

PRIVACY IMPACT ASSESSMENT

Annexe 2 - Full Assessment

Guidance for the Project Manager and Sponsor

The Privacy Impact Assessment (PIA) will enable you to systematically and thoroughly analyse how your project or system will affect the privacy of the individuals (i.e. customers) involved. The templates are based on the versions produced by the Local Government Association and the Information Commissioner's Office (ICO).

- The PIA is a proactive approach to privacy protection;
- It is often the most effective way to demonstrate to the Information Commissioner's Office (ICO) how personal data processing complies with the Data Protection Act 1998;
- The outcome of a PIA should be a minimisation of privacy risk;
- Conducting a PIA would be a legal requirement under the General Data Protection Regulation (GDPR).

Further guidance on completing the Pre-Assessment and Full PIA is available from the accompanying guidance. Further information on the PIA is also available on the [ICO's PIA code of practice](#).

Section One - Project Summary

Project Name	Homelessness Reduction Act – case management system	Directorate and Service	Supporting People Housing Needs
Project Sponsor and Position		Project Manager and Position	
Project Start Date	Sept 2017	Project Go Live Date (anticipated/planned)	Anticipated 03.04.2018
<p>Brief Description Of The Project</p> <p>The Homelessness Reduction Act 2017 (HRA) is live from 3 April 2017. Procurement of a case management system (CMS) aims to reduce administrative burdens imposed on Local Authorities by the act and assist staff with effectively managing cases.</p> <p>The HRA CMS is an innovative shared digital solution for three London boroughs (Camden, Islington and Haringey) that will:</p> <ul style="list-style-type: none"> • Provide automated homeless prevention advice online • Provide online capability that will enable members of the public and third parties to make referrals for housing assistance. • Provide secure online capability to manage interactions with the Council (PHPS) • Ability to manage case's through all stages of assistance through the Act • Provide the ability to integrate with existing systems and processes across the three Council's. • Provide document storage and retrieval options <p>The benefits</p> <p>The HRA project will: (Need to be clear what the IT solution will enable and what the other areas of the project will need to be incorporated. The project itself isn't providing the below it's the IT solution)</p> <ul style="list-style-type: none"> • provide a 24/7 digital web based self-assessment and referral function 			

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- Provide a 24/7 secure digital interface between the client and the Council to manage interactions with the council back-office housing advice service
- Determine a number of housing options and display them to customers that have been defined by the business with the intended purpose of reducing homeless approaches
- Enable third parties to make referrals for homeless households to the local authority
- Enable case creation and management by back-office staff with relevant permissions
- Reduce administrative burdens by automating many of the processes and letters.
- The case management solution should also enable officers to manage reviews.

GOVERNANCE ARRANGEMENTS

The PIA may be subject to review and audit by Camden including the ICT Project Review Board, Corporate Information Governance Group (CIGG) and the Information Commissioners Office (ICO). You may therefore find it helpful to keep the signed PIA and all supporting documents with your project file for audit purposes.

A copy of the completed Pre-Assessment (including the signed declaration where appropriate) must be sent to the Clerk to the CIGG. The CIGG will review pre-assessments on a risk basis and at any time during the life of the project, may ask you to attend a meeting to provide further information, answer questions and respond to any privacy concerns.

The ICT Project Review Board and ICO may also request the PIA at any time.

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Section Two - About the Project

1 Identify the need for a PIA

- **What does the project aims to achieve, what benefits will it bring to Camden, to individuals and other parties?**
- **Why was the need for a full PIA identified?**

Response:

It is a requirement of all local authorities to implement the provision contained within the Act by April 2018 (subject to issuing of the commencement order).

The Act places new duties on local authorities concerning people who are homeless, or at risk of becoming homeless. This includes the provision and management of a PHP, a statutory duty for public services to refer into councils and a formalised review process.

Demand on the housing needs services is expected to increase significantly following the introduction of the legislation. It is not possible to provide an accurate figure but indicative calculations range from 25 to 50% increases in cases presenting for assistance.

At the same time as introducing the new legislation, the Department of Communities and Local Government (DCLG) will implement new, more detailed, monitoring arrangements. Future funding for authorities for homelessness will be based on data obtained from the new monitoring arrangements.

