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.

Project Name	**Local Offer, Family Hubs - Research Interviews and Diary Study**	
Project Lead and Information Asset Owner/s	Project Lead	[redacted], User Researcher
	IAO name and asset	Louise Brown, Head Digital Products and Services (Digital Products and Services)
	IAO name and asset	
Summary of the project. *Outline what your project is about. Start with a general headline and then go into more detail. Explain any acronyms on first use.*	**Project Overview** Digital Products and Services (DPS) have been working with stakeholders in Supporting People and Strategy to assess the current digital offer for families, children, and young people – in particular the Integrated Early Years Service (IEYS), Local Offer, and Youth Offer.	

	Local Offer, also known as SEND, is a statutory requirement that LBC needs to publish for parents, careers, specialists and children and young people with Special Educational Needs and Disabilities. Previous research has not looked into the needs of parents or carers of Low SEND needs or parents that are at the beginning of this journey with their child. Another group that hasn't been covered are Children and Young People of over 18-25 years of age that have had contact or still have with the Local Offer and SEND during their education. The Local Offer website has been highlighted by Ofsted and the Care Quality Commission (CQC) as not delivering for users and Council Leaders have been aware of issues around communication and accessibility for some time. Prior to the forming of DPS, Camden has attempted to improve the digital offer across these service areas but the products have been poorly maintained over time. '**Parents are generally unaware of the local offer website** and how it can help them to find and use services to support their children and family. Parents who know about the local offer say it is difficult to find information and that the website is not easy to use. **Leaders are aware that communication and accessibility of the website are features that need to improve.**' Joint inspection report by Ofsted and the Care Quality Commission of Camden's SEND services, 2019 In addition to the current problems, Camden is one of 75 local authorities that is part of a new Government three-year programme (2022-25), called

	Family Hubs and Start for Life, to deliver a universal front-door offer for families that includes a digital offer. **Purpose and Context** The purpose of this research project is to deliver a new, joined-up offer to improve on the current failings and to deliver a leading example of how digital can empower citizens to make decisions that are right for them and their families, based on trusted support and services offered by Camden. The purpose of the research project is to provide qualitative evidence for this proposed activity by interviewing parents and carers that interact with Local Offer and SEND, and Children and Young People (18-25 years of age) by doing a diary study and then several interviews to understand what their struggles are, what are the things that they need and struggle with, digitally when accessing the current Local Offer. The researcher will run interviews, with up to 12 participants (parents and/or carers; children and young people of 18-25 years old) to understand their perspectives. Synthesis and results will be produced for 12th of April, in a presentation deck and report. To meet this deadline we will start the Diary Study on 27th March and close it on 3rd of April, and interview up to 5 participants that participated in the Diary Study for a 30 minute interview. Our goal is to deliver a new, joined-up offer to improve on the current failings and to deliver a leading example of how digital can empower citizens to make decisions that are right for them and their families, based on trusted support and services offered by Camden.

	Participant Recruitment Plan We are intending on using the Supporting People existing contacts. We intend to leverage our organisation's contacts in three ways: 1. Use Supporting People staff's personal connections with local groups of parents and careers within Camden. They have a close relationship with us through previous or ongoing work, and are usually happy to participate in ongoing research. 2. Email a list of VCSs that have already participated in a survey Supporting People had already did, through our secure Camden email addresses. These convenience samples are chosen as we are limited in the time we have, especially given the tight timeframe, which sits over April, which poses a challenge for recruitment given the holiday season. This sampling method will be noted as a limitation in our findings. **Diary Study, Interviews and Data Collected** The researcher will conduct the qualitative study, with mixed methods: • The interviews will be conducted remotely through the Teams platform and with the participant's consent, we will be taking notes on a Microsoft Word document, or a Miro Board which will be secured in our Teams channel. **If the interview is conducted remotely**, we will use either phone or Microsoft Teams video or audio call, depending on the participant's preference. With their consent, we will record the interviews on audio or video, according to their preference. These recordings will be stored

	securely on Sharepoint. Taking these recordings will allow the research team to play back interviews to ensure their written notes accurately reflect the participants' sentiments, and that direct quotes are transcribed verbatim. The video and audio recordings will not be used for any other purpose than transcription. **If the interview is conducted in-person**, with the participant's consent, the interview will be recorded on Microsoft Teams as an audio file. As above, these recordings will not be used for any other purpose than transcription. **Data Collected** • **Interview Transcripts:** As above, written notes will be recorded. Audio and video recordings may also be taken, based on the participant's consent; however, the raw audio and video recordings will not be presented as part of the core output. If consent is given, only transcribed quotes may be used. Depending on participants' preferences, these quotes may be anonymized. • **Personal Information:** We will collect these participants' names and email addresses and phone numbers for the purposes of contacting them for this research project only. • **Special Category Information:** If the participants are parents or careers, and children and or young people with SEND (ages 18-25 years) and provided consent is given, we will be recording their race, gender, disability status, and care leaver status on the MS Word document we use to transcribe notes from their interview. Recording this information will allow us to ensure we are including the voices of those who are historically excluded or disproportionally impacted by discrimination in existing research

