DATA PROTECTION IMPACT ASSESSMENT (DPIA)
Pre screen

Project Name	S12 Solutions
Directorate and Service	Camden, AMHP Service
Pre-Assessment Completed By	S12 Solutions Team
Project Go Live Date (anticipated/planned)	Original go live was September 2020; the current intention is that the app will be implemented before the end of 2020.

Description of the Project: what is your project doing in non-technical terms? If you've got a previous DPIA attach it and just give the changes from the previous one.

(S12) Approved Mental Health Professionals (AMHPs) are responsible for attending Mental Health Act (MHA) assessments and organising two doctors to attend with them; at least one should be s.12 approved. Currently, AMHPs are working through paper lists of doctors without knowing where they are of if they're available. This can take a long time, leaving the person waiting for the assessment potentially distressed and at risk, and add pressure to the rest of the crisis care system (e.g. places of safety, emergency services). S12 Solutions is an app and website (platform), developed by an AMHP, which connects AMHPs with local, available s.12 doctors. The platform also allows doctors to submit claim forms digital, replacing the current paper process.

(C&I) The project is to start using an app that will support AMHPs to book Section 12 doctors for Mental Health Act assessments being arranged in the London Borough of Camden. The app will also manage the claim form process for independents and Trust doctors working independently.

Whose Personal data or Special Category Data are you using *e.g., children, vulnerable adults residents, users of a service, employees*	(S12) Mental health professionals (AMHPs, Doctors) Administrative users of the Product Patients (under 18s may be assessed under the MHA) (C&I) Children, Vulnerable Adult residents, Vulnerable Adult non- residents
What Personal data or Special Category Data are you using *e.g. Names and addresses, health information/ ethnicity etc.*	**Identification data** Name, email address, telephone number **(AMHP and administrative users)** Legal name, preferred name, email address, telephone number(s), line manager/responsible officer **(Doctors)** **Doctor Professional qualification data** - GMC number, languages spoken, specialisms, status on

	Mental Health Act Register Database (MHA Register Database) **Technical data for AMHPs, doctors and administrative users** (no biometric data is held on the app) **Location data** – postcode or working location for assessment **Patient assessment data** – patient name, assessment location (may be the patient's home), date and time, NHS number, GP practice, assessment team data (the AMHP and doctor(s) who attended) Note: No information related to the reason for the assessment, what happens in the assessment itself, what the proposed medical treatment/opinion of the patient is, medical history etc. or any other clinical information is held by S12 Solutions. That is what S12 Solutions means when it says no clinical data is held in the app. **Availability data** – doctor work calendar data, base postcode **Claim form data** – doctor mileage, expenses
Why are you collecting this data? **(i.e. What is the purpose of the processing?)** **Is there a piece of law that says you must or should do this?**	(S12) The platform requires certain data for it to work and to provide the functionality that is useful to Users and Sites. S12 Solutions has minimised that data and processes it solely for the purpose of making the platform work in the desired manner. S12 Solutions has considered whether the data could be processed in a different way or not at all and has concluded that the structure of the platform is what is necessary to provide the functionality that is useful to Users and Sites. (C&I) The address information is needed to inform the doctors where assessments are taking place. The GP details are needed to ensure that the correct CCG is charged for the assessment.

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Are you using a new system or new IT kit? If so, what is it and have you cleared the security side with IT?	S12 Solutions is an app, which Users can download on to their devices. Alternatively, they can access their profile via S12 Solutions' website.
What do you think are the risks in handling data in this project?	(S12) All electronic processing systems have an inherent risk that the data will be lost, stolen, or become corrupted. S12 Solutions seeks to minimise that risk. It should be noted that the current paper-based system is not secure in terms of data loss as it relies on many hundreds of individuals keeping such data physically secure. It is also not good at data accuracy as many records use out of date information or at promoting a wide pool of Doctors carrying out assessments. (C&I) The only risk is if there is a data breach due to the app not being secure or if a practitioner were to lose their phone. If the app stops working, we are able to return to the previous systems to book and issue claim forms for doctors.

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Ethical Assessment. In assessing ethics you need to take into account the benefits, proportionate use, possible biases and transparency of the impact of the proposed processing and analysis of personal data on individuals and groups. It is the responsibility of the Project Manager and Sponsor to assess the potential ethical impacts that the intended processing may pose. (These answers can be reused for questions dealing with the same issues in the Full DPIA if the outcome of this pre-screen requires you to do one) This will be a link to Camden's Data Charter but this does not exist yet

1. *Effects on Residents*

a) *How does use of this data benefit our residents? (Is there evidence of this approach being likely to meet a public need?)*

(CE/S12) It enables people who need a MHA assessment to be assessed in a timely way by the best available assessing team.

(C&I)

- Using the app will increase the number and availability of section 12 doctors which should lead to fewer delays for assessments.
- Using the app will increase the availability and AMHPs awareness of doctors with particular expertise and knowledge.

b) *What would be the harm in not processing this data?*

(S12) The current process would remain in place; assessments would be difficult to organise, leaving people waiting for their assessment, potentially increasing their distress and risk. Sensitive patient information would continue to be collected in paper claim forms.

