

Data Protection Impact Assessment (DPIA)

Data Protection Impact Assessments (DPIAs) are a tool used to identify the most effective way to comply with General Data Protection obligations and meet individuals' expectations of privacy by identifying and fixing problems at an early stage, reducing the associated costs and damage to reputation which might otherwise occur. DPIAs are an integral part of taking a Privacy by Design approach.

To ensure that the DPIA is an effective document, it must be used throughout the development and implementation of a project, using existing project management processes.

A DPIA will allow you to systematically and thoroughly analyse how a particular project or system will affect the privacy of the individuals involved.

Version number	Summary of change	Author Name	Role	Date

Reviewers:

Reviewer name	Role	Version reviewed	Date

Your Information:

Officer Completing the form	Job Title	Project Name	Telephone Number	Email Address

High Risk Processing Screening Questions
<p><i>The questions below will help us understand whether the processing activity is likely to present a high risk to the rights and freedoms of individuals or to the council.</i></p> <p>Please answer the below questions, if you answer 'Yes' to any of the below, you must complete the full DPIA.</p> <p>If you have answered 'No' to all questions, only fill out Section 1 and send this to the Information Governance team to review.</p>

Does the processing involve any of the following activity?	Example	Yes	No	Unsure
Profiling - Systematic evaluation of the attributes or characteristics of individuals.	Using customer-profiling software to identify customers who would benefit from low-level interventions to raise their independence and resilience.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Automated decision-making - Making decisions about individuals without any human involvement.	The introduction of speed enforcement cameras that automatically issue speeding fines to the registered keeper of a vehicle when an infringement is recorded.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Large scale processing (Sensitive data) - Processing a large amount of personal data related to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership; sex life and sexual orientation.	An initiative to share adult social care personal data, including ethnic origin and religious beliefs, with third parties.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Large scale processing (Health data) - Processing large amounts of personal data related to the physical or mental health of an individual, including the provision of health care services, which reveal information about health status.	Contracting a new Occupational Health Provider that will undertake employee health assessments on behalf of the organisation.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Large scale processing (Criminal data) - Processing large amounts of personal data related criminal offences and convictions.	Collecting and holding DBS certificates for employees as part a suitability check.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Large scale processing (Monitoring) - Monitoring a large number of individuals in a public or private space.	Introducing CCTV operation in the town centre.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
New technologies - Deploying new and advanced technologies or using existing technologies in a novel way.	Using personal data in Artificial Intelligence or machine learning applications.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Biometric Data - Processing any information about the physical, physiological or behavioural characteristics of individuals.	Deploying facial recognition technology in a public area for the purpose of the apprehension of offenders.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Genetic data – Personal data related to inherited or acquired genetic characteristics, in particular, from an analysis of a biological sample.	Introducing a fingerprint scanner as a method of allowing entry to an office building.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Data Matching - Matching, combining and comparing information about individuals from multiple sources.	Matching council tax, NNDR and licensing personal data to detect potential electoral fraud.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Tracking - Processing personal data which involves tracking an individual's geolocation or behaviour, including but not limited to the online environment.	Attaching a tracking device to company owned vehicles and monitoring or recording the location data.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Children and Vulnerable Individuals - processing information about children or vulnerable individuals, for the specific purpose of marketing.	Sharing pupil data with a third party, who targets pupils/parent/guardians with homework support services.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Section 1: Background Information

Is this project;

☐ Completely new processing ☒ Change of a current process ☐ An upgrade to an IT system

Project Manager	
Information Asset Owner: <i>(Senior member of staff that has overall responsibility for the information)</i>	
Date project due/estimated to go live: <i>(if applicable)</i>	
What does this project involve? <i>(Explain broadly what the project aims to achieve and what type of processing it involves.)</i>	Our goal is to ensure children and families access the right support at the right time. The project enables social workers to access and use data on the family and their interaction with services when assessing the level and type of support to provide.
What is the purpose for processing personal information?	The project seeks to enable social workers to have better insight into the needs and risks present in families at the point of referral to statutory services and assessment of need and strength.

