



DATA PROTECTION IMPACT ASSESSMENT - Mental Health Reablement v1.1

Reference number: DPIA-440

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DATA PROTECTION IMPACT ASSESSMENT

When to complete this template:

Start to fill out the template at the beginning of any major project involving the use of personal data, or, where you are making a significant change to an existing process that affects personal data. Please ensure you update your project plan with the outcomes of the DPIA.

Table of Contents

- 1. Document Control 4
 - 1. Control details 4
 - 2. Document Amendment Record 4
 - 3. Contributors/Reviewers 4
 - 4. Glossary of Terms 4
- 2. Screening Questions 5
- 3. Project - impact on individual's privacy 7
- 4. Legal Framework and Governance – Compliance 15
- 5. Personal Data Processing Compliance 17
- 6. Sign off and record outcomes 25

1. Document Control

1. Control Details

Author of DPIA:	Lisa Lopez, Public Health Commissioning Lead
Owner of project:	Lisa Lopez
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2. Document Amendment Record

Issue	Amendment Detail	Author	Date	Approved
1.0	DPIA created	Lisa Lopez	30/01/2023	
1.1	Clarifications on provider is a separate data controller	Jeremy Lyn-Cook	16/02/2023	

3. Contributors/Reviewers


Name	Position	Date
Lisa Lopez	Public Health Commissioning Lead	
Jeremy Lyn-Cook	Information Policy Officer	
Helen Johnston	Consultant in Public Health	02.03.2023

4. Glossary of Terms

Term	Description
Reablement	Person-centred approach promoting and maximising independence and wellbeing. Usually a short-term support service helping people to learn/relearn daily activities, like cooking meals and paying bills.
NCC	Nottingham City Council
CMS	Case Management System

2. Screening Questions

1. Does the project involve personal data? Yes	If 'Yes', answer the questions below. If 'No', you do not need to complete a DPIA but make sure you record the decision in the project documentation.
2. Does the processing involve any of the following data: medical data, ethnicity, criminal data, biometric data, genetic data and any other special/ sensitive data?	Yes
2. Does the processing involve any systematic or extensive profiling?	No
3. Does the project involve processing children's data or other vulnerable citizen's data?	Yes
4. Does the processing involve decisions about an individual's access to a product, service, opportunity or benefit that is based on any evaluation, scoring, or automated decision-making process?	No
5. Does the processing involve the use of innovative or new technology or the novel application of existing technologies?	No
6. Does this project involve processing personal data that could result in a risk of physical harm in the event of a security breach?	No
7. Does the processing combine, compare or match data from multiple sources?	No
8. Does the project involve processing personal data without providing a privacy notice?	No
9. Does this project process data in a way that tracks on line or off line location or behaviour?	No
10. Will the project involve using data in a way it has not been used before?	No
11. Does the project involve processing personal data on a larger scale?	No
12. Will the project involve processing data that might prevent the Data Subject from exercising a right or using a service or entering into a contract?	No
If you answered 'Yes' to any <u>two</u> of the questions above, proceed to Question 3 below. If not seek advice from the DPO as you may not need to carry out a DPIA.	

Project Title: Mental Health Reablement Service	
Team: Public Health	
Directorate: People	
DPIA Reference number: DPIA-440	
Has Consultation been carried out? Yes. See 'Consultation' on page 9 below.	
1. DDM attached?	Yes – Report to Commissioning and Procurement Executive  Committee
2. Written evidence of consultation carried out attached?	No
3. Project specification/ summary attached?	Yes
4. Any existing or previous contract / SLA / processing agreement attached?	No
5. Any relevant tendering documents attached?	No
6. Any other relevant documentation attached?	No