(C&I) In time Section 12 doctors may be reluctant to work in Camden if other areas of London are using the app and Camden is not.

2. *Data Bias*

a) *How do you plan to identify errors and biases in data collection, analysis and algorithms?*

(S12) Data is provided by AMHPs and doctors and can check and change that data at any time. S12 Solutions relies on their professional standards to ensure that information is correct. Doctors manage a calendar which allows them to specify their availability and a base location for that time. Profiles are returned in AMHPs searches as per their availability and proximity to the assessment location. There is no large-scale processing, evaluation or scoring, automated decision making, profiling or predicting, systemic monitoring of publicly accessible area and no data is used for marketing purposes.

(C&I) There will be no analysis of patient data.

b) *Once errors and biases have been identified in data collections, how will they be taken into account for any future policy or service which uses this work as an evidence base?*

(S12) Not applicable for this project

c) *Who could be negatively affected by processing this data?* (How can you show there is a **fair balance** between the **rights of individuals** and the **interests of the community**?

(S12) The platform automates an existing process and in doing so improves governance and efficiency. It is S12 Solutions', the Sites' and the Users' belief that use of the platform will result in timelier MHA assessments, the best available MHA assessing team and better use of NHS and Social Care resources. The platform facilitates more efficient MHAA coordination, from a wider pool of doctors, in a more efficient manner, which is expected to have a positive effect on the whole mental health crisis care system.

3. *Limitations of Data*

a) *How will you make sure that you only process the data that is necessary and proportionate for the purpose of the project, and no more than is necessary?*

(S12) The platform requires certain data for it to work and to provide the functionality that is useful to Users and Sites. S12 Solutions has minimised that data and processes it solely for the purpose of making the platform work in the desired manner. S12 Solutions has considered whether the data could be processed in a different way or not at all and has concluded that the structure of the platform is what is necessary to provide the functionality that is useful to Users and Sites.

(C&I) The data used is only to identify the location of the assessment and the Clinical Commissioning Group.

b) *How are you ensuring the data used is reliable? (**Data quality**)*

(S12) As above, Users input their personal data onto the platform and can check and change that data at any time.

The Sites are responsible for ensuring that doctors are eligible to use the platform (i.e. that they have active s.12 approval).

The system will identify duplicate users.

(C&I) The data will be entered into the app by the AMHPs who will be using the app.

i) *What processes do you have in place to ensure maintenance of data accuracy? (**Data integrity**)*

As above, Users input their personal data onto the platform and can check and change that data at any time. S12 Solutions relies on Users' professional standards to input information correctly.

ii) *How have you clearly marked origins and destinations of data used to trace source of errors? (**Data lineage**) (Are all metadata and field names clearly understood)*

Yes, we have data flow maps and can trace sources and destinations of all data.

d) *How could the objectives of this project be completed without processing the data?*

(S12) This platform will not work without processing this data.
(C&I) The project is to use an app to book doctors which will require the use of data.

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Risk Assessment. In assessing risk you need to take into account the nature, scope, context and purposes of the processing and carry out an assessment of the impact of the proposed processing on the protection of personal data. It is the responsibility of the Project Manager and Sponsor to assess the risk that the intended processing may pose.

These are questions to help you and us assess the risk levels.

Will you use profiling or automated decision-making (ones where computers do the thinking and a human isn't involved at all) to make **significant** decisions about people **or** on a large scale (like a large area of the borough)?	No
Will the project involve processing special category data (race/religion/sexuality/health etc) or criminal offence data on a large scale – e.g. across the whole borough?	Yes
Will there be large scale systematic monitoring in a publicly accessible place – like a new CCTV system	No
Is the project using new technologies? Like face recognition software	No
Will you use profiling, automated decision-making or special category data to help make decisions on someone's access to a service, opportunity or benefit?	No
Will you process biometric (finger print /facial recognition) or genetic data?	No
Will data be combined, compared or matched from multiple sources?	No
Will personal data be processed without providing a privacy notice directly to the individual? In other words will this processing be kept secret?	No
Will personal data be processed in a way which involves tracking individuals' online or offline location or behaviour?	No
Will children's personal data be processed for profiling or automated decision-making or for marketing purposes, or offering online services directly to them?	No
Will personal data be processed which could result in a risk of physical harm in the event of a security breach?	No

If you have answered yes to any above please give some more details about what you are doing, what risks you think there are and how you will deal with those. This will help us assess the data protection risk level. **You can get more information on assessing risk in the** Article 29 Data Protection Working Party Guidance to assist in assessing the risk: http://ec.europa.eu/newsroom/document.cfm?doc_id=47711

Please see S12 Solutions' DPIA for more information about processing special category data:

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CONCLUSION	
WHAT IS THE LEVEL OF RISK:	LOW
REASONS FOR THIS LEVEL:	The data that being used is not being analysed or manipulated. The data is very simple and the smallest amount that can be used to complete the task. The app is secure.

Please send a copy of this screening questionnaire to the DPA Team dpa@camden.gov.uk