<i>(What purpose does the collection/processing of personal information serve in the project?)</i>	<p>The project enables social workers to access information on the family and facilitates conversations between practitioners:</p> <ul style="list-style-type: none"> • to better safeguard and protect children, to better identify and understand needs and strengths of children and families; • to respond to the needs of children and their families efficiently and effectively; and • to provide children and families access to the right services at the right time.
Which organisations are involved in this initiative? <i>(E.g. other local authorities, a company offering a service etc)</i>	<p>Stockport Homes (https://www.stockporthomes.org/) Social Finance (https://www.socialfinance.org.uk/) Leeds City Council (https://www.leeds.gov.uk/) Manchester City Council (https://www.manchester.gov.uk/) Ministry of Housing, Communities and Local Government (https://www.gov.uk/government/organisations/ministry-of-housing-communities-and-local-government)</p>
What Types of data subjects involved? <i>(E.g., employees, residents, students/pupils etc)</i>	<p>Children and families</p>

Section 2 - Project Description and scope

Project/change outline <i>(What is it that is being planned? A Project Initiation Document or Business Case can be referenced here)</i>	<p>Family Context will enable social workers to access timely and valuable information on children and their families related to needs, risks and services involved.</p> <p>The solution (including UI/UX, data fields, and technologies) has been chosen based on a discovery and alpha phase in Leeds and Stockport. Based on these phases, we've identified through prototyping with social workers, team managers and families what types of information would add the most value and how this information could be used within existing practise and processes.</p> <p>Family Context will be embedded in the social care assessment process to ensure social workers always have access to the information needed to make the right choice.</p> <p>For more detail please find a link to the outputs from discovery, alpha and private beta below: https://github.com/CSCDP/Family-Context-Discovery https://github.com/CSCDP/Family-Context-Alpha https://github.com/CSCDP/Family-Context-PrivateBeta</p> <p>The Family Context Reference API and Reference Front End are also available on GitHub: https://github.com/CSCDP/family-context-api</p>
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Relevant previous Data Protection Impact Assessment/Privacy risk assessment <i>(Please provide details of any previous Data Protection Impact Assessment/Privacy Risk Assessment)</i>	
Input of specific business functions <i>(Please list stakeholders involved in this project. Include internal departments, external organisations and any person or group likely to be affected by the project (e.g. local residents or service users) and summarise any advice/input provided.)</i>	[details specific to individual local authorities]
Input of data subjects and/or their representatives: <i>(Please confirm if views were sought and by what method. For example, obtained through studies, questionnaires, discussion with data subject representatives (customers, patients, staff))</i>	We conducted in-depth user research with residents who've previously experienced children's social care to capture their voice. We will continue conducting user research with residents throughout the project.
Approximately how many records are being collected, accessed, held or shared? <i>(E.g. 1200 council tax records, 50 adult social care records)</i>	[details specific to individual local authorities]
What frequency is the personal data collected, accessed, held or shared? <i>(E.g. Ad-hoc, daily, etc)</i>	[details specific to individual local authorities]
Types of data subjects involved <i>(E.g., employees, residents, students/pupils etc)</i>	Children and families

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Section 3 – The data involved

PERSONAL DATA - meaning any information relating to an identifiable person who can be directly or indirectly identified, in particular by reference to an identifier.

What data items are being processed e.g. for collection, storage, use and deletion: If there is a chart or diagram to explain please attach as an appendix			
Personal Data	Specific Data Items <i>Check all that apply</i>	Why are these items needed? <i>Please provide justification below (if unsure please contact the IG team)</i>	Where is this data item held? <i>E.g. personnel file, child record in an IT system, etc</i>
Personal details <i>Information that identifies the individual and their personal characteristics</i>	<input checked="" type="checkbox"/> Forename(s) <input checked="" type="checkbox"/> Surname <input checked="" type="checkbox"/> Address <input checked="" type="checkbox"/> Postcode <input checked="" type="checkbox"/> Date of Birth <input checked="" type="checkbox"/> Age <input checked="" type="checkbox"/> Gender <input type="checkbox"/> Physical description <input checked="" type="checkbox"/> Home Telephone Number <input checked="" type="checkbox"/> Mobile Telephone Number <input checked="" type="checkbox"/> Other Contact Number <input checked="" type="checkbox"/> Email address <input type="checkbox"/> GP Name and Address <input checked="" type="checkbox"/> Legal Representative Name (Next of Kin) <input type="checkbox"/> NHS Number <input type="checkbox"/> National Insurance Number <input type="checkbox"/> Photographs/Pictures of persons <input type="checkbox"/> Other – if this is ticked please list 'Other' personal data items to be processed below: <input type="text"/>	Please provide details for each item ticked: To be able to link datasets together, identify individuals, and families and the strength of familial connections.	Please provide details for each item ticked: [details specific to individual local authorities]
Offences including alleged offences <i>Information relating to any offences committed or alleged to have been committed by the individual</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable List of all data fields can be found in the appendix	Please provide details for each item ticked: To enable social workers to access appropriate information to build a rounded	Please provide details for each item ticked: [details specific to individual local authorities]

