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.

Version Control

Version	Reason	Date	Author(s)
0.1	Draft - initial draft	03/04/2023	[redacted]
0.2	Revised draft	12/05/2023	[redacted]
1.0	Final version	01/06/2023	[redacted]

Project / Work Stream Name	Strategic Insights Tool for Rough Sleeping
Overview: **(Summary of the project/work stream)**	Homelessness in London, including rough sleeping, continues to rise. Addressing the homelessness crisis is a priority for all levels of government and for civil society. Collectively, London seeks to implement a data-informed policy to address homelessness, resulting in improved collective action that cuts across institutions, services, and sectors. However, Greater London lacks consistency in data collection metrics, practices, and management. London lacks a system that enables us to leverage the extensive existing data to achieve these aims. The project will develop a system which allows join-up of data, thereby delivering the required intelligence and insights.. This project will consist of research and statistical work. The aim is not to change the delivery of support to a specific individual, but to inform and improve service delivery at a cohort, or population level. A key goal of the Strategic Insights Tool for Rough Sleeping is to better understand what happens to rough sleepers across their journeys into, during, and after they sleep rough, which will inform policy and service decisions. For most people who experience rough sleeping, the crisis is singular, short, and requires little intervention. For a few, time spent living on the streets is an intermittent occurrence amid other life challenges over a more extended period of time. These few long-term or episodic cases are the ones likely to need more services. The operational work needed to achieve these goals is be to: (1) map the user journeys and existing data systems that users touch (2) align partners on a citywide rough sleeping minimum data set (3) create a project governance structure to permit the sharing of data (4) develop a data governance structure that addresses ethics, security, and complies with policies for sharing data (5) develop the specs and a model for budget, build, management of production and maintenance

	(6) release of the commissioning for a technical data sharing solution (7) pilot and assess the new data solutions with a few local partners. Being able to see the full user journey for those with higher service needs requires a longer timeline. The advent of rough sleeping is often a confluence of events over many years, from losing a job, developing a health problem, and then finally, perhaps, the loss of a supportive family member or friend. Time on the street can be short, but it can also last months or years, followed by time in hostels or other temporary arrangements. This cycle can stretch over five years, or more. Current data systems allow service providers to track some of this journey for individuals they serve, at least the time spent rough sleeping and in hostels, with self-reported data for what happens in between when people return to the streets. But there is little systematic data to map out the major fault lines. Are there patterns of users who tend to come back to rough sleeping more frequently? Are there opportunities for strengthening ties between agencies, or opportunities for interventions that are lost? For example, a major reason for rough sleeping is that people are asked to leave their last settled base. This tenancy loss could be due to a variety of factors, including some non-specific life events such as loss of income, relationship breakdown, or emergence of a mental health or substance abuse problem. The current data systems will likely track the final crisis, but they may not indicate the intermediary steps or whether there was any attempt at intervention, such as contact with a Local Authority office. If there was contact, did it occur right before the crisis, or months or years earlier? People return to sleeping rough after being away for more than a year. What happened in between? Did they have any contact with their Local Authority? The Strategic Insights Tool for Rough Sleeping will have immediate impact by allowing decision makers to see the extent to which current rough sleepers systematically interact with prevention efforts, or with temporary accommodations, and the success of those outcomes. Being able to see journeys over a longer period of time will be immensely useful for more complex, and more service needing individuals.The Greater London Authority and London Councils are working with Bloomberg Associates to develop an integrated rough sleeping data solution for local government and non-government service providers across London to help better understand flow, plan services, report, and manage performance.
Implementation Date:	June 2023

Environmental Scan Describe the consultation/checks that have been carried out regarding this initiative or, project of similar nature, whether conducted within your organisation or by other organisations.	The Greater London Authority, LOTI, and London Councils have conducted a scan of the various disparate data sources that make up the local data collection and data sharing landscape: CHAIN, INFORM, HCLIC. Included in this scan are the agencies that are required to report and collect homeless information across the four pilot London boroughs. LOTI and London Councils have also developed a procurement process to retain a technical vendor to build and manage the new data system. CHAIN (Combined Homelessness and Information Network) is a multi-agency database recording information about people sleeping rough and the wider street population in London. It is commissioned and funded by the Mayor of London and managed by Homeless Link. CHAIN allows approved and trained users to share information about work done with rough sleepers and about their needs, ensuring that they receive the most appropriate support and that efforts are not duplicated. Homelessness Case Level Information Classification (H-CLIC) is a database collecting information from Housing Options offices operated by local authorities. It collects information regarding reasons people become homeless, a person's housing history and journey, the support needs of homeless households, and how these households link with other public services and/or the benefits system. Staff from each local authorities' Housing offices use proprietary software systems to enter H-CLIC data for clients who apply for benefits at the housing options office. This data is manually uploaded quarterly to the Department for Levelling Up, Housing and Communities (DLUHC). For this project, duplicate validated HCLIC information will also be uploaded to the city's Strategic Insight Tool for Rough Sleeping. In-form is a proprietary case management software system that is used by many providers in the homelessness/rough sleeping charity sector. Homeless Link, in partnership with Salesforce, offers a configurable tool for charity service providers to subscribe to and tailor according to their needs. The tool is often used when clients are linked to services, including rough sleeping hubs or temporary accommodation settings. Some charities commission similar case management tools directly from Salesforce, rather than the out-of-the-box tool offered by Homeless Link. Within the Strategic Insights Tool for Rough Sleeping, personal data on individuals is matched across data from multiple sources, and then aggregated trends and statistics are produced. For the pilot, the selected local authorities and housing charities will be joint data controllers, along with London Councils and the GLA, who have the contractor building the system as data processor. If the pilot is successful, it is expected that the GLA will become data controller for data within the system.

Step 1: Complete the Screening Questions

Q 1	Category	Screening question	Yes/ No
1.1	Technology	Does the project introduce new or additional information technologies that can substantially reveal an individual's identity and has the potential to affect that person's privacy?	Yes
1.2	Technology	Does the project introduce new or additional information technologies that can substantially reveal business sensitive information, specifically: have a high impact on the business, whether within a single function or across the whole business?	No
1.3	Identity	Does the project involve new identifiers, re-use or existing identifiers e.g. NHS or NI number, Local Gov. Identifier, Hospital ID no. or, will use intrusive identification or identity management processes or, electronic linkage of personal data?	Yes
1.4	Identity	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
1.5	Multiple organisatio ns	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?	Yes
1.6	Data	Does the project involve new process or significantly change the way in which personal data/special categories of personal data and/or business sensitive data is handled?	Yes
1.7	Data	Does the project involve new or significantly changed handling of a considerable amount of personal data/special categories of personal data and/or business sensitive data about each individual in a database?	Yes
1.8	Data	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	Data	Does the project involve new or significantly changed consolidation, inter-linking, cross referencing or matching of personal data/special categories of personal data and/or business sensitive data from multiple sources?	Yes
1.10	Data	Will the personal data be processed out of the EEA?	No
1.11	Exemptions and Exceptions	Does the project relate to data processing which is in any way exempt from legislative privacy protections?	No
1.12	Exemptions and Exceptions	Does the project's justification include significant contributions to public security and measures?	Yes
1.13	Exemptions and Exceptions	Does the project involve systematic disclosure of personal data to, or access by, third parties that are not subject to comparable privacy regulation?	No

The purpose of the screening questions is to confirm that the data protection laws are being complied with, or highlights problems that need to be addressed. It also aims to prevent problems arising at a later stage which might impede the progress or success of the project.**Answering "Yes" to any of the screening questions above represents a potential Information Governance (IG) risk factor, please proceed and complete the next section.**

Step 2: Identify the need for a DPIA		
2.1	**Is this a new or changed use of personal data/special categories of personal data and/or business sensitive data that is already processed/shared?**	New/Changed New

2.2 What data will be processed/shared/viewed?

Personal identifiable information (PII) will be processed and matched across data bases, but then the information will be aggregated and anonymised. Users will only be able to view:

(1) individual level data that they contributed and

(2) view linked information (in aggregate format) which has been de-identified.

