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	**Cost of Living Fund Research Project**	
Project Lead and Information Asset Owner/s	Project Lead	
	IAO name and asset	Kate Robertson, Director of Customer 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.* E*xplain any acronyms on first use.*	**Context: The Cost of Living Crisis Fund ("the Fund")** The rising costs of food, fuel and energy bills made it more difficult for people in Camden to make ends meet. Individuals and families have faced severe financial hardship and struggled to afford the essentials of food, warmth, water, electricity, and housing.	

	The Cost of Living Crisis Fund ("the Fund") was launched to enable residents to access a monetary award to help meet the rising cost of living. Currently, residents can receive up to £500, depending on their circumstances and the size of their household. They can apply for up to two payments in any 12-month period. To access the Fund, residents previously needed to apply via trusted partner organisations, such as the Camden Advice Network, schools, and community centres. The ambition behind this design was that this would serve as a pathway to not only one-off, immediate financial support, but as part of a comprehensive package of wraparound support which the partner organisations would provide. Following feedback from partners that the process increased pressure on them to complete the referral forms and reduced their capability to provide wraparound support, a new self-referral route was created. As of May 31st, 2023, residents no longer have to contact a partner to apply for the Fund; instead, they can refer themselves to be assessed for advice and financial support. Residents are now assessed for low-level advice and support, and as part of the assessment, they may be found eligible for certain income maximisation solutions, such as a payment from the Cost of Living Crisis Fund, as well as other discretionary payments and awards. This new process intends to serve a dual purpose: (1) To alleviate pressure from partners on processing applications for the Cost-of-Living Crisis Fund, leaving them to only support those who are unable to or unwilling to self-refer; and,

	(2) To ensure people who do self-refer are provided a basic level of financial advice and support, to hopefully improve their medium to long-term financial health. **Research Objectives** As Camden is continuing to invest £2.25m into the Cost of Living Crisis Fund, this feedback will inform a review of how the scheme can be improved this financial year. Overall, we are conducting this research project to understand how the service could be improved for both applicants of the Fund, and partner organisations. Our key research objectives are to: • Understand the journeys and experiences of the grant applicants (successful, unsuccessful; referred by partners, self-referred); • Understand the impact of the award on individuals' circumstances and its effectiveness in alleviating hardship on short-, medium- and long-term basis; and, • Understand the experience of partners, and how effective this process is as a pathway to longer-term financial and non-financial support **Participants** There are two groups of participants: representatives from partner organisations, and recipients of the Fund. We will be conducting 1-hour interviews virtually via MS Teams, or in person, depending on the participant's preference. We are submitting this DPIA as we intend to record the audio of the meetings, depending of course, on the participant's consent. The

	participant would be able to choose if they consent to note-taking only, or notetaking and an audio recording. If they consent to neither, we will respect their wishes and inform them that we would not be able to interview them for this project. All information held on the participant to date would be deleted immediately. Further information on data processing is discussed in Section 3.1. **Key Stakeholders and Researchers** The Strategy and Design Team was commissioned by the Director of Customer Services, Kate Robertson, to review the Fund (which sits in her directorate) and provide recommendations on service improvements. Team members Bonnie Cheng and Weronika Sarnowska are leading this project, and working closely with the service team to deliver this on this brief. The service team is Tackling Poverty, which is led by Sarah Sedley. Tackling Poverty is responsible for a suite of schemes and responses to the Cost of Living crisis, including this Fund. The assessment (and now advice) team is led by Habiba Hussain. Sarah and Habiba will be referred to as the "Tackling Poverty team managers" for brevity. While they are involved in steering this research project and in providing background information and subject matter expertise, the research will be conducted independently by Bonnie Cheng and Weronika Sarnowska, to preserve participant anonymity and data privacy. The Tackling Poverty team managers will not have access to participant data – this will be outlined in Section 3.1.
Implementation Date:	14 June, 2023

Should be at least a month to allow for assessment and any necessary steps to be undertaken	

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?	Yes – Please see section 3.1