The benefits of introducing a CMS will include compliance with the legislation and reporting requirements, reducing the administrative burden on staff. Applicants will be able to apply for assistance more easily and allows them to manage their housing situation and engage more proactively with the process.

A full PIA is required as the case management solution will retain large amounts of personal information that would be covered by the DPA and the GDPR.

2 Describe the information flows

- **Describe the collection, use and deletion of personal data. A flow diagram can be used for ease of understanding. See diagram 1.**
- **How many individuals will likely to be affected by the project?**

Hard to quantify due to unknown number of applications at this time. Demand on the service during 2016 – 2017 exceeded 1225 households and is expected that we could see demand increase by a further 50%.

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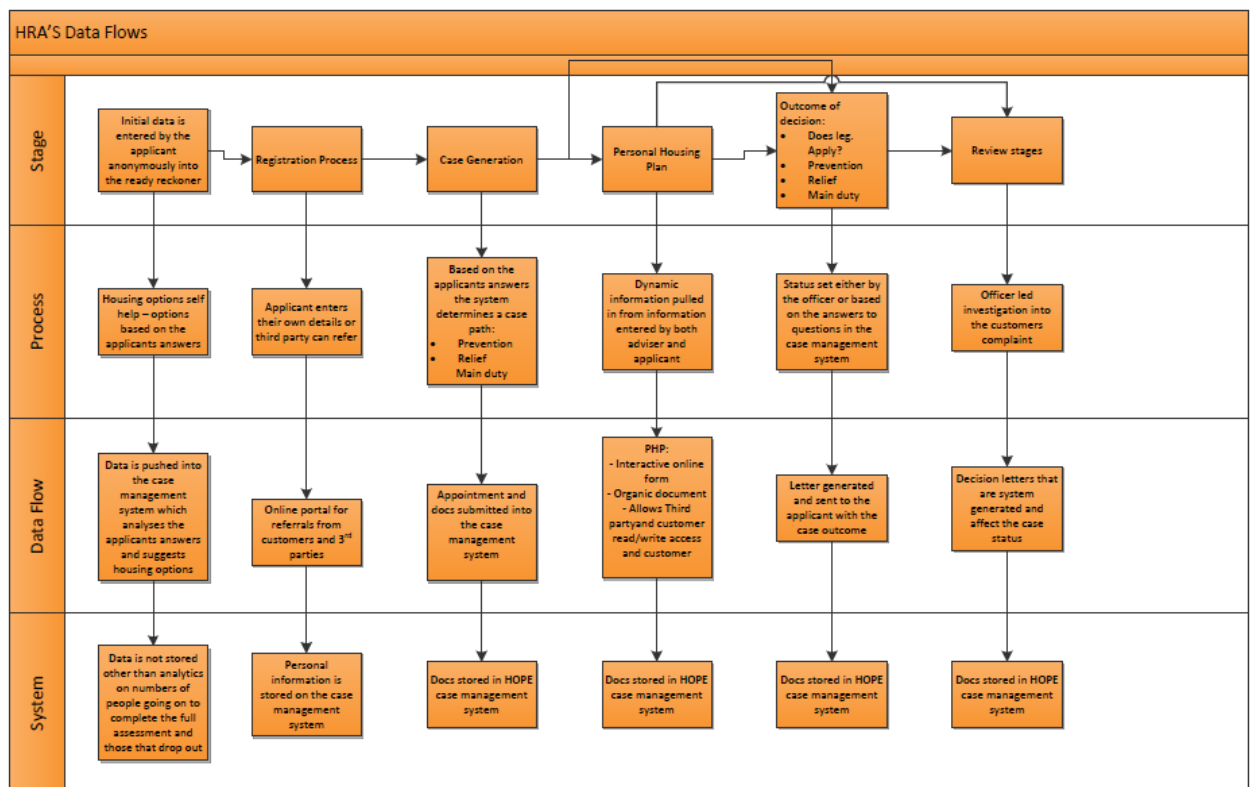


Diagram 1.

3 Consultation requirements

- **What practical steps will you take to ensure that you identify and address privacy risks?**
- **Who should be consulted, internally and externally?** It may be helpful to link to the stages of the project.