The reasons people enter rough sleeping are varied, so the treatments to address rough sleeping are equally as varied. This research project aims to better understand those reasons by mapping and connecting the continuum of rough sleeping. The aim is not to change the delivery of support to a specific individual, but service delivery may change to the cohort, or sub-cohorts, of people experiencing rough sleeping.

Personal Data

Forename	Y	Surname	Y	Date of Birth	Y	Age	Y	Gender	**Y**
Address	Y	Postal address	Y	Employment records	Y	Email address	Y	Postcode	Y
Other unique identifier (*please specify*)	Y (National Insurance #)	Telephone number	Y	Driving licence number	N	NHS No	Y	Hospital ID no	N
Other data *(Please state):*	Relationship Status, Preferred Language, Pregnancy Status, Disabilities, Armed Forces History, Nationality, Care Leaver 18+, Local authority connection, Current Substance Use, Current alcohol misuse support needs, Domestic Violence Services Need, History, Immigration Status, Entitlements to Welfare Benefits, Current Mental Health Concerns, Connection to hospital or rehab. The current data set list is attached as an appendix, though this is indicative and subject to change during the discovery period.								

Special Categories of Personal Data

Racial or ethnic origin	**Y**	Political opinion	N	Religious or philosophical beliefs	N				
Trade Union membership	N	Physical or mental health or condition	Y						
Sexual life or sexual orientation	Y	Social service records	N	Child protection records	N				
Sickness forms	N	Housing records	Y	Tax, benefit or pension records	N	Adoption records	N		
DNA profile	N	Fingerprints	N	Biometrics	N	Genetic data	N		
Proceedings for any offence committed or alleged, or criminal offence record, Current Medical Needs, Current or recent hospitalisation or in inpatient service (e.g. rehab), Current Immigration Support (legal needs),	**Y**								

	Other data *(Please state):*	Connection to Housing Options Office, Date of most recent Housing Options Office contact (if any), History of statutory homelessness or prevention duty, Borough most recently engaged in rough sleeping service(s), Preferred language, Domestic Violence Services Need, Date of first documented encounter during current episode of rough sleeping, Date Last Seen Rough Sleeping, Last Accommodation/Settled Base, Main reason (cause) for loss of settled base, Date Accommodated, Connection to hospital or rehab, Arrival date, Type of Accommodation, Departure/end date from accommodation, Departure reason, Destination Upon TA Departure, Reconnection made	

		Yes/No
	Will the dataset include clinical data? (please include)	Yes :Focus on current medical needs, mental health needs, substance misuse needs, alcohol support needs, and disabilities, connection to hospital or rehab
	Will the dataset include financial data?	No
	Description of other data processed/shared/viewed?	

2.3	**<u>Business sensitive data</u>**			
	Financial		**<u>None</u>**	
	Local Contract conditions		None	
	Operational data		None	
	Notes associated with patentable inventions		None	
	procurement/ tendering information		None	
	Customer/ supplier information		None	
	Decisions impacting:	One or more business function		**No**
				No
		Across the organisation		No
	Description of other data processed/shared/viewed (if any).			

Step 3: Describe the sharing/processing			
3.1	**List of organisations/partners involved in sharing or processing personal/special categories personal data?** *If yes, list below*		Yes/No
			Yes
	Name	Controller or Processor?	Completed and compliant with the IG Toolkit or Data Security and Protection (DSP) Toolkit
			Yes / No
	London Local Authorities	Controller	
	Westminster	Controller	Yes
	Camden	Controller	Yes
	Hillingdon	Controller	Yes
	Lambeth	Controller	Yes
	Other Public Sector		
	GLA	Controller	No (not subject to them)
	Charities/service providers		
	SHP	Controller	No (not subject to them)
	Homeless Link (CHAIN)	Controller	No (not subject to them)
	St. Mungo's	Controller	No (not subject to them)
	Thames Reach	Controller	No (not subject to them)
	Evolve	Controller	No (not subject to them)
	Contractor developing system	Processor	Contractor unlikely to be subject to these toolkits, but will have suitable security standards.
3.2		Yes/No	
	If you have answered 'yes' to 3.1 is there an existing ' Data Processing Contract' or 'Data Sharing Agreement' between the Controller and the Processor?	**Yes** A contract will be in place with the contractor building the system. A DSA will be put in place to cover sharing with the listed partners where they are Controllers. Each Local Authority will be responsible for ensuring that they have Data Processing Contracts in place with any local Processors.	

3.3.	**Has a data flow mapping exercise been undertaken?** If yes, please provide a copy, if no, please undertake	The flows will vary case by case according to specific circumstances and case requirements. The expected data flows are attached as an appendix, and are subject to change during discovery and build.	
3.4	**Does the project involve employing contractors external to the Organisation who would have access to personal or special categories of personal data?**		Yes / No Yes
3.5	**Describe in as much detail why this information is being processed/shared/viewed?** *(For example Direct Patient Care, Statistical, Financial, Public Health Analysis, Evaluation. See NHS Confidentiality Code of Practice Annex C for examples of use)*		

Local authorities are subject to a public duty to reduce or end rough sleeping in their areas, as identified, for example, in the Homeless Act 2002, and the Homelessness Reduction Act 2017. However, no single organisation is fully accountable for ending rough sleeping in a community. A collaborative, strategic, data driven approach, with shared commitments, must be undertaken by partners to make rough sleeping rare, brief, and non-recurrent. London seeks to implement a data-informed policy, but this cannot be accomplished without improved collective action that cuts across institutions, services, and sectors. However, Greater London (and most of England) lacks consistency in data collection metrics, practices, and management.