1.7	Does the project involve new processing or significantly change the way in which personal data/special categories of personal data is handled?	No
1.8	Does the project involve new or significantly change handling of personal data/special categories of personal data about a large number of individuals?	No
1.9	Will data be combined, compared or matched from multiple sources?	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
		Change **7 July 2023 Amendment:** Previously, we were collecting this data separately, through our research screening process. However, the Tackling Poverty team already has this information (from the application database). We are documenting a change in procedure, where we will be using participant data from the application database, rather than requesting they supply this information again to the research team, separately. Please see section 3.1 below for an updated overview.
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	**Yes ***
	Address		Email address	**Yes**	Telephone number	**Yes**	NHS No		Other eg a reference number such as Mosaic ref	**Age**
	Other data *(Please state):*			**This DPIA concerns two groups of participants.** **For the representatives from partner organisations** We will only collect their name, email address, phone number, and their employer. No other personal or special category data will be collected from these representatives, as we adhere to the principle of collecting minimal data. We will only request enough information so that we can contact them, and take note of whom we are speaking with. **For the recipients of the Fund** We will be collecting all forms of information marked as 'Yes' in Section 2. Collecting this data will allow us to ensure that our					

		sample is elevating the voices of people who tend to be marginalised by existing socio-political systems. We will be collecting **financial information** on the recipients. We will note the number of awards they have received, the amount of each award, the dates of the awards, and any benefits they are receiving. This information is used as a proxy for financial need and will allow us to ensure we are speaking with people along the spectrum in terms of severity. It will also allow us to segment participants by the time from which they received the award, allowing us to hear about short vs long-term impact of the award. In interviews, we will be asking about their financial information more generally, to ensure we understand their holistic experience. Participants may therefore voluntarily disclose other aspects of the financial health to us in the course of the interview. **Other Data:** • **Type of housing** (e.g. council tenant, private tenant, home owner, social housing, other); • **Age group** will also be collected to allow us to ensure representation in the sample.
	Special Categories of Personal Data	

	Racial or ethnic origin	**Yes**	Fingerprints/ Biometrics		Religious or philosophical beliefs Political opinion			
	Trade Union membership		Physical or mental health or condition					**Yes**
	Sexual life or sexual orientation		Housing records Social services records		Tax, benefit or pension records		Employee/HR records	
	Other data *(Please state):*		We will not directly ask for any other special category data; however, we recognize that some participants may supply special category data by their own volition, if deemed relevant to their context. In these cases, we will record these pieces of information to ensure the participant's original meaning and contributions are preserved.					
2.3	Will it include data about any criminal offence committed or alleged, or criminal offence record?		No – we do not intend to ask or to collect data on criminal offence; however, this may be recorded if it is voluntarily supplied by the participant, who deems it relevant to their context.					

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!**	**7 July 2023: We are submitting a change to this process – please see details below, under '7 July 2023 Update.' The Data Flow Map has been updated to show our new process. The old process is still available in the same document (underneath the new process), for reference.** **1. We have created a diagram which outlines the entire participant experience for the recipients of the Fund** The process from recruitment to follow-up is outlined, to answer questions 3.1, 3.4, and 3.5. Please access the flow chart here: DPIA - Data Flow Mapping.pdf The top level of the diagram shows the phases of work, such as participant recruitment, research, and analyses and sharing – these phases show what data is collected in that phase. Briefly, the principle of data minimization underpins each phase—we have designed our process such that only enough personal and special category data is collected at each stage to enable us to conduct our research. Further, access is controlled: only people with a need-to-know will have access to the data in each stage. All assets will be stored in our access-controlled SharePoint folder. As an overview, we will be recruiting participants through the Tackling Poverty team

		application database. This is discussed in full below. **(A) Application Database**: The Tackling Poverty team holds a database of all applications, which were collected in accordance to their Privacy Policy. To ensure we elevate the voices of those who have been hard to reach (so we can understand from their perspective, how we could improve the service for themselves and similar others), the TP management team has shared the anonymised application database, where personal names and contact information for the recipients have been removed. This allows us to segment possible research participants based on specific demographic characteristics – for example, we know that we had a hard time reaching private renters – thus we would want to contact more private renters to hear their perspectives. The research team will identify a group of people we are interested in speaking with, based on their unique identifiers. They will pass on these identifiers via an access-controlled, password-protected, encrypted spreadsheet to the Tackling Poverty team. Some of these unique identifiers could be contacted via email,

		whereas others who are digitally excluded would need to be contacted via phone. The Tackling Poverty team would conduct this outreach. If customers are interested in participating in our research, they will be directed to an MS Form to screen their eligibility. This Form would collect the personal and special category data as listed above. If they are digitally excluded, the Tackling Poverty team would note down their contact name, phone number, and preferred calling times on an access-controlled, encrypted spreadsheet, and the Research Team would walk them through the MS Form to screen their eligibility and to schedule their interview. If the customer does not wish to participate, no personal information will be shared with the project team. **7 July 2023 Update:** We are updating our procedure to reflect the following: - The Tackling Poverty team will provide the Lead Researcher access to their application database. The Lead Researcher will download full, non-anonymised applicant data for those