The project to develop the HRA case-management system consists of multi-disciplinary team that includes leads from a number of service areas including the service (Housing Needs), I.T (Shared Digital), customer insight, Legal and Communications. All parties will review the PIA and can further contribute to identifying privacy risks.

Where risks are identified these can be managed out through the development of the case-management solution. The PIA will be regularly reviewed with the aim of eliminating privacy risks.

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Revision History

Date	Version	Reason for change	Author

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Section Three - Data Protection Compliance Questionnaire

Use this questionnaire to help ensure that the project and the manner in which it will process personal and sensitive personal data in compliance will comply with the Data Protection Act. The questionnaire contains 60 questions of which 44 are closed (Yes/No).

This questionnaire is intended to be dynamic and updated/amended as you progress through the project. It is therefore recommended that you start completing this at the start of the project to ensure you have all key controls in place before the project goes live.

If you have answered NO to any of the questions, you may find it beneficial to record these in the Issues and Risk Log in section six to record and monitor mitigating actions whilst you are in the process of implementing them. You can amend this table to better suit your project or incorporate it into your overall project risk register.

Further guidance on completing the Pre-Assessment and Full PIA is available from the accompanying guidance. Further information on the PIA is also available on the [ICO's PIA code of practice](#).

Principal 1 - Fair And Lawful Processing			
Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless			
a) At least one of the conditions in Schedule 2 is met, and b) In the case of sensitive personal data, at least one of the conditions in Schedule 3 is also met.			
1	<u>Schedule 2 - Grounds for Legitimate Processing of Personal Data (see Section Four for conditions for processing)</u> What type of personal data are you processing? Please list the categories you can use the information from the pre-assessment).		Personal data including and not limited to household composition, ethnicity, religion, sexual preference, physical or mental health and offences, financial information e.g. income and benefits
2	Is there a legitimate basis for processing the data? If YES then please briefly explain the legal basis. If NO then please explain the basis on which the data is being processed?	YES	Data is processed for the purposes of delivering accurate housing assessments as described in Part 7 of the Housing Act 1996 as amended in the Homelessness Act of 2002 and the Homelessness Reduction Act 2017
3	<u>Schedule 3 - Grounds for Legitimate Processing of Sensitive Personal Data (see Section Four for conditions for processing)</u> Will you be collecting <i>sensitive personal data</i> , e.g. ethnicity, religion, health, sexuality, criminal conviction and trade union Please list all the data categories (if not already done so in question 1).	YES	As above

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4	Is there a legitimate basis for processing the sensitive personal data? If YES then please explain. NO then please explain the basis on which the data is being processed.	Yes	The local authority requires the data for the purposes of ensuring legal duties are met under the Act.
5	If you are relying on different grounds for different categories of sensitive personal data (e.g. a different basis for each type of data collected) then please explain.	N/A	
6	<u>Obtaining Consent</u> Are you relying on the individual to provide consent to the processing of their personal data (as grounds for satisfying Schedule 2)? If YES then how and when will this consent be obtained? If NO then what legitimate arrangements are already in place?	NO	Camden Council is relying on its legal obligations under the HRA and consent is not required. Details of how data subject's information will be used is contained in the Privacy Notice which is to be finalised imminently. Data subjects will be given this information throughout the process e.g Housing Options/Home Connections website, link at ready reckoner and registration stage There will be occasions that may require us to make further enquiries, also without consent – such as issues relating to fraud and safeguarding.
7	For <i>sensitive personal data</i> , will you ask for explicit consent from the individual (as grounds for satisfying Schedule 3)? If YES then how and when will this consent be obtained (answer only if different from question 6)? If NO then what legitimate arrangements are already in place?	Yes	As above
8	<u>Lawful Processing</u> Does your processing of personal data fall within your statutory powers? If NO then why not?	Yes	
9	How will you ensure compliance with the Human Rights Act (Article 8)? http://www.legislation.gov.uk/ukpga/1998/42/schedule/1/part/1/chapter/7		Data will only be used for the purpose of supporting and assisting households with housing. We may share this information where necessary with other organisations, including (but not limited to) where it is appropriate to protect public funds and/or prevent fraud in line with the National Fraud Initiative guidelines or for the

