# DATA PROTECTION IMPACT ASSESSMENT

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

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

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

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| **Project Name** | **Enrolment of Primary school children as library members and Sign up for Summer Reading Challenge** | |
| **Project Lead and Information Asset Owner/s** | Project Lead | [redacted] |
| | IAO name and asset | Fiona Tarn, Head of Libraries |
| | IAO name and asset | Vikram Hansrani, Director of Education Commissioning and Inclusion |
| **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.* | Camden Libraries have learnt from a similar project in Manchester Libraries. Camden wants to auto enrol all primary aged children (approx 9500 children in Camden) as library members and joiners of the Summer Reading Challenge to support their literacy development. This work is linked to the Every Child a Reader programme. On an annual basis we will want to upload approximately 1200 children who will be the new nursery children and any other children who have enrolled in the intervening 12 months. The school census data is updated three times a year (Jan, May, Oct). . The children and their parents will be told that the child is being joined to the summer reading challenge and the library and | |

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| | will receive SRC joining materials and of the school's participation in this project. The Library Service will help draft the notification to parents.<br><br>This will involve the Library Management System (Spydus) provider, CIVICA,. Being sent an encrypted spreadsheet holding the data which they will upload into Camden's Spydus database.The data will be extracted by the Council data team responsible for the school data. Uploading the data into the library system will avoid library team members having to manually input the data and avoiding data error and breach. Manchester Libraries saw an increase in engagement with the Summer Reading Challenge by using this process and no complaints have arisen over the three-year period with 18,000 families involved.<br><br>Once the data is in Spydus it is only accessible to library staff and will not be shared with anyone else. The data will be used in the same way as other library membership data for lending of books, access to online resources and communication about reservations. The data will be deleted if the new user does not use the library for six years – in line with the retention period. If the parent objects to the membership, the data will be deleted.<br><br>The data will be transferred from the Council data team to the library management system by CIVICA uploading the encrypted file . The data on the spreadsheet will be destroyed when the data has been uploaded and primary schools/parents have been given a chance to object. A letter will be prepared by the library service and shared with parents / carers by the schools.<br><br>The data being transferred will be<br><br>• Name<br>• Address<br>• Postcode<br>• Date of Birth<br>• Gender<br>• School attended. |

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| | The library service also plans to run a competition for book reviews and if a child completes the Reading Challenge, they will be automatically entered into a free prize draw to win a book voucher. If the child enters the book review competition there will be a chance to win a Kindle Fire and book bundles. The Library Service will run these competitions each year and will use the contact details held on the library management system to inform the winners. |
| **Implementation Date:**<br><br>*Should be at least a month to allow for assessment and any necessary steps to be undertaken* | May 2024 |

**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 |
| 1.7 | Does the project involve new processing or significantly change the way in which personal data/special categories of personal data is handled? | YES |
| 1.8 | Does the project involve new or significantly change handling of personal data/special categories of personal data about a large number of individuals? | YES |
| 1.9 | Will data be combined, compared or matched from multiple sources? | YES |

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| 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? | Yes |
| 1.13 | Does the project relate to data processing which is in any way exempt from legislative privacy protections? | No |
| 1.14 | Will personal data be processed in a way which involves tracking individuals' online or offline location or behaviour? | No |
| 1.15 | Will personal data be processed which could result in a risk of if there was a security breach? | Yes |
| 1.16 | Does the project involve systematic disclosure of personal data to, or access by, third parties that are not subject to comparable privacy regulation? | No |

| Step 2: What personal data is being used? | | | | | | | | | | |
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| **2.1** | **Is this use of personal data/special categories of personal data a new use? Or is it already happening and this is a change?** | | | | | | New/Changed | | | |
| | | | | | | | New | | | |
| **2.2** | **What data will be processed/shared/viewed?**<br>Put a YES in the box as appropriate | | | | | | | | | |
| | **Personal Data** | | | | | | | | | |
| | Name | **Yes** | Date of Birth | **Yes** | Gender | **Yes** | National Insurance Number | | Financial Information about the person | |
| | Address | Yes | Email address | NO | Telephone number | NO | NHS No | NO | Other eg a reference number such as Mosaic ref | Yes |
| | Other data *(Please state):* | | | School enrolled at | | | | | | |
| | **Special Categories of Personal Data** | | | | | | | | | |
| | Racial or ethnic origin | NO | Fingerprints/ Biometrics | NO | Religious or philosophical beliefs Political opinion | | | NO | | |

