

## Data Protection Impact Assessment (DPIA) template

Please contact [information.governance@york.gov.uk](mailto:information.governance@york.gov.uk) for advice and support on completing a DPIA.

Please send your completed form to [information.governance@york.gov.uk](mailto:information.governance@york.gov.uk)

This template should be used to record your DPIA process and outcome. It follows the process set out in our DPIA guidance \*\* insert intranet pages\*\*\*

You should start to fill out the template at the start of any major project involving the use of personal data, or if you are making a significant change to an existing process. The final outcomes should be integrated back into your project plan.

Please use this template when one or more of the below applies. If public monitoring is by CCTV please contact [information.governance@york.gov.uk](mailto:information.governance@york.gov.uk) as there is a specific CCTV DPIA template

- **Systematic and extensive profiling with significant effects:**  
any systematic and extensive evaluation of personal aspects relating to natural persons which is based on automated processing, including profiling, and on which decisions are based that produce legal effects concerning the natural person or similarly significantly affect the natural person.
- **Large scale use of sensitive data:**  
processing on a large scale of special categories of data referred to in Article 9(1), or of personal data relating to criminal convictions and offences referred to in Article 10.
- **Public monitoring**  
a systematic monitoring of a publicly accessible area on a large scale

<b>Title</b>	Recommissioning of Sensory Services in York
<b>Brief description</b>	Local authorities have a statutory duty to prevent, reduce or delay needs for care and support (Care Act 2014 section 2) for all adults including carers; this means early intervention to prevent deterioration and reduce dependency on support from others including those with sensory impairments. The current Sensory Support service contract is coming to an end this year, the commissioning team are in the process of recommissioning the service. The DPIA has been completed as part of CYC accountability obligations and a legal requirement for any type of processing, including certain specified types of processing that are likely to result in a high risk to the rights and freedoms of individuals.
<b>DPIA completed by</b>	
<b>Name</b>	Edward Njuguna
<b>Job Title</b>	Commissioning Manager
<b>Department</b>	All Age Commissioning
<b>Email</b>	edward.njuguna@york.gov.uk
<b>Review date</b>	

## **Step 1 – Identify the need**

### 1. Explain broadly what your project aims to achieve

Local authorities have a statutory duty to prevent, reduce or delay needs for care and support (Care Act 2014 section 2) for all adults including carers; this means early intervention to prevent deterioration and reduce dependency on support from others including those with sensory impairments. The current Sensory Support service contract is coming to an end this year, the commissioning team are in the process of recommissioning the service. The purpose of the report is for Executive Meeting to review the report and recommendations to come to a decision on the best option to go forward.

### 2. What type of processing it involves. You may find it helpful to refer or link to other documents, such as a project proposal.

- Special category health information

### 3. Summarise why you identified the need for a DPIA.

See screening questions

- Use systematic and extensive profiling or automated decision-making to make significant decisions about people.
- Use new technologies, innovative technological or organisational solutions.
- Use profiling, automated decision-making or special category data to help make decisions on someone's access to a service, opportunity or benefit.
- Carry out profiling on a large scale including evaluation or scoring

## **Step 2 – Describe the processing**

### **Describe the nature of the processing:**

- how will you collect data

Either directly providing or referring adults with sensory impairment(s) to the following types of support services:

- Advice and information

- Registration Certificate of Visual Impairment (CVI).
- Sensory Impairment Assessments
- Rehabilitation services
- Support Plans
- Access to Equipment
- Deafblind support
- how will you use data

The Sensory Hub (which acts as a single point of referral) ensures that adult customers with sensory impairment(s) are offered:

- **Advice and information** - that helps prevent, reduce, or delay the need for ongoing care and support.
- **Registration** - inform and advise people on the benefits of registration and complete the registration process for Certificate of Visual Impairment (CVI).
- **Sensory Impairment Assessments**- identify people's support needs on a day-to-day basis, recognising any risks or challenges as a result of their sensory loss.
- **Rehabilitation services** - for people with a visual impairment. The Service will offer rehabilitation support for eligible customers with visual impairment or who are Deafblind. There is a separate service for Children's mobility training.
- **Support Plans**- through (and regular reviews of support plans) for customers receiving an ongoing intervention through this service.
- **Access to Equipment**- to support daily living
- **Deafblind support**- who are unable to benefit from those services aimed primarily at Visually Impaired or Deaf/Hard of Hearing customers.
- where will the data be stored  
Mosaic systems
- how long will the data be kept/ retention period(s)  
5 years is the length of the contract however the records will be kept on mosaic for that retention period
- how will you delete data  
Using internal procedures for deleting
- What is the source of the data

- Individuals third parties on behalf of individuals professionals
- Who you share data with  
the Sensory Hub, relevant internal cyc teams
- What types of processing identified as likely high risk are involved?  
Potential for special categories/criminal
- Who has access to the data  
Relevant internal cyc staff and third parties/contractor
- Are you using any data processors, contractors, third parties Yes
- What security measures are in place – both technical and organisational  
CYC internal measures
- Using any new technologies; NO
- using any novel types of processing; NO
- what is the nature of the data - and does it include special category or criminal offence data?  
PD,SPCD and COD
- How much data will you be collecting and using and how often/ frequency of the processing  
Only the minimum needed and frequency will be determined by the people accessing the service
- How many individuals are affected/The number of data subjects involved See above
- What geographical area does it cover CYC
- What is the duration of the processing for contract length

