# DATA PROTECTION IMPACT ASSESSMENT

A Data Protection Impact Assessment (DPIA) is a process that helps an organisation identify and minimise the data protection risks of a project. **You should only complete this full DPIA where you have been told that one is required by the Information Rights Team or the Data Protection Officer.** If you have not been asked to do a full DPIA please do the pre-screen first. Search on essentials for 'DPIA' and download the DPIA pre-screen.

*A DPIA is a legal requirement therefore please complete the form in as much detail as you can so the council has the necessary assurances of data protection legal compliance. Avoid technical language and jargon, and assume little prior knowledge of your subject and project by readers.*

**Ethics screening:** If you have been advised to proceed straight to a full DPIA please complete the ethics screening at the end of this document. If you have already completed a DPIA pre-screen then the ethics screening need not be duplicated.

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| **Project Name** | **LIFT Dashboard (Low Income Family Tracker)** | |
| **Project Lead and Information Asset Owner/s** | Project Lead | Kate Robertson, Director of Customer Services, Corporate Services |
| | IAO name and asset | Universal Credit and Housing Benefit – Mark Stewart |
| | IAO name and asset | Council Tax- Mark Stewart |
| | IAO name and asset | Rent- Angela Spooner |
| **Summary of the project.** *Outline what your project is about. Start with a general headline and then go into more detail.* E*xplain any acronyms on first use.* | **Description of the Project:**<br>The LIFT Dashboard pulls together data on low income households in Camden to understand the impact of benefits such as Housing Benefit and other welfare changes and helps the Council to identify those households at risk of becoming homeless or experiencing poverty so that the local authority, or a service provider delivering a prescribed service, can intervene early and provide appropriate support and advice with the aim of preventing crisis. Camden currently shares housing benefit data with Policy in Practice, an external organization who also work with DWP, who present pseudonymised data in a dashboard for Council wide access via a license.<br>A pre-screen DPIA was agreed when housing benefits data was being shared with Policy in Practice and now Universal Credit (UC) data and potentially local welfare assistance awards data will be added for data sharing. As this increases the volume of data processed and | |

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| | shared, a full DPIA is required. As most Camden residents are transferring to UC, the data will provide a more holistic and realistic snapshot of households at financial risk. The Data Processing Agreement currently in use with Policy in Practice already has Universal Credit data incorporated.<br><br>The Department of Work and Pensions (DWP) has shared data with Camden Council showing Camden residents in receipt of UC and Council Tax Support, together with those whose claim has been approved and are awaiting payment. Data sharing between DWP and Camden has been agreed in a Memorandum of Understanding with Camden's Director of Finance and the CEO as signatories. At the point of receipt of DWP data, Camden becomes the data controller. As Camden is sharing data outside the scope of the MOU it must notify DWP. Camden will share UC data with Policy in Practice (external organization), where data will be processed to create financial dashboards for access by Camden officers.<br><br>The DWP has adopted an alternative approach from the MOU with some local authorities sharing UC data advising '*if a local authority as data controller is convinced that legal gateways exist, and that data protection legislation is being followed, it can make its own decisions on the proportionate use of available Universal Credit data. DWP does, however, want any LA who decides to do this to tell it what they are doing.*' Therefore Camden submitted a data re-use form to DWP to inform of UC data sharing internally with other services who can offer support to prevent homelessness and poverty and with Policy in Practice so they can add UC data to the financial dashboard. They responded that the Council can proceed as long as use cases remain compliant with the MOU.<br><br>There are 3 key elements to the proposal:<br><br>1. Data from housing benefits, council tax and housing rent is already shared securely with the external organization 'Policy in Practice' on a monthly basis. It is automatically matched to provide a view of a household which is then run through a policy engine that models national welfare changes to calculate impact, and tracks income to identify those who are not claiming benefits they are entitled to and identifies those at financial risk and therefore at risk of homelessness. Within the dashboard view, the data is pseudonymised with the housing benefit reference number used as a key identifier. Once matched and loaded by a defined list of staff at Policy in |

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| | Practice, the names and addresses are redacted from the source files and deleted.<br>2. Nominated named council officers will use the dashboard to model scenarios and understand impact on different cohorts of residents using pseudonymised data via license access.<br>3. Assessments on which council service teams have access to names and addresses and contact details of filtered data for specific cohorts will be made on a need to know basis for the purpose of providing support and advice to prevent homelessness and poverty in line with the DWP's Memorandum of Understanding. Teams with access to personal and confidential data will include but not be limited to: Homeless Prevention Officers, Welfare Benefits Officers, Crisis Payment Team, Welfare advice teams and Inclusive Economy. A restricted number of named officers within these teams will be able to view the names, addresses and contact details via specific Qliksense dashboards tailored to each service so officers can contact residents . There is an audit trail to show who has viewed personal data. As a condition of access to an internal dashboard – officers will sign a confidentiality agreement which will be administered by Digital IT Services and staff will need to have a DBS check.<br><br>Two use cases for the dashboard have been developed:<br><br>1. Datasets will be combined with council datasets at person/household. This process will involve the bulk extract of pseudonymised data from the LIFT environment into the Camden environment. These data will then be de-pseudonymised and merged with council data using various unique identifiers and/or fuzzy matching techniques. No new data will be shared with Policy in Practice.<br>2. A pan-London campaign funded by the Greater London Authority to use LIFT to undertake a take-up campaign for pension credit. No new datasets will be shared with Policy in Practice but they will use the personal data (names and addresses) to write to all those who are eligible but not claiming Pension Credit on the Council's behalf. (see Appendix B for detail of project) |
| **Implementation Date:**<br><br>*Should be at least a month to allow for assessment and any necessary steps to be undertaken* | Version 3 13 December 2022 amended to include Universal Credit, and specific projects including matching data with other council datasets to target support at those in financial distress and a pan-London take-up campaign for pension credit.(Pre-screen DPIA completed 1 Sept 2020 as version 1)F |

