

Data Protection Impact Assessment

Project Details

Name of Project

Policy for the Corporate Rent Guarantor Scheme for Care Experienced Young People

Brief Summary of Project

The Pathways Through Care Service would like to start a 12-month pilot of the Corporate Rent Guarantor Scheme starting in January 2024.

The Guarantor Scheme means that Southampton City Council (the Council) will act as the 'Corporate Guarantor' for the councils care experienced young people in their leaving care journey. Implementing this scheme will provide more housing options to young people by enabling young care leavers to access the private rental market. The Council will act as the guarantor for care leavers for 12 months of the tenancy, providing that the care leaver remains under the age of 25 years old throughout the entire tenancy.

The pilot will test out the financial implications, and the impact the scheme has on care experienced young people.

The Pathways Through Care Service are proposing to start the pilot on a small scale by limiting the number of successful applications to 12 in the year. This is to minimise the potential financial risks for the Council involved in the scheme, and to consider learning from other Local Authorities. Other mitigating actions include an **application process** ensuring care leavers have the means to pay rent, and a limit on the amount the Council will guarantee to pay being £850 per month, for each care leaver.

The care experienced young people who are interested in the scheme will need to apply via completion of an application form. The application form is part of the first stage application process and details will be needed from the young person in relation to the following:

- their currently living situation;
- their education, training, or employment status;
- their financial situation (including income, benefits, loans, bank statements);
- evidence of their budget management plan (including monthly outgoings);
- their housing/ accommodation aspirations;
- their future living arrangements;
- their independent skills;
- their financial plans if anything was to go wrong;
- contact details for their supporting references (could be their Personal Advisor, Social Worker, Carer, Employer, Tutor etc.).

Following the completion of the application form, the young persons Personal Advisor, and the relevant Practice Manager within the Children and Learning service will provide their comments, and recommendations for next steps. This information will be used to determine whether the young person will be successful for the scheme. Much of this

information/ data would not be new to the service, but the way in which the data is collected is different to pre-existing arrangements. The data collected will then be used to make decisions regarding the young person's eligibility of the Corporate Rent Guarantor Scheme.

The Corporate Rent Guarantor Scheme pilot would come to an end in December 2024, and a further decision will need to be made on whether the policy will remain in place long term.

Estimated Completion Date

December 2024

Name of Project Lead

Anisha Reed, Head of Service for Pathways Through Care (Children and Learning)

Details of Person Conducting DPIA

Name

Lucy Cooper

Position

Assistant Project Manager (Projects & Change)

Contact Email Address

lucy.cooper@southampton.gov.uk

Step 1: Identifying the need for a DPIA

Does your project involve the processing of personal data by or on behalf of Southampton City Council?

“Personal Data” means information that relates to an individual, who can be identified (either by the information alone, or when combined with other information).

“Processing” means collecting, recording, organising, structuring, storing, adapting, altering, retrieving, consulting, using, disclosing, combining, restricting, erasing, or destroying.

It should be integral to the project, and not just incidental to it.

Yes

No

If your project does **not** involve the processing of personal data by or on behalf of Southampton City Council, tick the declaration at the end of this section.

If your project **does** involve the processing of personal data by or on behalf of Southampton City Council, proceed to the next set of screening questions below.

Does your project involve any of the following? (Not all may apply, tick those that do)

- The collection of new information about individuals
- Compelling individuals to provide information about themselves.
- The disclosure of information about individuals to organisations or people who have not previously had routine access to the information.
- The use of existing information about individuals for a purpose it is not currently used for, or in a way it is not currently used.
- Contacting individuals in ways which they may find intrusive.
- Making changes to the way personal information is obtained, recorded, transmitted, deleted, or held

Are you planning to carry out any of the following? (Not all may apply, tick those that do)

- Evaluation or scoring
- Processing of sensitive data or data of a highly personal nature
- Processing on a large scale¹
- Processing of data concerning vulnerable data subjects
- Processing that involves preventing data subjects from exercising a right or using a service or contract

Do you plan to...? (Not all may apply, tick those that do)

- Use systematic and extensive profiling or automated decision-making to make significant decisions about people
- Process special-category data² or criminal-offence data on a large scale
- Systematically monitor a publicly accessible place on a large scale
- Use innovative technological or organisational solutions.
- Use profiling, automated decision-making or special category data to help make decisions on someone's access to a service, opportunity, or benefit
- Carry out profiling on a large scale

¹ "Large scale" can mean the number of individuals involved, the volume of data, the variety of data, the duration of processing, or geographical area.