Benefits to Organisations:

- Better data received more quickly
- Allows the discharging of local duties in respect to homelessness prevention and intervention
- Supports identification of improved interventions and more effective service delivery

Benefits to Society:

- Less rough sleeping overall
- Less money spent overall on rough sleeping prevention and client support

Benefits to Individuals

- Better targeted support to reduce rough sleeping for individuals making it rare, brief, and nonrecurrent

The fundamental challenges are:

• Too little join up between systems and stakeholders in some local areas

• Too much duplication across different systems with reporting requirements

• Extracting the data needed for casework, reporting and performance management is often difficult

• The data that commissioners need for reporting, management and commissioning is not always collected

Key strategic goals of this work are intended to:

• Enhance the effective operation of services for those who are rough sleeping

• Improve understanding of the population (including complexity of needs and flow)

• Improve understanding of individual outcomes and views of rough sleepers

• Learn what strategies work and inform public policy, service delivery and commissioning

	• Ease and enhance reporting and performance management • Measure success (in making homelessness rare, brief, non-recurrent) and align with DLUHC/CHI efforts • Ensure solutions and resources are properly understood, fully utilised, and linked to need **(See User requirements below)**

Rec(s)#	User	User Requirement (Functionality)
Research and Planning: Identifying trends, population needs and tracking outputs from the user journey (temporal)		
1	Senior Officials & Policy Makers, Directors & Local Authorities, Service Managers	Understand the common barriers preventing those sleeping rough to improve access the support they need and move off the street
2	Senior Officials & Policy Makers, Directors & Local Authorities, Service Managers	Understand what happens to rough sleepers after they move on to short-term accommodation, in order to understand any needs for improvement to services
3	Senior Officials & Policy Makers, Directors & Local Authorities, Service Managers	Understand what happens to rough sleepers after they move on to long-term accommodation or other solutions (e.g., reconnection), in order to understand any needs for improvement to services
4	Senior Officials & Policy Makers, Directors & Local Authorities, Service Managers	Track statutory offers and outcomes of statutory interventions to understand effectiveness of supports and providers
5	Senior Officials & Policy Makers, Directors & Local Authorities, Service Managers	--Identify trends and emerging issues and promptly act, commissioning a solution --Segment the rough sleeping population into different cohorts according to their housing status/needs to better tailor services
6	Senior Officials & Policy Makers, Directors & Local Authorities, Service Managers	Understand the pathways into homelessness and take action to reduce the factors that cause and contribute to rough sleeping through preventive or diversion services
Reporting of Outcomes for Accountability		
7	Directors & Local Authorities, Service Managers	Generation of reports for these users. Functionality should include: --Ability to report in multiple formats, to ease administrative burdens of required reporting to multiple entities/funders --Allows self-generation of reports, rather than that having to make a data request
8	Senior Officials & Policy Makers, Directors & Local Authorities, Service Managers	Generation of reports for these users. Functionality should include: --Run reports on activity/services available outside immediate area of responsibility to support collaboration --Run reports to provide evidence of what works and examples of good practice to guide policy, funding and commissioning
9	Directors & Local Authorities, Service Managers	Helps fulfill/report on Performance (KPI) of services delivered/commissioned
Case Management		
10	Directors & Local Authorities, Service Managers, Case workers	Upload or link (user owned data) with other data systems or modules (e.g., other case management systems)
Data Reporting Adaptability and Improvement		
11	Senior Officials & Policy Makers, Directors & Local Authorities, Service Managers	Informs a process of standardized data collection across the sector to align measures, improve comparability, and reduce administrative waste
12	Senior Officials & Policy Makers, Directors & Local Authorities	Capability to easily adapt to new data requirements (e.g., changes to existing databases, add-on of new databases, dataset modifications, new policies such as GDPR update)

Step 4: Assess necessity and proportionality

4.1 **Lawfulness for Processing/sharing personal data/special categories of personal data?**

Local authorities are subject to a public duty to reduce or end rough sleeping in their areas, as identified, for example, Part 7 of the Housing Act 1996, the Homeless Act 2002, and the Homelessness Reduction Act 2017. The Domestic Abuse Act 2021 amends Part 7 of the 1996 Act to strengthen the support available to victims of domestic abuse. The Act extends priority need to all eligible victims of domestic abuse who are homeless as a result of being a victim of domestic abuse. https://www.gov.uk/guidance/homelessness-code-of-guidance-for-local-authorities/overview-of-the-homelessness-legislation#:~:text=The%20primary%20homelessness%20legislation%20%E2%80%93%20that,threatened%20with%20or%20actually%20homeless

Rough sleeper services commissioned by, or in a smaller number of cases, working in partnership with and endorsed by, local authorities and the GLA, exercise a function on behalf of these bodies, in order to further this public duty.

Charities and service providers in the homelessness sector deliver support services and accommodation to those experiencing, or at risk of experiencing, homelessness and rough sleeping. They use a variety of lawful bases dependent on the services offered.

It is in the public interest to work to reduce rough sleeping and homelessness, as well as being a statutory requirement for local authorities. Reducing homelessness positively impacts individuals, improves the overall wellbeing of an area, and reduces public health risks.

Homeless Link manage the CHAIN system under commission from the GLA, for the task in the public interest to achieve outcomes that benefit rough sleepers and the wider street population, and thereby to reduce or eliminate rough sleeping in London.

The GLA is a joint data controller as it has influence over the Strategic Insights Tool for Rough Sleeping system's design and processing. The Digital Economy Act supports data sharing between the GLA and boroughs and vice versa under Part 5, Cpt 1 s35.

The reasons people enter rough sleeping are varied, so the treatments to address rough sleeping are equally as varied. This research aims to better understand those reasons by mapping and connecting the continuum of rough sleeping. There is no one system that exists to achieve this rough sleeping data solution, so a new solution will need to be developed that can leverage existing quality data sources in the short-term and identify data gaps to be addressed in the longer term.

This pilot project is subject to a joint data controller arrangement, since more than one organisation is involved in making decisions about the purpose and means of processing on the system.

The parties use different lawful basis conditions to process the personal data. For the local authorities, their original processing of the data matches the lawful basis for all parties as joint controllers for this project, which is public task fotr personal data, and substantial public interest (Schedule 1, Part 1 DPA 2018 - 'safeguarding of children and of individuals at risk), and research (Schedule 1, Part 2 DPA 2018 - 'research) for special category data.

The other parties use the following lawful bases for the original processing:

Organisation	**Article 6**	**Article 9**
SHP	Article 6 (1)(a) consent	Article 9(2)(a) explicit consent
Homeless Link (CHAIN)	Article 6 (1)(e) public task	Article 9(2)(g) substantial public interest
St. Mungo's	usually Article 6 (1)(e) public task	usually Article 9(2)(g) substantial public interest
Thames Reach	usually Article 6 (1) (f) legitimate interest	Article 9(2)(g) substantial public interest
Evolve	Article 6 (1)(f) legitimate interests	Article 9(2)(g) substantial public interest

	UK GDPR Article 5 states that, "...further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with Article 89(1), not be considered to be incompatible with the initial purposes ('purpose limitation');". Additionally, the ICO Guide to the General Data Protection Regulation (GDPR) states that, "If your new processing is for research purposes, you do not need to carry out a compatibility assessment, and in most circumstances you can be confident that your lawful basis is likely to be either public task or legitimate interests." This is a research project and is considered to be 'not incompatible' to the original lawful basis for processing, for any of the bases used by the parties. It is noted that while some parties use consent as lawful basis, further consent does not have to be sought as this processing for the research project is 'not incompatible' with the consent already in place. Processing of data relating to criminal convictions and offences or related security measures for the parties' original purposes, and this project, is in accordance with Schedule 1, Part 2, Section 6 of the Data Protection Act 2018. This allows for such processing that is 'necessary for reasons of substantial public interest' where the purpose relates to 'the exercise of a function of the Crown, a Minister of the Crown or a government department'.		
4.2	**Will the information be processed/shared electronically, on paper or both?**	Electronic	Yes
		Paper	No
4.3	**How will you ensure data quality and data minimisation?**		
This project consolidates data from varied sources and each partner is responsible for ensuring the accuracy and relevance of the personal data that it processes and shares and must have clear processes in place for managing data quality. Any party learning of the inaccuracy of personal data is responsible for taking appropriate action to correct it and informing the parties with whom that data has been shared. Client records from each database will be matched, most likely using probabilistic matching, which uses correlations between data fields to determine the statistical likelihood that multiple records are the same. During commissioning the vendors will propose methods for increasing the likelihood that multiple records may belong to the same person even if their attribute values are not the same, including how to address any data mismatch and errors. As this is a pilot project, it will actively consider this and test how the system will work. Outputs will be standards, processes, verifications data from varied systems, as part of the process to evaluate the quality of data, including mismatch and errors.			
4.4	**Have individuals been informed about the proposed use of their personal or special categories of personal data?** *For example, do the organisations/partners listed in section 3.1 have updated Fair Processing Notice available to patients on their websites?*		
	Privacy notices for all organisation note purposes. In some cases data subjects may not be specifically notified about the use of their data where giving them this information would be impossible or involve disproportionate effort. Following UK GDPR Article 5, research is 'not incompatible' with purposes for processing so additional privacy information is not required for this project. However, all parties are recommended to review their privacy information and adapt as necessary to reference research, and in the case of housing charities and similar, to describe sharing data with local authorities for the purposes of reducing homelessness.		

