

**Simplify,
Standardise
& Share**



Data Protection Impact Assessment (DPIA) Full DPIA Template

Document Scope

This form only needs completing if the project/programme involves the processing of '[personal data](#)': Any information relating to an identified or identifiable natural person.

This form is used following the completion of a **DPIA Screening Question Template** where **ANY** of the answers to the 10 Screening Questions have been answered **YES**.

This document should be accompanied by the **Birmingham City Council DPIA Procedure** which can be used as "**Guidance Notes**" for completing DPIA's.

Where possible, drop-down boxes are used to simplify the process, when completing this document please (*where possible*) add links to documents or embed supporting documents to save replication or duplication.

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DPIA Background

A DPIA (Data Protection Impact Assessment) is a process designed to help you systematically **analyse, identify and minimise the data protection risks of a project or plan**. It is a key part of Birmingham City Council's accountability obligations under the GDPR and Data Protection Act 2018, and when completed correctly helps the Council assess and demonstrate how we comply with all of our data protection obligations.

This procedure is **mandatory** and applies to all employees, councillors, agency staff, contractors or any other persons who are designing or planning to implement

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changes to processes, or introduce or change systems that involve processing personal or confidential data.

DPIA's must be completed as part of the Council's Information Governance Framework, the standard for managing information in the Council and is aimed at **all** staff.

Responsibility for DPIA's falls under the role of "Information Asset Owners" which are typically Head of Service or AD's, the main person undertaking DPIA's (Screening/Full) will typically be a Project Manager or Programme Manager, supported by a Business Analyst where required and in exceptional cases supported by the Council's Data Protection Officer.

An effective DPIA will allow the Council to identify and fix problems at an early project stage, reducing the associated costs and damage to reputation which might otherwise occur.

The Birmingham City Council Information Governance Framework states that each Assistant Director and/or Head of Service are Information Asset Owners who are accountable for information assets within their business unit. The Information Asset Owner (IAO) is accountable for how it is held, used and shared and assesses risks to the information.

The Senior Information Risk Owner (SIRO) is overall responsible for managing information risk in the Council, ensuring information governance compliance with legislation and Council policies and provides a focal point for managing information risks.

The Caldicott Guardian is responsible for ensuring that all personal/patient identifiable information handled by social care services and public health respectively, are compliant with existing law and standards and they act to safeguard the rights of service users.

The Data Protection Officer will review the assessment. In certain circumstances your project may require the Council's Data Protection Officer to provide advice, criteria which you may need to seek DPO advice on would include:-

- Clarity for a borderline data retention matter (example – what retention period to apply for Child to Adult transitions).
- When a 3rd Party has not clearly identified the cloud storage location or country in which the data resides (example – data resides in non-EU with no Adequacy decision).
- You are unable to fully quantify a risk or provide mitigation.

This will be then be approved by an Assistant Director and/or Head of Service (as the IAO), Senior Information Risk Owner (SIRO), and Caldicott Guardian as

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appropriate. The basis for sharing must be established and the data protection principles covered.

Any legally binding 'contracts' that include indemnity clauses must be approved by Legal Services. This includes data processing schedules/agreements with suppliers/providers when commissioning services, as well as a sharing agreement that has indemnity clauses included.

Carrying out a DPIA is a continual process, not a one-time or "Tick Box" exercise.

When is a DPIA Appropriate?

A DPIA is required whenever a change to a **"System"** or **"Process"** is ***"likely to result in a high risk to individuals"***.

DPIAs will be applied to new projects and data sharing arrangements, because this allows greater scope for influencing how the project will be implemented.

A DPIA can also be useful when planning changes to an existing system

The main purpose of the DPIA is to ensure that privacy risks are minimised while allowing the aims of the project to be met. Conducting a DPIA is a **legal requirement** of the GDPR in certain limited circumstances where there is a high risk to privacy, but carrying out an effective DPIA should also benefit the people affected by a project and also the organisation carrying out the project.