		picture of the family context	
Criminal proceedings, outcomes and sentences <i>Information relating to criminal proceedings outcomes and sentences regarding the individual</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable List of all data fields can be found in the appendix.	Please provide details for each item ticked: To enable social workers to access appropriate information to build a rounded picture of the family context	Please provide details for each item ticked: [details specific to individual local authorities]
Financial details <i>Information relating to the financial affairs of the individual</i>	<input type="checkbox"/> Income <input type="checkbox"/> Salary <input type="checkbox"/> Benefits <input checked="" type="checkbox"/> Not applicable <input type="checkbox"/> Other – please specify below:	Please provide details for each item ticked:	Please provide details for each item ticked:

SPECIAL CATEGORY PERSONAL DATA

Special Category Personal Data Item	Specific data item(s)	Why are these items needed?	Where is this data item held?
		<i>Please provide justification below (if unsure please contact IG)</i>	<i>E.g. personal file, child record in an IT system etc</i>
Physical or mental health or condition <i>Information relating to the individuals physical or mental health or condition.</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable List any data items below or attach as an appendix: Click here to enter text.	Please provide details for each item ticked: This information is used to understand family dynamic	Please provide details for each item ticked: Carefirst / LiquidLogic
Genetic data or biometric data <i>Genetic data or biometric data</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable	Please provide details for each item ticked:	Please provide details for

<i>where processed to uniquely identify a person</i>	List any data items below or attach as an appendix: Click here to enter text.		each item ticked:
Race or ethnic origin <i>Information relating to a person's race or ethnic origin</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable List any data items below or attach as an appendix: Click here to enter text.	Please provide details for each item ticked: This information is used to understand family dynamic	Please provide details for each item ticked: Liquid Logic
Religious or other beliefs of a similar nature <i>Information relating to the individual's religion or other beliefs</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable List any data items below or attach as an appendix: Click here to enter text.	Please provide details for each item ticked:	Please provide details for each item ticked:
Political opinions <i>Information relating to the individual's political opinions</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable List any data items below or attach as an appendix: Click here to enter text.	Please provide details for each item ticked:	Please provide details for each item ticked:
Sexual identity and life <i>Information relating to the individual's sexual life</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable List any data items below or attach as an appendix: Click here to enter text.	Please provide details for each item ticked:	Please provide details for each item ticked:
Trade union membership <i>Information relating to the individual's membership of a trade union</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable List any data items below or attach as an appendix: Click here to enter text.	Please provide details for each item ticked:	Please provide details for each item ticked:

Section 4 – The Flow of Data

[illegible][illegible]

Section 5 - Assessment

Question		Response (identifying risks and including necessary further measures/actions)
Lawfulness, fairness and transparency (<i>Data is processed lawfully, fairly and in a transparent manner</i>)		
Fairness and Transparency		
1A	<p>Will individuals be informed as to what is happening with their data? Is new fair processing/privacy notice information required?</p> <p><i>The fair processing notice/privacy notice is the information that you give to a person when collecting their data to inform them</i></p>	<p>In line with existing policy</p> <p>[link to existing policy]</p>

	how their data is to be used, who it is to be shared with, how long it will be kept for etc.	
Lawful basis: Part 1 <i>A lawful basis is the clause that allows you to process personal data. No basis is 'better' than another, however one will be more appropriate than another - depending on the processing. Each lawful basis has its own conditions, see the below links for guidance around each basis.</i> <i>The ICO have created an interactive tool to aid you in identifying a basis:</i> https://ico.org.uk/for-organisations/gdpr-resources/lawful-basis-interactive-guidance-tool/		
2A	<p>Which one of the following lawful basis are you using to process this personal data?</p> <p>A: Consent B: Performance of a contract C: Legal Obligation D: Vital Interests E: Public Task F: Legitimate Interests</p> <p>Consent guidance; https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/consent/</p> <p>Contract guidance; https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/contract/</p> <p>Legal Obligation guidance; https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/legal-obligation/</p> <p>Vital Interests guidance; https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/vital-interests/</p> <p>Public Task guidance; https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/public-task/</p> <p>Legitimate Interests guidance;</p>	Legal Obligation and Public Task