4.5	**How will you help to support the rights of individuals?**	
	Each controller remains responsible for complying with the applicable data subject rights. Each controller in this joint controller relationship has their own documented policies and procedures which detail how they will meet their own obligations in respect of data subject rights.	
4.6	**Are arrangements in place for recognising and responding to Subject Access Requests (SARs)?**	
	This is a joint controller relationship for the pilot and the data shared into the new system is a duplicate of data held by each organisation. Each data controller already has processes to handle SARs, and each will need to ensure reference to this system is included in SARs where relevant. If the pilot is successful and the GLA becomes the data controller for the system, the GLA will need to ensure that its SAR policies cover this system.	
4.7	**Will the processing of data include automated individual decision-making, including profiling?** *If yes, please outline the profiling processes, the legal basis underpinning the process, and the rights of the data subject*	
	No/not applicable–this data will not be used in a way that will impact individual, such as for determining program, service or benefits eligibility. Users of the tool can examine aggregate data for research and planning or reporting of broad outcomes for accountability.	
4.8	**Will individuals be asked for consent for their information to be processed/shared?** *If no, list the reason for not gaining consent e.g. relying on other lawful basis, consent is implied where it is informed.*	No
	Most of the data controllers use public task or legitimate interests for their lawful basis, with substantial public interest for special category data. Some of the housing charities may use consent for their overall work. This is a research project and as research is considered 'not incompatible' with the original purposes for processing, it is not expected that these organisations will need to seek consent to share data for this pilot.	
4.9	**As part of this work is the use of Cloud technology being considered either by your own organisation or a 3rd party supplier? If so please complete the embedded questionnaire.**	This project involves the creation of a new system, and suitable assurances and procedures for potential cloud hosting and cyber security are part of the required outputs.
4.10	**Where will the data 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.*	
	The integrated data system is still being commissioned, and the type of data warehouse platform is yet to be determined/built. However, the paper storage is minimised; all storage is UK only.	
4.11	**Data Retention Period** *How long will the data be kept?*	
	Organisations have different retention periods for the data they already hold. Personal data retention in the project will be 5 years, to allow data matching over time, with aggregate, pseudonymised data retained for a longer period. The pilot will consider the retention period for the aggregated outputs, and this is expected to be a longer period. A key goal of the Strategic Insights Tool for Rough Sleeping is to better understand what happens to rough sleepers across their journeys into, during, and after they sleep rough, which	

	will inform policy and service decisions. For most people who experience rough sleeping, the crisis is singular, short, and requires little intervention. For a few, time spent living on the streets is an intermittent occurrence amid other life challenges over a more extended period of time. These few long-term or episodic cases are the ones likely to need more services. Being able to see the full user journey for those with higher service needs requires a longer timeline. The advent of rough sleeping is often a confluence of events over many years, from losing a job, developing a health problem, and then finally, perhaps, the loss of a supportive family member or friend. Periods during which individuals have not been engaged with the organisations do not necessarily indicate a positive move away from the streets, and may, for example, result from time spent in prison or rough sleeping in another geographical location. Time on the street can be short, but it can also last months or years, followed by time in hostels or other temporary arrangements. This cycle can stretch over five years, or more. Being able to see journeys over a longer period of time will be immensely useful for more complex, and more service needing individuals.	
4.12	**Will this information be shared/processed outside the organisations listed above in question 3?** *If yes, describe who and why:*	Yes/No
	Yes–the data will be extracted from each of the data controllers (local authorities and charity service providers) and then records will be matched, integrated and stored in a data warehouse, where aggregate data reports can be generated. This data warehouse will be managed for the pilot by a contractor.	Yes

Step 5: Information Security Process						
5.1	**Is there an ability to audit access to the information?**					Yes/No
	All DSPT certified provider systems have an audit built in. We cannot guarantee for the voluntary sector, however they will be supplying rather than receiving information in most cases. We will ensure through the procurement process that the chosen system will have suitable audit controls.					
5.2	**How will access to information be controlled?**					
	This varies between providers, but RBAC control is required with password access as minimum.					
5.3	**What roles will have access to the information?** (list individuals or staff groups)					
	Access to the personal data is limited to the organisation that provided it (Directors & Local Authorities, Service Managers) and the contractor. Senior Officials & Policy Makers, Directors & Local Authorities, and Service Managers will have access to the aggregate outputs					
5.4	**What security and audit measures have been implemented to secure access to and limit use of personal data/special categories of personal data and/or business sensitive data?**					
	Username and password	Y	Smartcard		key to locked filing cabinet/room	

	Secure 1x Token Access		Restricted access to Network Files	
	Other: *Provide a Description Below*:			
	This will be determined through the procurement process and the development of the system. The supplier will ensure suitable security controls, such as multifactor authentication.			
5.5	**Is there a documented System Level Security Policy (SLSP) for this project? If yes, please embed a copy below:** SLSP is required for new systems. *SLSP refers to the architecture, policy and processes that ensure data and system security on individual computer systems. It facilitates the security of standalone and/or network computer systems/servers from events and processes that can exploit or violate its security or stature.*			Yes/No No - this will be developed as the system is developed
5.6	**Are there Business Continuity Plans (BCP) and Disaster Recovery Protocol for the proposed/existing system or process?** *Please explain and give reference to such plan and protocol*			Yes/No No - this will be developed as the system is developed
5.7	**Is Mandatory Staff Training in place for the following?**		Yes/No	Dates
	● Data Collection:		Yes	
	● Use of the System or Service:		Yes	
	● Information Governance:		Yes	
	● Data Controllers / Suppliers		Yes	
	All data controllers and the processor have mandatory training as part of their existing processes. Guidance on use of the system will be developed alongside the system development.			
5.8	**Are there any new or additional reporting requirements for this project?**			
	● What roles will be able to run reports?			
	1. Senior Officials & Policy Makers 2. Directors & Local Authorities 3. Service Managers (service providers)			
	● What roles will receive the report or where will it be published?			
	1. Senior Officials & Policy Makers 2. Directors & Local Authorities 3. Service Managers (service providers)			
	● Will the reports be in person-identifiable, pseudonymised or anonymised format?			
	Population level–aggregate data that has been matched and pseudonymised in the data warehouse			
	● Will the reports be in business sensitive or redacted format (removing anything which is sensitive) format?			
	No/N/A			
5.9	**Have any Information Governance risks been identified relating to this project?** (if Yes the final section will need to be completed)			**Yes/No** Yes