**Initial risk assessment:** Screening questions are to do an initial risk assessment and highlight problems that need to be addressed. Answering "Yes" to any of the screening questions above represents a potential privacy/data protection/security risk factor.

**If you have already completed a pre-screen, attach it to the DPIA, skip q1 and go to q2 otherwise** please answer the questions below.

| Q 1 | Step 1: Initial Risk Assessment | Yes/No |
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| 1.1 | Does the project introduce new or additional information technologies that have privacy implications? (like facial recognition, AI?) | No |
| 1.2 | Will there be large scale systematic monitoring in a publicly accessible place – like a new CCTV system | No |
| 1.3 | 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? | Yes<br><br>Yes, special category data. The modelling and analysis do not use ADM or profiling in the way covered by UK GDPR: it creates an individual assessment and there is human decision making about whether contact will be made, what interventions will be offered and the decision to access. |
| 1.4 | Does the project involve new identifiers, re-use or existing identifiers e.g. NHS or NI number, Mosaic ref, Northgate ref, and/or will use intrusive identification or identity management processes and/or electronic linkage of personal data? | Yes |
| 1.5 | Might the project cause data that was previously anonymous or pseudonymised (where a code is used instead of eg names) to become identifiable ? | Yes |
| 1.6 | Does the project involve multiple organisations, eg public sector agencies eg joined up government initiatives, or private sector e.g. outsourced service providers/ business partners? | Yes |
| 1.7 | Does the project involve new processing or significantly change the way in which personal data/special categories of personal data is handled? | Yes – names and addresses are being shared with specific Camden services on a need to know basis via Qliksense dashboards internally with UC added. |

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| 1.8 | Does the project involve new or significantly change handling of personal data/special categories of personal data about a large number of individuals? | Yes<br><br>Including ethnicity |
| 1.9 | Will data be combined, compared or matched from multiple sources? | Yes - from existing council sources |
| 1.10 | Will you process biometric (finger print /facial recognition) or genetic data? | No |
| 1.11 | Will the personal data be processed out of the U.K? Eg any provers have out of UK servers? | No |
| 1.12 | 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 |
| 1.13 | Does the project relate to data processing which is in any way exempt from legislative privacy protections? | No |
| 1.14 | Will personal data be processed in a way which involves tracking individuals' online or offline location or behaviour? | No |
| 1.15 | Will personal data be processed which could result in a risk of if there was a security breach? | Yes |
| 1.16 | Does the project involve systematic disclosure of personal data to, or access by, third parties that are not subject to comparable privacy regulation? | No |

<table>
<tr><th colspan="11">Step 2: What personal data is being used?</th></tr>
<tr><td>2.1</td><td colspan="7">Is this use of personal data/special categories of personal data a new use? Or is it already happening and this is a change?</td><td colspan="3">New/Changed<br><br>Changed. Same use for dashboard and identifying financial risk, but a different set of Universal Credit data will be added which is likely to include large numbers of Camden residents for data processing. Within the Council, the LIFT data will be matched with other council datasets to identify specific cohorts at risk of poverty in order for support to be better targeted.</td></tr>
<tr><td rowspan="6">2.2</td><td colspan="10">What data will be processed/shared/viewed?<br>Put a YES in the box as appropriate</td></tr>
<tr><td colspan="10"><u>Personal Data</u></td></tr>
<tr><td>Name</td><td>Y</td><td>Date of Birth</td><td>Y</td><td>Gender</td><td>Y</td><td>National Insurance Number</td><td>Y</td><td>Financial Information about the person</td><td>Y</td></tr>
<tr><td>Address</td><td>Y</td><td>Email address</td><td>Y</td><td>Telephone number</td><td>Y</td><td>NHS No</td><td>N</td><td>Other eg a reference number such as Mosaic ref</td><td>Y</td></tr>
<tr><td colspan="3">Other data (Please state):</td><td colspan="7">Non personal data – but some information may be used to identify someone if other info is available:<ul><li>Postcodes, Housing Benefit/Universal Credit reference numbers</li><li>Benefit figures received, income and household composition</li></ul>All info shared with PiP but personally identifiable data not viewable on main generic dashboard where data is pseudonymized. Bespoke dashboards with personal contact details will be created internally for specific teams via qliksense dashboards for the purpose of making contact with residents to provide bespoke support including but not limited to e.g. Homeless Prevention, Tackling Poverty Team (local welfare assistance and complex debt), Inclusive Economy, Family Early Help, Adult Social Care and Landlord Services.</td></tr>
<tr><td colspan="10"><u>Special Categories of Personal Data</u></td></tr>
<tr><td>Racial or ethnic origin</td><td>Y</td><td>Fingerprints/ Biometrics</td><td>N</td><td colspan="5">Religious or philosophical beliefs Political opinion</td><td>N</td></tr>
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| | Trade Union membership | N | Physical or mental health or condition | | | | | Y |
| | Sexual life or sexual orientation | N | Housing records social services records | Y | Tax, benefit or pension records | Y | Employee/HR records | Y |
| | Other data *(Please state):* | | | | | | | |
| **2.3** | Will it include data about any criminal offence committed or alleged, or criminal offence record? | No | | | | | | |