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Project Details

Project Details		
Detail	Name/Reference Number	Notes
Project Name	Holiday Activities and Food HAF Programme 2022	
Directorate	Education and Skills	
Initial Business Review Reference	Unknown	
High Level Business Requirements Reference		
High Level Business Case Number		

Data Controller Details

Data Controller Details		
		Date of Last Update
Data Controller Details	Birmingham City Council, 10 Woodcock Street, Birmingham, B7 4BL.	25/01/2022

RACI Matrix

Document RACI						
Name	Role	R	A	C	I	Organisation
TBC	Project Manager	x	x			Commissioned PMO
Clare M Nankivell	Data, Performance and Information Strategy Manager	x	x	x	x	Birmingham City Council Education and Skills Directorate
Audrey Salmon/David Erfani	Programme Manager			x	x	Birmingham City Council Commissioning
Nigel Harvey-Whitten	SIRO			x	x	Birmingham City Council AD Commissioning
TBC	Information Asset Owner		x			Commissioned PMO
TBC	Risk Owner/Lead	x	x			Commissioned PMO
TBC	Data Protection Officer	x	x			Commissioned PMO
TBC	Director	x	x	x	x	Commissioned PMO
N/A	DfE HAF				x	Department for Education

Revision Control

Revision Table/Change History					
Version	Date	Author / Editor / Reviewer	Details of Change	Approved By	Date of Approval
	27.01.21	Osh Riley	Version 1		
	13.09.21	David Erfani	Reviewed & updated		
	01.12.21	David Erfani	Reviewed & updated		
	25.01.21	David Erfani	Reviewed for recommissioning 2022		

Full DPIA

The template follows the process that is used in the ICO [Data Protection Impact Assessment Guidance](#).

Step 1: Describe the Desired Outcome

Project Objective	
1	<p>What does the Project aim to achieve?</p> <ul style="list-style-type: none"> • The project aims to deliver a provision that will ensure Young People entitled to Free School Meals (FSM) (there is a 15% uplift for young people who are disadvantaged to be included) to eat more healthily over the school holidays; be more active during the school holidays; take part in engaging and enriching activities which support the development of resilience, character and wellbeing along with their wider educational attainment; be safe and not socially isolated; have greater knowledge of health and nutrition; and be more engaged with school and other local services. the council is looking to create over 120k holiday club spaces for during the summer to reach over 18k young people. 2. The provision must meet the following criteria: <ul style="list-style-type: none"> 1. Food: clubs must provide at least one meal a day (breakfast, lunch or tea) and all food provided at the club (including snacks) must meet school food standards. All food provided as part of the programme must comply with regulations on food preparation and take into account allergies and dietary requirements and