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.	**Likelihood of harm**	**Severity of harm**	**Overall risk**
Note: risks here are risks of this sharing ONLY. Signatories should have DPIAs for their own individual systems and methods, covering their local risks.			
Data retention period			High
Ensuring cybersecurity and due diligence processes			High
Data quality and matching			High
Access Controls vs Audit Controls			Medium
That suitable privacy information is provided to clients			Medium

Step 7: Identify Measures to reduce risk				
Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 6				
Risk	**Options to reduce or eliminate risk**	**Effect on risk**	**Residual risk**	**Measure approved**
Data retention period - High	1. The project group have provided justification for a 5 year retention period for the personal data, to allow the project to follow journeys of individuals who experience rough sleeping on multiple occasions. 2. The project will consider whether this period is proportionate at the end of the pilot. 3. Procurement will ensure that providers can meet the retention period. 4. Retention for the aggregate data will be defined during the pilot.	Reduced	Medium	Yes

Ensuring cybersecurity and due diligence processes - High	1. Contract with the processor binding between relevant parties 2. Cybersecurity is part of the due diligence for the procurement a. Subprocesses for Article 28 reference	Reduced	Medium	Yes
Data quality and matching - High	Client records from each database will be matched, most likely using probabilistic matching, which uses correlations between data fields to determine the statistical likelihood that multiple records are the same. During commissioning the vendors will propose methods for increasing the likelihood that multiple records may belong to the same person even if their attribute values are not the same, including how to address any data mismatch and errors.	Reduced	Medium	Yes
Access Controls vs Audit Controls - Medium	We will ensure through the procurement process that the chosen system will have suitable audit controls. The supplier will be chosen to manage mitigation and audit.	Reduced	Low	Yes
That suitable privacy information is provided to clients - Medium	The use of personal data for research is considered 'not incompatible' so privacy information provided for the original processing purposes continues to apply. Parties are likely to take different approaches to whether they amend the privacy information they provide to data subjects.	Tolerated	Medium	Yes

Step 8: Sign off and record outcomes		
Item	**Name/date**	**Notes**
Measures approved by:		
Residual risks approved by:		
DPO advice provided:	Sarah Laws, Data Protection Manager, London Borough of Camden, 26/5/23	
Summary of DPO advice: • The project must review the DPIA at the end of the pilot, as part of the full end of pilot review, to ensure that proposed benefits have been achieved, and that any issues of concern can be mitigated. A new/revised DPIA is required before the project decides to move to roll out the project more widely. • The contractor is expected to process data within the UK and any outside UK processing will have to be agreed by London Councils and the GLA. • The contractor must ensure that retention periods can be met during system design. • The contract must cover cyber security of system, mandatory staff training, BC plans.Cyber security of system to be approved by IT security professionals. • All data controllers are prompted to review their privacy notices. I agree the bullet points above are necessary. Having considered the risks and mitigations, my view is that these are correctly identified and appropriately mitigated. Whilst there are residual risks, my view is that these are commensurate with the benefits of the processing and that the processing is appropriate and proportionate. I recommend that the risk be reviewed in one year to take account of the lived experience of the project, which may allow for downgrading of risks, or the inclusion of additional ones with mitigation.		
DPO advice accepted or overruled by:	Simone Melia, Head of Housing Solutions, London Borough of Camden, 31/05/23	If overruled, you must explain your reasons
Comments: DPO advice accepted as outlined above.		
This DPIA will kept under review by:	The DPIA will be reviewed by the respective DPOs of each organisation when required	The DPO should also review ongoing compliance with DPIA

Appendix 1

1. [Rough Sleeping Minimum Data set]

See the above link to the data set, or the below images.



Field No.	Data field	Definition(s)	CHAIN coding	Inform coding	HCLIC coding (from boroughs)
1	Client name	CHAIN uses client response. Sometimes a client can use an alias. I assume HCLIC validates a person's legal name with government databases	Salutation: Mr., Ms., Mx., Mrs., Dr., Prof First name Last name Other names	Title (honorific): Dr, Miss, Mr, Mrs., Ms. Mx First name Last name Preferred name	PERSONAL DATA NOT AVAILABLE FROM HCLIC. Personal data is provided separately to HCLIC via a separate upload. A1.4 Forename and A1.5 Surname
2	DOB	Two choices: A person's age can be asked or DOB can be asked (and age calculated), as could be used to help validate a person's identity with government	Birthdate. There is a box to check if estimated	First asks if DOB known (Yes, No, Do not ask, client did not wish to disclose) Date of birth (DD/MM/YYYY)	PERSONAL DATA NOT AVAILABLE FROM HCLIC. A1.3 DOB (YYYY/MM/DD)
3	Borough most recently engaged in rough sleeping service(s) local authority at point of referral would be the field of choice	The borough where the person engaged in rough sleeping is encountered. This is not necessarily where the person has a local connection.	When a new event is created, the street site populates a borough field where the street site is located (where the person is seen rough sleeping). *A person could be found rough sleeping in multiple boroughs. * A concern is that the borough in which the	Under Timelines, it asks about local authority at point of referral [HL]	The identifying code for the local authority is entered. Borough engaged is not relevant. It is alphanumeric and the nine character local authority code, followed by an underscore and a twelve character unique case reference number). LA code comes from
4	Preferred language	CHAIN and In Form: Language the client prefers to communiate in verbally or in writing	AcholiAlbanianAmharicAngolanArabicBengaliBritis	AcholiAlbanianAmharicArabicBengaliBritish Si	Not recorded
5	Ethnicity	Cambridge dictionary: large group of people with a shared culture, language, history, set of traditions, etc., or the fact of belonging to one of these groups: The Office for National Statistics runs the Census	Arab Asian or Asian British – Bangladeshi Asian or Asian British – Chinese Asian or Asian British – Indian Asian or Asian British – Other Asian or Asian British – Pakistani	Asks "Ethnic origin" Asian / Asian British: Bangladeshi Asian / Asian British: Chinese Asian / Asian British: Indian Asian / Asian British: Other	1.7 Ethnic Group of Main Applicant: White: English/Welsh/Scottish/Northern Irish/British0White:Irish1White: Gypsy or Irish Traveller2Any other White background3Mixed/Multiple ethnic groups:White and
6	Gender	The UK government defines gender as: a social construction relating to behaviours and attributes based on labels of masculinity and femininity; gender identity is a personal, internal perception of oneself and so the gender category someone identifies with may not match the sex they were	Male Female Non-binary Not known A separate field allows a response for (current)	Gender:FemaleMaleAgenderedGenderfluidGe	2.3 Sex: Female; Male; Transgender; Prefer Not to Say; Not Known/ Other It collects "Sex" for each household member. The field was previously called Gender but the option "Transgender" has been retired
7	Relationship status (trying to obtain understand "couple" status)	Couple status (Y/N) – Change to relationship status? --Amy Withy, T 1000, couples advice	"Couple status isn't currently recorded, as it would be likely to become out of date and inaccurate It does allow a link to be established with another	Relationship Status (HL): None; Civil Partnership; Cohabitating; Divorced; Former / Separated Civil Partnership; Married; Separated; Single; Widowed; Other; Did not ask; Client did not wish to disclose	No field for relationship status. It does record: 2.5 Relationship: Main Applicant; spouse / partner; Parent/ guardian; Daughter or son; Other relative; Carer; Lodger/tenant;
8	Immigration status	Legal status to visit, work, study, settle or seek asylum in the UK	* This changed in April 2023 (new measures are):UI	Immigration status: UK national EEA national Asylum applicant (sic Asylum appellant) Asylum seeker	1.3 Reasons for eligibility assistance: Not eligible0British or Irish citizen, habitualllyresident in UK, Ireland, Channelislands, or Isle of Man, or deported
9	Nationality	Nationality is a legal identification of a person as a subject, a national, of a sovereign state. Inform states that if client has EU nationality that	CHAIN offers a pulldown menu of countries from Afghanistan to Yemen. There is a phone number and email offered to contact them if a country is not on the list.	Asks Primary Nationality: Asks "Secondary nationalities" (not a drop down menu, but open-ended notes field)	UK national habitually resident in UK 0 UK national returning from residence overseas / in UK for first time 1 Czech Republic 2