² Special category data is personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation.

- Process biometric or genetic data
- Combine, compare, or match data from multiple sources
- Process personal data without providing a privacy notice directly to the individual
- Process personal data in a way that involves tracking individuals' online or offline location or behaviour
- Process children's personal data for profiling or automated decision-making or for marketing purposes, or offer online services directly to them
- Process personal data that could result in a risk of physical harm in the event of a security breach

If you have ticked any of these, please proceed to Step 2.

If **none** of these apply, please tick the below box, and return the form to the Information Lawyer (Data Protection Officer) at dataprotection@southampton.gov.uk

- None of the screening statements in Step 1 of this document apply to the project, and I have determined that it is not necessary to conduct a Data Protection Impact Assessment

Step 2: Describe the processing.

Details of the Personal Data

What type of personal data is being processed? Tick all that apply

- Education and training details
- Employment details
- Family, lifestyle, and social circumstances
- Financial details
- Goods or services provided and related information
- Personal details issued as an identifier (e.g. NHS Number)
- Personal details, including any information that identifies the data subject and their personal characteristics

What is the nature of the data?

INFO: Detail the type of personal data being processed. List any fields that will be processed (e.g. name, address, data of birth, NHS number, video images)

The following questions are within the draft application form for the young person to answer/ complete:

- Name & DOB of Applicant;
- What is your current living situation;
- What is the accommodation for (e.g., University, full-time residence);
- If university accommodation, name of university;
- What is your current education, training, or employment status;
- Do you have any reason to believe that this may change over the next 6 months;
- How much can you afford to pay in rent per month;
- Please explain how you will pay your rent, for example, wages, Housing Benefit, Student Loan, etc.;
- Please submit to Southampton City Council copies of any documentation with your application form (options: Housing Benefit eligibility letter, Letter of financial support from Southampton City Council, University Finance entitlement summary);
- Please also attach copies of the last 3 months' bank statements. Additionally, if you work, please attach the last 3 months' pay slips and proof of employment;
- Please provide us with a breakdown of your planned expenditure to provide evidence to Southampton City Council you have a monthly budget;
- Please advise and tick the appropriate box if you receive your income other than monthly (options: daily, weekly, fortnightly, other: please specify);
- Planned expenditure breakdown (including monthly income and monthly outgoings);
- Have you found a property;
- If you have said no, do you know which area/s you may want to live in and what are you doing to find a property, if so, please specify;
- If yes, what is the monthly rental cost per week/month;
- Please specify what research have you carried out in relation to local rent costs;
- What will be the living arrangements in this property (options: alone, in a shared house with friends, in a shared house with others, in student halls of residence for university study, what a partner/friend, other, please specify);
- Which skills do you believe that an individual requires to live independently and how would you describe those you have;
- If you found yourself in financial difficulty, who would you turn to for budgeting and practical support;
- How would you financially cope if you found yourself with an unexpected bill, loss of your job, or if you do not have any 'spare money'; whilst still paying your rent;
- Please provide us with contact details for a supporting reference (for example, your Personal Advisor, Social Worker, Carer, Employer, Tutor, or another);
- Please specify any further information that you feel may help towards your application.

The following questions are within the draft application form for the Children and Learning Service to answer/ complete:

- Date form completed;
- Allocated PA;
- Team/Hub;

- Practice Manager;
- Personal Advisor Comments/Recommendations;
- Practice Manager Comments/Recommendations.

