

Data Protection Impact Assessment (DPIA) - Full Assessment

Guidance for the Project Manager and Sponsor

Use the pre-screening template first. If that shows a high risk in processing the data then you must carry out this full DPIA. **Do not complete this form unless you have already completed the pre-screening and it shows high risk and the DPO as advised you to do a full DPIA.**

The Data Privacy Impact Assessment (DPIA) will enable you to systematically and thoroughly analyse how your project or system will affect the privacy of the people whose data you are dealing with and show how you will minimise the privacy risks. This template has been designed to incorporate the legal requirements of the General Data Protection Regulation (GDPR) and the Data Protection Act 2018. Conducting a DPIA is a legal requirement under the GDPR particularly if the proposed processing is using new technologies and poses a high-risk to people's data. Further information and guidance on the DPIA is also available on the ICO website here: [ICO's PIA code of practice](#) and the Article 29 Working Party [here](#).

GOVERNANCE ARRANGEMENTS

This DPIA will be submitted to the Corporate Information Governance Group (CIGG) and the advice of the Data Protection Officer (DPO) will be sought as part of that process. You must keep the signed DPIA and all supporting documents with your project file for audit purposes.

1. PROJECT SUMMARY

Project Name	Covid 19 Surge Testing	Directorate and Service	Supporting Communities - Public Protection
Project Sponsor and Position	Head of Public Protection	Project Manager and Position	Environmental health manager/Organisational Design Lead
Project Start Date Project End Date	3 rd February 2021 No end data – covers pandemic period	Project Go Live Date (anticipated/planned)	As soon as a surge is identified and testing is requested by central government

Third parties involved/associated with the Project:		Does this DPIA cover multiple projects?	No
<ul style="list-style-type: none"> • Description of the Project: what is your project doing in non-technical terms? If you've got a previous DPIA attach it and just give the changes from the previous one. <ul style="list-style-type: none"> • Following the identification of a novel or dangerous COVID variant in Camden and/or in other London boroughs, or in response to another direction from Public Health England, Camden may be asked to carry out enhanced testing in defined areas of the borough. • Testing may be required for a specified number of people in the borough, within specified postcode areas • Testing is not a requirement – it is an offer and will be encouraged within the testing area. All citizens in the testing area and in close proximity wishing to take a test will be permitted to do so. • The purpose of the testing includes identification of presence of the virus, facilitating containment of the virus and general surveillance of the virus spread in the community • To support more vulnerable residents to carry out tests where needed, we wish to identify those within a post code area who appear on Camden's CEV (Clinically Extremely Vulnerable) list and any who are known to Adult or Children's Social Care; this will enable a tailored service to those residents to meet their needs. The information will be used to contact these residents as quickly as possible – by phone or email to inform them personally that officers will be visiting all households in the area to offer them the opportunity and encourage them to take a Covid test as part of the surge testing operation. They would be asked if they had any concerns about taking part, if they needed any support to take part, if they needed any information or advice. Where possible we would provide the support to assist them in completing a test. The completed pre-screen DPIA concluded that a full DPIA is required for this project. See attached. is attached. 			

2. DESCRIPTION OF THE PROJECT

Context

As part of the national Covid-19 response NHS Test and Trace (NHS T&T) have recently identified in a number of areas in the country, through randomised sample checking, some cases of the South African variant that can't be linked to someone with a travel history to countries where that strain is more prevalent. Where such variants of Concern (VOC) are identified the Department of Health and Social Care (DHSC) and Public Health England (PHE) have asked local authorities to put in place a significantly enhanced testing regime to see if there is evidence of more generalised incidence or spread of a variant in their areas. The purpose is both for surveillance and containment of the virus and to inform infection control approaches moving forwards.

In order to deliver surge testing – if required, Camden will need to mobilise a significant operation to test the required number of people within a defined area of the borough. The information about numbers of tests required and area of testing will not be known prior to the request for surge testing coming through. Surge testing in other local authorities has required 10,000 tests to be carried out within defined postcodes.

