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	Camden Residents Index	**Directorate and Service**	Shared Digital / Camden IT
Project Sponsor and Position	Sudip Trivedi – Head of Data and Analytics	**Project Manager and Position**	– Senior Business Analyst
Project Start Date **Project End Date**	n/a	**Project Go Live Date (anticipated/planned)**	Live since 2013; additional data sets added Feb 2019; use of Housing Benefit data explained August 2020
Third parties involved/associated with the Project:	No third-party involvement	**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]

Camden Resident Index (CRI) is a system that enables us as an organisation to link together citizen records from different source systems across the Council to give a single view of the citizen, also called a master file (or **Golden Record**).

The system generates a view of a citizen's involvement with different services across the council, and also a view of their household.

Camden Residents Index has been live since May 2013 when the original PIA was done. There are three reasons for this review:

1. The number of users and services that have access to CRI has increased since the original implementation and it currently stands at around 300 users.
2. Additional data set - the Integrated Youth Services records (Connexions)
3. Change to the way Mosaic extract works and an addition of a new dataset - Camden Safety Net (CSN), and a restriction to access to information about 'involved others'

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 across Council services

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]

Overall reason for DPIA:

CRI processes data concerning vulnerable data subjects (recital 75). The processing of this type of data is a criterion because of the increased power imbalance between the data subjects and the data controller, meaning the individuals may be unable to easily consent to, or oppose, the processing of their data, or exercise their rights. Vulnerable data subjects in this case include children (they can be considered as not able to knowingly and thoughtfully oppose or consent to the processing of their data), more vulnerable segments of the population requiring special protection (persons in receipt of social care services or the elderly etc.), and in any case where an imbalance in the relationship between the position of the data subject and the controller can be identified.

Specific reasons for the review of DPIA:

1. The number of users and services that have access to CRI has increased since the original implementation. For example, it was originally envisaged that just 35 staff working in children's services will have access to the Child Records. However -having demonstrated the system to Children's Safeguarding staff - the Assistant Director for Family Support and Social Work services requested that up to 200 staff within Children's social care incorporate the use of the Index into their routine checks that they carry out for new referrals. The number of services within the Council that use CRI has increased too. In addition to Children's Services, Council Tax and Customer Services, it now includes: Accessible Transport, Education Services, Electoral Services, Parking Operations, Tenancy Services, Housing Needs, Leasehold Services, Community Safety etc.

   A DPIA is required because there is a risk that the information may be misused as access is available to approximately 300 staff across the council.

However, this risk can be mitigated with system security controls, audit trails, signed Acceptable Use Policies and with staff training and awareness. User access is tailored on a needs-to-know basis

2. A review of DPIA is needed because we are adding a new data source – the Integrated Youth Services records (Connexions). Connexions service is our careers, information and guidance service for young people aged 13 to 19 (up to 25 for those with learning difficulties or disabilities). This new data source is particularly useful because it covers a significant chunk of the population that usually missing due to their low level of engagement with Council services.

   Users who will have access to these records are those in the CRI Children's security group. Jenni Spencer, Service Development Manager in Children's Services, agrees access to this group.

3. DPIA is further needed because of changes in the social care system Mosaic which require an amendment to the CRI data extract. Since its inception in 2013, the data extract from Mosaic was divided in two data streams: Children's and Adults', and access was defined according to the strict rules which are further explained below in this document.

   Recently, Camden Safety Net (CSN) service have also started using Camden's social care system Mosaic to manage their cases. Following on from discussions with Mosaic data owners, it is proposed to change the way this extract works and to further divide up the data streams into which these clients are allocated:
   1. Clients with Children's workflow
   2. Clients with Adults' workflow
   3. Clients with CSN workflow, and
   4. 'Involved Others' (people set up with a current personal relationship in Mosaic to any clients identified in the Children's and Adults' data streams who live in Camden).

   This impacts on how they are displayed (or not displayed) in the Camden Residents Index.

