

DPIA (Data Privacy Impact Assessment) Pre-screen. **DO NOT edit this online document**

Download this to your laptop. It will be published on our Open Data Portal so please avoid jargon, explain acronyms the first usage, and complete all sections to a good standard. Names below head of service will be redacted, and if you have concerns about specific information being published talk to your IRO but note our obligations of telling people what we will do with their data so redaction will not be the norm.

Data Protection Advice Team's Ref (DP24_ xxx)	DP24_ 931
Project Name	Plinth
Directorate and Service	Community Partnerships, Equalities and Community Strength, Corporate Services
Pre-Assessment Completed By	██████████
Project Go Live Date (anticipated/planned)	

Description of the Project: what is your project doing in non-technical terms? Please explain it in enough detail for us to understand straight away- a couple of lines probably won't be enough. (If you've got a previous DPIA please paste the details in here and track change the updates)

Plinth is a Community Impact Platform that connects data from different local voluntary and community sector (VCS) organisations to support the delivery of community programmes and help them understand their impact. It combines several tools into a single solution, including an AI-powered grant-writer, case management system, CRM, booking platform, and impact reporting. This integration helps Camden Council and its partners (VCS) streamline processes, improve resource management, and achieve better outcomes for residents.

Key features include:

- **AI Grant-Writer:** Used only by external organisations (VCS) to assist in writing grant applications. It analyses documents uploaded by the organisation, including previous grant applications and funder guidelines, to generate tailored responses. The AI helps improve bid-writing efficiency but does not influence funding decisions made by the council.
- **Case Management System:** Tracks service histories, interactions, and outcomes, enabling case workers to provide targeted support.
- **CRM (Customer Relationship Management):** Manages contact and interaction records with partner organisations.

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- **Referral Management:** Coordinates referrals across different Council services such as the Tackling Poverty Team, healthcare, and housing, improving collaboration between the Council and VCS organisations.
- **Booking Platform:** Supports scheduling and management of events, appointments, and services.
- **Impact Reporting:** Tracks and measures programme effectiveness to inform data-driven decisions.
- **Volunteer Coordination:** Manages volunteer activities, including sign-ups and hour tracking.
- **Online Map of Food Banks:** Provides real-time information on local food support availability.

Background:

Plinth was introduced in 2019 under the name **Time to Spare (TTS)**, initially focusing on collaboration with **voluntary and community sector (VCS) organisations**. The platform aimed to provide digital tools to support **Community Partnerships** in their work with VCS groups.

History of DPIAs for Plinth (formerly Time to Spare)

- **2019:** Camden Council entered discussions with Time to Spare to provide digital tools for VCS collaboration. A DPIA was undertaken at this stage (see '[DPIA Time to Spare v3](#)') to assess the system's role in **VCS monitoring, reporting, and collaboration**.
- **2020:** In response to the COVID-19 pandemic, **two additional tools** were introduced:
 - **Volunteering Management ([DPIA for Time to Spare](#))**
 - **Referral Tool for Food Support** DPIAs were conducted for both additions ([DPIA for VCS Referral Tool](#)). Separate contracts were established for these tools (see '[Time to Spare Volunteering G-Cloud contract.p SIGNED](#)' and '[VCS food support platform G-cloud](#)').
 - **Council Access Expansion (COVID-19 Response):** Various teams were granted access to Plinth during the pandemic, including: Strategy, Tackling Poverty, Community Response and Arts and Culture to name a few.
- **2022:** The original contracts expired, and a **consolidated agreement** was established through a '**Change Variation / Extension**' clause for **2022-24**. This contract combined previous functionalities and was led by **Community Response** (a service that has since been disbanded). While Digital and Data were involved in finalising the contract (see '[Proposal April 2022](#)'), a DPIA for this consolidated agreement is not available.

Current Status of Plinth DPIAs

- **Past DPIAs exist for the VCS monitoring tool (2019), volunteering tool (2020), and referral tool (2020).**
- **No DPIA appears to have been conducted for the 2022 contract consolidation.**

As we consolidated all contracts into one contract that gives us access to Plinth as a whole, any features/functionalities they develop with other VCS organisations, funders, and local councils become available to us even though we had no input

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into developing them. This makes it a challenge to always complete a new DPIA for any new functionality.

Whose Personal data or Special Category Data are you using e.g., children, vulnerable adults, residents, users of a service, employees	<i>Each tool administered by Plinth involves the collection of personal data from different groups:</i> • Grants Management and Reporting Platform / CRM for Managing Interactions with Partners: ○ Trustees ○ CEOs/Directors ○ Staff from charities • Referral Network: ○ Residents • Volunteer Brokerage: ○ Residents • Online Map Showing Food Banks: ○ Residents
List the Personal Data (eg names, addresses, MOSAIC refs) and Special Category Data (race /religion/sexuality/health etc) and Criminal Offence Data (includes allegations of offences not just convictions) being used	The following types of personal data are collected and processed through Plinth's tools: Personal Data: • Names • Addresses • Contact details (e.g., phone numbers, email addresses) • Roles within organisations (e.g., Trustee, CEO, Director, Staff) Special Category Data: • Case notes for residents within the referral network, which may include: • Health information • Information about social or economic vulnerabilities Criminal Offence Data: • None collected or processed as part of Plinth's tools.
Why are you collecting this data and what will you do with it? Give details.	The data collected through Plinth's tools is used to facilitate effective collaboration, service delivery, and resource management between Camden Council and local voluntary and community sector