Project - impact on individual's privacy

Issue	Questions	Examples	Yes/No	Initial comments on issue & privacy impacts
Purpose and means		Profiling, data analytics, Marketing. Note: The GDPR requires a DPIA to be carried out where there is systematic and extensive evaluation of personal aspects relating to individuals based on automated processing, including profiling, and on which decisions about individuals are based.		
	Please give a summary of what your project is about (<i>you can also attach or embed documents for example a project proposal</i>).			<p>NCC is commissioning Mental Health Reablement service. This is a time-limited and highly focused 12-week intervention which involves one to one community support to help citizens to overcome issues in their daily lives that impact negatively on their mental health and wellbeing.</p> <p>The primary focus of the service is to enable citizens to remain independent in the community and to facilitate discharge from psychiatric wards.</p>
	<p>Aims of project</p> <p>Explain broadly what the project aims to achieve and what types of processing it involves.</p>			<p>The purpose of this service will be:</p> <ul style="list-style-type: none"> • To provide timely, flexible, intensive, short – term professional/ specialist support with the aim of increasing independence and overcoming social, practical, financial and emotional difficulties • To support service users to develop coping strategies and the ability to manage periods of problematic mental health and to develop effective coping mechanisms • To help citizens access their potential to manage aspects of daily living and to achieve levels of functioning and independence with minimal or no direct ongoing support • To assist the service user to overcome mutually acknowledged practically based challenges in their lives including but not limited to housing, finances, welfare benefits and immigration .This work will initially be undertaken within the service but will include signposting to a range of statutory agencies and voluntary sector organisations • To promote social inclusion and participation in the life of the city by developing and maintaining links with agencies beyond health and

			social care and by introducing citizens to activities, community resources and sometimes creative sources of support.
	<p>Describe the nature of the processing</p> <p>How will you collect store and delete data? Will you be sharing with anyone? You might find it useful to refer to a flow diagram or another way of describing data flows. What types of processing identified as likely high risk are involved? Who will have access to the project personal data, how is access controlled and monitored and reliability of staff assessed? Will data be separated from other data with in the system?</p>		<p>NCC will not provide or receive any personal information under the arrangements. The service provider will let NCC have aggregated, performance statistics regarding the service.</p> <p>The new service provider will act as a separate data controller responsible for managing service delivery including all aspects of processing data relating to service users. This will include personal and medical information.</p> <p>More specifically, referrals into the service will be made directly to the Service Provider, predominantly from staff teams working in psychiatric hospital settings and from Community Together Surgeries. These teams will use the Mental Health Reablement referral form which will be developed with the Service Provider.</p> <p>The provider will respond to the citizen within 3 working days of receiving the referral and will contact the citizen to arrange their initial visit to develop their support plan. The provider will use the information contained on the referral form to facilitate discussion with the citizen about their needs, and the outcomes they wish to achieve from receiving a service.</p> <p>The Service Provider will be required to keep and store the referral information securely.</p> <p>The Service Provider may decide that the citizens would benefit from additional support from within their organisation or from an external organisation. This would involve an onward referral from the Service Provider to the external organisation/provider.</p> <p>NCC requires the Service Provider to share the outcomes of the referral with Commissioners so that it can monitor the impact of the service and put in place improvement activities if necessary. This will involve the Service Provider sharing anonymised and outcome measurement information which is to be captured via the Outcome Star method (this is a process which determines whether desired outcomes agreed at the referral stage have been achieved and it would be a discussion that takes place between the citizen and the service provider).</p>

			<p>The people who will have access to the project personal data are:</p> <ul style="list-style-type: none"> • The referral organisation/worker who made the original referral • The Service Provider • The individual Service Users will have access to their own data only.
<p>Privacy Implications</p> <p>Can you think of any privacy implications in relation to this project? How will you ensure that use of personal data in the project is limited to these (or “compatible”) purposes?</p>		Yes.	<p>NCC will not provide or receive any personal information under the arrangements. The service provider will let NCC have aggregated, performance statistics regarding the service.</p> <p>The new service provider will act as a separate data controller responsible for managing service delivery including all aspects of processing data relating to service users. This will include personal and medical information.</p> <p>Citizen data/information is being shared with the Service Provider may contain sensitive or personal medical information. The referral information will only be accessed by the Service Provider for the purposes of delivering the service.</p> <p>Information contained within the referral form will specifically relate to the citizen and their needs to enable the service provider to create a support plan and to ensure an appropriate volunteer is allocated to deliver the plan.</p>
<p>New Purpose</p> <p>Does your project involve a new purpose for which personal data are used?</p>		No.	<p>This is a proposed new service, but previously, there have been many services that operate on a referral basis.</p>
<p>Consultation</p> <p>Consider how to consult with relevant stakeholders: Describe when and how you will seek individuals views- or justify why it's not appropriate to do so. Who else do you need to involve in NCC? Do you plan to consult Information</p>			<p>As part of a Strategic Commissioning Review in 2019/20, the following activities were undertaken to ensure a clear understanding of need and service gaps:</p> <ul style="list-style-type: none"> • Visits to services and discussion with staff and service users • A consultation event for providers and frontline staff • National analytical reports