	https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/legitimate-interests/	
Lawful Basis: Part 2 <i>(Depending on which lawful basis you are relying on, please fill in the below section.)</i>		
Consent	What would be your process for obtaining and recording consent? Do you have an opt-out process clearly defined?	Please provide details: N/A
Contract	Who is the contract with? Consider if they are a data processor and whether you'll need a processing agreement.	Please provide details: N/A
Legal Obligation	Please identify the legal obligation and where it appears in the relevant legislation	Please provide details: Article 6(1)(c) of the GDPR – necessary for compliance with a legal obligation. The processing is necessary to perform the Council's official functions, in particular to improve the efficiency of processing children's social care referrals. In addition, the Council will rely on Article 9(2)(g) and meets the condition in Schedule 1, Part 2, Paragraph 6 of the DPA 2018 to process Special Category Personal Data. Local authorities will also rely on Article 10 of the GDPR to process criminal offence data. RELEVANT LEGISLATION <u><i>The Children Act 2004</i></u> Section 10 of the Act places a duty on each children's services authority to make arrangements to promote co-operation between itself and relevant partner agencies to improve the well-being of children in the area in relation to: <ul style="list-style-type: none"> • Physical and mental health, and emotional well-being • Protection from harm and neglect • Education, training and recreation • Making a positive contribution to society

		<ul style="list-style-type: none"> • Social and economic well-being <p>“Each children’s services authority in England must make arrangements to promote co-operation between— (a) the authority; (b) each of the authority’s relevant partners; and (c) such other persons or bodies as the authority consider appropriate, being persons or bodies of any nature who exercise functions or are engaged in activities in relation to children in the authority’s area.”</p> <p>The relevant partners in the context of children’s services are:</p> <ul style="list-style-type: none"> • The police • The probation service • Youth Offending teams • The governing body of a maintained school that is maintained by the authority • Any clinical commissioning group for an area any part of which falls within the area of the authority <p><u>National Health Services Act 2006</u></p> <p>Section 82 places a duty on NHS Bodies and local authorities to co-operate in order to secure and advance the health and welfare of people.</p> <p><u>Care Act 2014</u></p> <p>Requires services including local authorities, health and housing to co-operate in order to care and support vulnerable people.</p> <p>Section 1 (Promoting individual well-being) places a duty onto the local authority to promote individuals’ well-being.</p> <p>Section 2 (Preventing needs for care and support) places a duty on the local authority to prevent or delay the need for care and support.</p> <p>Section 6 (Co-operating generally) places a duty on the local authority and relevant partners to cooperate (inc. sharing information) to protect adults with care and support needs.</p> <p><u>Mental Capacity Act 2005</u></p>
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		<p>Section 1 contains 5 statutory principles concerning a person's lack of capacity to give consent to information sharing.</p> <p><u><i>Crime and Disorder Act 1998</i></u></p> <p>The primary objective of the Crime and Disorder Act 1998 was to give more responsibility to local authorities with regards to implementing strategies to help with the reduction of crime and public disorder within the local community. It also gives provision for the prevention of crime and disorder.</p> <p>Section 17 applies to local authorities as defined by the Local Government Act 1972.</p> <p>Section 17A of the Act states that a 'relevant authority' is under duty to share with all other relevant authorities' information of a 'prescribed description' which is relevant to the reduction of crime and disorder, including anti-social behavior (ASB), in any area of England or Wales.</p> <p>Prescribed information will be information relating to:</p> <ul style="list-style-type: none"> • Police recorded crime and police recorded incidents • Local authority recorded incidents of ASB or crime <p><u><i>Criminal Justice Act 2000</i></u></p> <p>Section 325 of this Act describes arrangements for assessing risk posed by offenders.</p> <p>A responsible authority must establish arrangements for the purpose of assessing and managing risks posed by sexual and violent offenders or other persons, who are considered by the responsible authority to be persons who may cause serious harm to the public (incl. children).</p> <p>Responsible authority, in this context, refers to the chief officer of police, the local probation board and the Minister of the Crown exercising functions in relation to prisons, acting jointly.</p> <p>In establishing these arrangements, the responsible authority must act in co-operation (where co-operation may</p>
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		<p>include the sharing of information) with – among other services – <i>every local housing authority or social services authority</i>.</p> <p><u>Education Act 2002</u></p> <p>Section 175 of the Education Act 2002 lays out the duty of LEAs and governing bodies of maintained schools and further education institutions to make arrangements to carry out their functions with a view to safeguarding and promoting the welfare of children and follow the guidance in <i>Safeguarding Children in Education</i> (DfES 2004).</p> <p>Section 21 of the Act places a duty on the governing body of a maintained school to promote the well-being of pupils at the school. Well-being in this section is defined with reference to section 10 of the Children's Act 2004.</p> <p>This duty extends the responsibility of the governing body and maintained schools beyond that of educational achievement and highlights the role a school plays in all aspects of a child's life. There may be an implied power to work collaboratively and share information for this purpose if involvement of other services is necessary in order to fulfil the duty.</p>
Vital Interests	Please note that this is only applicable in life or death situations. Provide details of the vital interest.	Please provide details:
Public Task	What is the official task carried out in the public interest? This should be laid down by law.	<p>Please provide details:</p> <p>Article 6(1)(e) of the GDPR – necessary for compliance with a public task.</p> <p>The processing is necessary for the local authority in carrying out a task of public interest in particular better support vulnerable children and their families access the right services and reach their potential.</p> <p>In addition, the Council will rely on Article 9(2)(g) and meets the condition in Schedule 1, Part 2, Paragraph 6 of the DPA 2018 to</p>