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|---|---|---|---|---|---|---|---|---|
| | Trade Union membership | NO | Physical or mental health or condition | | | | | NO |
| | Sexual life or sexual orientation | NO | Housing records Social services records | NO | Tax, benefit or pension records | NO | Employee/HR records | NO |
| | Other data *(Please state):* | | | | | | | |
| **2.3** | Will it include data about any criminal offence committed or alleged, or criminal offence record? | | No | | | | | |

| Step 3: Describe the data processing | | |
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| **3.1** | **Describe in as much detail what is being done with the data - how is the data being used, how it is being handled, stored and transferred/shared? Please use plain English!** | The data will be extracted from the Council data set into an excel spreadsheet and uploaded into the Library Mangement System by encrypted file sent to CIVICA. Once the data is in the Library Management System only library staff will have access. The data on the spreadsheet will be deleted after upload.<br>Once the data is in the library system children will be able to borrow items. The data will be used to give the children access to the Summer Reading Challenge. This processing is the usual existing libraries processing. |
| **3.2** | **Explain in as much detail as possible why this is being done** | The reason for doing this data transfer is:<br>It is in the interest of the children to be part of the summer reading challenge – it is proven to assist with children's literacy levels when they are not at school during the summer holiday. It aligns with Camden's Every Child a Reader programme.<br><br>The summer reading challenge is the library services highest profile initiative each year. By working with the Reading Agency we are understanding the need to support children with their literacy levels. Libraries are still recovering from the pandemic in terms of reconnecting with communities. |

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| | | | The data transfer avoids the need for manual input of 9500 records which will be incredibly time intensive, and in itself risks errors being made in data input because of the volume of data input needed and data breach. In future years the data set will be smaller approximately 1200 children. |
| **3.3** | **Are you sharing the data with an external organisation or partner or are they involved in processing the data?** | | YES |
| | **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** |
| | Civia (Spydus) | Processor | Yes contract |
| **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.** | | Council data on pupils enrolled in Camden schools<br><br>Auto enrolment of Primary aged children (9500) in year one of enrolment. In subsequent years approximately 1200 children on an annual basis.<br><br>Data extracted into spreadsheet and uploaded by encrypted file shared with CIVICA for upload into the library management system and Library team who will make up the library cards |

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| | | Spreadsheet deleted<br><br>Data in Spydus enables lending of books and joining of Summer Reading Challenge |
| **3.5** | **How will you handle data in your project, how will use store and share it. Please explain** | The data will be transferred securely from the data team into the library management system. Once the data is transferred to the Library management System it will be processed in the same way as any library membership data is already processed. The libraries display a Privacy Notice on the website. The data spreadsheet will be deleted. |

| **Step 4: Assess lawful basis, necessity, and proportionality** | | | |
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| **4.1** | **Identify the Lawful Basis for processing personal data/special category /criminal data.**<br>**If you don't know then please ask Data Protection Advice Team for advice (DPA@camden.gov.uk if you have no named Information Rights Officer advising)**<br>**If not processing the category say N/A** | | |
| | **Personal data Article 6(1) UK GDPR condition**<br><br>Art 6(1)(e) public task with the underpinning law being the and the Localism Act 2011 well being | **Special Category data UK GDPR Art 9 condition and DPA18 schedule condition**<br><br>Not applicable | **Criminal data UK GDPR Art 10 condition and corresponding art 6 condition**<br><br>Not applicable |

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| | powers The Public Libraries and Museums Act 1964 | | |
| **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 is not the legal basis. | | |
| **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 | | |
| | The school census data is being used which is updated three times a year (Jan, May, Oct). And represents the most accurate dataset for school enrolments | | |
| **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?** | | |
| | Council policies will be followed. if any parent objects to the auto-enrolment the council will consider it an objection to processing under GDPR, accept the objection and cease the professing and cancel the registration. However we think this is unlikely given the subject matter and the experience of Manchester.<br>The contract with civica is a controller/processor one and all data subject requests will be passed to the council to handle. | | |

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| **4.6** | **Will the processing of data include automated individual decision-making, including profiling?**<br><br>If yes, please outline the profiling processes and the rights of the data subject. |
| | No |
| **4.7** | **Data Retention Period - how long will the data be kept? What will happen to the data at the end of the project – deleted or kept? If you're using a processor what are the arrangements with them for data at the end of the project?** |
| | Once in the Library Management system the data will be deleted after 6 years if not actively used. |
| **Step 5: Information Security Process** | |
| **5.1** | **On what systems will the data will be stored**<br>*Examples include Mosaic, SharePoint, shared drives,* |
| | Spydus which is the Library management system where all library membership data is stored |
| **5.2** | **In what country is the data stored?** |
| | UK |
| **5.3** | **What roles will have access to the information?** (List individuals or staff groups) |
| | **Library staff** |
| **5.4** | Is there role-based access control on all applicable systems? **How will access to information be controlled?** |

