental loss, destruction, damage to personal data** Have you assessed the risks and put in place mitigating controls to minimise the risk of data loss through: • Human error or theft; • Computer virus or network failure; • Fire, flood or any other disaster? If NO then please explain.	YES/NO	Files and other information will be hard copies. Electronic copies will remain on LBC network folder. To mitigate risk of accidental loss all return correspondence will have one named officer contact so that information is not shared across the Council. Forms will be scanned in and uploaded to shared drive accessible by the project team. For example the consent form self-addressed pre-paid envelope response will have a named contact. We have a DSA with LSE. The lead LSE researcher has attended the LSE information security user awareness training course. Responsibility for back up and recovery has been identified and allocated. LSE is using a department shared folder hosted by LSE's storage system and only people in the research group will be able to use it due to password protection. Data will be pseudonymised by assigning a reference number to each interviewee. Interviewers will orally explain the purpose of the research before each interview and emphasise that participation is voluntary.
39	Do you have procedures to recover data (both automated and manual) in the event that data is lost? If NO then please explain. **Practical safeguards:** *[How will you control who has access to the data?* *What training, communications and awareness will be carried out to make sure the data will be processed lawfully?*	YES/NO	IT have a data recovery procedure which means there is a back up in the event that data is lost. Data will be held on the shared drive with restricted access by the project/research team. Data will be retained for 7 years - project team and interviewers will have access. A list of authorised officers for data access will be created and circulated with restricted access. Project team meetings and interviewer briefings will include information about how data should be

	Will you carry out due diligence to make sure that third parties involved *adequate and subject to a legal obligation (e,g, a contract) to make sure they process the data lawfully?* *What contract management and monitoring arrangements will be put in place with third parties?]* **Mechanisms to protect personal data:** *[Examples: De-identification of data* *Examples: Arrangements re destruction of data* *Examples: Data back up/disaster recovery arrangements]* **Mechanisms to demonstrate compliance with legislation:** *[Examples: Maintenance of records such as re: consents, privacy* **Are there separate measures to protect special category personal data?** If NO then please state why the measures above are sufficient. **There is a corporate procedure for detecting and reporting breaches of security (remote, physical or logical) and this must be followed in the project. Any third parties or sub-contractors involved in processing the data must be made aware of this procedure and measures taken to ensure they comply with this.** Confirm this is the case and outline how it will be achieved**.**		accessed, handled and stored. The process will be circulated to all staff working on the project. A data sharing agreement will be in place with LSE. Monitoring and management will take place during project meetings and separate meetings will be arranged if necessary.

5. TRANSFERS OF DATA OUTSIDE OF THE EEA -will any personal data be processed outside of the EEA? This includes information processed on servers based outside the EEA as well as processing carried out by sub contractors. This is unlikely to apply to the Council but you must take advice from the Data Protection Officer if this is relevant to your project.

Country to be transferred to:

[Provide a list of all the countries that the personal data will be processed in]

We will not transfer any personal data outside of EU.

Hosting location:

[Identify where the data will be held. You may require IT advice in this regard as you may need to consider data being held on the cloud]

International data transfer arrangements:

[describe how the data will be transferred outside of the EEA]

N/A

Name and role of parties receiving the personal data:

lead researcher at LSE London and project co-ordinator will be receiving personal data on spreadsheet 2 and scanned data consent forms via egress (secure email) from Camden.

project manager at Camden Council will be receiving personal data on spreadsheet 2 and scanned data consent forms via egress (secure email) from LSE. Karen Swift, head of housing supply, partnerships and initiatives will receive personal data on spreadsheet 2. Other Camden officers to be recruited who are interviewing will also have access to the sample selected for Camden with personal data so they can make contact to arrange interviews.

Legal safeguards for the transfer: you need to seek DPO advice before completing this *[EU Model Clauses* *Privacy Shield]*

6. ARRANGEMENTS TO ADDRESS INDIVIDUAL DATA SUBJECT RIGHTS - THESE MUST BE DEALT WITH IN ACCORDANCE WITH CORPORATE POLICY [add in link when Jo has the doc finished]. They include the following and you must be aware of these rights.
If they are of specific significance to your project then you must state how you will deal with these, otherwise it is assumed they will be dealt with in accordance with the council's standard policy.

Right to be informed:	
Right of access:	
Right to rectification:	
Right to erasure/right to be forgotten:	
Right to object and restrict processing:	

Right to data portability:
Rights in relation to international transfer(s):
Rights in relation to prior consultation:
Rights in relation to automated decision-making and profiling:

7. CONSULTATION WITH INTERESTED PARTIES

Input of data subjects and/or their representatives and other stakeholders (for example a residents' association or business):

[Is your project going to effect a change which will have a direct impact on data subjects, for example: introducing CCTV into a library? If so, you need to consult with data subjects, their representatives and other stakeholders.]