What special category / sensitive data is being processed? Tick all that apply

- Physical or mental health
- Religious or philosophical beliefs
- Trade union membership
- Sexual orientation
- Criminal record
- Criminal proceedings
- Racial or ethnic origin
- Political opinions
- Biometric or Genetic data
- No special category / sensitive data

What is the nature of the special category / sensitive data? Please provide further information

n/a

Does the project involve the use of social care data?

- Yes
- No

Does the project utilise existing and established IT systems, or require the use / procurement of a new system?

- Existing / established system
- New system

The nature of the processing

Briefly describe the flow of personal data

INFO: Describe “the journey” of the data, from the point of collection from the data subject, through the various parties and departments involved.

- The Personal Advisor will identify a young person who is suitable for the scheme and will complete a guarantor application form with the young person. The Personal Advisor will need to provide a summary as to why they believe that the young person can hold a tenancy.
- The young person will sign a statement to say that they promise to meet the commitments of their rent payments each month, using whatever legal income they receive to do this. They will also sign to agree that all benefits or other monies received specifically for the purpose of paying accommodation costs, will be used.
- The summary, application form and documents relating to the tenancy should be checked by the respective Practice Manager and these will be shared via email. The PM will need to agree that the young person is able to meet the requirements to oversee their own accommodation.
- The Practice Manager and Personal Advisor will each sign a statement stating that they have assessed that there is affordability for this young person, for which they feel it is appropriate for the Council to ‘Guarantee’. They will each sign a statement to say they are confident in the young person’s ability to manage a tenancy with only basic input from their Personal Advisor.
- The Practice Manager or Personal Advisor will then forward all the documents (including signed statements) to the Head of Service for Pathways Through Care who will check and assess whether it seems an appropriate agreement. The agreement for the Council to act as a Guarantor will be given by the Head of Service for Pathways Through Care. They will also have overall responsibility for the tracking and monitoring of financial implications.
- Once the documents have been reviewed and a decision has been made on them, the files will be stored within the young persons file on Care Director.

Overall, the data shared by the young person via the application form will only be shared with the relevant Personal Advisor, the relevant Practice Manager, and the Head of Service for Pathways Through Care. The documents will be shared securely via email and stored in Care Director with the young person’s file.

How will the data be collected? E.g. via form, system transfer, face to face etc.

The data will be collected via an application form completed by the care experienced young person. The application form will be a Microsoft Word document which will be shared via email and later stored on Care Director after completion.

How will the data be used?

The data will be used to make an informed decision as to whether the young person is eligible for the Corporate Rent Guarantor Scheme.

How will the data be stored?

The data will be stored within the young person's file within Care Director for 7 years. This will enable the service to obtain the information throughout the process of the young person being part of the scheme (from 18 to 25 years old).

How will the data be deleted? E.g. Manually, via automated process etc.

The data will be stored within Care Director for 7 years, but how the data will be deleted is still to be confirmed. Work is being undertaken by the Care Director team to create a 'finance' section within the system for storing of all financial information on each child and young person open to children services. These updates have not yet been completed and will be an action to monitor as part of this DPIA. As part of the creation of the 'finance' section within Care Director the options are to be explored about whether a notification can be built into the section to highlight when information has been stored for the 7 years, and a reminder to manually delete the document.

The decision about whether the young person has been accepted for the scheme or not will be stored separately and will be manually deleted adhering to the Care Planning, Placement and Case Review (England) Regulations 2010, s. 50 which states the retention period for records of looked after children should be obtained for 75 years from the child's 18th birthday. This information is to be kept for a longer duration to ensure that the young person will be able to access the information about the support that the council have provided them throughout their time being open to the service. There is a risk that any person that was open to social care can take legal action against the council for improper support, and logging this decision and the rationale for the decision will mitigate that future risk.

What is the source of the data? i.e. What is the flow of data into the Council?

The data will be submitted by the young person themselves and shared with their Personal Advisor via email, if they have not worked on the document together. If the young person and the Personal Advisor completed the document together, the Personal Advisor would then share it with the relevant leads within the council (Personal Advisor, Practice Manager, and Head of Service for Pathways Through Care). The application form will then be stored within Care Director for 7 years.

Will you be sharing data with anyone?