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| | Only library staff are given access. Work experience are not given access to personal data. Highgate Library is co-managed with the Friends of Highgate Library so those volunteers have access to the Library Management system |
| **5.5** | **Is there an ability to audit access to the information?** |
| | **Yes** |
| **5.6** | **What security and audit measures will there be to make sure that data is kept safe?** |
| | The Library Management System is a secure system which already acts as the library service system to store personal data and a book catalogue. We have a contract with CIVICA to provide this service. |
| **5.7** | **Has the Information Security Team advised on the security measures? What were their comments?** |
| | **Yes** |

**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.<br><br>**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*<br><br>Add in additional rows as necessary. | **Likelihood of harm- see tabe 1** | **Severity of harm- see table 2** | **Overall risk – see table 3** |
|---|---|---|---|
| Misue of data by Spydus | Unlikely | Major | Amber 8 |
| Data breach from transfer to spreadsheet and upload into Spydus | Unlikely | Major | Amber 8 |
| Parents may complain about privacy intrusion from their children's data being used in this way. We will communicate with parents and carers and have a case study of Manchester who have run a similar project over 3 years with 18000 children with no complaints | Unlikely | Minor | Yellow 4 |

| Step 7: Identify Measures to reduce risk | | | | |
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| **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.*<br><br>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*<br><br>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?** |
| Misuse of data | Working with a trusted contracted provider (CIVICA) to upload an encrypted file. The libraries have worked with CIVICA for years and there have been no issues with the data management. They also provide other systems for the COuncil e.g Council Tax | Reduced | Minor (2) | YES |
| **Data breach** | Working with Council colleagues to extract data and upload to Library Management system. All employees are subject to employment conditions, have mandatory training, systems have role-based access control etc. | Reduced | Minor (2) | YES |
| **Residual (remaining) risk level when all mitigations have been applied:** ***Note IRT/DPO may change this*** | | | | |

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| **Low** |

| **Step 8: Record Data Protection Officer advice and outcome** | |
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| **DPO involved in preparing DPIA? If not, name of IRO** | **Sarah Laws** |
| **DPO advice** | Details need to be added to the school admissions privacy notice as well as the libraries privacy notice so parents are informed at the earliest opportunity.<br>Andrew Maughan, DPO and Borough Solicitor, March 2024 |
| **Information Asset Owner acceptance of residual risks** | Names of IAOs<br>Fiona Tarn<br>Jean Aston |
| This DPIA will kept under review by:<br>(*usually the author or the IAO)* | Fiona Tarn |

Version Control

| **Version** | **Reason** | **Date** | **Author(s)** |
|---|---|---|---|
| **1.0** | **New draft** | **March 2024** | **Fiona Tarn and Sarah Laws** |
| **1.1** | **Amended to show changed upload method with no increase of risk** | **May 2024** | **Fiona Tarn and Sarah Laws** |

**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 |

**Table 2 Impact of Risk if it occurs**

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| **Negligible** | No personal data involved, or risk won't have any impact. |
| **Minor** | • Short-term, minimal embarrassment to an individual<br>• Would involve small amounts of sensitive personal data about an individual<br>• 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*<br>• Short-term distress or significant embarrassment to an individual or group of individuals (e.g. a family)<br>• The potential of a financial loss for individuals concerned |

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| | • 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 | |
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| **1-3 Low Risk** | Acceptable risk<br>No further action or additional controls required<br>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<br>If not acceptable, existing controls should be monitored or adjusted |

**Table 4: is the risk level acceptable?**

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

**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

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| 1. *Effects on Residents*<br>a) *How does use of this data benefit our residents? (Is there evidence of this approach being likely to meet a public need?)*<br>• It will improve the literacy levels of children which will have positive impact on their lives<br>b) *What would be the harm in not processing this data?*<br>• The libraries are struggling to connect with children and families and this pilot will test if this system has a positive impact on that |
| 2. *Data Bias*<br>a) *How do you plan to identify errors and biases in data collection, analysis and algorithms?*<br>• The data is already collected for children to start school<br>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?*<br>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**?<br>• |
| 3. *Limitations of Data* |

*a) How will you make sure that you only process the data that is necessary and proportionate for the purpose of the project, and no more than is necessary?*

- The data will be processed in the same way that we process all library membership data only for purpose of lending books and encouraging participation in the Summer Reading Challenge

*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**)*

- It is data owned by the Council for school enrolment

*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)*

- The data will be uploaded by CIVICA into the Library database.

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

- Traction with the Summer Reading Challenge has been reducing year on year since the pandemic so we want to pilot this approach and measure success.