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			purposes of the protection of children or vulnerable adults.
10	Have you assessed whether any of the personal data being processed is held under a duty of confidentiality, e.g. client confidentiality? If NO please explain.	No	Not applicable for this type of data set.
11	Have you assessed whether your processing is subject to any other legal or regulatory duties? If YES, please list the additional legal or regulatory duties and how you will comply with these. If NO please explain.	No	Data supplied will only be used for the purpose of assisting households with housing options and advice
12	<u>Fair Processing</u> Will you make individuals aware of the identity of your organisation as the data controller and that they are holding personal data? If YES then please state how and when. If NO then please explain.	Yes	The Privacy Notice at the point data subject shares data and thereafter and possibly prior via customer focused information – there will be a layered approach across the Council Customers who are contacted as part of our service delivery and will be aware that we hold data relating to their personal circumstances.
13	Will you notify the individual on how their personal data is being used? If YES then please state how and when. If NO then please explain.	Yes	As above
14	Will you receive information about individuals from third parties? If YES then please give examples.	Yes	Information is often obtained from third parties these include but is not limited to: Medical professionals Financial institutions Offender management organisations Employers
<u>Principle 2 - Purpose Limitation</u>			

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Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.			
Uses of Personal Data within the Organisation			
15	Will you have a procedure for maintaining an up to date record over the use of personal data?	Yes	
Use of Existing Personal Data for New Purposes			
16	Does the project involve the use of existing personal data for new purposes? If NO then go to question 18.	Yes	It is possible that the information collected could be used to support Housing Applications
17	What checks have you made to ensure that processing of personal data is not incompatible with its original purpose?	Yes	We have digital guidance for staff to ensure that the data collected is relevant for its purpose and all staff are expected to complete mandatory data protection training.
Disclosures of Data			
18	Is there a corporate disclosure policy that covers the data processed under this project? If YES then then please skip to question 20.	Yes	Is contained within the Council Privacy Statement which is available 24/7 on the councils website here
19	If NO to question 18 then will you produce an appropriate disclosure policy? If NO the please explain.	N/A	
20	How will your team be made aware of the disclosures policy with respect to handling disclosures?		All staff members are required to complete data handling training
21	How will individuals be made aware of disclosures of their personal data?		The individual will be involved in the development of their Personal Housing Plan which is mutually agreed by both parties The Consent and declaration on the case management system provides additional information on how their personal information may be used.
22	Where a 3 rd party is involved, have you assessed their compatibility with respect to their use of the personal data in question (e.g. compatibility of systems, conflict of interests etc)? If NO then please explain.	Yes	Third party use will be defined by statute.
Principle 3: Adequate, Relevant And Not Excessive			

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23	<p><u>Adequacy and relevance of Personal Data</u></p> <p>What arrangements/procedures are in place to determine the adequacy and relevance of the personal data being collected for each purpose, and to ensure that it is not excessive (e.g. ensuring that only minimum required amount of data is collected for verification)?</p>		Processes and procedures re: data collection have recently been reviewed by Internal Audit
24	<p>What arrangements are in place to ensure that data collection procedures are and will remain adequate, relevant and not excessive in relation to the purpose for which data is being processed?</p>		Any changes in procedures are reviewable and we can reassess these through project working groups.
<p><u>Principle 4: Accurate And Up To Date</u></p> <p>Personal data shall be accurate and, where necessary, kept up to date.</p>			
25	<p>Please list all the sources of personal data being processed, i.e. internal systems, individuals, third parties etc.</p>		<p>Data from internal Council systems / IT applications</p> <ul style="list-style-type: none"> • Northgate Housing System • Civica Housing Benefits System • Housing Needs Group Database • Condeco <p>External systems used</p> <ul style="list-style-type: none"> • Experian • TraceSmart <p>Data from 3rd parties:</p> <ul style="list-style-type: none"> • 3rd parties who make referrals – potentially service professionals e.g. GPs, social workers • data from services that the person may already be engaged with that is relevant e.g. Hostel placement, PRS placement <p>Data from Individuals:</p> <ul style="list-style-type: none"> • Information provided by the person themselves e.g. on their self-referral form
26	<p>Have you assessed the risk to the individual and data controller with respect to the consequences that could be caused through; 1) Inaccuracy of data and; 2) Holding data that is out of date?</p> <p>If NO then please explain.</p>	Yes	<p>Data subjects are declaring on registration that their details are accurate.</p> <p>Inaccurate and out of date data can impact on incorrect decisions, a review processes in place to</p>