INFO: If yes, please provide details

The data will be shared with the relevant leads within the Children and Learning Service (Personal Advisor, Practice Manager, and Head of Service for Pathways Through Care).

If so, how will the data be transferred?

The data will be transferred via email to the relevant leads within the Children and Learning Service (Personal Advisor, Practice Manager, and Head of Service for Pathways Through Care).

If the data is being shared, will this be governed by an agreement? e.g. contract, data sharing agreement, data processing agreement

A privacy notice will need to be created for this work.

Describe the scope of the processing

How often will the data be collected and used?

The data will be collected on an ad hoc basis, as and when the young people apply for the Corporate Rent Guarantor Scheme. The Pathways Through Care Service are proposing to start the pilot on a small scale by limiting the number of successful applications to 12 in the year.

How long will you keep the data, and how is this length of time justified?

The data will be stored within Care Director for 7 years, but how the data will be deleted is still to be confirmed (detail above). A 7-year retention period is standard for financial information. This will also allow for the information to be obtained throughout the duration of the young person applying for the scheme (age 18), until the young person will no longer be supported by the children and learning service (age 25).

The decision about whether the young person has been accepted for the scheme or not will be stored separately and will be manually deleted adhering to the Care Planning, Placement and Case Review (England) Regulations 2010, s. 50 which states the retention period for records of looked after children should be obtained for 75 years from the child's 18th birthday. This information is to be kept for a longer duration to ensure that the young person will be able to access the information about the support that the council have provided them throughout their time being open to the service. There is a risk that any person that was open to social care can take legal action against the council for improper support, and logging this decision and the rationale for the decision will mitigate that future risk.

Is the time period reflected in the Council's Retention Schedule?

<https://staffinfo.southampton.gov.uk/information-governance/records-management/retention.aspx>

INFO: Please specify the corresponding entry on the Council's Retention Schedule. If unsure, contact the Information Officer (Data Management):

records.management@southampton.gov.uk

Yes, regarding the retention period of the application form, financial records including accountancy, budget, assets, creditors/income, and banking can be stored for up to 7 year (Fin Yr of the transaction + 6 Fin Yrs.) which is corporate/ statutory.

Yes, regarding the retention period for the decision on the application, under section EA 9 (page 100), records relating to looked after children states the following:

Review/Retention period & by what authority: 75 years from date of birth; 15 years from date of death if deceased before age of 18 (where there is a family unit in care, the above apply to the date of birth of the youngest child).

How many individuals are affected?

The volume of individuals that will be submitting their personal data cannot be estimated and will be based on the amount of young people that submit a completed application form to their Personal Advisor. The Pathways Through Care Service are proposing to start the pilot on a small scale by limiting the number of successful applications to 12 in the year.

What geographical area does it cover?

National as not only will this scheme support care leavers moving into local private accommodation, but the scheme will also support care leavers that are at university across England to move into private rented accommodation for their studies.

Describe the context of the processing

What is the nature of your relationship with the individuals?

INFO: Detail who the data subjects will be (e.g. residents, carers, pupils, staff, professionals)

The young people that will be submitting data will be residents of Southampton and will be care leavers, therefore known to the Children and Learning Service. The care experienced young people will already have a relationship with their Personal Advisors (professionals).

How much control will they have over their data? Will they be able to change it, access it, delete it etc.?

The young person will be able to control the information that they submit ahead of sending off the application form. They will also be able to work with their Personal Advisors on the application itself, and the process in which to follow. Once the application has been submitted, following the review of the Personal Advisor, the information cannot be changed.

Would they reasonably expect the Council to use their data in this way?

INFO: Please provide details to support your answer

Yes, to make an informed decision, the Pathways Through Care Service will need the information set out within the application form. The information will only be used for essential council purposes and will only be shared out of the original remit if there is a safeguarding concern. A privacy notice will need to be created for this work.

Do they include children or other vulnerable groups?

INFO: If yes, please provide details

Yes, the information that is being shared via the application process is information about and from care experienced young people. The scheme and application process will be open to young people aged 18 - 24. The rationale for stating yes in this section is that children in care and care leavers are considered to have protective characteristics in Southampton and can be viewed as being in a vulnerable group.