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		<p>preferences as well as any religious or cultural requirements for food.</p> <p>2. Enriching activities: clubs must provide fun and enriching activities that provide children with opportunities to develop new skills or knowledge, to consolidate existing skills and knowledge, or to try out new experiences. This could include: physical activities such as football, table tennis, cricket; creative activities such as putting on a play, junk modelling, drumming workshops; or experiences such as a nature walk, visiting a city farm etc. Authorities should consider how they can support providers to deliver a rich and varied mix of fun and enriching activities which are age-appropriate.</p> <p>3. Physical activities: clubs must provide activities which meet the Physical Activity Guidelines on a daily basis.</p> <p>4. Nutritional education: clubs must include an element of nutritional education each day aimed at improving the knowledge and awareness of healthy eating for children. These do not need to be formal learning activities and could for example include activities such as getting children involved in food preparation and cooking, growing fruit and vegetables, and taste tests.</p> <p>5. Food education for families and carers: clubs must include at least weekly training and advice sessions for parents, carers or other family members which provide advice on how to source, prepare and cook nutritious and low-cost food.</p> <p>6. Signposting and referrals: clubs must be able to provide information, signposting or referrals to other services and support that would benefit the children who attend their provision and their families.</p> <p>7. Policies and procedures: clubs must be able to demonstrate and explain their safeguarding arrangements and have relevant</p>
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		<p>and appropriate policies and procedures in place in relation to:</p> <ul style="list-style-type: none"> • Safeguarding; • Health and Safety; • Food safety and quality • Insurance; • Accessibility and inclusiveness; • Where appropriate, clubs must also be compliant with the Ofsted requirements for working with children.
2	Why do you want it?	<ul style="list-style-type: none"> • Statistical data will be captured and stored by partners and council staff depending on activities being delivered, and the level of management control (many management functions will be provided via partners) • Project management team (commissioned PMO) has been commissioned, thus will need to be provided with pupil details for their booking system from activity providers and parents. The commissioning team will not handle or see this level of detail. • In addition to operational use, statistical data will be used for reporting/MI and evaluation purposes for council, partners, and DfE use. • The Council is required to demonstrate to the DfE that eligible young people have attended the programme. Information (FSM unique code and person unique data) from the PMO is cross referenced with Council data on eligible cohorts' uptake to report back statistical data to the DfE.
3	When do you want it for? (When will processing of the data commence)	<ul style="list-style-type: none"> • The programme will take place during Easter, Summer and Christmas School Holidays. • At the start of each holiday period the council will identify families entitled to FSM. • At the end of each holiday period attendance data from the programme will be cross referenced with council data for statistical reporting to the DfE.
4	When was the need for a full DPIA identified?	<p>Date of screening 01/07/2021 <i>(what date were the screening questions completed?)</i></p>

Step 2: Describe the Processing (Link to Data Flow Diagram/Document)

The nature of the processing			
1	What Types of Data will be collected? <i>(Tick Boxes Provided)</i>	Name	<input checked="" type="checkbox"/>
		Personal phone number	<input checked="" type="checkbox"/>
		Languages	<input checked="" type="checkbox"/>
		National ID card details	<input type="checkbox"/>
		Social security number or other national identifiers	<input type="checkbox"/>
		Sex	<input checked="" type="checkbox"/>
		Work permit (foreign employees)	<input type="checkbox"/>
		Bank account	<input type="checkbox"/>
		CV/résumé/work experience	<input type="checkbox"/>
		Evaluation/annual appraisal	<input type="checkbox"/>
		Sick days	<input type="checkbox"/>
		Video images from security cameras	<input type="checkbox"/>
		Data re monitoring of internet use	<input type="checkbox"/>
		Electronic identification data: IP address, log-in data, cookies, ...	<input type="checkbox"/>
		Data on retirement/pension	<input type="checkbox"/>
		Working conditions	<input type="checkbox"/>
		Family composition: information on partner, children, ...	<input checked="" type="checkbox"/>
		Political opinions	<input type="checkbox"/>
		Home address	<input checked="" type="checkbox"/>
		Work phone number	<input type="checkbox"/>
		Place of birth	<input type="checkbox"/>
		Passport details, copy of passport	<input type="checkbox"/>
		Driver's license details, Copy of driver's license	<input type="checkbox"/>
		Religion	<input type="checkbox"/>
		Insurances	<input type="checkbox"/>
		Credit card details	<input type="checkbox"/>
(Labour) union membership	<input type="checkbox"/>		
Registered work hours/badging log	<input type="checkbox"/>		