   Currently members of the CRI's "Adults" security group will see the Adults' data stream records and members of the CRI's "Children's" security group will see the Children's data stream records. The exception to this are restricted/shielded records where users need to be in the Shielded security groups to see these. This behaviour is not changing.

   With regards to the new security groups (CSN and Involved Others), currently only CRI IT system administrators are able to view records from these sources in the CRI front end. From a technical point of view, other users could be given access to see these records in CRI by being added to the relevant security groups. Mosaic data owners will make all decisions regarding the level of access to these security groups.

   All records are exported to the reporting database for use by the Resilient Families team.

2. DESCRIPTION

Description of the Project:

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

The Camden Resident Index (CRI) is a Master Data Management (MDM) system. An MDM is a comprehensive method of enabling an organisation to link all of its critical data to one file, called a master file (or Golden Record) that provides a common point of reference. The CRI went live in Camden in 2013.

The CRI receives data from 17 source systems from across the Council - see full list below.

The primary purpose of CRI is to provide a single integrated view of a citizen. This means someone with access to CRI can view a 'Golden Record' with a trusted view of that citizen as well as an overview of systems (and therefore services) that the citizen is known to. The aim of the Golden Record is to cherry pick the best data from different sources and thereby assemble a record based on what we believe is the best data we hold in the Council.

The CRI also integrates records into a Household view, pivoted around the address. This can give an overview of services used at a household level and it helps practitioners (such as the MASH team) to learn about the household composition (e.g. has a new adult moved into a household where there is a vulnerable child known to social services). It can also be used for fraud identification (e.g. a council tenant with no other service involvement and many other people in the household).

A secondary purpose, which derives from the single integrated view, is an opportunity to identify issues with data quality from the different source systems – this has benefits for improving the 'Golden Record' but also for services across the Council.

The index is not a Customer Relationship management system – it holds no case information, but simply forms the matches between person records held on multiple systems and allows services to be confident that, for example, Stewart MacDonald is in fact the same person as Stuart McDonnell in another system. The fields within the system help to form the matches – for example: if in the above case Stewart and Stuart have the same date of birth, mobile phone number and email address in both systems then we can be more confident that the records are a match.

The system has the ability to control access to specific data fields and data sets (e.g. from specific databases) in a very granular way, also to hide a field completely and just use it for reporting purposes behind the scenes (shielding function).

It has sophisticated audit tools to report on which staff have searched for or accessed specific records.

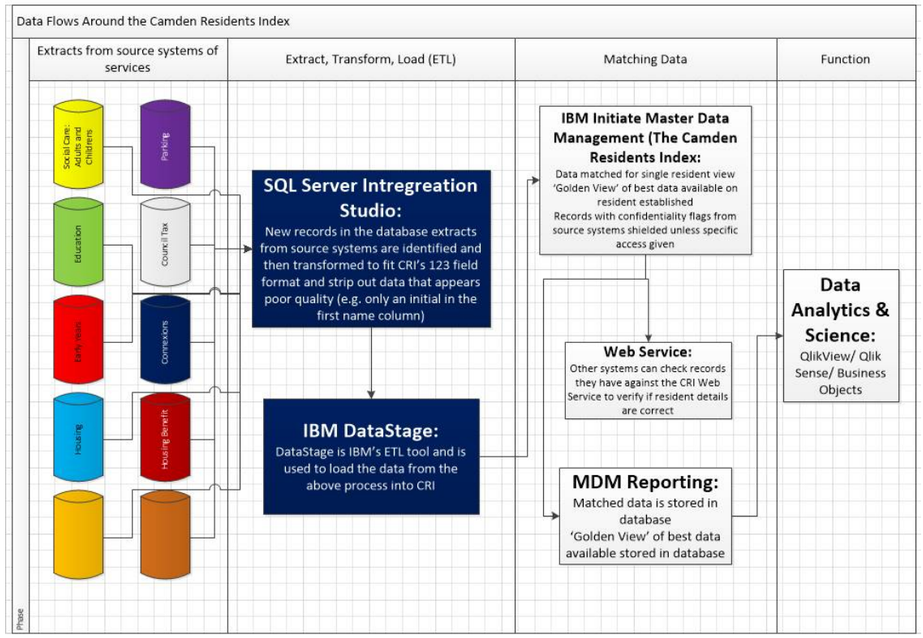
With regards to children's data on the index, the security groups Adults'/Children's are based on the system and not the age of the person. For example, Library is an adults' system in the security model but may contain children's data, and the Education system falls under Children's systems but will contain adults (eg. guardians). Access to records in the Children's security model is restricted to children's services staff (the Resilient Families teams, MASH, children missing education, safeguarding, admissions, fraud etc).

