



DATA PROTECTION IMPACT ASSESSMENT - Employee & Citizen Travel & Accommodation Booking System V1.0

Reference number:

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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.

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1. Document Control

1. Control Details

Author of DPIA:	Joseph Muir, Senior Homelessness Project Officer
Owner of project:	Joseph Muir
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2. Document Amendment Record

Issue	Amendment Detail	Author	Date	Approved

3. Contributors/Reviewers

Name	Position	Date
Mark Lowe	Head of Housing & Regeneration	
Rachael Harding	Homelessness Strategy Manager	
DPO		

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4. Glossary of Terms

Term	Description
<i>Please insert any abbreviations you wish to use:</i>	
DELTA	DELTA is the online system developed by the Department for Levelling Up, Housing and Communities (DLUHC) to streamline its processes and systems for collecting statistical data and grant administration.
H-CLIC	Homelessness Case Level Information Collection (statutory data collected from local authorities by government Department for Levelling Up, Housing & Communities)
C-PEC	Commissioning and Procurement Executive Committee

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?	Yes
5. Does the processing involve the use of innovative or new technology or the novel application of existing technologies?	Yes
6. Does this project involve processing personal data that could result in a risk of physical harm in the event of a security breach?	Yes
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 online 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 a contract?	Yes
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: Employee & Citizen Accommodation & Travel Booking System

Team: Homelessness Strategy

Directorate: Growth and City Development

DPIA Reference number: *(This will be allocated by the Information Compliance Team or the DPO and must be quoted in all correspondence)*

Has Consultation been carried out? (If not why not?) Describe when and how you will seek individual's views- or justify why it is not appropriate to do so. Who else do you need to involve within your organisation? Do you need to ask your processors to assist? Do you plan to consult information security experts, or any other experts?

1. DDM attached?	No – Currently seeking Commissioning and Procurement Executive Committee approval, DPIA required for approval
2. Written evidence of consultation carried out attached?	No – Currently seeking Commissioning and Procurement Executive Committee approval, DPIA required for approval
3. Project specification/ summary attached?	No – Currently seeking Commissioning and Procurement Executive Committee approval, DPIA required for approval
4. Any existing or previous contract / SLA / processing agreement attached?	No – Currently seeking Commissioning and Procurement Executive Committee approval, DPIA required for approval
5. Any relevant tendering documents attached?	No – Currently seeking Commissioning and Procurement Executive Committee approval, DPIA required for approval
6. Any other relevant documentation attached?	No – Currently seeking Commissioning and Procurement Executive Committee approval, DPIA required for approval

3. 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>Nottingham City Council has a responsibility for:</p> <ul style="list-style-type: none"> employee welfare and contractual obligations for travelling and accommodation whilst Nottingham City Council employees complete essential tasks detailed within job descriptions satisfying all statutory duties placed upon the Council to provide emergency accommodation to support and safeguard vulnerable households, assess homeless applications and for the protection of children and young people. <p>The Council currently uses an online booking system, Click Travel, to book 100% of its travel and accommodation requirements for employees. The council endeavours to commission a sufficient supply of temporary accommodation to meet its statutory duties to citizens. However, when this is full and emergency accommodation is required, the council must consider nightly paid options. Over 90% of these arrangements are made via the Click Travel booking system.</p>
	<p>Aims of project</p> <p>Explain broadly what the project aims to achieve and what types of processing it involves.</p>			<p>Nottingham City Council has completed a review to assess the future requirements and needs of the Council. The review has determined that the need for a booking system remains, and the existing system is effective overall but that there would be benefits to separating the two functions outlined above.</p> <p>Click Travel is the preferred option to continue to deliver the service which would ensure that no disruptions are experienced to a) employee travel and accommodation and b) in securing emergency placements to meet statutory duties to citizens.</p> <p>The booking system will require the processing of personal employee and citizen information in order to sufficiently secure accommodation and/or travel for the subject, this will include,</p> <ol style="list-style-type: none"> 1) Name & Family Name 2) Contact information 3) Ages of any children staying with Household

	<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 within the system?</p>		<p>Main collection of subject data will be through individual service area departments, HR records for employees and a dedicated homelessness online web-based software Jigsaw. Homelessness will record placement on a dedicated excel spreadsheet for monitoring purposes and share information internally with Homelessness Strategy for corporate reporting and monitoring</p> <p>Citizen support referrals will be shared with commissioned provider of the Independent Living Service, commissioned, and contracted under the Homelessness, Temporary Accommodation & Support Framework.</p> <p>Information can also be shared under homelessness with central government, the Department of Levelling up and Communities, DELTA and HCLIC Returns and statutory Authorities Social Care, Prison and Probation, NHS and Police</p> <p>Access to all dedicated online web-based system is restricted to NCC employees of homelessness and authorised officers only.</p> <p>Reporting portals enable secure submission of central reports</p> <p>Ad-hoc system, excel and word documents containing information is stored in secured drives on the Councils main network, with restricted access only to employees of homelessness services and authorised officers</p>	
	<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>		No	
	<p>New Purpose</p> <p>Does your project involve a new purpose for which personal data are used?</p>		No	