| Step 3: Describe the data processing | | |
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| **3.1** | **Describe in as much detail what is being done with the data - how is the data being used, how it is being handled, stored and transferred/shared? Please use plain English!** | Personal/special category data will be used for residents in receipt of Council Tax Support and or Housing Benefit and Universal Credit.<br><br>The datasets include data such as postcodes, date of birth, reference numbers for Housing Benefit/Universal Credit, NI numbers, transactional information including benefit receipt, income, tenure, council tax arrears, rent arrears, benefit overpayment arrears and any local welfare assistance payments.<br><br>Datasets are then processed by Policy in Practice to create a financial resilience dashboard which can be filtered according to cohorts.<br><br>The full unredacted datasets are securely shared with Policy in Practice (PiP) who use this to match data and then delete. PiP is compliant with BPSS and the wider security standards as set out in the Memorandum of Understanding (April 2022) agreed between Camden Council and DWP.<br><br>Designated officers will be able to analyse the redacted datasets to create priority cohorts for further support. These redacted lists will then be linked to council data to show names, addresses and possibly ethnicity (at a later stage) to enable council officers in services to contact residents and offer support to prevent homelessness and/or poverty including but limited to; Homeless and Housing Support Services, Family Early Help, Adult Social Care, Children's Social Care, Tackling Poverty, Landlord Services and Inclusive Economy. Written authorisation from the line manager of officers in these specific services will be required before sharing data.<br>Datasets will be combined with council datasets at person/household. This process will involve the bulk extract of pseudonymised data from the LIFT environment into the Camden environment. These data will then be de-pseudonymised and merged with council data using various unique identifiers and/or fuzzy matching techniques. |

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| | | Access to these data will be limited to officers carrying out the processing and/or responsible for delivering direct targeted support.<br><br>Contact details of residents would only be available to internal officers once the purpose is established and written authorisation provided from their line manager.<br><br>Benefit information is shared with Policy In Practice which includes claimant email and telephone number, but this will not be available for viewing on the dashboard.<br><br>A specific time-limited pan-London campaign will start in January 2023 to increase take-up of Pension Credit. In this project, set out in more detail in Appendix B) once the cohort is identified in the dashboard, Policy in Practice will send letters on behalf of the Council to those eligible but not claiming the benefit. |
| **3.2** | **Explain in as much detail as possible why this is being done** | Datasets such as those below are used to create a dashboard:<br>• Low income households and those below the poverty line<br>• Employment status<br>• Benefits take up including Pension Credit<br>• Accommodation tenure e.g. private rented, social housing, temporary accommodation<br>• Indices of Multiple Deprivation<br>• Residents in debt/rent/council tax arrears<br>• Geographical location<br>• Local welfare assistance and other discretionary awards<br><br>Datasets will be used to identify residents in low income households at financial risk and subsequently at risk of homelessness/already |

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| | | homeless. Personal Contact details made available to Camden officers working in the services identified, and support offered in the following areas:<br>• Welfare benefits advice to maximise benefit/grant take up<br>• Housing support to prevent homelessness and potentially uptake of discretionary housing support payments<br>• Debt advice and support including understanding the financial resilience of those in debt<br>• Employment, Education and Training Support to help prevent homelessness and/or financial hardship through increasing household income<br>• Targeting of local welfare assistance grants and the design of new schemes<br>• To support vulnerable residents migrating to Universal Credit<br>• Support for those impacted by welfare reforms including benefit cap, 2 child limit, bedroom tax<br>• Supporting families and children<br>• Supporting vulnerable adults<br>• Signposting to specialist organisations with resident consent<br>Data will also help to understand any disproportionate impact of welfare changes, housing and employment and training policies, model likely impact to changes to the Council's Council Tax Support Scheme and to plan for the likely impact of the full migration to UC for residents currently on legacy benefits.<br><br>Datasets will be combined with council datasets at person/household level to provide insight into financial pressures experienced across specific cohorts. These cohorts include but are not limited to:<br>- Camden School pupils<br>- Persons known to Ault Social Care<br>- Families known to Children's Social Care<br>- Families known to Children's Early Help |