	Collecting this data is critical to this project, as a key objective of Local Offer SEND is to make sure that the needs and wants are represented in the digital outputs are created. We are committed to ensuring that those who are marginalized by existing systems are prioritized. **Data Access** Only the core team will have access to the interview recordings and raw notes. They will be kept in our OneDrive and will be kept for 1 year. The core team entails: • [redacted], User Researcher (Digital Products and Services) • [redacted], Product Designer (Digital Products and Services) • [redacted], Associate Product Manager (Digital Products and Services) • [redacted], Lead Product Manager (Digital Products and Services) • Louise Brown, Head Digital Products and Services (Digital Products and Services)
Implementation Date: *Should be at least a month to allow for assessment and any necessary steps to be undertaken*	As soon as possible, so we can begin recruitment for the diary study and interviews in mid-March and April. Our absolute deadline to start recruitment is Tuesday, 21st March 2023.

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
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 cause data that was previously anonymous or pseudonymised (where a code is used instead of eg names) to become identifiable ?	No
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?	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?	Yes
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
1.9	Will data be combined, compared or matched from multiple sources?	No

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?	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

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?** Put a YES in the box as appropriate									
	Personal Data									
	Name	**Yes**	Date of Birth		Gender	**Yes**	National Insurance Number		Financial Information about the person	
	Address		Email address	**Yes**	Telephone number	**Yes**	NHS No		Other eg a reference number such as Mosaic ref	
	Other data *(Please state):*									
	Special Categories of Personal Data									

	Racial or ethnic origin		Fingerprints/ Biometrics		Religious or philosophical beliefs Political opinion			
	Trade Union membership		Physical or mental health or condition					
	Sexual life or sexual orientation		Housing records Social services records		Tax, benefit or pension records		Employee/HR records	
	Other data *(Please state):*		Special category data (race, gender, disability status) will only be collected if the participant is giving consent so we can make sure to prioritise the marginalised communities.					
2.3	Will it include data about any criminal offence committed or alleged, or criminal offence record?		No					

Step 3: Describe the data processing		
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!**	**Participant Recruitment Plan** We are intending on using the Supporting People existing contacts. We intend to leverage our organization's contacts in three ways: 1. Use Supporting People staff's personal connections with local groups of parents and careers within Camden. They have a close relationship with us through previous or ongoing work, and are usually happy to participate in ongoing research. 2. Email a list of VCSs that have already participated in a survey Supporting People had already did, through our secure Camden email addresses. These convenience samples are chosen as we are limited in the time we have, especially given the tight timeframe, which sits over April-May, which poses a challenge for recruitment given the holiday season. This sampling method will be noted as a limitation in our findings. **Interviews and Data Collected** The research team will conduct the qualitative study, with contextual interviews: • The interviews will be conducted remotely through Teams platform and with the participant's consent, we will be taking notes on a Microsoft Word document, or a Miro Board which will be secured in our Teams channel. **If the interview is conducted remotely**, we will use either phone or Microsoft Teams video or audio call, depending on

		the participant's preference. With their consent, we will record the interviews on audio or video, according to their preference. These recordings will be stored securely on Sharepoint. Taking these recordings will allow the research team to play back interviews to ensure their written notes accurately reflect the participants' sentiments, and that direct quotes are transcribed verbatim. The video and audio recordings will not be used for any other purpose than transcription. **If the interview is conducted in-person**, with the participant's consent, the interview will be recorded on Microsoft Teams as an audio file. As above, these recordings will not be used for any other purpose than transcription. **Data Collected** • **Interview Transcripts:** As above, written notes will be recorded. Audio and video recordings may also be taken, based on the participant's consent; however, the raw audio and video recordings will not be presented as part of the core output. If consent is given, only transcribed quotes may be used. Depending on participants' preferences, these quotes may be anonymized. • **Personal Information:** We will collect these participants' names and email addresses and phone numbers for the purposes of contacting them for this research project only.