	security experts, or any other experts?			<ul style="list-style-type: none"> • Barriers to move on service in relation to the accommodation-based support services with providers • Case reviews • Learning from other local authority's pathway. <p>Key Messages from engagement and consultation were that:</p> <ul style="list-style-type: none"> • The commissioned pathway operated well, offering an effective short-term support system that is value for money. However, some citizens seem to move on from one short-term provision to another, when in reality they require either an earlier discharge to independent living, or longer-term support. • An enablement service would help to provide an early diagnosis of need and therefore appropriate commissioning of services or discharge depending on individual needs. This should help prevent citizens moving from one temporary provision of support to another. NCC envisages that this service will work closely with the specialist mental health teams, commissioners and contract officers in order to ensure that issues are picked up and mitigated quickly. The focus will be ensuring that needs are met effectively.
	Will the project:	Expanding customer base; Technology which must be used by individuals; Hidden or complex uses of data; Children's data		
Individuals (data subjects)	Affect an increased number, or a new group, or demographic of individuals (to existing activities)?		Yes.	<p>The service is for vulnerable citizens with mental health needs. Generally the intended service users for this service are;</p> <ul style="list-style-type: none"> • Citizens whose mental health is at risk or those citizens considered vulnerable due to existing mental health needs, who are experiencing difficulty in managing their day to day lives, and who may, if not assisted, see a significant deterioration in their situation requiring a higher level of intervention from secondary mental health services or from social care

				<ul style="list-style-type: none"> • Citizens currently an inpatient in a psychiatric unit • Citizens who are having a crisis within the community and a period of focussed support could prevent an admission to hospital • Citizens who are moving on from MH Accommodation Based Support Services who require a short period of resettlement support. This is anticipated to be in the region of 4 weeks. • Citizens who are receiving a long-term package of support commissioned by Nottingham City Council who could potentially benefit from a reablement service
	Involve a change to the way in which individuals may be contacted, or are given access to services or data? Are there any areas of public concern that you should factor in?		Yes.	Currently, no such service exists. Citizens referred into this service will be accessing a new service with a new model of support.
	Affect particularly vulnerable individuals, including children?		Yes.	The service is for vulnerable citizens with mental health needs. The service will support service users to develop coping strategies and the ability to manage periods of problematic mental ill health, directly addressing issues in citizen's lives that impact negatively on their mental health and wellbeing. Each citizen receiving support will have a personalised, strengths-based support plan which aims to promote and maximise independence by utilising support available through this service and other community-based resources, enabling them to live as independently as possible. Children would only be affected if the service user has dependent children.
	Give rise to a risk that individuals may not know or understand how their data are being used?		Possibly.	The service pertains to supporting vulnerable citizens some of whom may not understand, or prioritise understanding how their data is being transferred and used. NCC will not share any personal information with the new service provider(s).