		<p>process Special Category Personal Data. Local authorities will also rely on Article 10 of the GDPR to process criminal offence data.</p> <p>RELEVANT LEGISLATION</p> <p><u><i>The Digital Economy Act 2017</i></u></p> <p>Section 35 Disclosure of information to improve public service delivery. The section states:</p> <p><i>A person (as specified in Schedule 4 of the Act) may disclose information held by them in connection with any of the person's functions to another specified person for the purpose of an objective which is a specified objective in relation to each of those persons.</i></p> <p><i>Specified objective, in relation to a specified person, means an objective specified in relation to that specified person in regulations made by the appropriate national authority.</i></p> <p>It is also considered to be required as defined in common law.</p> <p>The following DPA Schedule 8 condition is met (required for sensitive processing under part 3): Sch 8(1)</p> <p>(a) Processing is necessary for the exercise of a function conferred on a person by an enactment or rule of law, and</p> <p>(b) is necessary for reasons of substantial public interest</p> <p><u><i>The Digital Government (Disclosure of Information) Regulations 2016</i></u></p> <p>The objectives for the disclosure of information in the Digital Economy Bill are set out in Section 29(6) – including</p> <ul style="list-style-type: none"> • Objective 1: (a) identifying individuals or households who face multiple disadvantages, and (b) enabling the public services to be provided to such individuals and households to be tailored to their needs. • Objective 2: (a) identifying individuals or households who may
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		<p>be eligible for assistance under a relevant scheme, (b) contacting such individuals or households with a view to the provision of such assistance.</p> <p><u>Local Government Act 1972</u></p> <p>Section 111 gives a local authority power to do anything conducive or incidental to the discharge of their statutory functions.</p> <p><u>Local Government Act 2000</u></p> <p>Section 2 gives a local authority power to do anything which they consider is likely to achieve the promotion or improvement of the social well-being of their area.</p> <p><u>Localism Act 2011</u></p> <p>Local authorities have been given a general power of competencies (s.1). It gives local authorities the same power to act that an individual generally has and provides that the power may be used in innovative ways.</p> <p><u>Housing Act 1996</u></p> <p>Section 213 provides implied power for housing and social service authorities to share information in certain circumstances. See also section 213A.</p>
Legitimate Interests	Who does the interest lie with (e.g. the council, the data subject, a third party)? Are the data subjects' rights and freedoms affected by this processing?	<p>Please provide details:</p> <p>N/A</p>
Purpose limitation (<i>The purpose for which data is collected on any occasion must be specified, explicit and legitimate, and must not be processed in a manner that is incompatible with the purpose for which it is collected</i>)		Response (identifying risks and including necessary further measures/actions)
3A	Does your project plan cover all of the purposes for processing personal data? Are potential new purposes likely to be identified as the scope of the project expands?	<p>Please provide details:</p> <p>At this stage, and following user testing in Alpha, the purposes for processing the data are clear. There is no potential for new purposes to be identified during Beta.</p> <p>Any changes to what data are included will be added and reviewed by the Data Protection Officer prior to inclusion.</p>