The testing parameters will be set by DHSC and PHE (number of tests, asymptomatic or symptomatic, type of test etc). Current surge testing in England and in London has focused on asking those without symptoms to undertake a PCR test. The returned samples will all be analysed and if positive these will be sent for genome sequencing to see what strain of the virus they represent.

Testing will be carried out by Camden officers hand delivering PCR testing kits to all citizens within the testing area. Citizens can also go to a testing centre to complete a test. Officers will carry out collection of completed tests. A record will be made in the App of the number of tests delivered to each address, this will include the bar code only of each test left. Names of individuals accepting or returning a test will not be recorded. Residents will be advised that an officer will call the following day (morning or afternoon to collect the completed test. When tests are collected, the bar code will be scanned in and the App will mark the job as complete. The App will be used to identify how many test have been delivered and collected. The App will also be used to record tests delivered to the collection hub if utilised. No information about names or ages of people accepting or returning tests will be gathered or recorded

All tests within the surge testing area will be processed by NHS T&T and if any cases are positive these will be subject to genome sequencing. Local drop off points for completed tests will also be provided. The and the door-to-door team and staff at the drop off points team will signpost residents to the NHS 119 telephone help line if they are unable to register their test online.

In addition to hand delivery of testing kits and engagement with residents on the doorstep, we will also attempt to make telephone or email contact in advance of the door-to-door visits to residents in the testing area who are identified as Clinically Extremely Vulnerable (CEV) or have other welfare needs. Telephone and email information from the CEV data will be used to contact residents. Names will also be cross checked with the adult social care information if possible so that a known council officer can contact the resident if this is preferable. No details other than name address and contact information will be shared. The information will be shared only to the Covid support team responsible for contacting residents on the CEV list and with named adult social care staff if appropriate. This process is to ensure that more vulnerable residents are fully aware of the testing in the area and are supported and encouraged to take part if they wish to do so. They would be asked if they had any concerns about taking part, if they needed any support to take part, if they needed any information or advice. Where possible we would provide the support they need to assist them in completing a test

Camden is a very diverse area, and we will be asking community groups to get involved to help spread the message. A full communications plan will be used to explain to citizens in the area what is happening. These will be delivered to every household and versions translated into the main community languages will be available. Information will be provided via the Council's website and via other social media channels.

We will be distributing information to all residents in the testing area on the support available should they need to self-isolate following a positive test result or following notification of being in contact with someone who has tested positive. This surge testing or similar may be a requirement at any time during the pandemic. The intention is for this process to be ready to implement as soon as we receive notification to carry out surge testing from DHSC and PHE

Data Processing Activities

- As soon as the notification for surge testing is received and the area of testing defined, A Microsoft Power App will be used – this will be hosted on Camden's existing Microsoft tenancy. Addresses will be downloaded onto the app.
- CEV/Social care details will not be stored on the app.
- Test barcodes will be scanned into the app to facilitate monitoring of number of tests delivered and number collected
- Details of tests delivered, no response, test refused will be recorded to facilitate recording of number of tests attempted and carried out

- No other personal details will be recorded
- CEV/Social Care data will be used to identify those citizens within the testing area so that contact can be made by telephone or email as soon as possible – to ensure that these citizens can be supported and encouraged to take part in the testing if they are able to. This data will be stored in a secure Microsoft Teams channel area to which only the relevant officers to the call out process have access.
- The list of properties in the surge testing area will be cross checked against the Northgate Housing Management system just for the purposes of identifying which properties have Camden Council as the freeholder – this indicator will be incorporated into the Qlik Sense dashboard. The purpose of this is in case Housing services need to engage in areas of distribution/collection difficulties for which there are already housing management staff with local insight.

Purpose of Data Processing

- Addresses within the postcode area will need to be produced to facilitate logical delivery and collection of tests as required.
- CEV/Social Care data will need to be reviewed and information used to contact residents to ensure that we are providing any additional information and support that more vulnerable residents may need
- Test kits bar codes will be scanned onto the App to facilitate counting of tests delivered and tests completed – to enable a count of 10,000 (or other specified number) to be achieved as required.