				The service provider(s) is a separate data controller and will be responsible for informing users (and potential users) about any privacy implications for the service.
Parties	Does the project involve:	Outsources service providers; Business partners; Joint ventures		
	The disclosure of personal data to new parties?		Yes.	NCC will not share any personal information with the new service provider(s). As part of delivering the service, the provider may need to make onward referrals, sharing the referral data with external agencies who can provide specific support for the citizen. E.g. Community Connectors or other community or voluntary sector organisations or charities.
	The involvement of sharing of personal data between multiple parties?		Possibly.	In order to deliver the service effectively, the provider may share data with other parties – as per the answer to the above question. The new service provider will act as a separate data controller responsible for managing service delivery including all aspects of processing data relating to service users. This will include personal and potentially medical information.
Data categories	Does the project involve:	Special personal data; Biometrics or genetic data; Criminal offences; Financial data; Health or social data; Data analytics: Note: the GDPR requires a DPIA to be carried out where there is processing on a large scale of special categories of data or of data relating to criminal convictions and offences		
	The collection, creation or use of new types of data?		Yes.	The use of the Outcome STAR will involve the provider collecting information from the citizen to determine whether the service has helped them to achieve personal goals and outcomes. They will record this information on a form separate to the referral form.
	Use of any special or privacy-intrusive data involved? • Political opinions		Yes.	NCC will not share any personal information with the new service provider(s). The provider will have to take into account medical data/information from referrers relating to citizens specific medical conditions in order to deliver support effectively. E.g. if the citizen

	<ul style="list-style-type: none"> • Religious beliefs or philosophical beliefs • Trade union membership • Genetic data • Biometric data • Sexual life • Prosecutions • Medical data • Criminal data <p>(Criminal data processing, i.e. criminal convictions, etc. also has special safeguards under Article 10)</p>			<p>was being discharged from a psychiatric ward, then the support provided would need to be appropriate for the citizen's recovery.</p> <p>The provider will collect ethnicity information for equal opportunity monitoring purposes, with the ultimate aim being to widen access to the services.</p>
	<p>New identifiers, or consolidation or matching of data from multiple sources?</p> <p>(For example a unique reference number allocated by a new management system)</p>		Possibly.	The provider's system may give the service user a unique identifying number.
Technology	New solutions:	Locator or surveillance technologies; Facial recognition; Note: the GDPR requires a DPIA to be carried out in particular where new technologies are involved (and if a high risk is likely)		
	Does the project involve new technology that may be privacy-intrusive?		No.	
	Data:	New data		

Data quality, scale and storage	Does the project involve changes to data quality, format, security or retention? What are the benefits of the processing? i.e. will the new system have automatic retention features? Will the system keep the information in a safer format etc.?		No.	NCC will not share any personal information with the new service provider(s).
	Does the project involve processing data on an unusually large scale?		No.	The data transfer relates to approximately 375 citizens.
Monitoring, personal intrusion	Monitoring:	Surveillance; GPS tracking; Bodily testing; Searching; Note: the GDPR requires a DPIA to be carried out where the project involves systematic monitoring of a publicly accessible area on a large scale		
	Does the project involve monitoring or tracking of individuals or activities in which individuals are involved?		Yes.	The Outcome STAR methodology requires regular discussion between service provider and citizen to track the citizen's progress in relation to agreed personal goals or outcomes. Self-reported by the service user.
	Does the project involve any intrusion of the person?		No.	
Data transfers	Transfers	Transfers outside the EEA		
	Does the project involve the transfer of data to or activities within a country that has inadequate or significantly different data protection and privacy laws?		No.	NCC will not share any personal information with the new service provider(s). The processing location data will depend on the technical set up of a provider(s) cms. NCC will include provisions in the contract restricting or prohibiting data processing outside the UK/EEA.

3. Legal Framework and Governance – Compliance

Ref.	Question	Response	Further action required (and ref. to risk register as appropriate)
1. Applicable laws and regulation			
1.1	Which data protection laws, or laws which impact data protection and privacy, will be applicable to the project?	<ul style="list-style-type: none"> • UK General Data Protection Regulation • Data Protection Act 2018 • Human Rights Act 1998 	
1.2	Are there any sector-specific or other regulatory requirements or codes of practice, which should be followed?	<ul style="list-style-type: none"> • The Care Act 2014 	
2. Organisation's policies			
2.1	Is the project in compliance with the organisation's information management policies and procedures (including data protection, information security, electronic communications)?	Yes.	