		Personal health/medical info	<input type="checkbox"/>	
		Biometrics (finger print, retinal scan)	<input type="checkbox"/>	
		Data re monitoring of work e-mail use	<input type="checkbox"/>	
		Electronic localization data: cell phone, GPS, ...	<input type="checkbox"/>	
		Date of entry into service	<input type="checkbox"/>	
		Sound recordings (e.g. recorded telephone conversations, ...)	<input type="checkbox"/>	
		Leisure time activities and interests: hobbies, sports, ...	<input checked="" type="checkbox"/>	
		Data of sex life or sexual orientation	<input type="checkbox"/>	
		Personal e-mail address	<input checked="" type="checkbox"/>	
		Birthday/age	<input checked="" type="checkbox"/>	
		Nationality	<input type="checkbox"/>	
		Copy of ID card	<input type="checkbox"/>	
		Personal information about spouse/partner/children	<input checked="" type="checkbox"/>	
		Marital status	<input type="checkbox"/>	
		Wage/salary	<input type="checkbox"/>	
		Education level/diplomas	<input type="checkbox"/>	
		Training during employment	<input type="checkbox"/>	
		Leave/holidays	<input type="checkbox"/>	
		Criminal convictions/offences	<input type="checkbox"/>	
		Pictures/images	<input type="checkbox"/>	
		Data re monitoring of private e-mail use	<input type="checkbox"/>	
		Function grid	<input type="checkbox"/>	
		Place of work	<input type="checkbox"/>	
		Physical data: height, weight, and so on	<input type="checkbox"/>	
		Data revealing racial or ethnic origin	<input checked="" type="checkbox"/>	
		Memberships	<input type="checkbox"/>	
		Other (Not Listed) Please provide detail below:-	<input type="checkbox"/>	
2	How will you collect the data?	<ul style="list-style-type: none"> • Data provided by parents will go to the provider's booking system to book places at activities. The council is not collecting the detailed data. • Use of booking management system, spreadsheets, paper records (& other web-based 		
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		<p>tools) for advance, and on the day bookings and registration will be controlled by the provider</p> <ul style="list-style-type: none"> • Due to high volume, and variety of providers, unlikely to have one method for capturing and managing data the provider recognises this. • Overall reporting will be done on an anonymous basis, any personal data will be removed for reports to BCC, providers, and DfE 	
3	How will you use the data?	<p>The provider will be responsible for the following;</p> <ul style="list-style-type: none"> • Data will be used to book young people onto activity programmes which is shared with activity provider where the young people will attend. • Details of attendees and parents are required to ensure safeguarding, health & safety • To ensure activities are appropriate for ability • To ensure food allergies are identified • Data will be used to differentiate between FSM eligible children and non-FSM eligible children • Statistical data will be used to report uptake information back to DfE as per requirements 	
4	How will you store data?	<ul style="list-style-type: none"> • The data is stored by the provider, collected and processed within the UK only. There is no sharing of this data outside of the UK • The provider shall ensure that it stores and processes Personal Data in accordance with general terms and conditions. • The provider further ensures that they will take regular back-ups of the Confidential Information and Personal Data, and any other information held or processed in the course of performing its obligations which are to be stored securely in an off-site location. 	
5	How will you erase or delete data in the event of a Subject Access Request?	<p>On contracting the Council will ensure;</p> <ul style="list-style-type: none"> • The commissioned provider only retains information to the funded reporting period of the Department for Education (DfE). • After the reporting period ends information will be destroyed • The Councils obligations on the commissioned provider flows through the providers supply chain through contracting. • For Holiday Activities and Food (HAF) providers the commissioned provider will ensure that HAF provider destroy information 1 month after each holiday period unless they are legally required to retain information, which HAF providers will need 	
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		<p>to declare to the commissioned provider and Council.</p> <ul style="list-style-type: none"> The commissioned provider will have policies in place to set out its criteria for data.
6	What is the source of the data?	<ul style="list-style-type: none"> Users of the system will input their personal information in order to book onto activity sessions Provided directly by citizens; parents and carers of children and young people The council will not have access to this information <i>(Note – is the data provided directly by a citizen, via a 3rd Party, or via another system?)</i>
7	Will the data be shared, if so who with?	<p>Yes</p> <p>The provider will share statistical data to report back to the council and DfE as well as for programme evaluation <i>(Note – Are you using any Data Processors, 3rd Parties, Other Agencies)</i></p>
8	If 'Yes', who will you share it with? (3rd Parties, Agencies, Other Departments)	<ul style="list-style-type: none"> For project reporting, anonymised data will be shared with DfE as per reporting requirements <i>(Note – Is there a contract with the 3rd Party, has any due diligence been completed, is there are Data Sharing Agreement?)</i>
9	Do you have a data flow schematic? (Data Flow)	Yes
10	If you have a data flow schematic, please insert here	<ul style="list-style-type: none"> Held by Commissioned PMO
11	How long will you keep the data for? (retention)	<p>On contracting the Council will ensure;</p> <ul style="list-style-type: none"> The commissioned provider only retains information to the funded reporting period of the Department for Education (DfE). After the reporting period ends information will be destroyed The Councils obligations on the commissioned provider flows through the providers supply chain through contracting. For Holiday Activities and Food (HAF) providers the commissioned provider will ensure that HAF provider destroy information 1 month after each holiday period unless they are legally required to retain information, which HAF providers will need to declare to the commissioned provider and Council.