Furthermore, Camden Safety Net data and data on people who are recorded as 'involved others' (but are not clients themselves) in our safeguarding and social care system is restricted further so that only Camden Residents Index IT system administrators are able to view records from these sources in the CRI front end.

All records are exported to the reporting database for use by the Resilient Families team where the CRI reporting table is used outside of the software to link transactional data from a variety of services at person level. This is done for both operational and analytical purposes. An example of an operational implementation of the CRI reporting table might be to alert a frontline officer in one service to concurrent work being done by a frontline worker in another service (this is subject to a separate DPIA). An example of analytical implementation might be analysis of how many clients working with one service are also working with another service.

Data flow map(s):

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



Types of personal data to be processed :

Forename

Surname

Middle Name

Full Name

Address

Post Code

Alias

Date of Birth

Date of Death

Gender

Mobile phone number

Home telephone number

Email Address

GP info

Special Educational Needs level

National Insurance Number

DFES Unique Pupil Number

NHS Number

DWP Reference

Ethnicity

Disability

Caution flag - currently not populated

Social care status data in there e.g. LAC start date, involved team

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.

Disability – there has been feedback from customer services teams that disabled clients do want council services to share this information to improve the services they receive.

Caution Flag – there is an existing system in place for the Contact Camden Face to Face staff to aggregate warning flags across council services. This is simply a flag – with no contextual data. The justification for this is the duty of care to staff / Health and safety. The index would simply automate this existing process. This field is currently not populated.

Ethnicity – including this as one of the data fields allows the data on different systems to be cross-checked for discrepancies.

Types of data subject:

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

Camden residents and other users of council services

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?

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

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

e. Paper – will you be having paper records?

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

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)

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)]

Camden Residents Index is implemented using the IBM Infosphere Master data management solution. It uses sophisticated probabilistic matching technology to link records together. Standard data extract are taken on a daily or monthly basis from the source systems listed above and fed into the Index.

The processing is on Camden secure network. Around 300 users who are all Camden staff have access to the system. There are no paper records. It cannot be accessed via non-Camden devices. Currently no data is stored in the cloud.

Purpose and Benefits:

The Camden Residents Index is essential for the delivery of the Camden plan as it enables our disparate customer records to be cross-referenced and joined up accurately across systems.

The main driver for this project is the Camden plan:

- "Improving and integrating our knowledge of the customer to help join up service delivery better and on a bigger scale".

- "Develop a single view of the customer that will mean the Council can provide services that are tailored to people's needs, enabling us to introduce a personalised Camden account for all our residents and businesses. They will in turn have a single view of the Council to get a consistent and good customer service."

Camden Council, in carrying out its duties, aims to **provide residents with efficient and timely services** and to do so we need to co-ordinate our services.

The Golden Record allows the council to respond to queries residents may have in respect of the provision of services more quickly and efficiently. By linking into a number of Council systems, queries or issues can be investigated more quickly.

By using the index to perform **automated residency checks** – for example we now process around 25,000 Freedom Pass renewals automatically, we can ensure that we channel our limited resources to the people who need them most. To date, we estimate that these checks have helped us to make substantial savings by **minimising instances of fraud and erroneous payments**

The system also generates a **'household' view** which is something we don't have on any other system within the council. Understanding a household composition is essential for teams like MASH who get an **instant visibility** they need to capture basic information about potentially vulnerable children and adults in the borough often in urgent situations.