2.2	Which policy requirements will need to be followed throughout design and implementation of the project?	Data Protection Policy Information Security Policy Records Management Policy	
2.3	Are any changes/updates required to the organisation`s policies and procedures to take into account the project? Note: new requirements for “Accountability” under the GDPR, including record-keeping, DPOs and policies	No.	
3. Training and roles			
3.1	Will any additional training be needed for staff in relation to privacy and data protection matters arising from the project?	No.	

4. Personal Data Processing Compliance

Ref.	Question	Response	Further action required (and ref. to risk register as appropriate)
1. Personal Data Processing			
1.1	Which aspects of the project will involve the processing of personal data relating to living individuals?	<p>NCC will not share any personal information with the new service provider(s).</p> <p>The processing of all personal and medical information will be by the service provider(s).</p> <p>The referrer will provide personal data to the service provider as part of the referral process. .</p> <p>The service provider will process personal data when it assesses the needs of the citizen and creates the support plan which will be shared with the volunteer responsible for delivering the plan.</p> <p>The service provider will record the outcomes of the support (including the outcomes for the citizen) and will share this with the original referrer (and NCC ASC) if they are referring the individual on to ASC).</p>	To monitor this through implementation meetings, and once the service has commenced, through quarterly service reviews and audits, where possible.
1.2	Who is/are the data controller(s) in relation to such processing activities?	The service provider	
1.3	Who is/are the data processor in relations to such processing activities?	N/a.	
2. Fair and Lawful processing - GDPR Articles 5(1)(a), 6, 9, 12, 13			
2.1	Which fair processing conditions are you relying on? GDPR: Article 6(1) (legal basis for processing) and, for sensitive personal data, Article 9(2).	<p>6(1). Choose at least one of the following for personal data, usually (e) (Cross out the rest)</p> <p>a) Consent</p> <p>b) Performance of contract</p> <p>c) Legal obligation</p>	<p>NCC will not share any personal information with the new provider(s).</p> <p>The service provider(s) is its own separate data controller and will identify their own legal basis for processing personal data.</p>

- d) ~~Vital interests~~
 e) ~~Public interest / exercise of Authority~~
 9(2) Choose at least 1 for special data-
 usually g (cross the rest out)
- ~~— a) Explicit consent~~
 - ~~— b) Employment / social security /
— social protection obligations~~
 - ~~— c) Vital interests~~
 - ~~— d) Non-profit bodies~~
 - ~~— e) Processing made public by data
— subject~~
 - ~~— f) Legal claims~~
 - ~~g) Substantial public interest~~
 - ~~h) Health, social care, medicine~~
 - ~~— i) Public interest for public health~~
 - ~~— j) Archiving, statistics, historical research~~

~~For any criminal Data~~

**~~Comply with Article 10 if it meets a
condition in Part 1, 2 or 3 of Schedule 1.~~**

- ~~• Employment, social security and
social protection~~
 - ~~• Health and social care purposes~~
 - ~~• Public health~~
 - ~~• Research~~
- ~~Substantial public interest:~~
- ~~• Statutory and government purposes~~
 - ~~• Equality of opportunity and treatment~~
 - ~~• Racial and ethnic diversity at senior
levels of organisations~~
 - ~~• Preventing or detecting Unlawful Acts~~
 - ~~• Protecting the public against
dishonesty etc~~
 - ~~• Regulatory requirements relating to
unlawful acts and dishonesty etc~~
 - ~~• Journalism etc in connection with
unlawful acts and dishonesty etc~~