Benefits

- This project will form a vital part of the local, national and international Covid-19 response. Surge testing will enable surveillance, containment and future planning to manage the ongoing Covid-19 situation. To date Camden has seen 270 deaths from Covid and over 13500 infections. In the UK there have been over 120,000 deaths and over 4 million infections recorded. The UK has been in some form of lockdown for over 11months. This has had an enormous impact on the health and wellbeing of citizens and the economy. Test and Trace together with vaccinations and the motto ‘Hands, Face, Space’ are vital tools to manage infection levels and contain the spread of the virus. If localised outbreaks or unusual clusters of new variants are identified, surge testing will be employed. This will protect the citizens of Camden and beyond from the continued spread of infection and assist with the return to ‘normal life’. The data processed as part of this surge testing is only used for the purpose of speed of delivery of the surge testing and provision of appropriate support to vulnerable residents within the testing area.

Data Processing Methods

- From the designated post code areas we will query the Land property gazetteer (LPG) to identify all residential and non-residential properties in this area.
- The above addresses will be imported into the mobile app for logging activity at these properties such as giving and collecting PCR Tests to occupants. This activity information will be stored in a SharePoint list and visualised in a QlikSense dashboard to enable coordination of teams distributing and collecting the PCR Tests as well as to monitor key metrics on the volume of surge tests completed.
- The LPG data will also be imported into a page on the Camden website to enable residents to search for their address to see if they are a part of the surge testing area.
- A list of CEV residents and their contact details will be produced for those falling within the target geographical area and this will be stored in a secure Microsoft Teams channel so that the appropriate officers can make contact.
- A list of Social Care clients and their contact details will be produced for those falling within the target geographical error and will be shared via a secure Microsoft Teams channel with the appropriate officers in social care

How Will Data be Stored

- Data captured within the mobile app will be saved to a SharePoint list held within the Camden Microsoft 365 environment.
- LPG data will be stored within the mobile app and on the Camden website. This data is accessible only by searching and is not displayed as a single list of all properties.
- The Qlik Sense dashboard will extract the data from the SharePoint list and will store it “in memory” so it will not be on a file on a file server
- CEV data is currently stored in an on-premise Microsoft SQL Server database. A query will be run to extract the names and contact details of the people who fall within the designated area. Note that although CEV status is a piece of special category data, there are no clinical details in this record set. The output of this query will be saved in spreadsheet form in a Camden Microsoft Teams channel to which only the designated officers responsible for managing the CEV contact calls will have access. The CEV lists are already cross matched with Mosaic. Any CEV records which overlap with Adult Social Care allocation will be removed and passed to Adult Social Care

for them to process. There is a risk that some contacts could be contacted twice – once in a CEV capacity and once in an ASC capacity if the data sets haven't lined up 100%.

Where have you obtained the data from?

- The LPG holds a list of all properties within the borough. We will gather all property information from this to identify which addresses we will be surge testing.
- The mobile app will capture the barcodes of tests, activity at properties (Test given, Refused test, No response at property, Resident / non-resident).
- CEV data will come from the NHS supplied Shielded Patient List (SPL) which is loaded into a restricted-on premise Microsoft SQL Server database. The SPL contains contact details. These contact details will be augmented by any updated contact details the CEV resident has supplied themselves via the National Shielded Service portal which are loaded into the same database.
- Details of residents known to social care within the defined area will come from the social care system Mosaic.

How long will you be processing the data for and how often?

- The data for this project will be processed during the surge testing period only – for example current surge testing allows a 2-week period. An example of the likely process is below – this may need to be adapted based on the number of tests required and the timeframe allowed by DHSC and PHE
- Day 1 - Initial data will be downloaded onto App and CEV/SC identified
- Day 2 – Phone calls to CEV/SC residents from CEV Data and letter drops to other addresses in cohort via mobile App
- Day 3 –10 - Door to door visits delivering and collecting tests using addresses via mobile App. Continued phone calls to CEV/SC residents as needed
- Day 4-10 recording tests delivered to drop off locations via mobile App

What is the volume of the data?

- Defined by DHSC and PHE at project start– based on current testing of 10,000 citizens within defined postcode areas. The volume will equate to the number of addresses within the postcode.