Children's Services use it to ensure **safeguarding**, eg: to identify additional family members they're not aware of (one of the recommendation following the tragic baby P case). The household view is also used to **detect fraud**, for example for identifying the households with two or more adults that claim a Single Persons Discount.

Camden Residents Index is also used **to generate further income** for the Council – for example where it is used to identify the Houses of Multiple Occupation (saving on the cost of mail shot, and also increased revenue from new licenses) and **to reduce the regular annual spend** for certain statutory functions like the annual canvass of electors. For example, during the 2016/17 pilot, the use of CRI has reduced the need for the canvass by 55% thus saving an estimated 28k.

CRI is used **to identify illegal sub-letting** - in 2017 only, CRI helped recover 7 council properties. Assessing the monetary saving of recovering a property is difficult, because in a way, the property recovered for a waiting family on a housing list is the saving. Some local authorities use the National Fraud Initiative recommendation of £75,000 per property recovered based on average three year fraudulent tenancy, which includes temporary accommodation for genuine applicants, legal costs to recover property, re-let cost and rent foregone during the void period between tenancies. So if you want to use that measure, we're looking at 7 x £75,000, for a savings total of £525,000.

In October 2020, a temporary addition of two external sources was made for the purpose of managing response to the COVID-19 pandemic: the COVID-19 Shielded Patient List (SPL) from NHS SEFT Portal and Current COVID-19 Positive Test and Trace cases from Public Health England dashboard.

The current NHS Shielded Patient List is loaded into the Camden Residents Index to establish the overlap with our social care cohort for the provision of direct care. As per the latest Shielded Patient List (SPL) guidelines from the Ministry of Housing, Communities and Local Government (Data sharing guidance – COVID-19 After Shielding Suspension (v1.3)) – we can use the SPL to "To continue to provide ongoing direct care needs to clinically vulnerable persons as a result of the virus."

Current COVID-19 Positive Test and Trace cases from Public Health England dashboard: this confidential information on Data Subjects who test positive for COVID-19 is provided to us so that we can fulfil our responsibilities to take action to manage and mitigate the spread and impact of the current outbreak of COVID-19. These responsibilities are as set out in the 'COVID-19 – Notice under Regulation 3(4) of the Health Service Control of Patient Information Regulations 2002' dated 20 March 2020 from the Department of Health and Social Care on behalf of the Secretary of State for Health and Social Care. This data is being loaded into the Camden Residents Index for the purposes of obtaining additional contact information from existing service user records to assist the local test and trace teams in contacting the residents who have tested positive and identify any potential safeguarding concerns by identifying linkages with our social care data sets.

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

Feeds from the internal systems listed below:

Abbreviations	Meaning	Source System Name
CTAX	Council Tax	Civica Open Revenues
CPORT	Citizen Portal	Citizen Portal
CRM	Contact Camden	Lagan
EDU	Admissions/Education	Impulse
EYEARS	Early Years	Synergy EYS
ER	Electoral Register	Democracy Counts Elector8
FWIA	Mosaic (Safeguarding)	Mosaic (adults)
FWIC	Mosaic (Safeguarding)	Mosaic (children)
MOSAIC1	Mosaic (Safeguarding)	Involved Others
MOSAIC2	Mosaic (Safeguarding)	Separated data stream

HOU	Housing	Northgate Housing
HB	Housing Benefits	Civica
LIB	Library Service	Spydus
PARKPERM	Parking Permit	Park Mobile
TRANS	Transport	Accessible Transport
YOS	Youth Offending Service	YOIS
IYS	Integrated Youth Services (Connexions)	Core Integrated Youth Services system

Length and frequency of processing:

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

Standard data extracts are taken on a daily or monthly basis from the source systems listed above and fed into the Index.

Processing volumes:

[Volumes of Data subjects and records

The system covers all residents in Camden (children and adults) who have some form of service involvement with the council – this should cover nearly all the population of the borough but there will be some people who won't be on there because they don't use a service.