		<ul style="list-style-type: none"> • Preventing fraud • Suspicion of terrorist financing or money laundering • Counselling • Safeguarding of children and of individuals at risk • Safeguarding of economic well-being of certain individuals • Insurance • Occupational pensions • Political parties processing • Disclosure to elected representatives • Informing elected representatives about prisoners <p>Additional Conditions</p> <ul style="list-style-type: none"> • Consent • Vital interests • Personal data in the public domain • Legal claims • Judicial Acts 	
<p>Note: different conditions may be relied upon for different elements of the project and different processing activities. Also, the scope of special category data is wider under the GDPR, and in particular includes genetics & biometric data, and sexual orientation.</p>			
2.2	How will any consents be evidenced and how will requests to withdraw consent be managed?	<p>NCC will not share any personal information with the new service provider.</p> <p>The service provider is its own separate data controller and will identify their own legal basis for processing personal data.</p>	
<p>Note: new requirements for obtaining and managing consents within the GDPR.</p>			
2.3	Is the data processing under the project covered by fair processing information already provided to individuals or is a new	This is a new service so NCC will require the service provider to produce new service information and privacy notice.	

	communication needed (see also data subject rights below)?		
Note: more extensive information required under the GDPR than under current law, and new requirements on how such information is provided. Also a general principle of “ <i>transparency</i> ”. It is important to assess necessity and Proportionality			
2.4	If data is collected from a third party, are any data protection arrangements made with such third party?	No.	
2.5	Is there a risk of anyone being misled or deceived?	No.	
2.6	Is the processing “fair” and proportionate to the need’s and aims of the projects?	Yes.	
2.7	Are these purposes clear in privacy notices to individuals? (see above)	Yes.	New provider to supply, to include link to NCC privacy notice
3. Adequate, relevant and not excessive, data minimisation - GDPR Article 5(1)(c)			
3.1	Is each category relevant and necessary for the project? Is there any data you could not use and still achieve the same goals?	NCC will not share any personal information with the new provider. It is the responsibility of the service provider as data controller to decide on what, when and how they process personal data under their service.	
Note: GDPR requires data to be “limited to what is necessary” for the purposes (as well as adequate and relevant).			
3.2	Is/can data be anonymised (or pseudonymised) for the project?	No. See above. The service provider needs to be able to make direct contact with the citizen and for this they will require the identifiable information within the referral form. The provider will share anonymised data with NCC’s Commissioning and Contracts Management colleagues for use in performance reporting.	
4. Accurate and up to date - GDPR Article 5(1)(d)			

4.1	What steps will be taken to ensure accurate data is recorded and used?	See 3.1 above. (Data collected by referrers from various referral sources, will be cross-checked in conversation with the citizen by the provider).	
For example: checks when receiving/sending information from/to third parties, or transcribing information from oral conversations or handwritten documents, any automatic checks on information not meeting certain criteria.			
4.2	Will regular checks be made to ensure project data is up to date?	See above. (
5. Data retention - GDPR Article 5(1)(e)			
5.1	How long will personal data included within the project be retained?	The data retention period is x years from the end of the service delivery to the individual.	
5.2	How will redundant data be identified and deleted in practice? Consider paper records, electronic records, equipment?	This is not applicable at this time as the new service has not yet commenced.	
5.3	Can redundant data be easily separated from data which still need to be retained?	This is not applicable at this time as the new service has not yet commenced.	
6. Data subject rights - GDPR Articles 12 to 22			
6.1	Who are the relevant data subjects?	Vulnerable and vulnerably housed adults with mental health needs, who require support to maintain their accommodation, avoid eviction/homelessness; maximise income, reducing/avoiding debt; manage their mental health needs; and access appropriate services. NCC will not share any personal information with the new provider. The service provider will process the personal and special data relating to individuals using their service.	
6.2	Will data within the project be within the scope of the organisation's subject access request procedure?	NCC will not share any personal information with the new provider. See 3.1 above.	

6.3	Are there any limitations on access by data subjects?	See above.	
6.4	Is any data processing under the project likely to cause damage or distress to data subjects? How are notifications from individuals in relation to damage and distress managed?	See 3.1 above.	
6.5	Does the project involve any direct marketing to individuals? How are requests from data subjects not to receive direct marketing managed?	See 3.1 above.	
6.6	Does the project involve any automated decision making? How are notifications from data subjects in relation to such decisions managed?	See 3.1 above.	
6.7	How will other rights of data subjects be addressed? How will security breaches be managed?	See 3.1 above.	To be confirmed subject to the outcome of the tender.