	<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 security experts, or any other experts?</p>		Yes	<p>As part of the C_PEC Report, keys Council Services area have and will be consulted and feedback into the report for the committee.</p> <p>Further feedback on the DPIA will be sort from the Homelessness Servcie on citizen GDPR and Data Protection</p>
	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)?		No	
	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?		No	If the answer is Yes, then consultation with citizens should be considered.
	Affect particularly vulnerable individuals, including children?		Yes	Households are assessed under the Housing act 1996, the Homelessness Reduction Act 2017, and the Care Act 2014. By legal definition of these acts the household being assessed are vulnerable and its priority needs for emergency housing related support.
	Give rise to a risk that individuals may not know or understand how their data are being used?		No	

Parties	Does the project involve:	Outsources service providers; Business partners; Joint ventures		
	The disclosure of personal data to new parties?		Yes	Accommodation and Travel providers Commissioned Support providers
	The involvement of sharing of personal data between multiple parties?		No	
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?		No	
	Use of any special or privacy-intrusive data involved? <ul style="list-style-type: none"> • Political opinions • Religious beliefs or philosophical beliefs • Trade union membership • Genetic data • Biometric data • Sexual life • Prosecutions • Medical data • Criminal data (Criminal data processing, i.e. criminal convictions, etc. also has		Yes	Possible collection of medical and criminal data for the purpose of find appropriate accommodation and access arrangements.

	special safeguards under Article 10)			
	New identifiers, or consolidation or matching of data from multiple sources? (For example a unique reference number allocated by a new management system)		No	
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 quality, scale and storage		New data		
Data quality, scale and storage	Data: 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	
	Does the project involve processing data on an unusually large scale?		Yes	Data collected over the course of the 4-year contract will contain large scale recorded
Monitoring, personal intrusion		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		
Monitoring, personal intrusion	Monitoring: Does the project involve monitoring or tracking of individuals or activities in which individuals are involved?		Yes	The households will be monitored within the place and moved to suitable temporary accommodation when a placement becomes available
	Does the project involve any intrusion of the person?		No	
Data transfers		Transfers outside the EEA		
Data transfers	Transfers 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	(Is any information held on the cloud? If so check where it is held)

4. 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"> • General Data Protection Regulation 2016/679 • UK General Data Protection Regulation • Data Protection Act 2018 • Human Rights Act 1998 <p><i>(What laws gives you the power to process the data for this project i.e. the Education Act etc,,)</i></p> <ul style="list-style-type: none"> • <i>Care Act 2014</i> • <i>Housing Act 1996</i> • <i>Homelessness Reduction Act 2017</i> • <i>Employment contract law</i> 	None
1.2	Are there any sector-specific or other regulatory requirements or codes of practice, which should be followed?	<p>The Children Act 2004 (the Act), as amended by the Children and Social Work Act 2017.</p> <p>Homelessness Codes of Guidance for Local Authorities</p>	None
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.	None

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 Homelessness B&B Elimination Plan Homelessness Prevention Strategy 2019-2024	none
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	None
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	None

5. 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?	Booking travel Booking accommodation	None
1.2	Who is/are the data controller(s) in relation to such processing activities?	Nottingham City Council Nottinghamshire County Council	None
1.3	Who is/are the data processor in relations to such processing activities?	Citizen - Homelessness Housing Solutions, Homelessness Strategy, Social Care, Children Integrated Services, Employee – HR – Executive/Leadership Support Team, any Council Service requiring staff travel and accommodation	None
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).	6(1). Choose at least one of the following for personal data, usually (e) -(Cross out the rest) <ul style="list-style-type: none"> a) Consent b) Performance of contract c) Legal obligation d) Vital interests e) Public interest / exercise of Authority 9(2) Choose at least 1 for special data- usually g (cross the rest out) <ul style="list-style-type: none"> a) Explicit consent b) Employment / social security / social protection obligations c) Vital interests 	None

		<p>d) <u>Non-profit bodies</u></p> <p>e) Processing made public by data subject</p> <p>f) Legal claims</p> <p>g) Substantial public interest</p> <p>h) Health, social care, medicine</p> <p>i) Public interest for public health</p> <p>j) Archiving, statistics, historical research</p> <p>For any criminal Data Comply with Article 10 if it meets a condition in Part 1, 2 or 3 of Schedule 1.</p> <ul style="list-style-type: none"> • Employment, social security and social protection • Health and social care purposes • Public health • Research <p>Substantial public interest:</p> <ul style="list-style-type: none"> • 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 • Preventing fraud • Suspicion of terrorist financing or money laundering • Counselling • Safeguarding of children and of individuals at risk 	
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		<ul style="list-style-type: none"> • 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?	Placement will be based on public task, consent to secure accommodation is not required. If the subject refuses accommodation or travel, then the process will be required and withdrawn	None
<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 communication needed (see also data subject rights below)?	Attach privacy notice or provide a working link to the relevant privacy notice	None
<p>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</p>			
2.4	If data is collected from a third party, are any data protection arrangements made with such third party?	N/A	N/A