20	**Armed forces history**	Most useful definition is: Served in UK armed forces (give two choices) in past year/ever This would make it meaningful information that could point to a breakdown in discharge practices and capture those who have a statutory right to housing.	Armed forces (history): Yes No Not known Also asks: Date last left armed forces CHAIN asks about serving in armed forces of any	Under Timelines, Main Causes of homelessness [HL] there is an option "Left HM Forces"	3.2 Support Needs: see above. Specifically, "Served in HM Force" Option "Armed Forces accommodation" under the fields 1.13 Accommodation at time of application and 1.14 Accommodation when last settled There is the option "Left HM Forces" under
21	**Prison history** **We could also ask "Prison stay in the last year", or "ever" of as "last settled base"**	The new DLUHC indicator set will ask whether a rough sleeper has left prison in the last 13 weeks. We should match this. But we would also want to know if they have ever had a prison stay so we can measure the incidence of prison experience in the wider community.	Prison history isn't normally asked for as part of a street contact, but there is a chance to add it when the client record is 'first created. As part of the case history of the street encounter, "Prison" history is prompted offering responses such as: Not selected	Needs assessment record - multiple fields relating to this area Involvement with the Criminal Justice System in the Last Year or Ever is part of the Needs Assessment. It asks about involvement with the CJS, reprimand/warning/caution, involved with probation, involved with youth	3.3 Support Needs: see above Specifically "Offending history" We have the option "Homeless on departure from institution: Custody" under the fields 1.13 Accommodation at time of application
22	**Connection to Housing Options Office** **(There is a temporal aspect, row #24)**	(CHAIN does offer a field Approached LA for help relating to LSB "last settled base"	Field now called 'Approached LA for help relating to LSB', and there is also another field supplementing the 'last settled base' field, which records the date they left last settled base. Options in the 'Approached LA for help relacing to LSB' are: Yes - before leaving Yes - after leaving Yes - not known when No Not known No settled base since arriving in UK There is another field which allows the specific	'Source of referral' field and option 'Local Authority - Housing/ Homeless Department or Helpline Not recorded	H-CLIC contains the core questions to be used in the monitoring of statutory homelessness by local authorities in England following commencement of the Homelessness Reduction Act 2017 (HRA) No perfect overlapping to Housing Options Office In H-CLIC : 1.2.7 Date of homeless application, is The date of the first approach where a commitment to take an application was made. This can be but is not necessarily the There is an optional field (L.2 Previous Case Reference Number) to potentially identify previous approaches for the same LA. We are working on linking H-CLIC and the personal collection to identify reapplications across quarters and LAs using a spine id generated from PI data by ONS.
23	**History of statutory homelessnass or prevention duty**	Accepted as statutorily homeless (give 3 choices) currently, in past year, ever Not sure any current system collects this in this way - would need CHAIN to agree to capture these categories	*These fields are summarised from timeline events, rather than being directly editable CHAIN has a section for "Client Rough Sleeping History" which asks relevant questions such as (without showing fields): Verified Date Last Seen Rough Sleeping Borough Last Seen Rough Sleeping		
24	**Date of most recent Housing Options Office contact, if any**	Date of most recent connection (CHAIN does offer a field asking if Housing Options had been approache in the last 12 months)	CHAIN uses 'Approached LA for help relacing to LSB' (i.e. last settled base). It is therefore now related specifically to the date the client left their last settled base, rather than any time in the last 12 months. It is also possible to record timeline events to indicate that a client has made a new approach to Housing Options.	Under Needs Assessment, a "Primary Client Group" can be selected and "Single homeless with support needs" or "Homeless Family with support needs" can be selected. Then, "Local connections to second stage move on" can be selected.	H-CLIC contains the core questions to be used in the monitoring of statutory homelessness by local authorities in England following commencement of the Homelessness Reduction Act 2017 (HRA). No perfect overlapping to Housing Options
25	**Care leaver 18+**	Under the Children Act 1989, a child is legally defined as 'looked after' by a local authority if he or she: 1) is provided with accommodation for a continuous period for more than 24 hours	Asks if the client is a "Care leaver" Yes/No/Do not know	Asks Care leaver:YesNoDid not askClient did no	7.2 Priority need decision , options "Priority need: applicant is care leaver and aged 18 to 20 years" and "Priority need: vulnerable as a care leaver 21+". Can only select one option for this field, then