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<tr><td></td><td colspan="2"></td><td>Datasets will be combined with council datasets at person/household level to identify individuals/households at risk of becoming homeless or experiencing poverty so that the local authority can intervene early and provide appropriate support and advice with the aim of preventing crisis. Such datasets include by are not limited to those pertaining to persons know to:<br>- Adult Social Care<br>- Children's Social Care<br>- Children's Early Help<br><br>Direct targeted support may include but is not limited to interactions such as:<br>- to offer grant payments,<br>- to offer retrofitting of improvements to property energy efficiency<br>- to encouraging data subjects to apply for certain benefits or grant payments that they may be eligible for<br><br>The take-up campaign on pension credit will use data to identify low income pensioners entitled to Pension Credit but not claiming it. There are an estimated 500 households in this position and claiming pension credit could lead to a significant increase in their income each month alongside entitlement to wider government benefits. See Appendix B for more details</td></tr>
<tr><td rowspan="3">3.3</td><td colspan="2">Are you sharing the data with an external organisation or partner or are they involved in processing the data?</td><td>Yes – Policy in Practice</td></tr>
<tr><td>External organisation or partner Name</td><td>Controller or Processor?</td><td>Is there an existing contract or Data Sharing Agreement between the council and the parties which covers information security and data protection ? Yes/No/In progress</td></tr>
<tr><td>Policy in Practice</td><td>Processor</td><td>Yes a contract is already in place with Policy in Practice which includes sharing Universal Credit data.</td></tr>
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| **3.4.** | **Please explain your process from start to finish. you can do this is a diagram if you wish, or a flow chart, or describe it. You can attach a document if that's easier.** | See data flowchart in Appendix A.<br><br>Policy in Practice have a data specification document that sets out their mapping and transition process, identifying source down to field level.<br><br>The dashboard is based on data feeds from council systems and so is reliant on data quality in core systems. The analysis has identified some anomalies in household data that have been referred to council system owners or DWP to resolve and correct.<br><br>Currently the redaction, transfer and matching of data is undertaken manually with the risk of human error. By providing a full dataset and automating the transfer and matching the risk of error is reduced. |
| **3.5** | **How will you handle data in your project, how will use store and share it. Please explain** | The UC data is already held by Council services as part of core work – processing benefit claims, council tax payment and rent payments. The LIFT Dashboard does not collect any new personal data. The services and/or DWP are therefore responsible for correcting any data anomalies. |

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<tr><th colspan="4">Step 4: Assess lawful basis, necessity, and proportionality</th></tr>
<tr><td>4.1</td><td colspan="3">Identify the Lawful Basis for processing personal data/special category /criminal data.<br>If you don't know then please ask Data Protection Advice Team for advice (DPA@camden.gov.uk if you have no named Information Rights Officer advising)<br>If not processing the category say N/A</td></tr>
<tr><td></td><td>Personal data Article 6(1) UK GDPR condition<br><br>Article 6(1)(e), Public Task in that it is necessary for the Council to perform a task in the public interest or with a clear basis in law. Specifically the Social Security (Information sharing in relation to Welfare Services etc.) Regulations 2012 which enable benefits data to be used to support those affected by welfare changes, to reduce the risk of homelessness, employment support and to reduce the risk for vulnerable children.</td><td>Special Category data UK GDPR Art 9 condition and DPA18 schedule condition<br><br>Article 9 (g) reasons of substantial public interest with the Data Protection Act 2018 Schedule 1 Part 2 condition being para 6 statutory and government purposes with the underlying law being the Social Security (Information sharing in relation to Welfare Services etc.) Regulations 2012. These enable benefits data to be used to support those affected by welfare changes, to reduce the risk of homelessness, employment support and to reduce the risk for vulnerable children.</td><td>Criminal data UK GDPR Art 10 condition and corresponding art 6 condition<br><br>Not applicable</td></tr>
<tr><td>4.2</td><td colspan="3">If consent is a legal basis how is it obtained? Note that in most cases consent is not the basis relied on by the council. Only use consent when Data Protection Advice Team have advised this is appropriate</td></tr>
<tr><td></td><td colspan="3">Consent is not the lawful basis</td></tr>
<tr><td>4.3</td><td colspan="3">How will you ensure data quality and data minimisation- how will you ensure the data is accurate and you are only using the minimum data to achieve your aims? If this is covered in a pre-screen refer to the pre-screen, otherwise detail below</td></tr>
<tr><td></td><td colspan="3">Data Quality<br><br>Most of the data comes from the Council's benefits file (SHBE). The Council's benefits service has a strong evidence and verification process for all claims and data is audited each year for accuracy by external audit.<br><br>There is a known data lag of one month as time is required to process datasets which could mean that residents are either no longer at financial risk or they are already in financial crisis or homeless.<br><br>Direct contact with households at risk mitigates inaccurate data used, but not entirely as some residents choose not to share information with the Council which includes whether the data is accurate and if they are financially at risk or have undeclared income sources. For those who say they are not at financial risk, a</td></tr>
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| | record will be made and reported to Policy in Practice and to services direct where corrections/data checks are required.<br><br>• Corrections to core council datasets are referred to system owners within the Council by Policy in Practice<br>• Monthly updates ensure that the data is up-to-date and reflect corrections and changes in circumstance<br>• Policy in Practice check benefit rates and complete reconciliation checks against existing data for new clients who are added e.g. total number of tenants, number of people living in specific tenures<br>• Corrections to DWP data will be referred to DWP for amendment<br><br>Council's Housing Benefits Team is not in full control of accuracy as most data originates from central government.<br><br>• The LIFT dashboard is used by many authorities across the country and has been used to undertake national and regional research that has fed into Government and select committees. As such the algorithms within it are fully tested to ensure accuracy with a strong focus on quality assurance.<br>• The dashboard does not make decisions on access to services, these are made by council officers.<br><br>**Minimum Data**<br><br>Line managers within the Council will provide written authorisation for license access to Policy in Practice so that Council officers can use the LIFT dashboard to view pseudonymised data.<br><br>Line managers will provide written authorisation for officers to access resident names, addresses and contact details who are working in teams, or with a prescribed provider, offering residents support for the purpose of preventing homelessness, poverty and financial crisis or to those already in financial crisis. This will include but is not limited to Homeless Prevention Team, Tackling Poverty Team, Family Early Help, Landlord Services and Inclusive Economy Team.<br><br>*Ethnicity Data*<br><br>Whilst the Council does not currently use the ethnicity data shown in the Benefits file – Policy in Practice already has access to the data but residents often leave this field blank. The COVID 19 pandemic has identified the need to understand the disproportionate impact of national policies on BAME communities. As a result the Council want to use the data available to understand an aggregated level impact, but this will not be shown on individual household views. | |
| **4.4** | **Have/ will individuals been informed about the proposed use of their data?** For example, do all the organisations/partners who will process the data (inc the council) cover this use in their Privacy Notice? Remember telling people is not the same as asking for consent | This is covered in the Council's privacy notice |
| **4.5** | **Will you comply with the council's policies on to Subject Access Requests and other data subject rights? Do contracts with any processors for the council contain the council's clauses on data subject rights?** | |
| | Yes | |