Are you aware of any prior concerns over this type of processing or security flaws?

INFO: If yes, please provide details

No.

Is the processing novel in any way? E.g. do other local authorities have a similar process in place?

INFO: If yes, please provide details

No. Many other local authorities have implemented a Corporate Rent Guarantor Scheme for care experienced young people. Some examples are Medway Council, North Somerset Council, Kent County Council, and Dorset Council. Engagement with Medway has taken place over the course of the policy development, and they also have an application form for the care experienced young people to complete as part of the scheme. Both application forms are very similar in the questions that it asks.

Are there any current issues of public concern that should be considered?

INFO: If yes, please provide details

No.

Describe the purposes of the processing

What do you want to achieve?

The Corporate Rent Guarantor Scheme wants to achieve the following for care experienced young people:

- Care Leavers will have better and more secure access to private rented accommodation.
- Care Leavers will have the same options and opportunities as young people that have not been in care.
- The local offer would have a better variety of support available to care leavers.
- It provides an opportunity for care leaver to become independent and learn to manage tenants and pay bills.
- Care leavers are supported by the council if issues arise around the accommodation.
- The Council will be able to support eligible care leavers as part of this scheme which could potentially result in cost avoidance to provide other sources of accommodation.

What is the intended effect on individuals?

The intended effect on individuals is to ensure that care experienced young people have access to opportunities that other young people in the city have. The goal is to help care experienced young people with their independence, by supporting them to move into private rented accommodation without the worry of not having a personal guarantor. The information that the young people provide within the application form will help professionals make an informed decision on eligibility and ensure the best outcome for the young person.

What are the benefits of the processing – for the Council, and more broadly?

INFO: Please confirm which of the Council's key goals this will support, and how

Goal:

- Strong foundations for life
- A proud and resilient city
- A prosperous city
- A successful, sustainable organisation

Please explain how the goal is met

The Corporate Rent Guarantor Scheme supports the Council's key goal of 'strong foundations for life', ensuring that the care experienced young people have access to positive opportunities that support their future.

Children Services, and the Corporate Parenting Board are responsible for the delivery of the [Corporate Parenting Strategy](#) which was published in 2022 and will run until 2027. The strategy sets out 7 key priority areas, one of which is around home and accommodation. One of the key deliverables linked to the priority is around increasing the Council's enhanced housing offer for young people as they move into adulthood. Publishing the Rent Guarantor Scheme Policy would help achieve this aim.

The scheme aligns with key deliverables set out in the Corporate Parenting Strategy, and the draft Homelessness and Rough Sleeping Strategy.

Step 3: Consultation

Consider how to consult with relevant stakeholders

Do you think it's necessary to consult with the public about the processing?
If not, why?

INFO: Please provide details to support your answer

A formal consultation on the Corporate Rent Guarantor Scheme pilot is set to start on Monday 14th August and conclude on 29th September (7 weeks total). The final decision is intended to be at Cabinet on 19th December 2023.

As part of the formal consultation period, direct engagement will be made with care leavers, the Corporate Parenting Board, and the internal Housing service so that they are able to understand how this would impact them, and what their views are on the pilot.

Legal have advised that a Privacy Notice is created as part of this work.

Who else do you need to involve, or have you already involved within the Council?

INFO: e.g. IT services, records management

The only services that have been involved within the development of the Corporate Rent Guarantor Scheme pilot is the Children and Learning Service, Finance, Legal, Policy, and Projects & Change.

Do you plan to consult IT, external information security experts, or any other experts? If not, why?

INFO: Please provide details to support your answer

Not currently but will if advised to do so.

Step 4: Assess necessity and proportionality

Describe compliance and proportionality measures

What do you consider your lawful basis for processing to be? Please choose one of the following...

INFO: There should generally only be one legal basis for processing.