Data Minimisation <i>(personal data must be adequate, relevant and not excessive in relation to the purpose for which it is processed)</i>		Response (identifying risks and including necessary further measures/actions)
4A	Is the information that you are using likely to be of good enough quality for the purpose?	Please provide details: [details specific to individual local authorities]
4B	Have you considered ways in which the amount of data processed can be minimised? <i>It is important to identify the minimum amount of personal data needed to satisfy the project</i>	Please provide details: Yes, we conducted user testing in discovery and alpha with social workers, team managers and families to establish the minimum personal data needed. [additional details specific to individual local authorities]
Accuracy <i>(Personal data must be accurate and, where necessary, kept up to date)</i>		Response (identifying risks and including necessary further measures/actions)
5A	Are you able to amend information when necessary to ensure it is up to date?	Please provide details: [details specific to individual local authorities]
5B	Are you able to ensure that personal data obtained from individuals or other organisations is accurate? <i>Describe a process for validating data if you have one</i>	Please provide details: [details specific to individual local authorities]
Storage Limitation <i>(Personal data must be kept for no longer than is necessary for the purpose for which it is processed)</i>		Response (identifying risks and including necessary further measures/actions)
6A	Have you identified retention periods for this processing?	Please provide details: Yes [same as source system retention periods]
6B	Are there likely to be exceptional circumstances for retaining certain data for longer than the standard retention period?	Please provide details: No
6C	How will you destroy the information when it has reached its retention period?	Please provide details: [details specific to individual local authorities]

6D	If you are procuring software, does the system allow you to delete information in line with retention schedules?	Please provide details: [details specific to individual local authorities]
Integrity and confidentiality (information security) <i>Personal data must be processed in a manner that includes taking appropriate security measures as regards risks that arise from processing personal data. The risks include (but are not limited to) accidental or unauthorised access to, or destruction, loss, use, modification or disclosure of, personal data</i>		Response (identifying risks and including necessary further measures/actions)
7A	Have all staff with access to the information had appropriate information governance training?	Please provide details: [details specific to individual local authorities]
7B	If you are using electronic systems to process/store the information, what technical security measures are in place?	Please provide details: [details specific to individual local authorities]
7C	If you are storing/processing any information in physical formats (e.g., paper files), what security measures are in place to keep this information secure?	Please provide details: N/A
7D	What security measures will be in place when transferring information?	Please provide details: [details specific to individual local authorities]
Individuals Rights <i>Explain how you will manage individual rights</i>		
8A	Do all systems used in this project allow for data subject rights requests to be fulfilled? <ul style="list-style-type: none"> Right of access (copies of their own personal data that you hold) Right to rectification (personal data to be amended) Right to erasure (personal data to be permanently deleted) Right to restrict processing (personal data to be restricted) Right to object (data subject to object to the processing of their personal data) 	Please provide details: [details specific to individual local authorities] Source systems would be used to fulfil any requests.
Automated decision-making/Profiling		

<i>Automated decision-making is where a decision is made solely by automated means without any human involvement. Profiling is the automated processing of personal data to evaluate certain aspects about an individual. Profiling can be part of an automated decision-making process.</i>		
9A	Are individuals subject to automated decision-making or profiling?	Please provide details: N/A
International Transfers		
10A	Will an individual's personal information be disclosed internally/externally in identifiable form and if so to who, how and why?	Please provide details: N/A
10B	Will any personal data be transferred outside the European Economic Area (EEA)? <i>If so, please list who the data will be shared with and in what countries</i>	Please provide details: N/A

Section 6 – Risk identification

Please fill out the following tables so we can identify the risks.