		The commissioned provider will have policies in place to set out its criteria for data. <i>(Note – Check the Corporate Retention Schedule)</i>
12	Are you using any new technologies? (New to Market or New to BCC)	No

The scope of the processing		
1	What is the nature of the personal data?	<ul style="list-style-type: none"> • Full Name of parents / carers • Full Name of young person • Date of Birth of young person • Gender of young person • Ethnic Origin of young person • Address • Email Address of parent / carers • Mobile Phone of parents/ carers and young person (if age appropriate) • Landline Phone of parents / carers • Registered Disabled • Dietary requirement of young person • Data will be captured and stored by partners and council staff depending on activities being delivered, and the level of management control (many management functions will be provided via partners) • Project management team has been commissioned, thus will need to be provided with pupil details • In addition to operational use, data will be used for reporting/MI and evaluation purposes for council, partners, and DfE use • As part of the grants and distribution of funds providers will need to provide their details as well as payment details to receive funds from the commissioned PMO. These agreements will be between providers. The council will receive an audit of distribution of funds but no bank details of providers. • Safeguarding, complaints, compliments and incident reports may also be passed to the council to respond to.

		<ul style="list-style-type: none"> <i>(Note – Please explain what the data is and why you need it)</i>
2	<p>Does the data include any special category or criminal offence data?</p> <p><u>(Link to Special Category Data Description)</u></p>	No
3	<p>How much data will be collected (Estimated Number of records)?</p>	<ul style="list-style-type: none"> 74,000 (approx.) pupils on FSM in Birmingham total at each holiday period. There are three holiday periods Based on a 30% expected uptake, this equates to 22,200 children and young people who could be affected Details of providers who will be providing activities approximately 200 providers each holiday period
4	<p>How much data will be processed?</p>	<ul style="list-style-type: none"> Approximately 22,200 pupil records collected on registration to the programme at each holiday period. <i>(Note – How Many Records are Processed and at What Frequency – Example – we will process 125 housing repair records every week)</i>
5	<p>How often will data be collected?</p>	<ul style="list-style-type: none"> At the start of the holiday periods as new parents/users sign up to the booking system. This is related to sign up at each holiday period for activities. Change of pupil details e.g. address may trigger collection of data for same pupil <p><i>Note – (What Triggers Data Collection, New Record, Change of Details, when might these occur?)</i></p>
6	<p>How often will data be used? (Frequency of Processing)</p>	<ul style="list-style-type: none"> Activity providers will access data daily during the holiday periods PMO will access data during the mobilisation period and daily during the holiday period to monitor sufficiently The council will access data prior to the holiday period to send out unique registration codes to families in receipt of free school meals. The council will receive statistical data on weekly highlight reporting from PMO.