Types of personal data to be processed and data flow map(s):

Personal data:

List the types of data that you intend to process and the types of data subject (for example, names, addresses of residents, service users etc):
Refer to this guidance to assess what is personal data: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/key-definitions/what-is-personal-data/>

- Addresses – house number, road and post code, number of residents registered at address, bar code of tests delivered to each property
- Name, address and contact details of residents on CEV/Social Care Lists
-

Special category data:

List the types of special category data and the types of data subject:

- Refer to this guidance to assess what is special category data: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/special-category-data/>
- Health data in that they have received (or not received) a covid-19 test
- CEV status
- Any criminal convictions data? NO

Data Flows:

- ATTACHED IN ANNEX A

3. DATA PROTECTION PRINCIPLES

This section demonstrates how the project meets the data protection principles.

- How will you make sure that you only process the data that is necessary and proportionate for the purpose of the project, and no more than is necessary?
- If the data was originally collected for one purpose and you intend to use it for another purpose, explain how you will inform the data subjects.
- How will you make sure that the data is kept accurate and up to date?
- How long will you keep the data for and how will you destroy it at the end of the retention period?

- The data processed will only be the data listed above associated with defined areas of testing and required in order to deliver and collect tests. The team is not responsible for any part of the testing or collation of results. This is handled entirely by NHS T&T
- We are using Land and Property Gazetteer data to inform us of the properties falling within the test area and the number of residents. WE are using the CEV/SC data to provide additional support to these residents. As surge testing is a new concept required as an urgent measure to control Covid-19 Pandemic this detail should be added to Camden's Privacy Notices. Residents falling within the defined testing area will be provided bespoke comms materials to ensure that they are aware of the testing and how we have used their data only to facilitate the delivery and collection of tests. Comms materials should include reassurance that surge test data will remain the property of NHS T&T and under its governance as is the case with all testing in the pandemic
- The address data will be downloaded from the Land and Property Gazetteer. It will be used as a guide for the number of tests required at each property. The land and Property Gazetteer is updated continuously as needed.

- Have you cleared the information security arrangements with the Information Security Manager? YES/ ~~NO~~
- Record the Information Security manager's comments here:

Information Security Manager has reviewed and is satisfied that the relevant controls are in place

4. BASIS OF PROCESSING

- Which legal basis in Article 6 are you relying on? See this guide to help you identify the legal basis <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/>
- If you think you need to rely on legitimate interests then ask the Information and Records Management Team for advice.
- If you are processing special category data, you will also need a legal basis under Article 9 to process this. See this guide to help you identify the legal basis <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/special-category-data/>

If you are processing criminal convictions data or data for law enforcement reasons then you should speak to the Legal team as you need an additional legal basis to do this. Article 6(1)(e) public task

Article 9 (g) public task with the Part 2 of Schedule 1 of the DPA 2018 condition being para 6(1) - the exercise of a function conferred on a person by an enactment or rule of law, being the council's duties under the COPI notice and various public health requirements: 9(i) public health with the Part 1 of Schedule 1 of the DPA 2018 condition being para 3 public health

5. DISCLOSURES OF DATA

- Will you be transferring/ sharing/giving this data to a data processor or a sub-processor? **a/ NO**
- Tick here to agree that you will be entering into a data processing agreement with them **[n a]**

Will you be sharing data with any other third party? **NO** List the third parties that you propose to share with: Tick here to agree that you will be entering into a data sharing agreement with the third parties []

6. TRANSFERS OF DATA OUTSIDE OF THE EEA

Will any personal data be processed outside of the EEA? NO

See a list of countries here: <https://www.gov.uk/eu-eea>

If your answer is yes, you must consult the DPO straight away, and see the guidance here:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/international-transfers/>

If there WILL be a transfer out of EEA enter comments of the data protection advisor:

To contain comments detailing the safeguards that need to be put in place.

7. DATA SUBJECT RIGHTS AND COMPLIANCE WITH CORPORATE POLICIES

[Information in Camden](#) contains the Council's policies and procedures on data protection compliance, including how to respond to requests from people to enforce their rights under data protection law.