There will also be records for service users or associated individuals (e.g, guardians of a school applicant) who live outside the borough but use a Camden service

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

Volumes - users and type

Approximately 300 staff across the council will have access to the Index. Their access to the system will be tailored on a need to know basis. For example, only users who have 'a legitimate need' to have access to Housing Benefits data in light of this guidance have access to the group 3 listed below. This included users working in the Benefits teams, social care and safeguarding services, in housing support, on prevention of homelessness and those who undertake eligibility checks (eg. Blue Badges).

The system has the ability to shield records such as records protected in the source system because of their sensitivity.

There are four principal security groups:

1) Adults' Systems

2) Children's Systems

3) Housing Benefits system data and

4) Shielded records.

Users can have different permutations of these depending on their role.

There are also two additional security groups which are hidden from users (only CRI admin staff currently have access):

5) CSN workflow

6) Involved Others

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

Users are all internal Camden staff.

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]

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.	NO	
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	Localism Act 2001 gives the general power of competence as a new power available to local authorities in England, allowing them to do 'anything that individuals generally may do'. Specifically, this can be used as a basis to share information to identify and work with individuals and families, improve service provision and provide a more holistic approach to social care and providing services to residents in general. Section 47 of the Children's Act places a duty on local authority to make enquiries where they have reasonable cause to suspect that a child in the area may be at risk of suffering significant harm - Safeguarding purposes (for example to inform social workers if a new adult moves into the household – a recommendation following the tragic Baby P case) The Education and Inspections Act 2006 places a duty on local authorities to have in place robust multi-agency systems that will identify children in their area who are not receiving a suitable education (Section 4, Education and Inspections Act 2006).

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?	NO	
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 orientation? The Council also considers financial data and electronic signatures to be special category data. **YES:** **NO:**	YES	
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.		Article 9(2)(g) – substantial public interest

	Which basis in Article 9(2) are you relying on to process Special Category Data?		
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:		
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.		All of the data processed by the Camden Residents Index is already collected by the Council for a legitimate purpose**.** Privacy Notice on Camden website as well as consent forms used by services when collecting data explain that information can be shared with other services within the council for the purpose of providing a single view of a customer. This information is then used to respond to resident's queries, provide service to the residents or to carry out our duties. This system does not allow us to do anything that we could not already do. It uses data that we already have for purposes that we already use that data for. Nonetheless, we are aware that it is creating a new dataset for our users, and the increased efficiency that results will mean a slight increase in our ability to investigate residents. Therefore the purposes the system is used for will be considered on a case by case basis. Proposed uses which involve monitoring or investigating subjects with potential negative consequences for those subjects will be closely scrutinised to balance the potential benefits to the public interest, before the data is used. Given the above, we consider the impact to privacy to be minimal, proportionate to its use and justified by public interest.
12	Is any of the personal data being processed held under a duty of confidentiality, e.g. client confidentiality? If YES please detail	YES	For COVID-19 purposes: We regard all personal data relating to residents as confidential and suitable safeguards are in place to ensure prevent the use of data for purposes other than COVID-19. All COVID-19 related data has been purged from the system in early March 2022 (the legal basis for processing this data due to expire on 31/3/2022)
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. You must read these. Indicate here how you will comply with them.		The Fair Process Notice and the Privacy Statement on the Council website cover these situations. https://www.camden.gov.uk/ccm/content/council-and-democracy/about-the-council/about-this-site/disclaimer-and-privacy-statement/?page=2
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	
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	The Fair Process Notice and the Privacy Statement on the Council website cover these situations. https://beta.camden.gov.uk/data-protection-privacy-and-cookies?inheritRedirect=true#yedw
17	What checks have you made to ensure that processing of personal data is compatible with its original purpose?	YES	
18	**Disclosures of Data** Who will you routinely share the data with? **Recipients:** *Organisation Name:* *Address:*		Data is shared with council services to give single view of a citizen. There is no data sharing with third parties or external organisations.