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			challenge any inaccurate decisions. In addition, applicants will have access to a portal that holds their information so they can ensure accuracy.
27	What arrangements are in place to check the accuracy of the data with the individual?		Applicants will have access to a portal that holds their information so they can also ensure accuracy.
28	Will accuracy checks cover free text fields including comments about individuals?	Yes	
29	How will you determine when and how often personal data would require updating?		The HRAAct/Code of Guidance will include suggested guidelines for reviewing data – but whilst a case is active personal data will be maintained We will be implementing a data retention policy.
30	What arrangements are in place to for individuals to notify you if they believe their data to be inaccurate?		Individuals will have access to an online self-assessment form to make changes in circumstances to some of their information. Applicants can also contact the service to notify us of any changes, the contact details will be made available on the Camden Website.
<p><u>Principle 5 - No Longer Than Necessary</u></p> <p>Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.</p>			
31	<p><u>Retention Policy</u></p> <p>Is there a corporate data retention policy that covers the data processed under this project? If YES then skip to question 33.</p>	YES	
32	<p>If NO to question 31 then will you produce a suitable retention policy? If NO the please explain.</p>		
33	<p>How will you determine when the data is no longer necessary for the purposes for which it was collected? Who will be responsible for reviewing the data?</p>		The timescales relate directly to the legislation related to housing and homelessness. We will need to retain certain documents for the purposes of our statutory duties, reporting, and in case of possible future legal claims by and against the London Borough of Camden. Periods of retention need to satisfy the periods set down in the Limitation Act 1980 after which

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			proceedings are time-barred – generally between three and 12 years, dependent on the type of claim.
34	If the data is held on an IT system then will this system flag records that due for review/deletion? If NO then please explain (answer only if different from that stated in question 35).	Yes	It is intended that that IT solution will be able to flag/remove data in a managed way, based on the data retention policy. This will need testing in due course.
35	Will there be any exceptional circumstances for retaining certain data for longer than the normal period? If YES then please explain.	No	
36	<u>Destruction of personal data</u> Are there arrangements over the secure deletion/destruction of personal data? If NO then please explain.	No	This will be included in the 'TO BE' data retention policy
<u>Principle 6 - Data Subject Access</u>			
Personal data shall be processed in accordance with the rights of data subjects under this Act.			
	<u>Subject Access</u>		
37	Is there a corporate procedure that deals with subject access requests under this Principle? If YES then please skip to question 42.	YES	
38	If NO to question 37 then will you introduce a procedure? If NO the please explain.	n/a	
39	How will you locate all personal data relevant to a request (including any appropriate 'accessible' records)?	n/a	
40	Will you provide an explanation of any codes or other information likely to be unintelligible to a data subject (e.g. short codes or abbreviated codes)? If NO then please explain.	n/a	
41	Are there arrangements in place to manage personal data relating to third parties? If NO then please explain.	n/a	

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42	<p><u>Withholding of personal data in response to a subject access request</u></p> <p>Will there be any circumstances where you would withhold personal data from a subject access request? If YES then on what grounds would and how would this, be identified?</p>	Yes	Where disclosing the information would harm or impact others e.g. disclosing instances of accusations made by others re: harassment etc.
43	<p><u>Processing data that may cause Damage or Distress</u></p> <p>How will you avoid causing unwarranted or substantial damage or unwarranted and substantial distress to an individual?</p>		Data will be used within the limits of our processes and staff are aware of this through mandatory training
44	<p><u>Right to Object</u></p> <p>Is there a procedure for complying with an individual's request to prevent processing for the purposes of direct marketing? https://ico.org.uk/for-organisations/guide-to-pecr/introduction/what-are-pecr/ If NO then please explain.</p>	No	Not applicable
45	<p><u>Automated Decision-Taking</u></p> <p>Are any decisions affecting individuals made solely on processing by automatic means?</p>	Yes	<p>The Ready Reckoner does automate responses to applicant's answers but it is not definitive and is not a decision on the assessment.</p> <p>There will be a level of priority assigned to applications based on answers to assist officers in managing their time. This should not negatively impact applicants as they should all be contacted within 48 hours and they can escalate their cases by contacting the service if their need changes. There will be clear messaging on the website.</p> <p>The case management system can assist officers by checking their immigration status and also the validity of private sector notices on private tenancies.</p> <p>In these instances letters are generated that are amendable by officers.</p>
46	<p>If YES to question 45 then will you notifying the individual that an automated decision making process has been used. If NO then please explain.</p>	Yes	All decisions will be given in writing with a right to review
	<p><u>Rectification, Blocking, Erasure and Destruction</u></p>		Existing Council Corporate Policy applies.