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| **4.6** | **Will the processing of data include automated individual decision-making, including profiling?**<br><br>If yes, please outline the profiling processes and the rights of the data subject. |
| | No |
| **4.7** | **Data Retention Period - how long will the data be kept? What will happen to the data at the end of the project – deleted or kept? If you're using a processor what are the arrangements with them for data at the end of the project?** |
| | The Data Processor, Policy in Practice, will retain the Data for a period not to exceed 1 year in line with the council's retention policy, or for the duration of the contract plus six months, or upon the termination or completion of the Purpose (whichever may be longer). Data shall be securely deleted from all physical and electronic storage media.<br><br>Policy in Practice will delete resident names, addresses, email and telephone data immediately after data matching has completed. |

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| | **Step 5: Information Security Process** |
| **5.1** | **On what systems will the data will be stored**<br>*Examples include Mosaic, SharePoint, shared drives,* |
| | **LIFT Dashboard**<br>**Revenue and Benefits Team – Civica system**<br>• Housing Benefit, Council tax support<br>  o Tenure<br>  o Employment status<br>  o Household composition<br>  o Property and bedroom size<br>  o Income and earnings<br>• Discretionary housing payments awarded<br>• Council tax arrears<br>• Housing Benefit overpayments<br>**DWP to Camden – DWP Universal Credit data share**<br>• Universal Credit data<br>  o Tenure<br>  o Employment status<br>  o Household composition<br>  o Property and bedroom size<br>  o Income and earnings<br>  o Deductions to Universal Credit<br>**Housing – Northgate**<br>• rent arrears<br>**Data Transfer – SFTP secure file transfer protocol**<br>• Transferred from Camden to Policy in Practice via secure file transfer protocol (SFTP) via Daniel Chambers (Database Administrator IT)<br>**Merging of LIFT extracts with council data**<br>• All processing and storage associated with the merging of LIFT extracts with council data will be carried out within Camden's secure environment and no data will be transferred outside of Camden's secure environment. |
| **5.2** | **In what country is the data stored?** |
| | UK |
| **5.3** | **What roles will have access to the information?** (List individuals or staff groups) |
| | **Names, Addresses and Contact Details** |