		who applied in September, January, or June, and who were successful (i.e. they eventually received an award). This data will be stored on a password-protected, encrypted spreadsheet. This would allow the Lead Researcher to identify a group of people we are interested in speaking with. The Tackling Poverty team will continue to conduct the initial outreach via email and phone. We are changing this procedure due to two key reasons: (1)_ 1. We could reduce the fatigue and stress of filling out the screening form, which asks the participant the same information they have provided before in their application. We know that participants experience fatigue when asked to repeat the same information over and over again; we would like to reduce this as much as possible, particularly given that we are speaking with people who have been under severe financial stress: we want to reduce their mental load as much as possible to minimise any negative mental health impacts from participating in research.

		2. We would be more certain that the information we are receiving is accurate. Under the old process, we know some information supplied by participants on the screener is inaccurate – for example, participants have noted that they received £150 from the Fund, but this amount does not reflect any of our records. This misinformation is understandable, as people are having a hard time recalling details from 6-9 months ago, and are filling out an online form which encourages rapid, instinctual (rather than reflective) responses. Overall, this change in process will help us ensure that we can minimise harm from participating in this research, and improve our data quality (see Section 4.3 for updated comments). **If the participant passes screening, they will be scheduled for an interview.** Chosen participants will be provided a consent form with the privacy notice on a Microsoft Office Forms, which is stored securely in our private, access-controlled OneDrive folder. If they would like, a private calendar invitation

		will be sent out to their email address. The private email block ensures that the identity of participants is protected – nobody can see the details of the invitation except for those invited. **If the interview is conducted remotely**, we will use either 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 our access-controlled OneDrive folder. 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. Notes will also be taken, with the participant's consent, and will be stored in the OneDrive folder. **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. As above, notes will also be taken, with the participant's

		consent, and will be stored in the OneDrive folder. **All interview materials including the notes and recordings will be stored with all names pseudonymised with participation codes**. They will be stored in our private, access-controlled OneDrive folder. They will be deleted after 1 year. **2. For the representatives from partner organisations** The same principles in terms of consent, data protection, and storage apply. The process would be identical, except for the recruitment and screening stages. As the partner organisations work closely with the Tackling Poverty team, we will identify potential participants and take the TP team's guidance on how to best reach out (likely via an email introduction facilitated by the TP team). Consent would be obtained, and the privacy notice would be shown. The chats will be of a more professional, advisory nature.

3.2	**Explain in as much detail as possible why this is being done**		This is in accordance to Strategy & Design Team's policy on 'How we manage research data and participant privacy', which has been created in consultation with Sarah Laws and has been approved by the Information Governance Team.
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	**Controller or Processor?**	**Is there an existing contract or Data Sharing Agreement between the council and the parties which covers information security and data protection ? Yes/No/In progress**
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.**		We designed a flow chart to answer all questions in section 3 – please see here: DPIA - Data Flow Mapping.pdf
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 for an overview, and this data flow map for details: DPIA - Data Flow Mapping.pdf

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	**Special Category data UK GDPR Art 9 condition and DPA18 schedule condition**	**Criminal data UK GDPR Art 10 condition and corresponding art 6 condition**
	For recordings art 6(1)(a) consent, for other processing art 6(1)(e) public task. Where safeguarding information is disclosed such that the council is required to act then art 6(1)(c) legal duty	For recordings art 9(2)(a) explicit consent. For other processing art 9(2)(g) public task, with the Data Protection Act 2018 schedule 1 part 2 condition being para 6 Statutory and government purposes, and the underlying law being the Localism Act 2011. Where safeguarding information is disclosed such that the council is required to act then art 9(2)(b) (b) Employment, social security and social protection (if authorised by law) with the Data Protection 2018 schedule 1 part 1 condition being para 1 Employment, social security and social protection and (g) Reasons	Criminal offence data is not being directly collected, but if provided by a participant the article 6 legal basis is that as for personal data and the DPA18 schedule conditions will be the same as for special category data