- You must comply with the requirements in Information in Camden. Tick here to agree that you will be complying with IIC on Data Subject Rights [] If there is a reason why you cannot do this, please explain why here:

8. CONSULTATION WITH INTERESTED PARTIES

Is one of the outcomes of your project going to make a change which will have a direct effect on data subjects?, For example: introducing CCTV into a library? If so, contact the Information and Records Management Team for advice at dpa@camden.gov.uk about whether you need to consult with stakeholders.

If citizens test positive for Covid-19 they will be required to self-isolate – as is required with any current Covid-19 testing. As this is a matter of national direction and we have no choice about that directive –consultation is not appropriate. People will not be required to test – just encouraged to and supported to self-isolate (via current support strategies)

Record the comments of the data protection adviser here:

There are no interested parties in this situation that should be consulted.

9. RISK ASSESSMENT AND MITIGATION

Risk is a combination of **impact**- how bad the effect of the risk would be- and **probability** – the likelihood of the risk happening. Risk is assessed from the perspective of the data subject (as opposed to risk to the Council) and what the impact could be on them as a result of the proposed data processing. For each of the risks you identify:

1. think about how likely they are to occur and categorise them according to **Table 1 in the appendix (e.g., rare, unlikely etc)**.
2. Then consider the impact each risk will have and categorise them according to **Table 2 in the appendix (e.g., minor, moderate etc)**.
3. Then look at **Table 3** and see the risk level. Where the level says mitigations are needed, think about what these will be and how they will reduce the risk level down.
4. Enter the details in the grid below

There is more information on the council’s approach to risk here
https://lbcamden.sharepoint.com/sites/intranet/finance/Pages/Risk_Management.aspx

Risk 1	Risk Level Before any Mitigations	Risk Level After Mitigations
<i>[include as many rows as necessary to identify each risk individually]</i>		

<p>Source of risk: Privacy intrusion to people on the CEV list and known to social care who are being given different treatment in a surge testing to other people. Privacy intrusion to all those involved in surge testing.</p> <ul style="list-style-type: none"> <i>Example: Potential impact on individuals:</i> Privacy intrusion leading to embarrassment or distress. <p>Threats that could lead to illegitimate access, undesired modification and disappearance of data: n/a</p> <p>Any compliance or corporate risks? No</p> <p>Where mitigations are required what are these?</p> <ul style="list-style-type: none"> The minimum data is being used for a specified discrete purpose. Whilst the CEV and social care data processing is above that strictly required to undertake surge testing, the council believes the privacy intrusion is proportionate due to the risks of people in these groups not being tested, and their potential needs in being helped with testing. 	<p>Minor Impact</p> <p>Rare</p> <p>Short term minimal embarrassment to an individual</p> <p>2</p>	<p>Minor Impact</p> <p>Rare</p> <p>Short term minimal embarrassment to an individual</p> <p>2</p>
<p style="text-align: center;">Risk 2</p>	<p>Details and Risk Level Before any Mitigations</p>	<p>Risk Level After Mitigations</p>