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| | Named officers in specific internal Council teams, or a prescribed provider, will have access to resident names, addresses, email and telephone number once written authorisation is provided by the relevant line manager for the purpose of offering support to residents who have been identified as financially at risk or in crisis to prevent homelessness and poverty. Teams include but are not limited to:<br><br>• Tackling Poverty Team – local welfare assistance and complex debt cases<br>• Housing Support Services – Homeless Prevention, Temporary Accommodation and supported housing<br>• Inclusive Economy – education, employment and training including access to data on young people (non-dependents) not in education employment or training (NEETs) and those impacted by welfare reforms (e.g. Benefit cap)<br>• Landlord Services – advice and support for tenants in debt/poverty or moving to UC<br>• Family Early Help services – safeguarding, local welfare assistance and take-up for FSM and healthy start<br><br>**Pseudonymised Data View of Dashboard – all Camden officers with license access**<br><br>Other council services can have access and view the dashboard via a license but resident names and addresses are redacted and identified via a pseudonymised benefit reference number.<br><br>**Policy in Practice**<br><br>Named users at Policy in Practice have access to the data for development and support purposes. This is specified in the Data Processing Agreement. See appendix B for details of those involved in the pension credit campaign.<br><br>**Merged datasets**<br><br>Datasets generated by the merging of LIFT data with council data will be accessible to Data Analysts and Data Engineers responsible for the processing of those data. |
| **5.4** | Is there role-based access control on all applicable systems? **How will access to information be controlled?** |
| | Policy in Practice set up users which are restricted via licenses and written authorisation provided by the relevant line manager who can view the dashboard's pseudonymised data |
| **5.5** | **Is there an ability to audit access to the information?** |
| | Yes |
| **5.6** | **What security and audit measures will there be to make sure that data is kept safe?** |
| | There are clear restrictions on the use of benefit data set by the Government through regulations. Access to the dashboard will be restricted to authorized nominated officers via license with a clear audit trail of access. Access to resident names, addresses and contact details will be restricted to authorized officers for the purpose of offering support to residents e.g. via an internal Qliksense dashboard with an audit trail of access. Line managers will be required to authorise access and officers will sign a confidentiality agreement prior to access, which Digital Data Services will administer. |

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| **5.7** | **Has the Information Security Team advised on the security measures? What were their comments?** |
| | The Policy in Practice dashboard has been in use since 2020 and has established secure transfer mechanisms signed off by the Council's data security team - see data sharing agreement for detail. The Council's data security teams were fully involved in designing interfaces and security transfers/measures.<br><br>Transfer is an automated process which picks up the files when they are generated from Civica and Qlik and subject to formatting are then sent securely to Policy & Practice via WinSCP to their SFTP site. Once successfully transferred the files created as apart of our process are automatically deleted.<br><br>Information Security have confirmed they are happy with the secure transfer mechanisms in place. |

| Step 6: Identify and Assess Risks | | | |
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| **Describe source of privacy (data protection, privacy and information security) risk and nature of potential impact on individuals.** Include associated compliance and corporate risks as necessary. | **Likelihood of harm- see table 1** | **Severity of harm- see table 2** | **Overall risk – see table 3** |
| 1. **Misuse of data**; Personal data could be used by Policy in Practice in a manner incompatible with the Data Sharing Agreement. This would be privacy intrusive to the data subject and may be processed in a way they would not expect to occur.<br>Compliance risk: could be a breach of purpose limitation and transparency<br>Corporate risk: Reputational risk. Loss of trust from data subjects and the partners providing the data. Legal implications and penalty fines. | Rare | Major | 4 - Moderate |
| 2. Council officers or Policy in Practice accessing and sharing data inappropriately or using for unauthorised purposes e.g. for financial or personal gain such as identity fraud<br>Compliance risk: Could be a breach of purpose and fraud duties.<br>Corporate risk: Subject detriment. Reputational risk. Loss of trust from data subjects and the partners providing data. Legal implications and penalty fines. | Possible | Major | 12 – Medium/High |
| 3. Data errors may not be checked and corrected by teams or DWP leading to inaccurate or unreliable data. Unreliable or incorrect data could lead to incorrect residents being contacted to offer support or residents could experience financial detriment.<br>Compliance Risk: Low<br>Corporate Risk: Minimal disruption | Possible | Minor | 6 - Moderate |
| 4. Data kept for longer than retention periods recorded<br>Compliance Risk: Legal<br>Corporate Risk: Legal breach and challenge, reputational and financial damage | Unlikely | Moderate | 6- Moderate |
| 5. Privacy Intrusion- the processing itself is privacy intrusive, and being contacted by council officers may be unwelcome even if support is being offered. | Likely | Moderate | 12- medium/high |

## Step 7: Identify Measures to reduce risk

**Identify measures to reduce or eliminate risks identified in step 6.** *Remember that risks need to be reduced to an acceptable level, and not all risks can be eliminated.*

Then calculate the risk that remains after the mitigations/controls are in place: the residual risk. Tables 1, 2 and 3 will help with this. *Note that risks and scores are subject to review and change by /DPO*

The Information Asset Owner/s need to decide if the mitigations are achievable and if the residual risk is accepted in the 'measure approved?' column by inserting a Yes or No. Table 4 provides guidance on what level of residual risk could be acceptable.