- The data subject has given consent.
- The processing is necessary for the performance of a contract to which the data subject is party or to take steps at the request of the data subject prior to entering a contract.
- The processing is necessary for compliance with a legal obligation to which the Council is subject.
- The processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Council.
- The processing is necessary for the purposes of the legitimate interests pursued by the Council or by a third party

Please provide further information to support this

INFO: For example, if the processing is necessary in order for the Council to perform a statutory function, detail the relevant legislation.

The data will be provided directly by the young person, with the help of their Personal Advisor. The processing of the data provided is necessary to make an informed decision on whether the young person in question is eligible and suitable for the scheme. Once the data has been submitted by the young person, the individual cannot amend any information shared. If successful for the scheme, there will be a legal contract in place which details the role of the young person, and the role of the corporate guarantor.

Why is the processing deemed necessary?

INFO: e.g. Is the Council under an obligation to provide a service, or is there a particular problem that the project is trying to address?

The process is deemed necessary to offer a new service to care experienced young people. This work is for the purposes of a new opportunity and not to address a problem of any kind.

The problem that this scheme is addressing is that not all care leavers have their parents or adults in their lives to support them with independence. The scheme will allow the council to act as the corporate parents for the young person and give them the same opportunities other young people have.

Southampton's care leavers are some of the most vulnerable young people in the community who have experienced trauma and loss in their childhood. This has led to them being removed from their families and placed in local authority care. Once a young

person in care reaches the age of 18, they are at a stage in their lives where they can become more independent.

The Council is using powers under the Localism Act 2011 to carry out this scheme. The Localism Act 2011 contains a wide range of measures to devolve more powers to councils and neighbourhoods. The Localism Act 2011 states 'A local authority has the power to do anything that individuals may generally do', subject to certain exceptions, none of which are applicable here. This Act gives the power to Local Authorities to act as a Corporate Guarantor for young care leavers.

The following list is the potential benefits that could be realised pending the successful delivery of the Rent Guarantor Scheme Policy pilot.

- Care Leavers will have better and more secure access to private rented accommodation.
- Care Leavers will have the same options and opportunities as young people that have not been in care.
- The local offer would have a better variety of support available to care leavers.
- It provides an opportunity for care leavers to become independent and learn to manage tenants and pay bills.
- Care leavers are supported by the Council if issues arise around the accommodation.
- The scheme aligns with key deliverables set out in the Corporate Parenting Strategy, and the draft Homelessness and Rough Sleeping Strategy.

Does the processing actually achieve your purpose?

INFO: Please provide details to support your answer

Yes, the process will help the Pathways Through Care Service to successfully roll out a new service for care experienced young people to have access to private rented accommodation, if they do not have a personal guarantor. Without the process, professionals will not be able to offer the scheme to young people as they would not have the information, they need to make an informed decision.

Is there another way to achieve the same outcome?

INFO: Please details to support your answer

No, without the young person submitting their data, the professionals would not have the evidence they need to determine whether this accommodation route would be suitable for that young person.

How will you prevent function creep?

INFO: Function creep is where data collected for one purpose is used for another purpose over time.

The data will primarily be used to determine eligibility for the scheme and will have professionals make those decisions. There is potential that if the young person applies form for the scheme, but it is declined, the Pathways Through Care Service would investigate options to use that data to help them secure other accommodation such as social housing. These options will be discussed with the care leaver themselves on what options they want to consider.

How will you ensure data quality and data minimisation?

INFO: We should only use the minimum amount of personal data possible to achieve the purpose of the processing.

The application form has been created with data quality in mind and is only asking necessary questions for decision making. The service will already have some of the information provided by the young person as part of other data processing for care leavers, but some of the data would be new and only needed for the purposes of checking eligibility of the scheme.

What information will you give individuals about the processing?

As part of the Corporate Rent Guarantor Scheme pilot, a young person’s guide has been drafted to ensure that the process of the scheme is clearly set out, and they understand key information such as what a Guarantor is, what does the scheme offer, as well as eligibility and support via the scheme.

Legal services have advised that a Privacy Notice is also needed as part of this work to ensure the young person is aware of what information the council is collecting, how it is being used, and stored.

Aside from existing corporate processes, will there be any additional measures in place to support individuals exercising their privacy rights?