[- Explain how the views were sought. For example, obtained through studies, questionnaires, discussion with data subject representatives (customers, patients, staff, Works Council).

- Final decision - if different from Data subjects' views to include rationale for proceeding

- Justification for not seeking input from Data subjects for example, compromises confidentiality of business plans, disproportionate, impractical.]

Input of experts and other interested stakeholders:

[Record the advice/input of independent experts of different professions (such as lawyers, IT experts, security experts,) as well as other stakeholders who have an interest in the Project, such as a business affected by the project.]

8. PRIVACY RISKS

This section should be used to identify the risks and specify measures and safeguards that will be implemented to ensure that personal data is protected and processed in compliance with the GDPR and Data Protection Act. This section is also a method of recording the risks and monitoring their implementation of mitigating measures. Add rows to this table as necessary.

RISK **Identify and Describe the Risk**	**MITIGATION** **What is the Mitigating measure?**	**OWNER of ACTION** **Who is responsible for ensuring mitigating measures are implementedand how?**	**TIMESCALE** **Timescale for Implementation?**	**RESIDUAL RISK** **Once the mitigating measures are put into place, what is your assessment of the level of residual risk?**
Example ***There is a risk that unauthorised people will access the Apply-o-matic system and access and potentially steal personal data***	***Example*** ***The Apply-o-matic system has a defined list of users who all have individual passwords, sign a user agreement and their access is auditable, and there are security systems in place for the***	***Example*** ***The team manager is responsible for keeping authorised users lists up to date and undertaking spot checks, and the software provider is contracted to***	***Example*** ***On going***	***Example*** ***Low***

	software to guard against unauthorised access.	***provide security releases for the software as necessary***		
1. Risk that unauthorised person will access personal or special category data on the laptop or notebook used for recording interview data.	All laptops used have passwords for secure access and can be locked. Notebooks will be locked in a secure place.	[redacted] Project Co-ordinator at LSE is responsible for undertaking spot checks. [redacted] Project Manager at Camden is responsible for undertaking spot checks.	Oct 2018 – Feb 2019	Low
2. Risk that Camden will share data without complying with Data Protection Act and GDPR and receives a subject access request.	Privacy notices and consent forms are issued. Procedures are communicated to project team and interviewers. If subject access request received Camden and LSE will be able to demonstrate compliance with statutory requirements.	Sheena Anyanwu – Head of Temporary Accommodation [redacted] Homelessness Initiatives Service Manager [redacted] Lead Research Fellow at LSE London	Oct 2018 – Feb 2019	Low
3. Risk of data breach following data access if sent via insecure email.	Personal and Special Category Data to be sent via secure email egress.	[redacted] Housing Placements and Information Analyst Camden [redacted]- LSE	Oct 2018-Jan 2019	Low
4. Risk of interviewers not updating contact details where inaccurate data.	Column to be inserted with updated contact details/data in spreadsheet 2. Interviewers briefed to inform Fanny Blanc in LSE who will refer accurate data to the 2 designated Camden housing officers. They will update the Camden database. Camden officers will also refer	[redacted] Project Co-ordinator Sheena Anyanwu – Head of Temporary Accommodation [redacted] Homelessness Initiatives Service Manager	Oct – Dec 2018	Low

	updated contact information to the 2 housing officers.			

Overall risk rating before mitigation: Low

Overall risk rating after mitigation : Low

If the risk of the intended processing still remains high, despite mitigating measures being put in place, there may be a duty to consult the ICO before any processing takes place (Article 36). You must take advice from the Data Protection Officer.

9. DPO Advice and Consultation

Officers must seek the views of the DPO when carrying out a DPIA. Use this section to record the advice, attach additional documentation in appendix B if required**:**

ADVICE OF DPO

Advice of DPO: Low risk to data.
Date of the advice: 18/10/18
Does the DPO advise that ICO consultation is required? If so, record here how that will be actioned: **See 11 below.**

10. DECISION

Decision: *Proceed with Initiative*
Authorised person: Data Protection Officer

11 CONSULTATION WITH ICO

If the DPO advises that consultation with the ICO is required this will be undertaken by the DPO (or by Business Support staff who deal with data protection under the instructions of the DPO). There will be consultations with services and project sponsors as needed.

Date ICO consulted:

Attach documents sent to ICO in Annex C.

Date ICO reply:
ICO Case Officer:
ICO reference:
ICO decision in summary:
and attach formal notification in Annex D:

OUTCOME

Based on ICO ruling detail the outcome for the project:
What steps need to be taken:
Update the PIA risks is section 8 and reassess the risk based on ICO advice.

DPO Comments:

ANNEX A
DATA FLOW MAPS

ANNEX B
DPO ADVICE - add in anything not included in 14 above

ANNEX C – Documentation sent to ICO

ANNEX D – ICO Response

DOCUMENT MANAGEMENT

Document history:

Version number	Summary of change	Date	Reviewed by