| Risk identified in step 6 | Options to reduce or eliminate risk | Effect on risk | Residual risk | Measure approved? |
|---|---|---|---|---|
| **1.** Misuse of data | Data sharing contract with Policy in Practice includes Universal Credit. All organisations have policies and processes in place to guard against data misuse. PiP have undertaken due diligence which has been passed. | Reduced | Low | yes |
| **2**.Inappropriate secondary usage | Role based access control. Audits of access and use. All staff trained and employee checks.<br>Clear processes and policies in place – with written approval for access to names, addresses and contact details from line managers on a need to know basis with audit trail of access. Staff to sign confidentiality agreements as condition of access. | Reduced | Moderate | yes |
| **2.** Data errors | Data errors checked via sense check and contacting residents and monitoring data. Any errors recorded and reported to services/DWP for correction.<br>Policy in Practice check the benefit levels and reconciliation processes for new clients e.g. number of tenants in type of accommodation | Same | Moderate | yes |
| 3. Retention issues | Data sharing agreement includes data retention clause. All parties have agreed to follow established periods. | Same | Moderate | yes |

| | | | | |
|---|---|---|---|---|
| 5 Privacy Intrusion | The processing is designed to offer help and support and is unlikely to be detrimental to the data subjects. However there is a degree of intrusion. Privacy notices will be in place, and with role based access control and internal processes the intrusion will be as minimal as possible. The council considers the residual intrusion to be commensurate with the benefits overall of the processing. | Reduced | Moderate | yes |
| **Residual (remaining) risk level when all mitigations have been applied:** ***Note IRT/DPO may change this*** | | | | |
| **Moderate** | | | | |

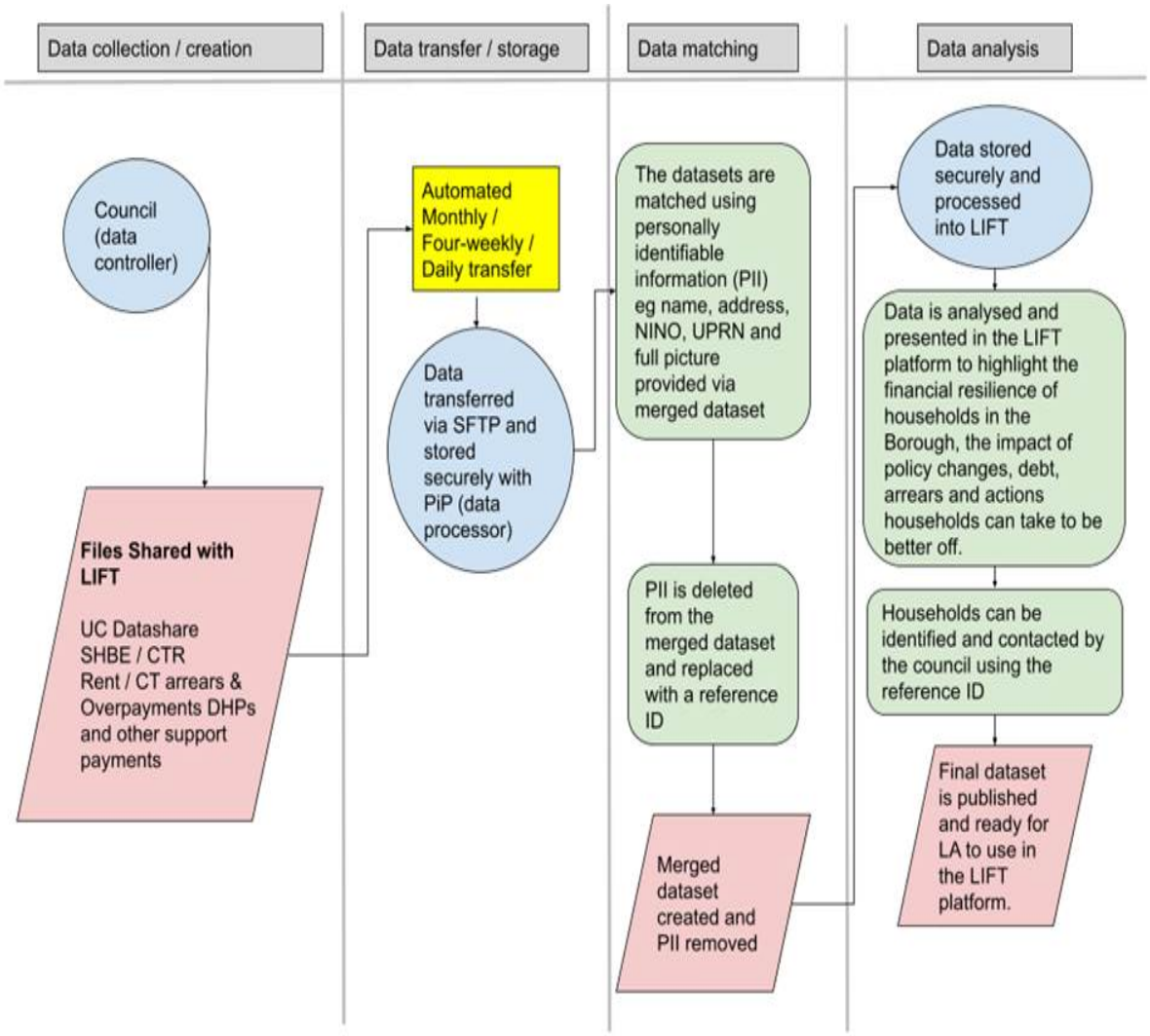
| Step 8: Record Data Protection Officer advice and outcome | |
|---|---|
| **DPO involved in preparing DPIA? If not, name of IRO** | Sarah Laws |
| **DPO advice** | Reapproved 15th December 2022 by Andrew Maughan DPO |
| **Information Asset Owner acceptance of residual risks** | Kate Robertson |
| This DPIA will kept under review by: (*usually the author or the IAO)* | Kate Robertson |