35	**Last Accommodation / Settled Base**	CHAIN asks "location of last settled base" HCLIC records accommodation at the date of approach	CHAIN has renamed the field as 'Last settled base (LSB)' in UK', and the new options are: 'Last settled base (LSB) is UK' options are: No settled base since arriving in UK Living with family/friends/partner Private rented accommodation Council tenancy (local authority accommodation)	Under Timelines, it asks about last settled base	1.14 Accommodation when last settled: Not known0; Owner-occupier1; Shared ownership2; Private rented sector3; Lodging (not with family or friends)4; Council tenant5; Registered Provider tenant6; Living with family or friends7; Looked after children placement8; Social
36	**Main reason (cause) for loss of settled base**	CHAIN revised to ask 'type of departure from LSB' and 'cause of departure from LSB'. This integrated database will use "Cause of departure."	This is now split into two fields - 'type of departure from LSB' and 'cause of departure from LSB'. This integrated database will use "Cause of departure." Type of departure options: Asked to leave by person they were staying with End of time-limited stay Evicted Left of own accord No departure - still has the accommodation Other Not known	Under Timelines, it asks about main cause of homelessness Main Reason for leaving last settled base: None Harassment, threats or intimidation - racially motivated Harassment, threats or intimidation - other Left HM forces Left hospital Left prison Loss of rented or tied accommodation -	1.15 Main reason for leaving last accommodation: Mortgage repossession0End of private rented tenancy–assured shorthold tenancy1End of private rented tenancy–not assured shorthold tenancy2End of social rented tenancy3Eviction from supported housing4Family no longer willing or able to accommodate5Friends no longer willing or able to accommodate6Relationship with partner ended (non-violent breakdown)7Domestic abuse8Retired9Racially motivated violence or harassment9Non-
37	**Date Accommodated**	Tenancy start date. CHAIN notes that CHORUS hotels are an exception, as they use the departure from the hotel	A given individual could have had many accommodation stays recorded on the system over a period of time "Arrival date" is the date accommodated. It also	Under Tenancy, there is information collected on Bedspace, start date, and end date.	Several data fields in H-CLIC for Accommodation outcomes (at the end of each duty) and TA placements. 8.2 Date Relief Duty started
38	**Connection to hospital or rehab**	Connected to needed hospital inpatient care	**A New Timeline Event "Health" can be created which is used to record client interactions with healthcare service.** The event can be selected from a pull down list of	In the "Tenancies" section, it allows the creation of a new Tenancy - this is to show when a Client is accessing a Bedspace or Move On.	1.21 Referral agency option "Community Rehabilitation Company" 6.2 Assistance with Support Needs: Engaged with services for physical health
39	**Arrival date**	Arrival date to hostel or temporary accommodation	"Arrival date is when the person actually moved in, and would ideally be completed by the accommodation provider	Uses "Entry date and time"	Use TA date fields only, no main duty decision as entering and leaving TA can happen independently. 7.2 Date main duty decision takes effect: 9.1
40	**Type of Accommodation**	The "type" of service provided accommodation	Temporary accommodation is created a new event under "Accommodation Stays (temporary)"; Encounter Type "Accommodation"; Event coded as "Accommodation Stay"; "Service/Type" coded as "Emergency Bedspace"; "Type of	In the "Tenancies" section, it allows the creation of a new Tenancy–this is to show when a Client is accessing a Bedspace or Move On. Under "Move On information" it allows for	9.5 Type of Temporary Accommodation: Temporarily remains in property0Made ownarrangements for temporary accommodation1Privately managed Bed & Breakfast hotels (privately managed
41	**Departure/end date from accommodation**	The date in which a client departed from provided accommodation	CHAIN uses "Leaving Date" (DD/MM/YYYY)	End date under Tenancy	Use TA date fields only, no main duty end date as entering and leaving TA can happen independently. 8.2 Duty end date, 8.4 or 8.9 Date of exit
42	**Departure reason**	The reason a client has departed from accommodation Circumstances behind the client leaving. Was it positive, negative or neutral?	CHAIN notes whether the departure was 'Planned or unplanned": Abandoned End of time-limited stay Evicted (arrears)	In-Form notes whether the departure was 'Planned or unplanned": Unplanned - abandoned Unplanned - evicted (arrears) Unplanned - evicted (behaviour)	Confirm if they have left TA placement first as entering and leaving TA can happen independently. 8.3 Reason the section 193(2) Duty, the
43	**Destination Upon TA Departure**	A wide variety of outcomes from temporary accommodation	Destination on departure: Accommodation where client is owner Assessment Centre Bed & Breakfast Care Home	Destination on departure: Moved into Accomm as owner occupier Moved into Bed & Breakfast: Moved into Care Home	The field "Accommodation Outcome" is also recorded at the end of the DECISION and FINAL DUTIES section. 8.4 Accommodation outcome is last

10	**Local Authority connection**	Inform: Does the client have links to the area?	* Only editable by pan-london services (like VSNO). Likely will change in the medium term future Contains the following fields which doesn't allow	No local connection field	1.1 Local Authority Code and Case Reference Number And CHAIN application implies that an
11	**Pregnancy Status**	An indication of whether the female person is pregnant, at time of repoting. Pregnancy status could be self-reported or verified. Obviously, there could be benefit to pregnancy for some,	Pregnancy not recorded as a standard piece of information across the system, due to its likelihood of becoming out of date	Under Timelines, Main Reason for Referral [HL] there is an option for "Household with pregnant member and no other dependents"	Pregnancy is a priority need under 7.5. Under Support Needs of Main Applicant and Household Members there is an option for "young parent requiring support to manage
12	**Employment status (or Economic status)**	Currently working for pay? (Y/N). The applicant's self-reported current employment status. Inform asks about economic status that includes	**OTHER ASSESSMENT:** Current Benefits. Currently in receipt of all benefits. Employment status none; employed full time (30 hrs or more); employed - furloughed; employed	**'Economic Status' field on Needs Assessment Table/ Drop down values: 18-25 NEET, Child under 16, Full time student, Full time work - more than 24 hours per week** Government training / work programme	**Employment Status: also collected for spouse or partner)** **Don't know / Refused** **Working: 30 hours a week or more (contracted, regular or guaranteed)**
13	**Sexual orientation (or Sexuality)**	CHAIN defines this as "sexuality" Inform uses definition from www.stonewall.org.uk	Bisexual Gay Man Gay woman/lesbian Heterosexual Other Prefer not to say	Asks "Sexual orientation:" Asexual Bisexual Gay Heterosexual Lesbian	HCLIC records under a Sexual identification category: Heterosexual/straight Homosexual (gay/lesbian) Other Prefer not to say
14	**NRPF or Entitlements to Welfare Benefits**	A person who has recourse to public funds will be able to access benefits and housing assistance if they meet the relevant qualifying requirements.	* CHAIN changed the methodology for recording NRPF. This will report "Entitlements to welfare benefits" Field now called "Entitlements to welfare benefits	Not recorded	2 fields on benefits : 1.11 Benefits towards housing costs (options No benefits; Universal Credit; Housing Benefit ; Don't know / refused) 1.12 Benefits towards other living costs
15	**Phone number (personal)**	The priority should be a personal phone number, but it can also refer to another person's # (friend, family) used by a rough sleeper to receive messages.	Phone	Phone	Not recorded
16	**Email**	Similar to the phone field	Email	Email	Not recorded
17	**National Insurance (NI) number**	The National Insurance number is available for people who: -live in the UK -have the right to work in the UK -are working, looking for work or have an offer to start work	NI #	NI #	Field in the personal collection, but PERSONAL DATA NOT AVAILABLE FROM HCLIC
18	**NHS number**	An NHS number is a 10-digit number, which is unique for each person. It helps healthcare staff and service providers correctly identify patients and match their details to health records	NHS#	NHS Number is available on the client record	Not recorded
19	**Disabilities (e.g. Cognitive, Mental or Physical)?**	CHAIN wants to know "if a client considers themselves to have a disability" Inform asks Disabilities Conditions in the needs assessment section	In the Needs Assessment section it asks "Disability types": Autistic Spectrum Condition Hearing Impairment Learning Disability	In the needs assessment section asks "Disabilities Conditions": Yes Yes - but the client did not wish to disclose details No	We have reference to disability in 4 fields in H CLIC 3.2 Support Needs of Main Applicant and Household members (select all that apply) 3.2 Assistance with support needs (select all that apply)