	Role: *Data to be disclosed* *Role of the recipient* *Reasons for disclosure* *Agreements.* ***It is likely to be necessary to enter into a data Sharing agreement with the third party. You must access the Corporate templates and take advice when drafting these.*** *Need for separate 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?	N/A	
20	How will you make data subjects aware of their rights?	N/A	
'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)?		We are collecting and matching only key data fields needed to create a single view of a citizen and so that we have accurate records across source system
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?		Regular review of data extracts to ensure that only relevant data is collected
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	
24	What arrangements are in place to check the accuracy of the data with the individual?		Checks are performed within the source systems Only records that have been active in source systems within the last two years are included in CRI extract
25	Will accuracy checks cover free text fields including comments about individuals?	NO	No free text fields in imported into CRI
26	How will you determine when and how often personal data would require updating?		This will be determined within the source systems
27	What arrangements are in place to for individuals to notify you if they believe their data to be inaccurate?		As above
28	How will you ensure that inaccurate or out of date data is erased or rectified without delay?		As above
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)?	NO	
30	**Retention Policy** Is there a corporate data retention policy that covers the data processed under this project? If YES then go to question 34. If NO then seek advice from the Information and Records Management Team	YES	
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?		Flat file extracts from the business systems are loaded onto the CRI SQL database and regularly (daily or monthly) removed by database administrators. Golden Record itself is not stored anywhere – it is calculated on a fly: CRI simply forms the matches between person records held on multiple source systems. Data in the reporting database is overwritten each day so it is only ever stored for a day at a time.
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	N/A	As above, extracts from source systems are held on the **CRI database** temporarily and then deleted to allow space for the new extract. All data held on **source systems** and within reports created from CRI is managed in accordance with the Council's corporate retention schedule.

33	Will there be any exceptional circumstances for retaining certain data for longer than the normal period? If YES then please explain.	NO	
34	**Destruction of personal data** Are there arrangements over the secure deletion/destruction of personal data? If NO then please explain.	YES	This is done in source systems
'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		Corporate and System security controls Audit trails All users sign the Acceptable Use Policy Staff training and awareness During the procurement phase, the system specification included stringent requirements around security, user permissions and system audit. The winning bidder comprehensively fulfilled these requirements and that was one of the main factors that led to them being chosen. The chosen system is the same software with the same security standards as the ContactPoint national index (before it was decommissioned).
37	Who will be responsible for enforcing compliance with the council's corporate security policy?		This will be done within source systems and not in CRI
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	
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:**	YES	- User access is given strictly on the needs to know basis - All users sign the Acceptable Use Policy which is then held on their HR file (attached in Appendix) - All users are requested to watch training videos - Users' security roles have been set up to allow access to records and fields on the business appropriate basis - Regular user audits

	[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?* *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**.**	YES	Most users will have access to the ethnicity codes. We believe that the measures listed above are sufficient for the purpose. Other special category personal data is further protected using the following: - Defined user permission roles - Shielding functionality: any record which is marked as restricted in the social care system has a shielding flag and is therefore restricted within the CRI only to users with sufficient permission levels - Separate data streams

5. TRANSFERS OF DATA OUTSIDE OF THE UK - will any personal data be processed outside of the UK? This includes information processed on servers based outside the UK 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: N/A no transfer of data outside of the UK *[Provide a list of all the countries that the personal data will be processed in]* N/A
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]* Data is hosted on Camden servers
International data transfer arrangements: *[describe how the data will be transferred outside of the EEA]* No data will be transferred outside of the UK
Name and role of parties receiving the personal data: N/A
Legal safeguards for the transfer: you need to seek DPO advice before completing this not applicable *[EU Model Clauses* *Privacy Shield]*

6. ARRANGEMENTS TO ADDRESS INDIVIDUAL DATA SUBJECT RIGHTS - THESE MUST BE DEALT WITH IN ACCORDANCE WITH CORPORATE POLICY [https://beta.camden.gov.uk/data-protection-privacy-and-cookies?inheritRedirect=true#yedw]. 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: In accordance with corporate policy. Fair Processing Notice on Camden website.
Right of access: In accordance with corporate policy
Right to rectification: In accordance with corporate policy – this will be done within source systems.
Right to erasure/right to be forgotten: In accordance with corporate policy – this will mainly be done within source systems.
Right to object and restrict processing: In accordance with corporate policy. If there is a legitimate request, it would be possible to incorporate a process where specific records could be excluded from processing within Camden Residents Index.
Right to data portability: In accordance with corporate policy
Rights in relation to international transfer(s): Not applicable – no international transfers
Rights in relation to prior consultation: In accordance with corporate policy
Rights in relation to automated decision-making and profiling: In accordance with corporate policy