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	(VCS) organisations. The purposes for collecting and using this data are as follows: • Grants Management and Reporting Platform / CRM: ○ To manage funding applications and interactions with partner organisations. ○ To maintain accurate records of trustees, CEOs, directors, and staff from VCS organisations involved in grant-funded projects. • Referral Network: ○ To connect residents to appropriate services and support, such as healthcare, social services, or housing assistance. ○ To track service history and outcomes through case notes, ensuring that residents receive consistent and effective support. • Volunteer Brokerage: ○ To match residents with volunteering opportunities and track volunteer activities. • Online Map Showing Food Banks: ○ To provide residents with accessible and up-to-date information on food bank locations and availability.
Is there a piece of law that says you must, should, or may do this? If yes, set it out. If there's no such law explain the basis for doing this processing – consent or something else?	For personal data the legal basis is UK GDPR article and 6(1)(e) public task. If special category is included this will be processed under the legal basis 9(2)(b) Employment, social security and social protection (if authorised by law) with the Data Protection Act 2018 (DPA18) Schedule 1 Part 1 condition being para 1 Employment, social security and social protection;
Are you using a new system or new IT kit? If so, what is it and have you cleared the security side with the Information Security Team?	No, it's renewing a contract we already have with Plinth (FKA Time To Spare) for a system that we are already using.
If you are using a contractor name them, and are you going through	We are not going through procurement.

DATA PROTECTION IMPACT ASSESSMENT (DPIA)



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procurement? If so, please tell us the procurement contact.	
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Risk Assessment. In assessing risk we need to consider the nature, scope, context and purposes of the processing, and carry out an assessment of the impact of the proposed processing on the protection of personal data. **These are questions to help you and us assess the risk levels**, so it is essential that this table is completed accurately. **If you answer Yes or Unsure, please add detail to the Risk Explanation Table that follows this table.**

	Risk Type	Yes/No/Unsure
1	Will you use profiling or automated decision-making eg AI (where computers do the thinking and a human isn't involved at all) to make significant decisions about people (eg to help make decisions on someone's access to a service, opportunity or benefit?) or on a large scale (like a large area of the borough)?	No
2	Will you use special category data (race/religion/sexuality/health etc) to help make decisions on someone's access to a service, opportunity or benefit?) or on a large scale (like a large area of the borough) or for a lot of vulnerable people?	No
3	Will there be large scale systematic monitoring in a publicly accessible place – like a new CCTV system?	No
4	Is the project using new technologies? Like face recognition software or a system we don't currently use?	No
5	Will you be using criminal offence data (this includes allegations of offences not just convictions)?	No
6	Will you process biometric (fingerprint /facial recognition) or genetic data?	No
7	Will data be combined, compared or matched from multiple sources?	No
8	Will personal data be processed without providing a privacy notice directly to the individual? In other words will this processing be kept secret?	No
9	Will personal data be processed in a way which involves tracking individuals' online or offline location or behaviour?	No
10	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
11	Will any of the data be processed (this includes being stored and accessed by sub-contractors or IT support) outside the UK and outside the EU?	No
12	Will personal data be processed which could result in a risk of physical harm in case of a security breach?	No

Risk Explanation: If you marked any risks above as **Yes** or **Unsure** please complete the table below so we can assess if a full DPIA is needed. Explain what you are doing, what risks you think there are and how you will deal with those. This will help us assess the data protection risk level. **You don't have to remove all risks- just reduce them to an acceptable level.**

Risk Number	Explanation
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<i>Example: 12</i>	<i>Example: The information is about vulnerable people and could cause them harm if misused. But the data will only be used by council employees on council equipment, and an organisation that we've contracted. They've been through due diligence with procurement and there will be a contract with DP clauses. We are not sure about how to transfer the data so we need advice about secure emails and what to do with the info at the end of the contract.</i>
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Ethical Assessment. In assessing ethics you need to consider 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) Please see our Data Charter page for more information on ethical use of data in Camden <https://www.camden.gov.uk/data-charter>

1. Effects on Residents a) How does use of this data benefit our residents? (Is there evidence of this approach being likely to meet a public need?) The use of data through Plinth benefits residents by: • Enhancing service delivery through improved coordination between Camden Council and voluntary and community sector (VCS) organisations. • Ensuring timely and effective referrals for services such as social care, healthcare, and housing support. • Streamlining grant processes to fund programmes that directly address community needs. • Supporting community programmes like food banks and volunteer opportunities, ensuring resources are effectively allocated. • Providing data-driven insights that help identify gaps in services and enable informed decision-making to better meet residents' needs. b) What would be the harm in not processing this data? • Residents may face delays in accessing vital services due to inefficient referral systems. • Grant funding decisions may be less informed, potentially reducing the effectiveness of funded programmes. • Volunteer opportunities and community initiatives may not be effectively coordinated, limiting community impact.
2. Data Bias a) How do you plan to identify errors and biases in data collection, analysis and algorithms? 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? Plinth is utilised by Voluntary and Community Sector (VCS) organisations to manage various functions, including case management, activity bookings, client details, and impact reporting. These organisations input and manage their own data within the platform. The council does not have direct access to the internal data collection or analysis processes of these organisations. Consequently, the identification of errors or biases in data collection and