Version Control

| Version | Reason | Date | Author(s) |
|---|---|---|---|
| 2.0 | Full DPIA required due to adding Universal Credit data and access to resident contact details for internal officers working to support residents and prevent homelessness | 9 June 2022 | Lisa-Marie Bowles |
| 2.1 | Reviewed and amended | 15 June 2022 | Sarah Laws |
| 2.2 | Information Security clearance | 11 August 2022 | Kate Robertson |
| 3.0 | Updated with new case uses | 13 December 2022 | Kate Robertson |

**APPENDIX A - Data Flow**

The new process will be:




**Enriching data within LIFT with Universal Credit data share**

Camden will continue sharing the existing files and columns shared for the LIFT dashboard:

- Single Housing Benefits Extract (SHBE)
- Council tax support dataset (CTRS)
- Benefits Extract
- Council tax arrears
- Rent arrears
- HB overpayments
- Discretionary Housing Payments

The above files transferred to Policy in Practice will continue to have all columns as generated from the source system that may include personally identifiable information (PII).

PII columns will be used initially for matching purposes and then any columns of PII not required for analysis in LIFT (such as names, addresses) will be deleted by Policy in Practice and will not be surfaced in the LIFT dashboard. These files will continue to be transferred to Policy in Practice at the existing frequency (monthly).

In addition, **a new set of files namely the LCTR Universal Credit datashare** will be shared daily with Policy in Practice. These files will be transferred with all fields, and similar to above, after matching is carried out any PII not required for analysis in LIFT will be deleted.

**Surfacing resident contact information for named Camden users**

Camden Council will create a Qliksense dashboard that extracts contact information for residents from the below datasets. This dashboard will be made available to named users at Camden Council for operational purposes.

- Single Housing Benefits Extract (SHBE)
- Council tax support dataset (CTRS)
- Benefits Extract

This Qlik dashboard will also use outputs from the LIFT dashboard that can be matched with a Civica reference which is the identifier used within LIFT.

Policy in Practice

# APPENDIX B

Additional Terms agreed (e.g. data linkage activities) can be noted here.

**ACTIVITY 1: Project Summary**

GLA Pension Credit project being fully funded by the GLA and run by Policy in Practice. Policy in Practice (PIP) (ICO Registration Number: ZA006797)

This project will allow the Council to identify pensioner residents who are entitled to Pension Credit and not claiming. This would enable the Council to do targeted prevention work rather than just expensive non targeted campaigns. In some cases, some of these pensioners will also be entitled to Attendance Allowance and Severe disability premium and if over 75, also get a free TV licence.

As part of the funded campaign by the GLA, Policy in Practice will take the required data sets, do the data matching, find cases entitled to Pension Credit and will be using a third party provider (that are approved on G-Cloud or relevant government frameworks) to send the letters out. We can share a separate sub-processor agreement if required. The Local Authority will do the follow up phone calls, and/or arrange for support from local Community partners, such as AgeUK.

Local authority datasets to be used (including project start and end dates, if applicable):

All data is contained in the Single Housing Benefit Extract (SHBE) file, and Council Tax Reduction Scheme extract. The initial phase of the project will run from November 2022 and end August 2023. These data sets will be provided 3 times during the project, twice so we can do the matching and mail outs and one for the ROI. This project may run again for a second time in 2023 and again datasets would be provided 3 times during that phase of the project.

Third party datasets to be used:

N/a

Identifying information to be use for linkage:

All data is contained in the Single Housing Benefit Extract (SHBE) file, and Council Tax Reduction Scheme extract. Data to be linked via resident's name, address, postcode, date of birth, and benefit entitlements. This is needed for the linkage, matching and then the mail out to these households eligible to Pension Credit that are not claiming.

Provide details of individuals who will have access to the Data.

| |
|---|
| The following named employees of Policy in Practice will have access to the unredacted data, including personally identifiable information (i.e., claimant name fields):<br><br>[redacted], Strategic Client Services, Policy in Practice<br>[redacted], Client Services, Policy in Practice<br>[redacted], Client Services, Policy in Practice<br>[redacted], Analyst and Product Manager, Policy in Practice<br>[redacted], Senior Data Analyst, Policy in Practice<br>[redacted], Analyst, Policy in Practice<br>[redacted], Analyst, Policy in Practice<br>[redacted], Analyst, Policy in Practice<br><br>Policy in Practice may work with associates or subcontractors from time to time.<br><br>The Data Controller will be notified if any associates or subcontractors are required to have access to the data. Associates and subcontractors are required to sign a separate contractor / processor contract, meaning that they are subject to the same contractual and legislative obligations as the Data Controller and Data Processor. |

| | |
|---|---|
| Signed of behalf of Camden Council | |
| Name | Kate Robertson |
| Responsibility | Director of Customer Services |
| Date | |
| Signed of behalf of Policy in Practice | |
| Name | Deven Ghelani |
| Responsibility | Director, Policy in Practice Ltd |