INFO: Data subject’s rights include the right to access, rectify, erase, port, and restrict their data.

Additional measures could include self-service options to enable individuals to change / update their personal data, or download copies of their data

Legal services have advised that a Privacy Notice is also needed as part of this work to ensure the young person is aware of what information the council is collecting, how it is being used, and stored.

If a third party is carrying out the processing on our behalf, what measures will be in place to ensure they comply with the UK GDPR, and assist the Council in supporting individuals in exercising their rights?

INFO: E.g. will there be a contract in place with the third party that contains data protection obligations?

n/a

How do you safeguard any international transfers of personal data?

INFO: If there are no international transfers involved, please state this

n/a there would be no international transfers involved.

Step 5: Send DPIA Form to the Data Protection Officer

After completing this part of the form, please send the document to the Information Lawyer (Data Protection Officer) at dataprotection@southampton.gov.uk
The DPO will review the information provided and identify and assess the privacy risks.

Step 6: Identify and assess risks (DPO to complete)

Describe source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary.	Likelihood of harm	Severity of harm	Overall risk
<p>Although a retention period has been identified, it is not yet known on an operational level how this retention period will be enforced / enacted.</p> <p>This could lead to personal data being kept for longer than is necessary.</p>	Low	Minimal	Low

Step 7: Identify legal basis and measures to reduce risk (DPO to complete)

Condition(s) for Processing
Personal Data
<ul style="list-style-type: none"> <input type="checkbox"/> The data subject has given consent <input checked="" type="checkbox"/> The processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract <input type="checkbox"/> The processing is necessary for compliance with a legal obligation to which the Council is subject <input type="checkbox"/> The processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Council <input type="checkbox"/> The processing is necessary for the purposes of the legitimate interests pursued by the Council or by a third party
Further Information
<p>If successful for the scheme, there will be a legal contract in place which details the role of the young person, and the role of the corporate guarantor.</p>

Special Categories of Personal Data

- The data subject has given explicit consent
- The processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law
- The processing is necessary for reasons of substantial public interest
- The processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems
- The processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes
- No special category data being processed

Further Information

No special category personal data processed as part of the application.

Data Protection Act 2018 Schedule 1 Condition

N/A

Further Information

N/A

Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 5

Risk	Options to reduce or eliminate risk	Effect on risk	Residual risk
1.	<p>As per the DPIA, work is being undertaken by the Care Director team to create a 'finance' section within the system for storing of all financial information on each child and young person open to children services.</p> <p>As part of the creation of the 'finance' section within Care Director the options are to be explored about whether a notification can be built into the section to highlight when information has been stored for the 7 years, and a reminder to manually delete the document.</p>	Eliminated	N/A

Comments from the Data Protection Officer

No additional comments.

Comments from the Information Officer (Data Management)

No additional comments.

Comments from the Head of IT

Not consulted due to the use of existing / established systems.

Step 8: Sign off

Item	Date	Notes
DPO reviewed DPIA and provided advice on:	21 st November 2023	DPO should advise on compliance, step 7 measures and whether processing can proceed
Information Officer (Data Management) reviewed DPIA on:	28 th July 2023	SRO should advise on records management matters
Head of IT reviewed DPIA on:	N/A	Head of IT should advise on IT security matters
Measures approved by Project Lead on:	27 th November 2023	Integrate actions back into project plan, with date and responsibility for completion
Comments from Project Lead:	No comments.	
Residual risks approved by Information Asset Owner / Administrator on:	4 th December 2023	The relevant IAO or IAA is required to accept any residual risks associated with the processing.
Comments from IAO / IAA:	No comments.	
Project approved by Caldicott Guardian (CG) on:	28 th November 2023	The relevant Caldicott Guardian is required to approve any project involving the processing of social care data.
Comments from CG:	No comments (cc'd in)	
Residual high risks approved by the Senior Information Risk Owner (SIRO) on:	N/A	If accepting any residual high risk, consult the ICO before going ahead
Comments from SIRO:	N/A	

Step 9: Review

Item	Date	Comments
DPO reviewed DPIA on:		
Date of next review:		