		<ul style="list-style-type: none"> The council will cross reference attendance data at the end of each holiday period with information on census to ensure eligibility for DfE reporting. <p><i>Note (If this is an upgrade system, can you get reports from the existing/prior system?)</i></p>
7	How long can the data be kept for? (Corporate Retention Schedule - CRS Reference #)	<p>On contracting the Council will ensure;</p> <ul style="list-style-type: none"> The commissioned provider only retains information to the funded reporting period of the Department for Education (DfE). After the reporting period ends information will be destroyed The Councils obligations on the commissioned provider flows through the providers supply chain through contracting. For Holiday Activities and Food (HAF) providers the commissioned provider will ensure that HAF provider destroy information 1 month after each holiday period unless they are legally required to retain information, which HAF providers will need to declare to the commissioned provider and Council. The commissioned provider will have policies in place to set out its criteria for data. <i>Note (The Corporate Retention Schedule is BCC's Legal Document; this must be referred to – Functions are listed in Column A of the CRS.)</i>
8	What geographical area does the data cover?	<ul style="list-style-type: none"> Covers pupils in Schools in all Birmingham Wards.

Context of the processing		
1	What is the Source of the Data?	<ul style="list-style-type: none"> Provided directly by citizens; parents and carers of children and young people
2	What is the nature of your relationship with the individuals (Data Subjects)?	<ul style="list-style-type: none"> BCC providing a service to citizens Children and families being supplied a service. <p>Data will be used by the programme manager Commissioned PMO to assess the needs of children and families, assign services to them, and track the delivery and results of those services</p>

		<i>Note – (This may typically be BCC providing a service to a Citizen, please describe the relationship)</i>
3	How much control will Data Subjects have?	<ul style="list-style-type: none"> Data subjects will be able to update their own information Subjects can ask for information rights requests and will control their own information shared with principal and adhering parties. <i>Note – (This is asking you to consider the Data Subject's Rights {Access, Rectification etc.})</i>
4	Would Data Subjects expect you to use their data in this way?	<ul style="list-style-type: none"> Yes, as when they sign into the system, they are aware they are booking their children into holiday activities Data is used only to protect and provide service to the subject <i>(Note – IF BCC have not been transparent about why we require and process the data we are not meeting our GDPR compliance)</i>
5	Do they include children or other vulnerable groups?	Yes
6	Are there prior concerns over this type of processing or security flaws?	<ul style="list-style-type: none"> None <i>Note – (This may be one of the reasons for implementing a new system – Example, cannot delete Data Subject data from the existing system)</i>
7	Is it novel in any way?	No
8	What is the current state of technology in this area?	<ul style="list-style-type: none"> The booking system in use by Commissioned PMO. <i>(Note – Is this a completely untried/untested system or service? – Example – Artificial Intelligence, or is this purely a revised system/service?)</i>
9	Are there any current issues of public concern that you should factor in?	<ul style="list-style-type: none"> No <i>(Note – have there been complaints or any issues raised by Data Subjects (Citizens) about how we use their data?)</i>
10	Are you signed up to any approved code of conduct or certification scheme (once any have been approved)?	<ul style="list-style-type: none"> N/A

		<i>(Note – This relates to Article 40 of GDPR[Codes of Conduct], at this time no certification schemes for GDPR exist, this may change over time)</i>
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The purposes of the processing		
1	What do you want to achieve? (Intended Outcome)	<p>For commissioned PMO the provider will be able to;</p> <ul style="list-style-type: none"> • Book eligible children onto holiday activity programmes • Ensure safeguarding, health & safety • Ensure activities are appropriate for age and ability • To ensure food allergies are identified • Data will be used to differentiate between FSM eligible children and non-FSM eligible children • Data will be used to report uptake information back to DfE as per requirements • Ensure eligible children and young people can secure a place on a holiday activities and food scheme suitable for their needs • <i>(What is the expected outcome of implementing this new system or service?)</i>
2	What is the intended effect on individuals?	<ul style="list-style-type: none"> • Children booked into holiday activities with their personal details using the booking system will eat more healthily over the school holidays; be more active during the school holidays; take part in engaging and enriching activities which support the development of resilience, character and wellbeing along with their wider educational attainment; be safe and not socially isolated; have greater knowledge of health and nutrition; and be more engaged with school and other local services. • Parents will easily be able to book a place on a holiday activities and food scheme <p><i>(Note – How will Citizens benefit from this system or service?)</i></p>
3	What are the benefits of the processing – for BCC, and more broadly?	<ul style="list-style-type: none"> • In addition to operational use, statistical data will be used for reporting/MI and evaluation purposes for council, partners, and DfE use • This will allow BCC to monitor uptake from FSM eligible pupils and understand where need is • Indicates numbers for informing forecasts of uptake for future schemes