		• **Special Category Information:** If the participants are parents or careers, and children and or young people with SEND (ages 18-25 years) and provided consent is given, we will be recording their race, gender, disability status, and care leaver status on the MS Word document we use to transcribe notes from their interview. Recording this information will allow us to ensure we are including the voices of those who are historically excluded or disproportionally impacted by discrimination in existing research Collecting this data is critical to this project, as a key objective of Local Offer SEND is to make sure that the needs and wants are represented in the digital outputs are created. We are committed to ensuring that those who are marginalized by existing systems are prioritized. **Data Access** Only the core team will have access to the interview recordings and raw notes. They will be kept in our OneDrive and will be kept for 1 year. The core team entails: • [redacted], User Researcher (Digital Products and Services) • [redacted], Product Designer (Digital Products and Services) • [redacted], Associate Product Manager (Digital Products and Services)

			[redacted], Lead Product Manager (Digital Products and Services) Louise Brown, Head Digital Products and Services (Digital Products and Services)
3.2	**Explain in as much detail as possible why this is being done**		We have chosen to only use our Camden addresses for communication and to store our documents on MS Teams securely, following the best practices at Camden. All the data collected will be stored on MSTeams securely for at maximum 90 days from the beginning of the project. Raw transcripts and recordings will be deleted after 1 year, in line with suggested best practices.
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 Name	**Controllero**	**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**

		r P r o c e s s o r ?	
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.		Please see above in the overview section
3.5	How will you handle data in your project, how will use store and share it. Please explain		Please see above in section 3.1

Step 4: Assess lawful basis, necessity, and proportionality	
4.1	Identify the Lawful Basis for processing personal data/special category /criminal data.

	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) **If not processing the category say N/A**		
	Personal data Article 6(1) UK GDPR condition For recording art 6(1)(a) consent, for everything else 6(1)(e) public task	**Special Category data UK GDPR Art 9 condition and DPA18 schedule condition** For recording art 9(2)(a) explicit consent, for everything else Art 9(2) (g) Reasons of substantial public interest with the Data Protection Act 2018 Schedule 2 Part 2 conditions being para 6 Statutory and government purposes	**Criminal data UK GDPR Art 10 condition and corresponding art 6 condition** This is not within scope
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 Data Protection Advice Team have advised this is appropriate**		
	For recording this will be consent and gained at the time		
4.3	**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		
	Data Quality: Participants can review and update their contributions at any time by emailing the research team. Data Minimisation:		

	• Personal Data: We are only collecting enough personal data (name, email address, and at times, phone number) to contact the participants to conduct the research. Special Category Data: Limited special category data is only collected for participants who are or have been using Local Offer SEND either for themselves or for children and young adults they are caring for. Collecting this data allows the research team to ensure that the voices of those from groups which face disproportional barriers to financing are elevated. Participants who are only a representative of the business will not be asked for their special category data, as it is not relevant to the research objective at hand.	
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	Yes – A privacy notice will be created
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 - 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?**	
	1 year, to be deleted at the end of the retention period	

Step 5: Information Security Process	
5.1	**On what systems will the data will be stored** *Examples include Mosaic, SharePoint, shared drives,*
	MS Teams will be used and Sharepoint for collection and storage.
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)
	[redacted] User Researcher (Digital Products and Services) [redacted] Product Designer (Digital Products and Services) [redacted] Associate Product Manager (Digital Products and Services) [redacted] Lead Product Manager (Digital Products and Services

	Louise Brown, Head Digital Products and Services (Digital Products and Services)
5.4	Is there role-based access control on all applicable systems? **How will access to information be controlled?**
	Yes – we will be storing information on the Teams Channel for this project. 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?**
	Yes – only members of the research team will access the data, and they will not share or grant access to anyone outside of this group.
5.6	**What security and audit measures will there be to make sure that data is kept safe?**
	All team members have completed the mandatory GDPR learning offering as part of their onboarding process. Team members will only access this data for the purposes of this project and will not share or grant access to anyone outside of this group.
5.7	**Has the Information Security Team advised on the security measures? What were their comments?**
	No

Step 6: Identify and Assess Risks			
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. **These are the risk *before* any controls (mitigations are applied).** Assess risk assuming there are no controls in place- controls/mitigations are discussed in the next step. **Use tables 1, 2 and 3 in the appendix to help you.** *Note that risks and scores are subject to review and change by IRT/DPO* Add in additional rows as necessary.	**Likelihood of harm- see table 1**	**Severity of harm- see table 2**	**Overall risk – see table 3**
Privacy intrusion from participants could be identified through their opinions and quotes by members of staff from the Supporting People, who may have worked with the participants in the past.	Possible	Moderate	Medium High
Data stored longer than retention	Possible	Moderate	Medium High
Participant consent withdrawal not properly actioned meaning data retained incorrectly	Possible	Moderate	Medium High
Data accessed by unauthorised persons leading to privacy intrusion or harms	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, 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?**
Privacy intrusion	Although we are relying on the contacts from the Supporting People team as our recruitment source, the team members from Supporting People will not receive any specific information about participation. Our Participants list will not be shared outside of the team, so any suspicion about a participant's identity will remain a hypothesis. Further, any personal data will not be associated with any used quote in the final outputs (the quotes will be anonymized).	Reduced	Low	yes