Describe the source of risk and nature of potential impact on individuals. <i>Include associated compliance and corporate risks as necessary.</i>	Likelihood of harm <i>None / possible / probable</i>	Severity of harm <i>Minimal / significant / severe</i>	Overall risk <i>Low / medium / high</i>
1. Malicious use of sensitive personal data (e.g. deliberately looking up family members or acquaintances)	Low	Significant	High
2. Loss of data or data sent to the wrong recipient	Possible	Significant	High
3. Children/families reacting negatively to the gathering/processing of their personal information	Possible	Significant	Medium
4. Inaccurate information being gathered/used to make key decisions	Possible	Significant	Medium
5. Business continuity on access to data or on system up-time	Possible	Significant	Medium
6. Inappropriate or accidental disclosure of passwords resulting in unsolicited access to information	Low	Significant	Low
7. Misinterpretation of the information provided by Family Context	Low	Medium	Low
8. Inadequate security measures (technical and organisational) in place resulting in loss of data or inappropriate access to systems and buildings.	Low	Significant	Low

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Section 7 – Risk mitigation

Please use the below table to help mitigate the risks identified above.

Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in Section 6.				
Risk	Options to reduce or eliminate risk	Effect on risk <i>Eliminated / reduced / accepted</i>	Residual risk <i>Low / medium / high</i>	Measure approved <i>Yes / No</i>
1.	<p>Only named parties will be able to access Family Context data. There will be a log detailing access requests and actions (e.g. which data has been accessed when) for audit purposes and spot checks will be carried out periodically.</p> <p>The Family Context training manual will focus on the appropriate and ethical use of sensitive information. The manual will clearly state the limits of its use.</p>	Reduced	Low	Yes
2.	<p>Family Context will only be accessible through secure devices. The training manual will encourage the continuation of existing processes, which seek to minimise the printing of sensitive information at large and advises the use of secure messaging systems to communicate sensitive information.</p>	Reduced	Low	Yes
3.	<p>Feedback from families accessing social services indicate that they do not like having to repeat themselves.</p> <p>Resident user research has been conducted to capture their views on what data should be included in Family Context.</p> <p>A privacy notice is in place to inform residents that their data is being processed and used to provide services and support – including how to exercise their rights under GDPR.</p> <p>There will be measures in place to ensure that these rights are presented to families in an accessible way.</p>	Reduced	Low	Yes
4.	Family Context practice model and tool	Reduced	Low	Yes

	focuses on facilitating conversations with practitioners. The information is only used to support practitioner-to-practitioner conversations. The information is not designed to be used in isolation from a conversation.			
5.	The Family Context training manual will advise on reverting back to current practice (manual, offline investigation) in the event that data becomes inaccessible for any reason.	Accepted	Medium	Yes
6.	Family Context relies on the local authority's active directory service. Users are expected to be aware of current local authority password policies and the importance of not disclosing information.	Reduced	Low	Yes
7.	Initial training and support will provide users with the knowledge to properly interpret the information presented by Family Context. This training will be updated periodically to ensure that all eventualities are covered. There will also be ongoing support by Children's Social Care and users will be encouraged to get in touch if they are uncertain about a particular use case.	Reduced	Low	Yes
8.	Family Context conforms to all local authority policies, practices and procedures in regards security controls, access controls, audit, staff training and awareness.	Reduced	Low	Yes

Section 8 - High Risk Processing Assessment

GDPR Article 35(3) and ICO guidance 35(4)		Yes	No	Unsure	Comments <i>Document initial comments on the issue and the privacy impacts or clarification why it is not an issue</i>
i)	Is there to be systematic and extensive profiling with significant effects : “(a) any systematic and extensive evaluation of personal aspects relating to natural persons which is based on automated processing, including	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.

	profiling, and on which decisions are based that produce legal effects concerning the natural person or similarly significantly affect the natural person”				
ii)	Is there large scale use of sensitive data : “(b) processing on a large scale of special categories of data referred to in Article 9(1), or of personal data relating to criminal convictions and offences referred to in Article 10”.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Risk sufficiently addressed above
iii)	Is there monitoring of the public : “(c) a systematic monitoring of a publicly accessible area on a large scale”	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
iv)	Does the processing involve the use of new technologies , or the novel application of existing technologies (including AI)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
v)	Is there any denial of service : Decisions about an individual's access to a product, service, opportunity or benefit which is based to any extent on automated decision-making (including profiling) or involves the processing of special category data?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
vi)	Does the initiative involve profiling of individuals on a large scale ?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
vii)	Is there any processing of biometric data ?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
viii)	Is there any processing of genetic data other than that processed by an individual GP or health professional, for the provision of health care direct to the data subject?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
ix)	Is there any data matching : combining, comparing or matching personal data obtained from multiple sources?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Risk sufficiently addressed above
x)	Is there any invisible processing : processing of personal data that has not been obtained direct from the data subject in circumstances where the controller considers that compliance with Article 14 would prove impossible or involve disproportionate effort?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
xi)	Is there any tracking of individuals: processing which involves tracking an individual's geolocation or behaviour,	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.

	including but not limited to the online environment?				
xii)	Is there any targeting of children or other vulnerable individuals : The use of the personal data of children or other vulnerable individuals for marketing purposes, profiling or other automated decision-making, or if you intend to offer online services directly to children?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
xiii)	Is there any risk of physical harm : Where the processing is of such a nature that a personal data breach could jeopardise the [physical] health or safety of individuals?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.