		<ul style="list-style-type: none"> • Will allow BCC to evaluate the success of the Holiday Activities and Food programme • Will allow DfE to assess the success of the Holiday Activity and Food programme, and evaluate how it can be improved <p><i>(Note – How will Staff, 3rd Parties and BCC benefit from this system or service?)</i></p>
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Step 3: Consultation Process

Consultation		
1	Is consultation needed?	No
2	If 'No', why?	<ul style="list-style-type: none"> • Only way to collect information to book children onto the activity program • No reason has been identified to consult with the population
3	Who have you consulted with?	Internal <ul style="list-style-type: none"> • legal External <ul style="list-style-type: none"> • Please add detail
4	How many have you consulted with?	Internal <ul style="list-style-type: none"> • Malkiat Thiarai • Head of Corporate Information Management External <ul style="list-style-type: none"> • Please add detail
5	How did you carry out consultation?	<ul style="list-style-type: none"> • Teams meeting
6	When did you carry out the consultation?	<ul style="list-style-type: none"> • 27.01.2022

NB

You can use consultation at any stage of the DPIA process.

<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/accountability-and-governance/data-protection-officers/>

In exceptional cases Birmingham City Council may need to seek the advice of the ICO (**but not before consulting or escalating to the Information Governance Team and the Data Protection Officer**).

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Step 4: Assess necessity and proportionality

The purposes of the processing		
1	What is your lawful basis for processing?	Legitimate Interest
2	Does the processing actually achieve your purpose ?	Yes as managing this level of detail needs a booking system to keep information secure and managed
3	Is there another way to achieve the same outcome?	Yes to keep excel or paper based systems, this is less secure and carries more risks
4	How will you prevent function creep?	<ul style="list-style-type: none"> Have at least one employee designated as the privacy officer. Have a process in place so that employees (or members of the public) can raise concerns and that those concerns are investigated. Funding is defined by DfE year by year. Which is broken down further into three holiday periods. <p><i>(Note – where a purpose is gradually widened or blurred after consent is obtained, The GDPR requires either a statement from the data subject or a clear affirmative action; silence, inactivity or pre-ticked boxes do not constitute valid consent).</i></p>
5	How will you ensure data quality and data minimisation?	<ul style="list-style-type: none"> By ensuring the data collected links directly to the output needed by the provider <p><i>(Note – Making sure that data is both accurate and necessary.)</i></p>
6	What information will you give individuals?	<ul style="list-style-type: none"> Communication of the HAF programme publicly <p><i>(Note – Usually by a Privacy Notice, need to consider how to accommodate non-computer users.)</i></p>
7	How will you help to support Data Subjects Access Rights ? 1. The Right to be Informed	<ul style="list-style-type: none"> Through existing council routes for subject access.

	<p>2. The Right of Access</p> <p>3. The Right to Rectification</p> <p>4. The Right to Erasure</p> <p>5. The Right to Restrict Processing</p> <p>6. The Right to Data Portability</p> <p>7. The Right to Object</p> <p>8. Rights in relation to automated decision making and profiling</p>	<p><i>(Note – This is to ensure that a Data Subject can exercise their rights under GDPR by means of a “Subject Access Request or SAR).</i></p>
8	<p>What measures do you take to ensure processors comply?</p>	<ul style="list-style-type: none"> • The contract with commissioned provider with obligations set out in T&C’s <p><i>(Note – A data processor is a person or company who processes data on behalf of a data controller (BCC). This needs to be covered by a contract with a Data Sharing Agreement, seek input from both legal and procurement)</i></p>
9	<p>How do you safeguard any international transfers?</p>	<ul style="list-style-type: none"> • All information is handled only within the UK <p><i>(Note – An International Transfer will depend upon the Brexit Outcome and we Need to understand “Where” the data is held (e.g. which country) if there is an adequacy decision with that country, ask vendor for information??</i></p>