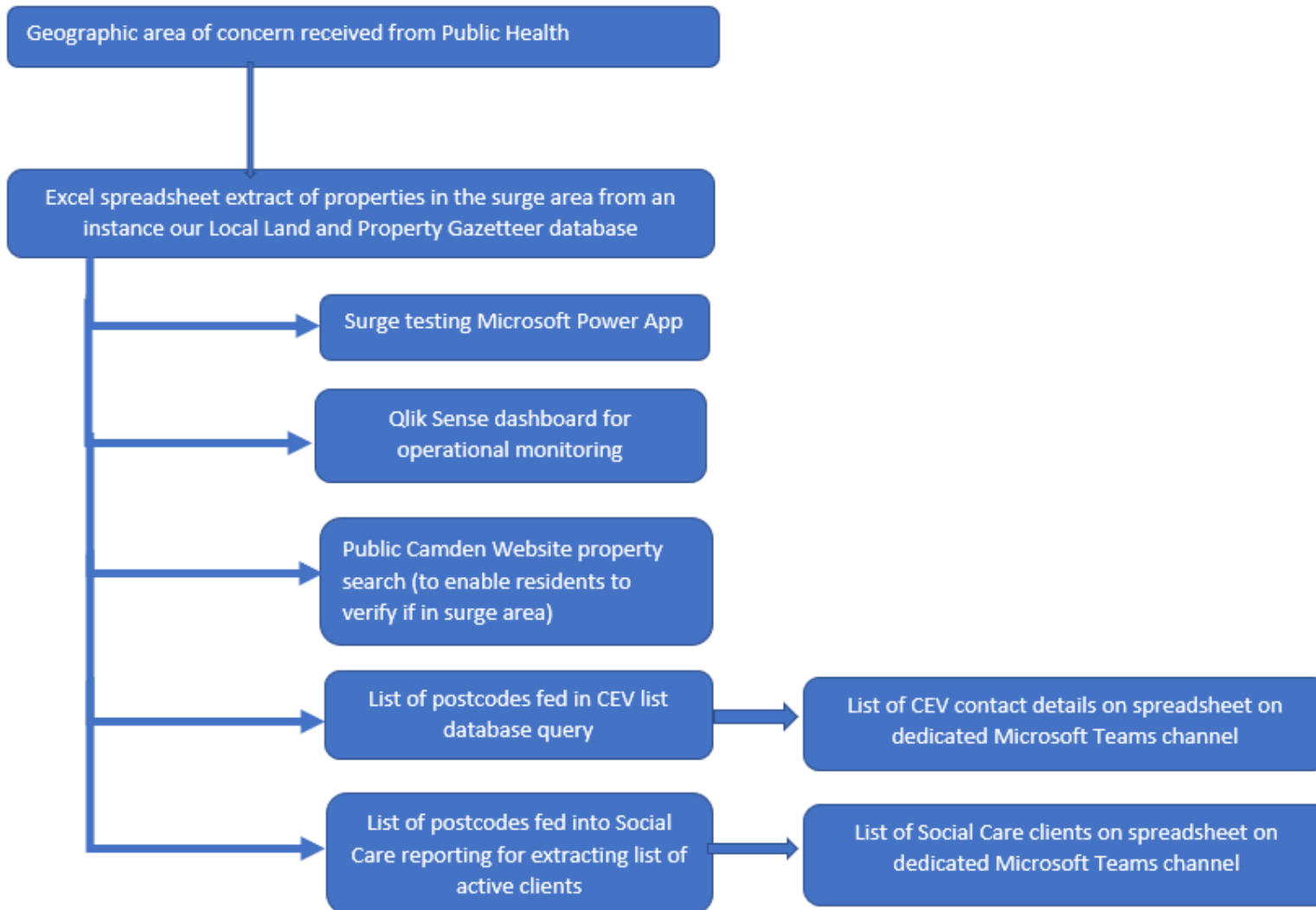
<p>Source of risk: Data Dashboard data could be used in unauthorised ways</p> <p>Potential impact on individuals: No The only personal level data displayed on the dashboard is address data. Qlik Sense dashboard access is to authorised internal users only so this risk would be rare (incorrect user granted access) and minor impact</p> <p>Threats that could lead to illegitimate access, undesired modification and disappearance of data: Unauthorised disclosure could give insight to individuals about which properties need to be visited to collect test kits</p> <p>Any compliance or corporate risks? No</p> <p>Where mitigations are required what are these? N/a</p>	<p>Rare event and minor impact 2</p>	<p>Rare event and minor impact 2</p>
<p style="text-align: center;">Risk 3</p>	<p>Details and Risk Level Before any Mitigations</p>	<p>Risk Level After Mitigations</p>