Retaining past retention	The raw data will be deleted after 1 year, and we will mark this in our calendars, so we don't forget to do this. However, this information is automatically deleted from Teams and SharePoint after 30 days, so we can extend it each month. We can add an expiration date, so it will automatically delete it after a particular time so it doesn't live forever	Reduced	Low	yes
Consent withdrawal not properly handled	If a participant withdraws consent at any point after collection the researcher will remove all the data associated with the participant, and delete all the raw video, audio, notes and any other anonymized information associated with the participant. The information will be discarded and deleted from Teams and Sharepoint, and any other associated notes.	Reduced	Low	yes
Unauthorised access	All the data will be stored securely on Sharepoint and Teams, on Camden owned laptops. The access to the data will be limited in order to minimize this risk. Only the people on the project list will have access to the raw information so thee is full Role Based Access Control. All the data collected will be anonymized past the point of collection. All employees have DBS check in order to be able to do this type of work, and if they use the data for other purposes they would be	Reduced	Low	yes

	disciplined if they are found to have acted illegally.			
Residual (remaining) risk level when all mitigations have been applied: *Note IRT/DPO may change this*				
Low				

Step 8: Record Data Protection Officer advice and outcome	
DPO involved in preparing DPIA? If not, name of IRO	DP23_166 , Sarah Laws
DPO advice	Approved Andrew Maughan DPO and Borough Solicitor March 2023
Information Asset Owner acceptance of residual risks	Louise Brown
This DPIA will kept under review by: (*usually the author or the IAO)*	[redacted]

Version Control

Version	Reason	Date	Author(s)
1.0	Removal of the use of a 3rd party platform to minimise harm	02/03/2023	Sarah Laws
2.0	Redrafted	15/3/23	[redacted]

Appendix 2: Ethics screen.

Only complete this if you have skipped the DPIA pre-screen and proceeded straight to a full DPIA. If you did the ethics screen as part of the DPIA pre-screen ignore this section.

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) The Data Charter is here: Camden's Data Charter - Camden Council

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?)*

- Collecting personal contact information enables us to reach out to parents, careers and young people that have used or benefited from the Local Offer SEND. This piece of information will enable our research to bring the digital offer to life, and the allocation of resources will reflect the needs of our residents directly impacted by the council's development plans.
- Collecting special category data is necessary in this case as the project is particularly focused on people with low and high SEND needs, and that have been historically excluded previously. This is a difficult to reach group that we want to ensure we are reaching, and remove the barriers to access essential services and include equality into the process.

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

- Personal Data: we would not be able to contact residents that are in our group target for this project and to get insights from them that will make the digital offer not compliant with the process of co-designing with residents and would negatively impact the proposal.
- Special Category Data: We would not be able to have a representative sample that is inclusive of the group that we are targeting in the digital offer of the service for Local Offer (SEND) and Family Hubs, and the insights will not be representative.

2. *Data Bias*

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

- Data Collection: Collecting special category data would allow us to actually control for potential bias. By ensuring we have representative samples that will represent the experiences of those who have been historically excluded, we can ensure their experiences and needs are considered moving forward.
- Data Analysis: Feedback will be aggregated based on thematic analysis; by applying appropriate research methodology, we can minimise the bias which may flow through in prioritising one type of feedback over another.

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?*

- Limitations of the research will be clearly stated, including and not limited to: a) convenience sampling, b) small sample size, c) response bias, d) limitations of qualitative analysis.
- By clearly stating and elaborating on these limitations, future users of this research can understand and determine for themselves the extent to which they rely on these core findings as part of their evidence base

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**?

- Potentially, some of the parents and carers and some young people who would be asked to provide special category data, may feel the research process is intrusive; however, those who would not like to supply their information are not required to. All supplied information is voluntary and can be revoked at any time.

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?

- We are only processing the name, email, and potentially phone number of participants in order to contact them for the purposes of this research.
- Regarding special category data, we are not collecting this from all participants, but we would like to have a representative sample that provides data relevant to our research objectives

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

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

- Participants may revise their comments at any time through contacting us via phone or email, in case they would like to retract or update a previous statement. Any outdated statements will be deleted and will not be used in the final output.

*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)*

- Names, will be attributed to our raw notes.
- In the analysis stage all the information will be coded and anonymized.

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

- Not possible, as contact information is required to gain insight.