Step 5: Identify and assess risks

Describe source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary. (<i>Review BCC Risk Management Framework – BCC Intranet</i>)		Likelihood of harm Remote, possible or probable	Severity of harm Minimal, significant or severe	Overall risk Low, medium or high
1	We are commissioning a third party to handle data, with a sub-contracting supply chain.	Remote	Significant	Low
2	Risk of suppliers retaining data too long	Remote	Minimal	Low
3	Risk around the provider obtaining too much information	Remote	Minimal	Low

Step 6: Identify measures to reduce risk

Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 5			Effect on risk	Residual risk	Measure approved
	Risk	Options to reduce or eliminate risk	Eliminated, reduced, accepted	Low, medium, high	Yes/no
1	We are commissioning a third party to handle data, with a sub-contracting supply chain.	On contracting the Council will ensure; <ul style="list-style-type: none"> • Data can't be held outside of the UK • The councils obligations on the commissioned provider flows through the providers supply chain through contracting. • Sub contactors are clearly listed on contracting with the commissioned provider. • The commissioned provider will have policies in place to set out its criteria for data. 	Reduced	Low	
2	Risk of suppliers retaining data too long	On contracting the Council will ensure; <ul style="list-style-type: none"> • The commissioned provider only retains information to the funded reporting period of the Department for Education (DfE). • After the reporting period ends information will be destroyed • The Councils obligations on the commissioned provider flows through the providers supply chain through contracting. 	Reduced	Low	

		<ul style="list-style-type: none"> For Holiday Activities and Food (HAF) providers the commissioned provider will ensure that HAF provider destroy information 1 month after each holiday period unless they are legally required to retain information, which HAF providers will need to declare to the commissioned provider and Council. The commissioned provider will have policies in place to set out its criteria for data. 			
3	Risk around the providers obtaining too much information	<p>On contracting the Council will ensure;</p> <ul style="list-style-type: none"> The commissioned provider will collect key information related to council and DfE reporting. The commissioned provider will ensure HAF providers only collect information that is relevant to support safe delivery of the programme. This will be demonstrated via the booking system which will outline the information being collected in defined fields. The commissioned provider will have policies in place to set out its criteria for data. 	Reduced	Low	

Step 7: Sign off and record outcomes

In certain circumstances your project may require the Council's Data Protection Officer to provide advice, criteria which you may need to seek DPO advice on would include:-

- Clarity for a borderline data retention matter (example – what retention period to apply for Child to Adult transitions).
- When a 3rd Party has not clearly identified the cloud storage location or country in which the data resides (example – data resides in non-EU with no Adequacy decision).
- You are unable to fully quantify a risk or provide mitigation.

In the first instance you should consult with the Business Analyst supporting your DPIA, then look to specialists available in the Information Assurance Team also your Information Asset Owner and finally the Council's Data protection Officer.

Item	Name/date	Notes
Measures approved by:		Integrate actions back into project plan, with date and responsibility for completion
Residual risks approved by:		If accepting any residual high risk, consult the ICO before going ahead
DPO advice provided:	Meeting took place 27.01.22	DPO should advise on compliance, step 7 measures and whether processing can proceed
Summary of DPO advice:		
DPO advice accepted or overruled by:		If overruled, you must explain your reasons
Comments:		

Consultation responses reviewed by:		If your decision departs from individuals' views, you must explain your reasons
Comments:		
This DPIA will kept under review by:		The DPO should also review ongoing compliance with DPIA
Review Frequency:		