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.

Project Name	Housing Allocations Scheme Service Discovery	
Project Lead and Information Asset Owner/s	Project Lead	Tom Wastling, Lead Policy Designer
	IAO name and asset	Shaun Flook, HNG
	IAO name and asset	
Summary of the project	The discovery project focuses on building a stronger understanding of the resident and staff experience of the Housing Allocations Service and using this to build on existing policy recommendations, in view of making the existing service more human-centred. The research team will conduct qualitative interviews with residents who have experiences with using the housing allocations service to gather perspectives on their views and experiences. The interviews will be conducted either remotely, on Microsoft Teams or in-person, based upon participants' preference. With participants' consent we will record the interviews either on audio or video, based upon what participants consent to.	

	We will recruit staff through the service and the respective staff managers. Our recruitment route for residents will be through the Housing Communication Team's Consultation List, which contains residents who have consented to be contacted for consultations and research purposes. We will contact these residents via an email sent out by the Housing Communication Team on our behalf to the consultation list. Once we have recruited residents, we will work with the Housing Needs Research and Data Analyst Team who will provide us with a set of Personal and Special Category Data listed on NEC relating to the residents who have agreed to take part in the research through the consultation list. We will only access this data for the residents who have consented for us to do so through the consent form completed prior to the interview. Based upon what the research team learns from the interviews, the team will analyse and synthesise the data into insights around participants' perspectives on the housing services. These insights will be put into a format for delivery which is still tbc - possible outcomes include a report and user-journeys.
Implementation Date:	23.09.2022 (first day of recruitment)

Pre-screen: If you have not already done a pre-screen please do the questions below. If you have a pre-screen, attach it to the DPIA. 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 and the rest of the DPIA should be completed.

Q 1	Screening question	Yes/No
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?	No
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?	No
1.5	Might the project have the effect of denying anonymity and pseudonymity, or converting transactions that could previously be conducted anonymously or pseudonymously into identified transactions?	No
1.6	Does the project involve multiple organisations, whether they are public sector agencies i.e. joined up government initiatives or private sector organisations e.g. outsourced service providers or business partners?	No

1.7	Does the project involve new processing or significantly change the way in which personal data/special categories of personal data is handled?	No
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?	No
1.9	Will data be combined, compared or matched from multiple sources?	Yes
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?	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 physical harm in the event of a security breach?	No
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

*1.9 risk explanation: Personal data provided by the research participant may be combined with data held on NEC to help us understand more about the participant before an interview is conducted. Access to the data will be limited to the user research team only and data will be held on secure Camden systems. The data will only be accessed for the residents who have consented for the research team to do so through the research consent form completed prior to the interview.

Step 2: What personal data is being used?										
2.1	**Is this use of personal data/special categories of personal data a new use? Or is it already happening and this is a change?**						New/Changed			
							New			
2.2	**What data will be processed/shared/viewed?**									
	Personal Data									
	Name	X	Date of Birth	X	Gender	X	National Insurance Number		Financial Information about the person	
	Address	X	Email address	X	Telephone number	X	NHS No		Other eg a reference number such as Mosaic ref	

									X (NEC reference number)	
	Other data *(Please state):*									
	Special Categories of Personal Data									
	Racial or ethnic origin	X	Fingerprints/ Biometrics		Religious or philosophical beliefs Political opinion					
	Trade Union membership		Physical or mental health or condition X							
	Sexual life or sexual orientation		Housing records Social services records	X	Tax, benefit or pension records					
	Other data *(Please state):*									
2.3	Proceedings for any offence committed or alleged, or criminal offence record?		No							

Step 3: Describe the sharing/processing		
3.1	**Describe in as much detail what is being done with the data**	The data will be used for research purposes to gain understanding on participants' perspectives on the Housing Allocations Service. The data will be analysed and synthesised by the research team and will lead to the formulation of research insights. For recruitment and interviewing, the data will be used to put together a sampling mix of participants that broadly represents people working on the service and residents on the housing register across the LBC. Additionally, the data will be used by the research team to quality assure our approach to speaking with participants.
3.2	**Explain in as much detail as possible why this is being done**	In order to gather residents and staff perspectives that will inform the service redesign, we need to collect some personal and special category data about the participants to help us in ensuring that we are representing a

			wide range of views and experiences. Processing this data will also allow the research team to quality assure the interviews with participants by providing the researchers with information around a participants context/particular needs in terms of sensitivity checking the interview approach. Ultimately processing the data will allow the research team to create outputs based upon the insights uncovered from the synthesis which will help the housing teams understand residents' experience with the housing services so that they are able to provide a better service for residents.
3.3	**Are you sharing the data with an external organisation or partner or are they involved in processing the data?**		No
	External organisation or partner N/A	**Controller or Processor?**	**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**
		the research team	No