7. Data Security - GDPR Articles 5(1)(f), 32

For example:

- **Technology:** encryption, anti-virus, network controls, backups, DR, intrusion detection;
- **Physical:** building security, clear desks, lock-leads, locked cabinets, confidential waste;
- **Organisational:** protocols on use of technology, asset registers, training for staff, pseudonymisation, regular testing of security measures.

Describe the source of risk and nature of potential impact on the individuals. Include associated compliance and corporate risks as necessary -What security measures and controls will be incorporated into or applied to the project to protect personal data? Consider those that apply throughout the organisation and those which will be specific to the project. N.B Measures that are appropriate to the nature of the data and the harm which may result from a security breach	Likelihood of harm Remote, Possible or Probable	Severity of harm Minimal, Significant or Severe	Overall Risk Low, Medium or High
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<ul style="list-style-type: none"> NCC does not take the appropriate steps to procure a service provider who is able to deliver a safe and efficient service. Consequently, NCC suffers reputational damage. 	Possible	Significant	Medium
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Identify measures to Reduce Risk- Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk that you have identified

Risk	Options to reduce or eliminate risk	Effect on risk Eliminated/ Reduced or Accepted	Residual risk Low/Medium/High	Measures approved Yes/No
NCC does not take the appropriate steps to procure a service provider who is able to deliver a safe and efficient service. Consequently, NCC suffers reputational damage.	NCC will ensure that that the contract with the new provider will deliver a safe and efficient service.	Reduced.	Low	Yes.

8. Data processors - GDPR Article 28 & direct obligations in other articles

8.1	Are any data processors involved in the project?	No.	
8.2	What security guarantees do you have?	N/a.	
For example: specific security standards or measures, reputation and reviews			
8.3	Please attach the processing agreement	N/a.	
For example: security terms, requirements to act on your instructions, regular audits or other ongoing guarantees Note: new requirements for the terms of contracts under the GDPR (much more detailed than current law).			
8.4	How will the contract and actions of the data processor be monitored and enforced?	N/a.	
8.5	How will direct obligations of data processors be managed?	N/a.	

Note: New direct obligations for processors under the GDPR, including security, data protection officer, record-keeping, international data transfers.

For example: fair & lawful, lawful purpose, data subject aware, security, relevance.

9. International data transfers - GDPR Articles 44 to 50

9.1	Does the project involve any transfers of personal data outside the European Union or European Economic Area?	NCC will not share any personal information with the new service provider. The location of where the service provider processes data will depend on the technical set up of their CMS. NCC will include provisions in the contract restricting or prohibiting data processing outside the UK/EEA.	
9.2	What steps are taken to overcome the restrictions?	See above.	

For example: Safe Country, contractual measures, binding corporate rules, internal assessments of adequacy

Note: GDPR has similar methods to overcome restrictions as under current law, but there are differences to the detail and less scope for an “own assessment” of adequacy.


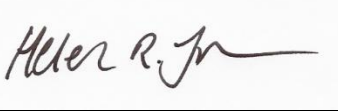
10. Exemptions

10.1	Will any exemptions for specific types of processing and/or specific DP requirements be relied upon for the project?	See 3.1 above.	
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For example: crime prevention, national security, regulatory purposes

Note: Exemptions under the GDPR to be assessed separately, and may be defined within additional EU or UK laws.

5. Sign off and record outcomes

Item	Name	Date
Measures approved by: (project owner) This must be signed before the DP can sign off on the DPIA.	Helen Johnston 	02.03.2023
Residual risks approved by: (If accepting any residual high risk, consult the ICO before going ahead)	Helen Johnston 	02.03.2023
DPO advice provided: (DPO should advise on compliance, measures and whether processing can proceed)		
Summary of DPO advice:		
DPO advice accepted or overruled by		If overruled, you must explain your reasons
Comments:		
IT Security Officer: Where there are IT security issues		
IT Officer comments:		
SIRO Sign off: (For major projects)		
Consultation responses reviewed by:		
This DPIA will be kept under review by:		The DPO should also review ongoing compliance with DPIA