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47	Are there (e.g. corporate) procedures or will you have a procedure for responding to a data subject's notice (in respect of accessible records) or a court order requiring rectification, blocking, erasure or destruction of personal data? If NO then please explain.	Yes	
<p><u>Principle 7 - Data Security</u></p> <p>Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.</p>			
48	<p><u>Security Policy</u></p> <p>Is there a corporate security policy that covers the protection of personal data and processing activities under your project? If YES then please skip to question 50.</p>	Yes	There is the information provided in the tender / bidding process against security requirements, and an in-depth supplier's questionnaire that incorporates a range of relevant information. This is to be signed off by Shared Digital security compliance officer
49	If NO to question 48 then will you produce a policy? If NO the please explain.	n/a	
50	Who will be responsible for enforcing compliance with the security policy?		Shared Digital Security & Compliance Officer will be required to sign off on the supplier's technical questionnaire and responses. Executive summary of outcomes of penetration (penn) testing by the supplier on our total hosted setup will be required to be provided and signed off by same officer. Penn testing is an on-going requirement within the specification and contract.
51	<p><u>Unauthorised or unlawful processing of data</u></p> <p>What security measures are in place to prevent any unauthorised or unlawful processing of data held manually (e.g. locked cabinets) and on IT systems (e.g. passwords)?</p>	n/a	Not applicable to clients data as all data held will be digitally. Staff Passwords and permissions will be managed within the IT system-using role based approach. Clients register themselves and will have a self-service password reset option
52	Are there separate measures to protect sensitive personal data? If NO then please state why the measures in question 51 are sufficient.	No	All information will be retained in the same secure capacity

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53	Is there a corporate procedure for detecting and reporting breaches of security (remote, physical or logical) relating to this project? If YES then please skip to question 55.	Yes	There is an internal policy for reporting suspected breaches of security. Not aware of any thing for outside access by clients. The IT solution will be externally hosted and managed by 3 rd party supplier (Home connections). Refer to 48 regarding specification tender responses and extended supplier information.
54	If NO to question 53 then will you introduce a procedure? If NO the please explain.	n/a	
55	<u>Contingency planning - Accidental loss, destruction, damage to personal data</u> Have you assessed the risks and put in place mitigating controls to minimise the risk of data loss through: <ul style="list-style-type: none"> • Human error or theft; • Computer virus or network failure; • Fire, flood or any other disaster? If NO then please explain.		HomeConnections have contingencies to recover loss of data. This will be managed through our Shared Digital IT provision. Refer to 48 regarding specification tender responses and extended supplier information.
56	Do you have procedures to recover data (both automated and manual) in the event that data is lost? If NO then please explain.	Yes	There will not be any manually maintained non-digital data. Refer to 55. .
<u>Principle 8 - Overseas Transfer</u> There is no need for the Council to transfer data out of the EEA itself. If the Council is using third party systems e.g. survey tools, then care should be taken to check no data is being transferred out of the European Economic Area.			
57	<u>Direct transfer</u> Will you be transferring personal data to a country or territory outside of the EEA? If YES then please state where and with whom.	No	

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58	If YES to question 57 then have you assessed whether the country or territory has adequate privacy protections in line with EEA? If NO then please explain.	n/a	
59	<u>External agents</u> Are you working with an external system provider (i.e. web based service) for the processing of personal data?	Yes	Home Connections are providing this service.
60	If YES to question 59 then is the provider hosting your personal data on servers outside of the EEA? If NO then please explain.	No	The solution provider will ensure that data is not shared outside the EEA, preferably UK. All solutions will need to comply with GDPR regulations.