		of substantial public interest (with a basis in law) with the Data Protection Act 2018 schedule 1 part 2 condition being para 6 Statutory and government purposes and para 18 18. Safeguarding of children and individuals at risk with the underlying laws being the Care Acts and Children Acts	
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**		
	Consent form – see supplementary materials for reference		
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		
	Our procedure is in accordance to Strategy & Design Team's policy on 'How we manage research data and participant privacy', which has been created in consultation with Sarah Laws and has been approved by the Information Governance Team. I have included specific design choices below, in case of interest: **Data Quality** Participants can review and update their contributions at any time by emailing or phoning the members of the research team. **Further, under the new procedure** (where participants are no longer required to submit contextual information about their financial circumstances on the screener), we are minimising the amount of self-		

	reported data participants must supply at this stage, data which can be inaccurate due to memory constraints (as we are asking them to recall details from 6-9 months ago), due to the context of an online survey (which encourages instinctive, rather than reflexive responses), or other reasons. **Data Minimisation** **This DPIA concerns two groups of participants:** **For the representatives from partner organisations** We will only collect their name, email address, phone number, and their employer. No other personal or special category data will be collected from these representatives, as we adhere to the principle of data minimisation. We will only request enough information so that we can contact them, and take note of whom we are speaking with. **For the recipients of the Fund** It is key to first note that data minimization is jointly determined between us, the researchers who are designing the research experience, and the participants, who can determine if the data we ask for is deemed unnecessary for their personal context. While we only ask for data which is required for contact and screening purposes, some participants may find that they do not wish to supply certain pieces of information due to personal preferences or concerns. To address this, we uphold the principle that participants own their data: they are invited to request we delete any information we hold about them at any time before, during, or after the research interviews, simply by contacting a member of the research team via their preferred method of phone or email. Secondly, in terms of the deliberate design of our research process, data minimization is a key value which underpins our approach for collecting both personal and special category data. Below, we have explained our approach for each category.

	(1) Personal Data Personal data is used on two bases only: (a) to contact participants; and, (b) to ensure our sample is representative. **To contact participants:** We are only using an individual's name, email address, and/or phone number, to contact the participants, and to conduct the research. **To ensure our sample elevates the voices of those who may be marginalised by the existing system:** Accessing existing data on a participant's gender, financial circumstances, type of housing, and ward will allow us to achieve a more holistic picture of each person's unique circumstance. It will also allow us to ensure that we interview participants who the Fund had difficulty reaching, but whom we know could be struggling and could benefit from access (such as private tenants). **(2) Special Category Data** We are only analysing enough special category data to ensure key factors related to financial health are factored into our sampling and analysis. An example of this is collecting data on one's mental health condition. Existing research shows that poverty can impact one's mental health (and vice versa), and that mental health concerns can impair one's ability to seek financial assistance and support: at times, dealing with financial matters can be so overwhelming that people may bury their head in the sand and avoid addressing pressing financial concerns. We want to understand how we can better support people who face these circumstances; thus, identifying people from these backgrounds who would be interested in speaking with us would allow us to improve this service for others who may be in a similar position. However, we do acknowledge the ethical and safeguarding concerns of reaching out to people who may be struggling with their mental health, to discuss a topic which may be distressing to recount – our acknowledgment of this risk and our mitigation plan is addressed in Section 6.

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
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,*	
	A private, access-controlled OneDrive folder. Only members of the core research team (listed in Section 5.3) will have access.	

5.2	**In what country is the data stored?**
	United Kingdom
5.3	**What roles will have access to the information?** (List individuals or staff groups)
	Only the core research team members (listed below) will have access: • User Researcher • Policy Designer
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 private, access-controlled OneDrive folder for this project. Specific collaborators will have limited access –- they will only be permitted to access documents and/or sub-folders which are necessary for them to complete their contribution to this project. Only members of the research team will have access to all 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**
Participants could be identified through their opinions and quotes by Tackling Poverty staff, who may have assessed the participants	Unlikely	Moderate	Moderate
Recordings may go astray or may be retained beyond retention period	Likely	Moderate	Medium/High
Participants' contact information may be revealed to other Camden employees via the calendars of researchers	Likely	Minor	Moderate
Unnecessary personal data is collected	Unlikely	Moderate	Moderate
Researcher contact information such as personal phone number or email may be revealed to participants	Rare	Moderate	Moderate
The emotional wellbeing of participants may be compromised as they may disclose distressing information during the interview. This is likely as the topic of financial crisis can be a highly	Likely	Negligible from a data privacy	Moderate

emotional and private experience. This risk may be heightened for people who are experiencing mental health concerns, which may in part be due to the financial distress they are experiencing.		perspective, but noted due to its ethical and safeguarding significance	