2.5	Is there a risk of anyone being misled or deceived?	No	None
2.6	Is the processing “fair” and proportionate to the need’s and aims of the projects?	Yes	None
2.7	Are these purposes clear in privacy notices to individuals? (see above)	Yes	None

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?	No	None
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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	None
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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?	Records are kept and checked with placement data/records,	None
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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?	monitoring on usage is completed and audited by services leaders	None
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5. Data retention - GDPR Article 5(1)(e)

5.1	How long will personal data included within the project be retained?	7 years (Unsure of NCC Retention Periods)	None
5.2	How will redundant data be identified and deleted in practice? Consider paper records, electronic records, equipment?	Electronic data will be securely deleted from the folders and network systems Paper copies are not kept, if electronic forms are printed, they will be disposed of with the Councils confidential waste management systems when no longer needed.	None

5.3	Can redundant data be easily separated from data which still need to be retained?	Yes	None
6. Data subject rights - GDPR Articles 12 to 22			
6.1	Who are the relevant data subjects?	Employees Members of the public presenting as homelessness	None
6.2	Will data within the project be within the scope of the organisation's subject access request procedure?	Yes	None
6.3	Are there any limitations on access by data subjects?	No	None
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?	Yes, Homelessness household may be at risk if location is disclosed, if others understand they are homeless. Direct work is completed with household throughout their involvement and data process, concerns are identified and dealt with immediately by trained employees	None
6.5	Does the project involve any direct marketing to individuals? How are requests from data subjects not to receive direct marketing managed?	No	None
6.6	Does the project involve any automated decision making? How are notifications from data subjects in relation to such decisions managed?	No	None

6.7	How will other rights of data subjects be addressed? How will security breaches be managed?	These rights will be processed by the Information Compliance Team at Nottingham City Council. All breached will be dealt with by the Information Compliance team and the Data Protection Officer.	None		
7. Data Security - GDPR Articles 5(1)(f), 32					
<p>For example:</p> <ul style="list-style-type: none"> • 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	
<ul style="list-style-type: none"> • Risk of basic Personal Information Names and contact details being shared external to Council commissioned providers <ul style="list-style-type: none"> ○ Online booking system with owner security ○ Restricted Council network storage system with limited access arrangements 		Remote	Minimum	Low	

<ul style="list-style-type: none"> • Risk of household address being disclosed <ul style="list-style-type: none"> ○ Point of contact with communications Between Council and Household ○ Strict Non-disclosure of information to any other parties not the household or confirmed authorities or commissioned providers of the Council 	Remote	Significant	Medium	
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
Household address being disclosed	Information only shared with approved services and commissioned providers If address is compromised the Council will seek to move and source alternative housing/accommodation	Accepted	Low	Yes
8. Data processors - GDPR Article 28 & direct obligations in other articles				
8.1	Are any data processors involved in the project?	Yes, Commissioned Support Providers		None
8.2	What security guarantees do you have?	Procurement Framework and service level contract with information sharing agreement in place		None

For example: specific security standards or measures, reputation and reviews			
8.3	Please attach the processing agreement	<p>All Framework Agreements contain,</p> <ul style="list-style-type: none">• SECTION 8 - warranties and Representations, sub-section<ul style="list-style-type: none">○ 8.1.4 - as at the Commencement Date, all information, statements and representations contained in the Tender and the SQ Response (including statements made in relation to the categories referred to in Regulations 23, 24 and 25 of the Regulations) for the Services are true, accurate, and not misleading save as may have been specifically disclosed in writing to the Authority prior to the execution of this Framework Agreement and it will promptly advise the Authority of any fact, matter or circumstance of which it may become aware which would render any such information, statement or representation to be false or misleading;• SECTION 20 – Data Protection –<ul style="list-style-type: none">○ 20.1 It is the intention of the Parties that no Personal Data shall be processed or shared under this Framework Agreement and that the Provider shall be Data Controller with respect to any Data it obtains under this Contract.○ 20.2 To the extent relevant under a Contract, the Provider shall (and shall procure that any of the Staff	None

		<p>involved in the provision of the Service) comply with any requirements under the Data Protection Legislation.</p> <ul style="list-style-type: none"> ○ 20.3 In the event that Personal Data is to be processed or shared in accordance with this Contract, the Parties shall ensure that appropriate data processing or sharing agreements are established prior to doing so. ○ 20.4 The Parties shall enter into an Information Sharing Agreement provided by the Authority prior to the Provider commencing the provision of the Services under any Contract. 	
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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?	Power to audit under the processing agreement.	None
8.5	How will direct obligations of data processors be managed?	Under the processing agreement	None

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?	No	None
9.2	What steps are taken to overcome the restrictions?	N/A	N/A

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?	No	None
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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.

6. 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.	Joseph Muir	17/11/2023
Residual risks approved by: (If accepting any residual high risk, consult the ICO before going ahead)		
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