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Section Four - Conditions for Processing


The conditions for processing are set out in Schedules 2 and 3 to the Data Protection Act. At least one of the conditions in schedule 2 listed below must be met whenever you process personal data. However, if the information is sensitive personal data, at least one of several other conditions in schedule 3 must also be met before the processing can comply with the first data protection principle.

Schedule Two Conditions	Schedule Three Conditions
<ul style="list-style-type: none"> The individual whom the personal data is about has consented to the processing. 	<ul style="list-style-type: none"> The individual whom the sensitive personal data is about has given explicit consent to the processing.
<ul style="list-style-type: none"> The processing is necessary: <ul style="list-style-type: none"> - in relation to a contract which the individual has entered into; or - because the individual has asked for something to be done so they can enter into a contract. 	<ul style="list-style-type: none"> The processing is necessary so that you can comply with employment law.
<ul style="list-style-type: none"> The processing is necessary to protect the individual's "vital interests". This condition only applies in cases of life or death, such as where an individual's medical history is disclosed to a hospital's A&E department treating them after a serious road accident. 	<ul style="list-style-type: none"> The processing is necessary to protect the vital interests of: <ul style="list-style-type: none"> - the individual (in a case where the individual's consent cannot be given or reasonably obtained), or - another person (in a case where the individual's consent has been unreasonably withheld).
<ul style="list-style-type: none"> The processing is necessary for administering justice, or for exercising statutory, governmental, or other public functions. 	<ul style="list-style-type: none"> The processing is carried out by a not-for-profit organisation and does not involve disclosing personal data to a third party, unless the individual consents. Extra limitations apply to this condition
<ul style="list-style-type: none"> The processing is in accordance with the "legitimate interests" condition. 	<ul style="list-style-type: none"> The individual has deliberately made the information public.
	<ul style="list-style-type: none"> The processing is necessary in relation to legal proceedings; for obtaining legal advice; or otherwise for establishing, exercising or defending legal rights.
	<ul style="list-style-type: none"> The processing is necessary for administering justice, or for exercising statutory or governmental functions.
	<ul style="list-style-type: none"> The processing is necessary for medical purposes, and is undertaken by a health professional or by someone who is subject to an equivalent duty of confidentiality.
	<ul style="list-style-type: none"> The processing is necessary for monitoring equality of opportunity, and is carried out with appropriate safeguards for the rights of individuals.

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Section Five - Conclusion and Declaration

Please complete the declaration below. Retain this document and supporting evidence with your project file.

<p>PRIVACY IMPACT ASSESSMENT – DECLARATION OF COMPLETION</p> <p>I declare that I have completed the Privacy Impact Assessment to the best of my knowledge. I and in the process of or have implemented the actions arising from this PIA to ensure that the project and the processing of personal data complies with the Data Protection Act 1998.</p> <p>I understand that the privacy impact assessment and any supporting evidence may be required for review and audit by Camden including the ICT Project Review Board, Corporate Information Governance Group, and the Information Commissioners Office. I also understand that these groups may and at any time during the life of the project may ask me to attend a meeting to provide further information, answer questions and respond to any privacy concerns.</p>		
<p>Project Manager Signature and date</p>		<p>Alternately email approval can be attached</p>
<p>Project Sponsor Signature and Date</p>	 22/03/2018	

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Section Six - Issues and Risks Log

Use the risk register as a template to record risks and mitigating actions arising from your PIA, and monitor their implementation. You can amend this table to better suit your project or incorporate it into your overall project risk register. You may also find it helpful to group your risks under each DPA principle.

The accompanying guidance document includes a section entitled “Data Protection Act Principles”. This may further help you to identify the key risks associated with the protection of personal data and non-compliance with the Data Protection Act.

	Issue or Risk	Proposed Action/Control	Risk/Action Owner	Timescale for implementation
	Principle 1 - Processing of data	N/A		
	Principle 2 - Obtaining data	There is potential risk regarding consent and if this can be applied to other household members when making enquiries.		Jan '18
	Principle 3 - Adequacy of data	N/A		
	Principle 4 - Accuracy of data	N/A		
	Principle 5 - Data retention periods	Implement data retention Policy		
	Principle 6 - Rights of the individual			
	Principle 7 - Technological safeguards	N/A		
	Principle 8 - Transfer of data outside the EEA	N/A		