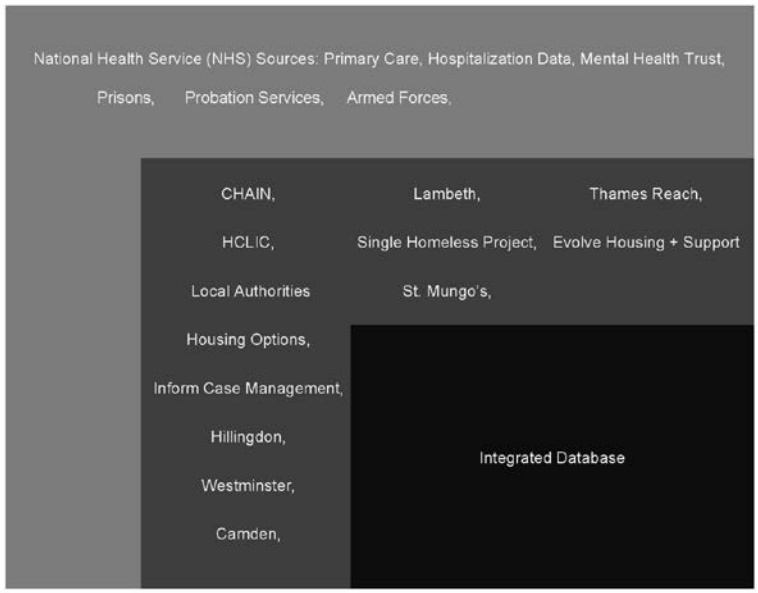
44	**Reconnection made (not need)**	"the process by which people sleeping rough, who have a connection to another area where they can access accommodation and/or social, family and support networks, are supported to return to this area in a planned way" (Homeless Link, 2014b, p.3).	*If there's no reconnection event recorded, it means none has been attempted but not necessarily that none is needed "Reconnections" is created as a separate event. A distinction is made of "Reconnection advise" or "Reconnection Confirmed" We assume that if no event is created, then no	The link between access to accommodation, and/ social, family and supported networks to connecting to another area is not there	5.5 Relief Activity: Successful or other assured measures to enable return home (7)

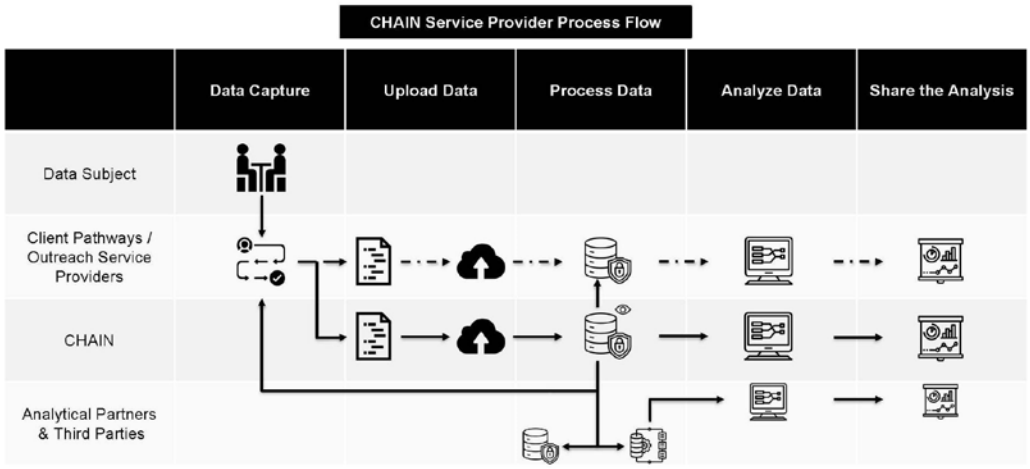
26	**Current Mental Health Concerns**	Does the client have current mental health needs? Yes/No Are the current MH needs severe/moderate/low?	There is a "Mental health" area as part of the "Support Needs and Lifestyle" section. A "first asks "Mental health (worker)	Under Needs Assessment, there are questions about Mental Health Support, including whether the current supports meet the client's needs, and MH support that WOULD help HL	3.2 Support needs option "History of mental health problems" 1.13 Current accommodation and 1.15 Reason lost both include options for "Reason for loss institution: (mental
27	**Current Medical Needs**	Does the client have notable current physical or	There is a "Physical health" area as part of the	Under Needs Assessment, there are	1.22 Date of homeless application, is The

2. [IGfL Process Flows]

   See the above link to the process flows, or the below images.

IGfL Process Flows




CHAIN Service Provider Process Flow
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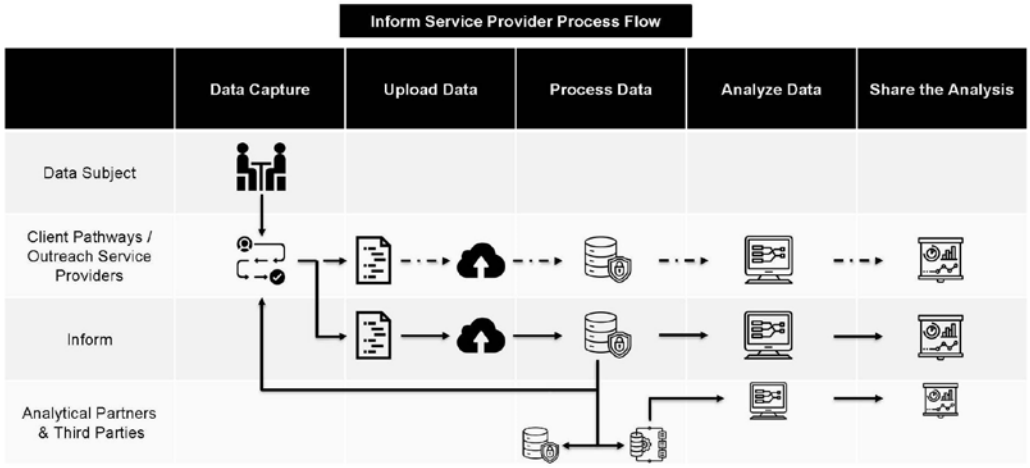
Upload Data
Process Data
Analyze Data
Share the Analysis
Data Subject
Client Pathways / Outreach Service Providers
CHAIN
Analytical Partners & Third Parties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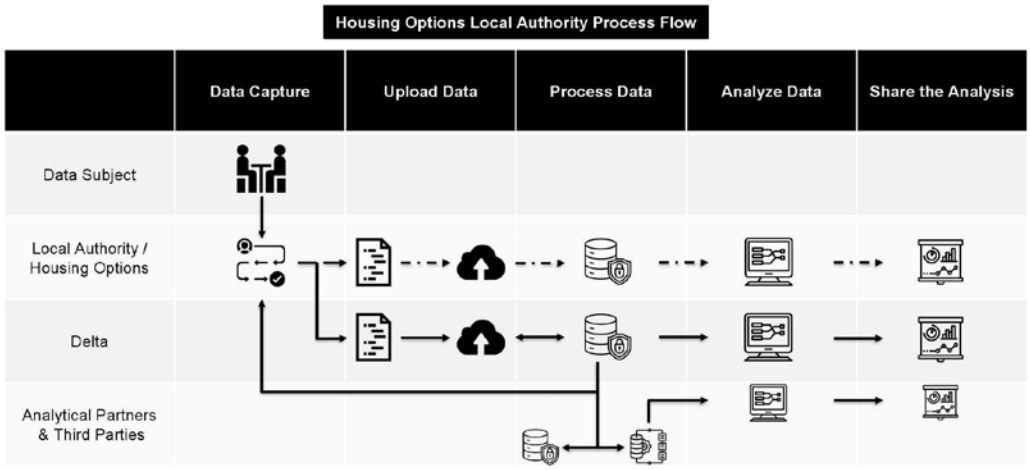
Upload Data
Process Data
Analyze Data
Share the Analysis
Data Subject
Client Pathways / Outreach Service Providers
Inform
Analytical Partners & Third Parties


Housing Options Local Authority Process Flow
Data Capture
Upload Data
Process Data
Analyze Data
Share the Analysis
Data Subject
Local Authority / Housing Options
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Analytical Partners & Third Parties