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analysis is managed by the respective VCS organisations. Camden Council utilises several functionalities of the Plinth platform, in which the council is responsible for the data collected and processed. Currently, data collection is conducted through standardised forms and processes designed to capture relevant information for each function. At present, there is no specific mechanism in place to identify errors or biases in data collection, analysis, or the algorithms used within these functionalities.

Regarding the AI-powered Grant Writer, it is exclusively used by Voluntary and Community Sector (VCS) organisations. The council does not have access to or involvement with this specific functionality. Therefore, the responsibility for identifying errors or biases within the AI tool lies with the respective VCS organisations.

- b) 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**?)

As the Council does not use the AI functionality, it is not liable for negatively affecting anyone through its processing of data within that tool. The AI-powered Grant Writer is exclusively used by (VCS) organisations, and any potential biases in AI-generated outputs would be the responsibility of those organisations.

The Council uses Plinth as a platform to streamline processes, manage referrals, and improve communication between services. Any biases that could occur are based on human decision-making rather than the technology itself, as the system relies on users to input, manage, and interpret data.

Plinth facilitates better coordination between the Council and VCS organisations, ensuring that referrals and service provisions are more efficient and accessible.

Human oversight remains central to decision-making processes, meaning that any concerns around bias or misrepresentation are a result of human input rather than automated decision-making (as this is not part of Plinth's functionalities).

Data security and compliance with UK GDPR ensure that personal data is handled responsibly while still enabling services to operate effectively.

By using Plinth as an administrative tool rather than a decision-making system, the Council ensures that services remain person-centred, while also maintaining compliance with data protection regulations.

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?

Camden Council processes only the data required for the services it manages within Plinth, including grant management, referral coordination, case management, CRM, volunteer tracking, and impact reporting.

- Role-Based Access Control (RBAC): Data access is limited based on user roles:
 - Admins – Can add/remove users, manage settings, and oversee data.
 - Users – Can view all data within their assigned organisation account.
 - Restricted Users – Can add new records but cannot access existing sensitive data.
 - Each department has its own organisation account, ensuring users only see data relevant to their department.
- Default Permissions: The least privilege principle is enforced by setting newly created users to Restricted User by default.

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- Data Retention: Data deletion policies are managed by Plinth, with user data becoming inaccessible immediately upon account cancellation and permanently deleted within 30 days. This structure ensures that only necessary data is processed and accessed by authorised users.

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

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

VCS organisations and Council staff are responsible for ensuring the accuracy of data entered into Plinth.

Changes made to data are tracked within the platform, currently this is only visible to Plinth but Camden will be given access to this activity audit.

Camden's data is segregated from non-Camden users within the shared database. Each data entry is assigned a unique team ID, preventing unauthorised access.

While Camden does not actively scrutinise VCS data, funding decisions undergo a rigorous review process to ensure fairness and reliability.

i) 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)

As mentioned above, Camden's data is segregated from non-Camden Users at the database level.

Each dataset within Plinth is assigned a unique identifier, making it easier to trace errors back to their source.

Role-Based Data Access Logs: Admins and Users can download and share data, but this activity is not currently audited.

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

Processing this data is essential for the efficient operation of Camden's services within Plinth. Before using Plinth:

- Referral Coordination, Grant Management, and Case Tracking were previously handled via Microsoft Word and Excel documents, which posed risks related to data fragmentation, security, and efficiency.
- Without Plinth, Camden would need to revert to manual processes, increasing the administrative burden and making data sharing and collaboration more difficult.

Since this project replaces an existing manual data collection process, it could not be effectively completed without processing this data.

Please check you have completed all sections, and then send a copy of this screening questionnaire to the Data Protection Advice Team at dpa@camden.gov.uk on a OneDrive link with edit rights. If you are already dealing with someone in DPAT please send it back to them on a **OneDrive link with edit rights**.

For Data Protection Advice Team to Complete:

Project Name and Our Ref	Plinth – DP24_931
WHAT IS THE LEVEL OF RISK ?	LOW
REASONS FOR THIS LEVEL	This is an online data system which has been used by the council previously under a different name (Time to Spare). The function for which this project will use data will be information which

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	the user inputs however the AI technology will help the user tailor their bid application this will however not influence the councils funding decision. The data is stored on plinth and is a secure system and has cleared the security assessment. Data is used in accordance with its purpose for this project.
IS A FULL DPIA NEEDED?	NO
Date cleared by DPAT	13/02/2025
Cleared by	Tanya Bryant