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 implemented and 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?**
1. There is a risk that the information may be misused as access will be available to approximately 300 staff across the council	This risk can be mitigated with system security controls, audit trails, signed Acceptable Use Policies and with staff training and awareness.	CRI Administrators The system has the ability to control access to specific data fields and data sets (e.g. from specific databases) in a very granular way, also to hide a field completely and just use it for reporting purposes behind the scenes. It has sophisticated audit tools to report which staff have searched for records.	Ongoing	Low
2. There is a risks related to adequacy of data	Controls over data extracts and explicit guidance to prevent unlawful use of data We are collecting and matching key data fields so that we have accurate records across all systems	Data owners and system administrators	Ongoing	Low
3. Accuracy of data	Data quality checks in the source systems. CRI reports are available to identify data quality issues. One of the main benefits of the Resident Index is the ability to cross-reference demographic data across different systems, and for the discrepancies to be delegated to Data Stewards to be investigated and corrected. This will result in improved data quality. In time, the intention is to make the information securely available on-line to individuals so that they can self-serve in correcting inaccurate information.	Data owners	Ongoing	Low
4. Rights of the individual	Residents are made aware that personal data will be shared with other council services – Fair Processing Notice on Camden website	System administrators	Ongoing	Low
5. Connexions data is reported from a system shared across multiple North London Councils (Core Integrated Youth Services System) this introduces a minor element of risk around the accidental reporting out of subjects that are not Camden residents or service users.	To mitigate this risk the extract of data will be defined by 'responsible centre' and 'corporate parent' flags which are held within the source database. These flags allow for the identification of individuals who are either LBC Residents and/or LBC service users. This will be done with the responsible data officer and tested before the dataset is incorporated into the matching engine. This mitigation is routinely used by Connexions services across the North London Councils for all for all internal and statutory reporting.		June 2018	Low

Overall risk rating before mitigation: Low **Medium** High

Overall risk rating after mitigation : **Low** Medium High

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: The DPO has approved your DPIA as low risk. There's no further action required from you to proceed with the project.
Date of the advice: 28 January 2019
Does the DPO advise that ICO consultation is required? If so, record here how that will be actioned: n/a **See 11 below.**

10. DECISION

Decision: *[Proceed with Initiative/~~Not proceed with Initiative/ Other~~]*
Authorised person: Andrew Maughan SIRO

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
CAMDEN RESIDENTS INDEX USER ACCEPTANCE POLICY

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
V8	Additional data source - Connexions	25/6/2018	
V9	GDPR compliance	8/6/2018	

V9.1	Addition of CSN data and separation of 'Involved Others' into a separate data stream	22/3/2018	
V9.2	Final amendments	10/9/2019	
V9.3	Projected Go Live date amended to Feb 2019	16/01/2019	
V9.4	Explained the use of Housing Benefit Data and updated the Data Flow diagram to show the new ETL tool DataStage (in place of Clover)	20/08/2020	
V9.5	A temporary amendment to explain the addition of two new data sources needed for the Council response to the COVID-19 pandemic.	21/10/2020	
V9.6	A temporary amendment – as per V9.5 – date of review changed to 30 September 2021 in line with the Control of Patient Information (COPI) notice; also added an entry to cover the potential use of CRI for Covid surge testing	27/4/2021	
V9.6.1	Date of review changed from 30 September 2021 to 31 March 2022 in line with the Control of Patient Information (COPI) notice	17/09/2021	
V9.7	Removed all references to the processing of Covid related data which has now been purged from the system	14/03/2022	