3.4.	**Has a data flow mapping exercise been undertaken?**	Yes Data Flow Map attached as separate document
3.5	**How will the information be processed/shared**	The data will only be accessible by the research team. The data collected will be held on an encrypted spreadsheet and a secure Teams folder both of which only the research team have access to. The data will not be shared more widely. The research team will create outputs for delivery which will be shared with members of the housing team. While the exact format of these outputs is yet tbc, they will not contain any personal or special category data collected throughout the research, but only synthesised insights uncovered by the research team around participants' experiences and perspectives on the Housing Allocations Service.

Step 4: Assess lawful basis, necessity, and proportionality

4.1	**Identify Lawful Basis for processing personal data/special category /criminal data. Ask IRT for advice if needed (DPA@camden.gov.uk if you have no named Information Rights Officer advising)**		
	Personal data **Article 6(1) UK GDPR condition** Article 6(1)(e) Public task and for the interviews Article 6(1)(a) **Consent**	**Special Category data UK GDPR Art 9 condition and DPA18 schedule condition** Article 9(2)(g) Substantial public interest under Homelessness Reduction Act, 2017, Housing Act, 1996 and Localism Act, 2011 and for the interviews 9(2)(a) explicit consent	**Criminal data UK GDPR Art 10 condition and corresponding art 6 condition** N/A
4.2	**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 Information Rights Team have advised this is appropriate**		
	N/A		
4.3	**How will you ensure data quality and data minimisation?** If this is covered in a pre-screen refer to the pre-screen, otherwise detail below		

	We will ensure data quality and reliability of data by only processing data that we have received from residents and staff. We will not use any data sources which may have inaccuracies or historic or out of date information on clients. For the participants who have consented to the research team combining their personal data with data held on NEC, members of the Housing Needs Research and Data Analyst Team will provide this data relating to each individual participant, which will ensure data minimisation and data quality.	
4.4	**Have 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 Processing Notice online	Yes
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	
4.6	**Will the processing of data include automated individual decision-making, including profiling?** If yes, please outline the profiling processes and the rights of the data subject	
	No	
4.7	**Data Retention Period h***ow long will the data be kept?*	
	We will keep the information that participants have provided on the screener and consent form as well as the information participants have told us in interviews for up to 5 years. Recordings will be held for 1 year and then deleted.	

Step 5: Information Security Process		
5.1	**On what systems will the data will be stored** *Examples of Storage include bespoke system (e.g. EPR, Emis & other clinical systems, SharePoint, data repository, Network Drives, Filing cabinet (office and location), storage area/filing room (and location) etc.*	
	Data will be stored on Microsoft Teams and an encrypted spreadsheet.	
5.2	**Where is the data stored geographically?**	
	The data is stored within the UK, on the research team member's camden computers.	
5.3	**What roles will have access to the information?** (list individuals or staff groups)	
	The research team: Tom Wastling, Lead Policy Designer; [redacted] Delivery Manager; [redacted], Policy Designer; [redacted], Service Designer; [redacted], User Researcher; [redacted], User Researcher; [redacted], Organisational Designer	
5.4	Is there role based access control on all applicable systems? **How will access to information be controlled?**	
	Only members of the research team will have access to the data. Access to information is controlled by only granting members of the research team access to the data who do not grant access more widely.	