Section 9 - DPIA Summary

Item	Name/date	Notes
Data Protection Officer (DPO) advice provided:		<i>DPO should advise on compliance, only if the processing of personal data in this project is determined to be high risk</i>
Summary of DPO advice:		
DPO advice accepted or overruled by:		<i>If overruled, you must explain your reasons for this decision.</i>
Comments:		
Residual risks approved by:		<i>If accepting any residual high risk, the ICO should be consulted before going ahead with the project. Contact with the ICO should be made via the Council's IG Team</i>
Does the DPIA need to be submitted to ICO prior to the project commencing as it constitutes high risk processing?	Date submitted to ICO	ICO Decisions/recommendations

Section 10 - DPIA Sign-off

Please ensure that the relevant officers below have checked the details of the DPIA. Once satisfied the officers should enter their name in the appropriate field and complete the date of sign-off.

Role	Name	Date
Project Officer		

Information Asset Owner/Information Asset Administrator		
Information Governance Officer <i>If processing is 'High Risk' this should be the Data Protection Officer</i>		
Senior Information Risk Owner <i>Only complete if the processing is to be referred to the ICO</i>		

Appendix

Data Fields	
General Information	<ul style="list-style-type: none"> • First Name • Surname • Date of birth • Gender • Address • Relationship with the child on referral
Adult Social Care	<ul style="list-style-type: none"> • Service involvement • Name of service (e.g. local authority ASC) • Lead practitioner name • Lead practitioner role • Lead practitioner number • Lead practitioner email address • Start date of involvement with service (i.e. when was the first contact registered on the system) • Most recent recorded interaction with service (i.e. when did the last interaction with the service take place) • 'Data current as of' (i.e. when was the information last updated) • Coverage start date and end date (i.e. how far back does the data look) • 'Geographic area covered'
Housing	<ul style="list-style-type: none"> • Service involvement • Name of service (e.g. housing association) • Lead practitioner name • Lead practitioner role • Lead practitioner number • Lead practitioner email address • Is there a record of Anti-Social Behaviour? (Yes/No) • What is that record's status (Case Open/Case Closed/ No Record Found) • Is there a record of eviction? (Yes/No) • What is that record's status (Case Open/Case Closed/ No Record Found) • Is there a record of a notice seeking possessions? (Yes/No) • What is that record's status (Case Open/Case Closed/ No Record Found) • Is there a record of rent arrears? (Yes/No) • What is that record's status (Case Open/Case Closed/ No Record Found) • 'Data current as of' (i.e. when was the information last updated) • 'Coverage start date and coverage end date' (i.e. how far back does the data look) • 'Geographic area covered'
Police	<ul style="list-style-type: none"> • Service involvement (i.e. has this individual been involved with the police?) • Police area • Contact name • Contact role • Contact email • Contact number • Does the individual have a conviction record or suspect record for the specified safeguarding offences? Safeguarding offences include Homicide/ Other sexual offences/ Possession of weapons/ Rape/ Robbery/ Violence with injury/ Violence without injury. • For last 3 safeguarding offences: <ul style="list-style-type: none"> ○ Date of offence ○ Type of offence ○ Nature of involvement (i.e. convicted/ suspect) • Does the individual have a conviction record or suspect record for the specified non-safeguarding offences? • 'Data current as of' (i.e. when was the information last updated)

	<ul style="list-style-type: none"> • 'Coverage start date and coverage end date' (i.e. how far back does the data look) • 'Geographic area covered'
Schools	<ul style="list-style-type: none"> • Service involvement (i.e. is the child currently attending school or has the child done so in the recent past) • School name • School contact number • School admissions type • 'Data current as of' (i.e. when was the information last updated) • 'Coverage start date and coverage of end date' (i.e. how far back does the data look) • 'Geographic area covered'