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?**

Participants could be identified through their opinions and quotes by Tackling Poverty staff, who may have assessed the participants	In terms of potential controls: While the Tackling Poverty management may be aware of who is interested in participating, they will not be privy to the final list of participants. Thus, any suspicion they have about a participant's identity will remain a hypothesis. If a participant supplies a piece of information which may uniquely identify them – for example, the specific amount of debt they owe and the school their children attend, we would paraphrase the contribution in the final output, replace the information with a broader, more descriptive term, or use their feedback in combination with that of several others, to create one aggregated profile which masks individual identities.	Reduced	Low	yes
Recordings may go astray or may be retained beyond retention period	All recordings and interview materials are stored in a secure folder on SharePoint. At the expiry of the 1-year retention period, the Research Lead (Bonnie Cheng) will delete all recordings from our SharePoint. The Research Lead will set an appointment in her calendar 1 year from the date of the last interview, to ensure all records are deleted in the future.	Reduced	Low	yes

	Within the Strategy and Design team, there are plans to integrate a file-cleaning procedure every 6 months. While there is not yet a date for implementation, this will likely occur before the 1-year anniversary of this project, and would therefore help reduce the risk of recordings going astray or retained after the 1-year period.			
Participants' contact information may be revealed to other Camden employees via the calendars of researchers	The default settings in our calendars shows all appointments as visible to our team. If a calendar invitation is sent to participants, their contact information and participation would be visible to Camden employees. To eliminate this risk, all calendar invitations sent will be marked 'Private', which ensures no details will be visible to anyone except the diary holder and meeting invitees.	Eliminated	Low	yes
Unnecessary personal data is collected	The risk of this is considerably lowered as we have designed a research process based on the principle of data minimisation. For example,if people are not selected for research, their personal name, email, phone number, and address will be deleted from our spreadsheet – we will anonymise their entries. We will not delete their entries altogether, as we would like to conduct some quantitative analysis to understand more about the overall	Reduced	Low	

	population; however, their personal, identifiable data will be removed.			
Researcher contact information such as personal phone number or email may be revealed to participants	Researchers will only contact participants through their Camden email addresses and Camden-issued phone numbers (which operate via MS Teams). In the event MS Teams is unable to support the interview call, researchers will not use their personal email addresses or phone numbers to attempt to contact the participant. The interview will be rescheduled so that contact remains secure and the researchers' contact information remains private.	Eliminated	Low	yes
The emotional wellbeing of participants may be compromised as they may disclose distressing information	**Recruitment** If a participant signals their interest in participating but does not respond to the Research Team's communications, the team will try twice. On the second attempt, the research team will let the potential participant know that we will not attempt to contact them again, but they are encouraged to reach out if they feel ready and would like to participate. This is to	Reduced	Low	yes

during the interview. This is likely as the topic of financial crisis can be a highly emotional and private experience. This risk may be heightened for people who are experiencing mental health concerns, which may in part be due to the financial distress they are experiencing.	ensure that we get free and informed consent to participate, and that we do not chase after people who may feel stressed or anxious about the engagement. Some people may not feel comfortable saying they do not wish to participate, and may use avoidance strategies instead; while others may feel too anxious to answer the phone. In any case, we take their cue and prioritise their wellbeing. During the scheduling call, researchers will check with the participant to see if there are any accommodations we can make the make the experience more comfortable for them, including being aware of any potentially triggering topics to avoid. **Cancellations** If a participant cancels or asks for a reschedule, we will provide an opportunity to reschedule the conversation. If they do not respond, or if they respond but cancel again, we will, as above, not chase them for participation. It is possible of course, that some participants may need to reschedule multiple times but are still keen to participate – we will use our discretion and judgment to ascertain this. **During the Interview**			

	Prior to the interview, the research team will explain that the conversation may be challenging, and that we encourage taking a break or skipping questions at any time. If the participant is discussing a sensitive topic, even if they are not visibly demonstrating signs of distress, the researcher will acknowledge the potential challenge and check to see if they feel comfortable to continue speaking about the topic. The researchers will actively encourage taking a break at any time, ending the interview, or rescheduling to another time. If the participant would like to withdraw from participating, the researchers will encourage it, and stay on the line with the participant to ensure there is no immediate risk of harm. **After the Interview** For all participants, researchers will share a list of vetted resources at the end of the interview. This list will signpost participants to services which can help them with their debt. These services range from organisations which are dedicated to supporting individuals during the			

	cost-of-living crisis, to longer-term aid relating to debt advice. Prior to distribution, the researchers will contact these services to understand their capacity to support referrals, to ensure that participants are not directed to oversubscribed services which are unable to provide aid.			
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	Original DPIA No, Sarah Laws, Data Protection Manager Amended and updated version - Tanya Bryant
DPO advice	Approved but consent but be carefully recorded, Andrew Maughan DPO June 2023
Information Asset Owner acceptance of residual risks	Names of IAOs Kate Robertson Director of Customer Services
This DPIA will kept under review by: (*usually the author or the IAO)*	