**Describe the context of the processing:**

- what is the nature of your relationship with the individuals  
CYC and individuals who contact for this service
- How much control will they have  
Data subjects have control on accessing the service
- Would they expect us to use their data in this way Yes
- Do they include children or other vulnerable groups yes
- Do we have any previous experience of this type of processing Yes
- Are there prior concerns over this type of processing or security flaws? Is it novel in any way? NA

- Are there any current issues of public concern that we should factor in NA
- What is the current state of technology in this area NA
- Are there any relevant advances in technology or security NA
- Are we signed up to any approved code of conduct or certification scheme eg UK GDPR codes of conduct or UK GDPR certification schemes; PSN certification, NHS DSP; etc YES PSC NHS
- Have we considered and complied with relevant codes of practice YES

**Describe the purposes of the processing:**

- what do you want to achieve See other business case docs
- What is the intended effect on individuals provide them with a service
- What are the benefits of the processing – for you, and more broadly See other business case docs
- What are our legitimate interests, where relevant provide a service, spend and monitor of public funds
- What are the intended outcome for individuals See other business case docs
- What are the expected benefits for you or for society as a whole See other business case docs

### **Step 3: Consultation process**

#### **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 within your organisation?
- Do you need to ask your processors to assist?
- Do you plan to consult information security experts, or any other experts?

IG, procurement, legal, Business Intelligence, Equalities/communities, Comms and media, Individuals/users feedback

Will continue to work with the successful bidder

#### **Step 4: Assess necessity and proportionality**

##### **Describe necessity and proportionality measures:**

- what is your lawful basis for processing legal obligation, task in the public interest or legitimate interests
- Does the processing actually achieve your purpose Yes
- Is there another way to achieve the same outcome NA
- How will you prevent function creep BAU/service management
- How will you ensure data quality Covered in contract when its in place
- How will you ensure data minimisation Covered in contract when its in place
- What information will you give individuals/intend to provide privacy information to individuals All ROI will be covered in published/accessible PN's
- How will you help to support their rights/do we implement and support individuals' rights As in PN
- what measures do you take to ensure processors comply Procurement process/ongoing contract management
- How do you safeguard any international transfers NA
- Do our plans help to achieve our purpose YES
- Is there any other reasonable way to achieve the same result NA
- How will we prevent function creep As above
- How do we measure to ensure our processors comply Procurement process/ongoing contract management
- What are the safeguards for international transfers/ transfers outside the UK NA



**Step 5 and 6 – Identify and assess the risks and measures to reduce**

Describe source of risk and nature of potential impact on individuals, compliance and corporate as necessary.	Likelihood of harm	Severity of harm	Overall risk	Options to reduce or eliminate risk	Effect on risk	Residual risk	Measures approved
<p><i>Data breaches: Personal data may be exposed, leading to identity theft, financial fraud, or other forms of malicious use</i></p>	Possible	Significant	Medium	<p><i>Although we think the risk of data breach and privacy violation is low, we will still:</i></p> <p><i>Implement robust data security measures: Using passwords and other cybersecurity tools to protect sensitive data from unauthorised access.</i></p> <p><i>Carry out employee training: Educate our team about data security best practices and the importance of safeguarding personal information.</i></p> <p><i>Review our incident response plan: Check that our plan to handle data breaches or security incidents is still efficient and effective.</i></p>	Reduced	Low	Yes

<i>Privacy violations: Sensitive personal information could be accessed or shared without individuals' consent, violating their right to privacy.</i>							
<i>Discrimination and stigmatisation: Unauthorised access to sensitive personal data may lead to discrimination or stigmatisation against affected individuals.</i>							
<b>Associated compliance risks:</b>							
<i>Non-compliance with data protection regulations: Inadequate data security measures may lead to non-compliance with data protection laws, such as the GDPR, resulting in potential fines and legal actions.</i>	Remote	Minimal	Low	<i>Compliance monitoring: Continuously monitor and update our data security practices to ensure compliance with relevant data protection regulations.</i>	Reduced	Low	Yes

<i>Breach notification obligations: If a data breach occurs due to insufficient security, the organisation may fail to meet its obligation to promptly notify affected individuals and relevant authorities.</i>							
<i>Regulatory investigations: Data protection authorities may launch investigations into the organisation's security practices, resulting in reputational damage and possible penalties for non-compliance.</i>							
<i>Contractual / agreement/MOU/ ISA obligations: We may be in breach of these with **</i>				Controller/processor will be set out in the contract and we will need to do Data processing schedule			
<b>Corporate risks:</b>							
<i>Financial loss: Data breaches and subsequent legal</i>							

<i>action could result in financial losses, including legal fees, fines, and compensation to affected individuals.</i>							
<i>Ensure ROI are published/accessible</i>				Review and update specific PN			

**Step 7: Sign off and record outcomes**

<b>Item</b>	<b>Name/position/date</b>	<b>Notes/ Comments</b>
<b>Measures approved by:</b>		Integrate actions back into project plan, with date and responsibility for completion
<b>Residual risks approved by:</b>		
<b>DPO/ Information Governance advice provided:</b>		Summary of DPO/ Information Governance advice
<b>DPO:/Information Governance advice accepted or overruled by:</b>		If overruled, please explain your reasons
<b>Consultation responses reviewed by:</b>		
<b>This DPIA will kept under review by:</b>		