<p>Source of risk: CEV/SC Data Unauthorised use of CEV/social care data leading to harm to data subjects</p> <p>Potential impact on individuals: Privacy intrusion. Possible identity fraud or other criminal attempts due to knowing the people are vulnerable and therefore easy targets.</p> <p>Moderate – whilst details of the nature of the CEV or Social Care involvement are not being shared, the existence on these lists is of a sensitive nature and could lead to malign targeting if in the wrong hands. Incorrect contact details on the lists produced (no additional risks as all data shared will be from source e.g. most recent Shielded Patient List and referrals and Mosaic social care system).</p> <p>Threats that could lead to illegitimate access, undesired modification and disappearance of data: Unauthorised internal access to the lists External sourced IT Security breach</p> <p>Any compliance or corporate risks? Risk of breach of GDPR</p> <p>Where mitigations are required what are these? Only share list via user based restricted (internal Camden) Microsoft Teams Channel The staff who will have access to this data will already have access to it via other sources (e.g. Mosaic Social Care system). All that is being done here is identifying those residents in these datasets based on a geographical area. All staff subject to employee policies, processes and controls. Systems are secure. This makes the likelihood rare.</p>	<p>Moderate and Possible if adequate controls on list not established</p> <p>9</p>	<p>Moderate and rare if data stored in Microsoft Teams Channel with role based access controls</p> <p>3</p>
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10. OVERALL RISK RATING FOR THE PROJECT AS A WHOLE ONCE THE MITIGATING MEASURES HAVE BEEN PUT IN PLACE:

LOW	MODERATE	MEDIUM/HIGH	HIGH
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ANNEXE A: DATA FLOW MAPS



ANNEX B Risk Assessment Tables

Table 1 Likelihood of Risk Occurring

Rare	One-off failure
Unlikely	Possible that it may reoccur but not likely
Possible	Might happen or reoccur on a semi-regular basis (no more than once a quarter)
Likely	Will reoccur on a regular basis, pointing to some failure in controls
Almost Certain	Wilful act, systemic failure in controls

Table 2 Impact of Risk if it occurs

Negligible	No personal data involved, or risk won't have any impact.
Minor	<ul style="list-style-type: none"> • Short-term, minimal embarrassment to an individual • Would involve small amounts of sensitive personal data about an individual • Minimal disruption or inconvenience in service delivery to an individual (e.g. an individual has to re-submit an address or re-register for a service)
Moderate	<p><i>More than a minimal amount of sensitive personal data is involved at this level</i></p> <ul style="list-style-type: none"> • Short-term distress or significant embarrassment to an individual or group of individuals (e.g. a family) • The potential of a financial loss for individuals concerned • Minimal disruption to a group of individuals or significant disruption in service delivery or distress to an individual (e.g. availability to a set of personal information is lost, requiring resubmission of identity evidence before services)
Major	Significant amount of HR, or resident personal, and / or sensitive data released outside the organisation leading to significant actual or potential detriment (including emotional distress as well as both physical and financial damage) and / or safeguarding concerns

Level of risk	
1-3 Low Risk	Acceptable risk No further action or additional controls required Risk at this level should be monitored and reassessed at appropriate intervals
4-6 Moderate Risk	A risk at this level may be acceptable, if so no further action or additional controls required If not acceptable, existing controls should be monitored or adjusted
8-12 Medium / High Risk	Not normally acceptable Efforts should be made to reduce the risk, provided this is not disproportionate Determine the need for improved control measures
15-25 High Risk	Unacceptable Immediate action must be taken to manage the risk A number of control measures may be required
Catastrophic	Catastrophic amount of HR or service user personal and or sensitive data released outside the organisation leading to proven detriment and / or high-risk safeguarding concerns. Data subjects encounter significant or irreversible consequences which they may not overcome (e.g. an illegitimate access to data leading to a threat on the life of the data subjects, layoff, a financial jeopardy)

Risk Assessment: Table 3

	Score:	PROBABILITY				
		Rare	Unlikely	Possible	Likely	Almost Certain
IMPACT	Catastrophic	5	10	15	20	25
	Major	4	8	12	16	20
	Moderate	3	6	9	12	15
	Minor	2	4	6	8	10
	Negligible	1	2	3	4	5

Annex C:

Any DPO Advice or comments not included above

I am happy that this is an appropriate use of data given the current challenges and the protections build into the system. It's clearly only something that is going to be run during the current crises. If for whatever reason this becomes long term we should revisit this assessment

Andrew Maughan

Borough Solicitor and Data Protection Officer

25th February 2021