Version Control

Version	**Reason**	**Date**	**Author(s)**

1.0	New DPIA	June 2023	Bonnie Cheng
2.0	Editing DPIA to reflect change in process (granting Lead Researcher access to view non-anonymised applicant data, to reduce the amount of duplicate personal data collected for research)	July 2023	Bonnie Cheng

Appendix 1
Risk Assessment Tables

Table 1 Likelihood of Risk Occurring

Rare	One-off failure
Unlikely	Possible that it may reoccur but not likely
Possible	Might happen or reoccur on a semi-regular basis (no more than once a quarter)
Likely	Will reoccur on a regular basis, pointing to some failure in controls
Almost Certain	Willful act, systemic failure in controls
Negligible	No personal data involved, or risk won't have any impact.

Table 2 Impact of Risk if it occurs

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

Risk Assessment: Table 3 - risk level

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

Level of risk	
1-3 Low Risk	Acceptable risk No further action or additional controls required Risk at this level should be monitored and reassessed at appropriate intervals
4-6 Moderate Risk	A risk at this level may be acceptable, if so no further action or additional controls required If not acceptable, existing controls should be monitored or adjusted

8-12 Medium / High Risk	Not normally acceptable Efforts should be made to reduce the risk, provided this is not disproportionate Determine the need for improved control measures
15-25 High Risk	Unacceptable Immediate action must be taken to manage the risk A number of control measures may be required

Table 4: is the risk level acceptable?

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

- *Effects on Residents*
- *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 residents to gain their insight on their motivations, experiences, and pain points with applying for the Cost of Living Crisis Fund. This piece of research would enable us to bring these perspectives to the sponsor of this project and the Tackling Poverty team management. Sharing this feedback would enable us to improve the service for future applicants, understand how we could work more closely with partner organisations, and provide valuable insights to lobby central government for continued funding for this scheme, which supports our most vulnerable residents.

- Collecting special category data would allow us to ensure that we are speaking with people who we had a hard time reaching (e.g. private renters). This will allow us to improve our services, and tailor our engagement strategy for this upcoming winter, when we expect more applications. Overall, elevating the voices of those who were difficult to reach will allow us to distribute these awards more equitably and reach the people in Camden who need support the most.

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

- Personal Data: We would not be able to contact individuals to gain their insight on their lived experiences of undergoing the application and award process. Our research findings would then only include staff perspectives, which are only one piece of the overall picture of the customer experience.
- Special Category Data: We would not be able to gain deeper insight into how we could better reach certain applicants, making it difficult to distribute the Fund more equitably this upcoming year.

1. *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 control for potential bias. By ensuring we have key voices which represent prioritized profiles, we can ensure their experiences and needs are considered moving forward.
- **Data Analysis**: Feedback will be aggregated based on thematic and qualitative analysis; by applying appropriate research methodology, we can minimize the bias which may flow through.
- **Algorithms:** None used

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) small sample size, b) non-response bias, c) limitations of qualitative analysis.

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, the participants may experience emotional turmoil from recounting difficult life experiences particularly as they relate to financial crisis; however, participation is entirely voluntary, can be paused, or revoked at any time. We lead with an empathetic and trauma-informed approach, where we put our participants – our people – above research results and outcomes. We will also supply a list of support resources after the interview, as part of our compensation package. These

support resources will be vetted before being presented to participants, for capacity and ability to provide support, such that we are not directing participants towards outdated or oversubscribed services.

2. *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?*

- As noted above in section 4.3, data minimization is a key principle underlying our project. We do not collect any data which is unnecessary to complete our research objectives. Personal and special category data are collected on two bases only: to contact participants and to ensure our sample is representative.

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 and contact method (phone or email address) will be attributed with our raw notes

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

- Not possible, as contact information is required to gain insight, and other personal data is required to ensure our sample is representative and eligible.