5.5	**Is there an ability to audit access to the information?**
	Only members of the research team have access to the data and they will not share or grant access to anyone outside of the team.
5.6	**What security and audit measures have been implemented to secure access to and limit use of personal data/special categories data and/or criminal data?**
	We will ensure secure access to and limit use of personal data/special categories data in a number of ways. All members of the project team will have completed GDPR mandatory training upon starting the project ensuring that they understand the requirement to only process data which is necessary and proportionate. In addition to this, any requests for further data analysis and processing will need to be discussed and approved by the research team's members as listed above. No criminal data will be processed.
5.57	**Has the Information Security Manager advised on the security measures? What were his/her comments?**

Step 6: Identify and Assess Risks			
Describe source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary. **These are the risk *before* any controls (mitigations are applied)** Add in additional rows as necessary. The completed row is an examples	**Likelihood of harm- see table 1**	**Severity of harm- see table 2**	**Overall risk – see table 3**
Residents could be identified through the stories they share with the research team relating to their individual housing situations	Possible	Moderate	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, not all risk can be eliminated. Then calculate the risk that remains after the mitigations/controls are in place- the residual risk. Decide if this is accepted in the measure approved? column				
Risk identified in step 6	**Options to reduce or eliminate risk**	**Effect on risk**	**Residual risk**	**Measure approved?**
Residents could be identified through their stories relating to their individual housing situations	In synthesising the data and producing outcomes for delivery that will be shared with members of the housing team, the research team will not include any details included in participant's stories that could lead to the participant being identified.	The risk will be considerably lowered leading to rare likelihood	Low risk	
Residual (remaining) risk level when all mitigations have been applied:				

Low

Step 8: Record Data Protection Officer advice and outcome	
DPO involved in preparing DPIA? If not, name of IRO	Veron Reece-Jones
DPO advice	Approved Andrew Maughan DPO and Borough Solicitors
Information Asset Owner acceptance of residual risks accepted by	Names of IAOs
This DPIA will kept under review by:	[redacted]

Version Control

Version	Reason	Date	Author(s)
1.0			

Table 1 Likelihood of Risk Occurring

Rare	One-off failure
Unlikely	Possible that it may reoccur but not likely
Possible	Might happen or reoccur on a semi-regular basis (no more than once a quarter)
Likely	Will reoccur on a regular basis, pointing to some failure in controls
Almost Certain	Wilful act, systemic failure in controls

Table 2 Impact of Risk if it occurs

Negligible	No personal data involved, or risk won't have any impact.
Minor	● Short-term, minimal embarrassment to an individual ● Would involve small amounts of sensitive personal data about an individual ● Minimal disruption or inconvenience in service delivery to an individual (e.g. an individual has to re-submit an address or re-register for a service)
Moderate	*More than a minimal amount of sensitive personal data is involved at this level*

	• Short-term distress or significant embarrassment to an individual or group of individuals (e.g. a family) • The potential of a financial loss for individuals concerned • Minimal disruption to a group of individuals or significant disruption in service delivery or distress to an individual (e.g. availability to a set of personal information is lost, requiring resubmission of identity evidence before services
Major	Significant amount of HR, or resident personal, and / or sensitive data released outside the organisation leading to significant actual or potential detriment (including emotional distress as well as both physical and financial damage) and / or safeguarding concerns
Catastrophic	Catastrophic amount of HR or service user personal and or sensitive data released outside the organisation leading to proven detriment and / or high-risk safeguarding concerns. Data subjects encounter significant or irreversible consequences which they may not overcome (e.g. an illegitimate access to data leading to a threat on the life of the data subjects, layoff, a financial jeopardy)

Level of risk	
1-3 Low Risk	Acceptable risk No further action or additional controls required Risk at this level should be monitored and reassessed at appropriate intervals

4-6 Moderate Risk	A risk at this level may be acceptable, if so no further action or additional controls required If not acceptable, existing controls should be monitored or adjusted
8-12 Medium / High Risk	Not normally acceptable Efforts should be made to reduce the risk, provided this is not disproportionate Determine the need for improved control measures
15-25 High Risk	Unacceptable Immediate action must be taken to manage the risk A number of control measures may be required

Risk Assessment: Table 3 - risk level

	Score:		PROBABILITY				
			Rare	Unlikely	Possible	Likely	Almost Certain
IMPACT		Catastrophic	5	10	15	20	25
		Major	4	8	12	16	20
		Moderate	3	6	9	12	15
		Minor	2	4	6	8	10
		Negligible	1	2	3	4	5