

## Data Privacy Impact Assessment (DPIA)



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### What is a DPIA?

DPIA is a new obligation under the GDPR which requires us to set out and have recorded all our processing activities across the council. It will also help us to identify and tackle problems at an early stage and ultimately help to reduce associated costs and damage to RBC's reputation.

### When do I need to conduct a DPIA?

You must carry out a DPIA :

- If you are currently processing data and have not completed a DPIA
- When using new technologies and the processing is likely to result in a high risk to the rights and freedoms of individuals.

### What information should the DPIA contain?

- A description of the processing operations and the purposes, including, where applicable, the legitimate interests pursued by the controller.
- An assessment of the necessity and proportionality of the processing in relation to the purpose.
- An assessment of the risks to individuals.
- The measures in place to address risk, including security and to demonstrate that you comply

<b>Directorate:</b>	<b>Economic growth and Neighbourhood services</b>	<b>Lead Officer</b>	<b>Zelda Wolfle</b>
<b>Brief Description or Title of activity requiring a DPIA</b>	<b>New Housing IT System</b>	<b>Date:</b>	<b>07/05/2020</b>

*Please leave this blank*  
DPO Reference Number:

<b>Version</b>	<b>Reason</b>	<b>Author</b>	<b>Date</b>
<b>0.1</b>	<b>Draft</b>	<b>Johnnie Stanley</b>	<b>07/05/2020</b>
<b>1</b>	<b>Final Version</b>	<b>Johnnie Stanley</b>	<b>19/05/2020</b>

### **Approvals- This document requires the following approvals:**

Please ensure that approval is sought from your Head of Service and the Data Protection Officer

<b>Name</b>	<b>Title</b>	<b>Signature</b>	<b>Date</b>
<b>Zelda Wolfle</b>	<b>Assistant Director of Housing and Communities</b>		
<b>Ricky Gill</b>	<b>Data Protection Officer</b>		

### **Distribution - This document has been distributed to:**

Please ensure that a copy once approved is sent to the Data Protection Officer for record-keeping

<b>Name</b>	<b>Title</b>	<b>Company</b>	<b>Date</b>
<b>Ricky Gill</b>	<b>Data Protection Officer</b>	<b>RBC</b>	<b>18/05/2020</b>

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## 1. Screening Questions

### Description of process or activity

Give a detailed explanation of the process or activity and attach relevant reports or papers

This DPIA is being submitted for the procurement and implementation of a new Housing IT system.

The housing teams currently use a legacy IT system called OHMS to manage their processes and data as well as paper-based forms. These processes include but are not limited to, managing homeless cases, providing housing advice, collection of rent, managing repairs, tenancy management, capturing applicants' details and sharing data with 3<sup>rd</sup> parties where appropriate. The housing team are procuring a new IT system from the same supplier in which data will be migrated from OHMS and other IT systems to simplify the processes for end users and residents. The paper-based forms will also become digitised to reduce, if not eliminate, paper-based forms and processes within the housing team.

Regarding data, this projects goal is to consolidate multiple IT systems and paper-based forms into one IT system.

### Detail what personal data you will be processing

List the personal data you will be collecting that can identify an individual/individuals

Through this project no new data categories will be captured than are currently captured. Currently residents of the boroughs individuals' names, address, occupants, contact details, family connections ,medical problems, anti-social behaviour history, benefits history, bank details for direct debit collections, credit check reports and other ancillary details are processed through the housing team and council operations.

### Explain why the processing is necessary & proportionate to the activity

Explain why each item of personal data listed above is needed in relation to the activity

The above processing is necessary as without the customers details the Council can't assist with their housing needs. The data needs to be moved from the legacy system to the new system to continue the service provided.

### Is there a lawful basis for processing ?

- With consent of DS
- Necessary for a contractual obligation with DS
- Necessary for compliance with a "clear and precise" legal obligation
- Necessary to protect vital interests of DS
- Necessary for performance of public interest task in exercise of official legal duty
- Necessary for your legitimate interests or the legitimate interests of a third party (When not performing tasks as a public authority)

The above personal data is captured and processed on the basis of...

- (a) Consent: the individual has given clear consent for you to process their personal data for a specific purpose.
- (b) Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations).

<p><b>Impact on individuals</b> Explain whether there will be any negative impact on or risks to the affected individuals</p>	
<p>No negative impact is anticipated for the individuals affected.</p> <p>The main risk to individual's data is focused around any change of processes internally that are expected as part of this project as well as leakage from the secure network. This is due to purchasing a non-bespoke product that RBC may need to adapt processes to fit as well as data will be moved from multiple IT systems over to the final IT system. There remains a risk where data is leaked outside the secure network during these migrations.</p>	
<p><b>Measures</b> Explain what measures will be put in place to mitigate the impact (eg. security, deletion, redaction, encryption, restricting access, staff training)</p>	
<p>To mitigate the risk of data leakage or exposure the following controls will be put in place:</p> <ul style="list-style-type: none"> <li>- Encryption when moving data from secure networks across non-secure networks</li> <li>- Restricting access via the systems roles and responsibilities functionality</li> <li>- Staff training provided by the systems supplier</li> <li>- Review and agreement of data sharing and processing terms on contract with supplier</li> </ul>	
<p><b>How many individuals' personal data will be affected?</b> Enter the number of individuals or an approximate number if exact number is unknown</p>	<p>Approx. 20,000</p>

	<b>Yes (x)</b>	<b>No (x)</b>
<b>Will the personal data collected include sensitive personal data?</b> These include medical/health, religious, political, racial/ethnic or trade union data	X	
<b>Will the data be used for profiling purposes?</b> Profiling means making automated decisions (typically involving algorithms or IT systems) that would have an impact on a person's life	X	
<b>Will the activity compel individuals to provide information about themselves?</b>	X	
<b>If Yes, has consent been sought?</b>	X	
<b>Will the information about individuals be disclosed to organisations outside of RBC? If so, who and why?</b> Please include a copy of the contract or agreement governing the sharing of information	X	
<b>Does the activity involve you using new technology which might be perceived as being privacy intrusive? For example, the use of biometrics or facial recognition.</b>		X
<b>Will the activity require you to contact individuals in ways which they may find intrusive?</b>		X

**Please submit completed form to the IG team at the following e-mail address:  
GDPR@reading.gov.uk**