

Data Protection Impact Assessment

DPIA Name:

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Stage 1: Data Protection Impact Assessment screening questions for proposed changes. Please read the DPIA guidance document before completing this form

	Screening questions	Yes	No
1	Will the project involve the processing of information about individuals? Please note this does include pseudonymised data*	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2	Will information about individuals be disclosed or shared with organisations or people who have not previously had routine access to the information?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3	Are you using information about individuals for a purpose it is not currently used for, or in a way it is not currently used?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4	Does the project involve you using new technology which might be perceived as being privacy intrusive? For example, the use of biometrics or facial recognition.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5	Does any phase of the project utilise automated decision making based on the information provided/ shared	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6	Will the project require you to contact individuals in ways which they may find intrusive? e.g marketing*	<input type="checkbox"/>	<input checked="" type="checkbox"/>

If the answer is “yes” to any of the questions above then a DPIA must be carried out.

Please ensure that this has been to the following :

Information Management & Governance, Subject matter experts including Business Partners, ICT, CYBER.

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Stage 2: Data Protection Impact Assessment

Version control

Version	Status	Revision Date	Summary of Changes	Author
1.0	Draft	30/07/2019		Simon Townend
2.0	Draft	12/08/2019	Comments added	Dave Britton
3.0	Draft	16/06/2023	Updated for extension	Nicola Bruce
4.0	Draft	15/03/2024	Updated for new contract	Nicola Bruce

DPIA Approved by Information Asset Owner	Name:	Date:
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Section A: New/Change of System/Project General Details

Name: (of the project or change to be delivered)	Contract of an e-purchasing card solution
Background/Objectives: (why is the new system / change required?)	The project is to directly award an e-purchasing card solution. The current contract is due to expire in August 2024.
Information flow diagram* (please see examples in guidance) see section on data mapping	Information flow for a Pcard holder during application process to obtain a Pcard;

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	<pre> graph TD A[Prospective cardholder completes Insite hosted application with key pieces of information drawn from individuals own Insite profile.] --> B[Details transferred by Pcard team to application batch upload file and uploaded the Lloyds bank secure website.] B --> C[Card produced and issued to cardholder workplace address. Account details created and appear on Lloyds back office system to enable review of spend.] C --> D[Information flow for a system user during account/profile set up process within back office system;] D --> E[Requirement to set up new user as a result of card application received (see above)] E --> F[Details drawn from Insite form and existing Insite profile along with other details i.e. Service Area / Directorate to determine access rights to be provided.] F --> G[Batch upload file completed and uploaded to back office system to create profile and issue login details, username and password.] </pre> <p>Information flow for a system user during account/profile set up process within back office system;</p>
<p>State who is the Data Controller* see glossary</p>	<p>Leeds City Council</p>

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<p>Benefits: (explain what the project aims to achieve, what benefits to the organisation, to individuals and to other parties)</p>	<p>The continuation of an e-purchasing card solution is essential to ensure the continued use of the councils preferred method of payment, purchasing card. The current e-purchasing card solution supports the processing of 160k transactions a year and £43m worth of spend. In addition to efficiency savings as a result for reduced invoice input staff costs the programme delivers an income stream to the council by way of a rebate payable on all card spend. Last year's rebate paid to LCC was in the region of £510k. With the implementation of a new Financial Management System it is imperative that an established e-purchasing card is available as an alternative method of payment.</p>	
<p>Consultation: (If required detail here any consultation undertaken with the public, partners, internal or external stakeholders)</p>	<p>The intention to re-procure an e-purchasing card solution for a period of 3 years plus the option of a 12 month extension has been placed on the list of forthcoming key decisions on 21st December 2023.</p> <p>Consultation has taken place with colleagues working on the Core Business Transformation Team who recognise the risks associated with a possible change in e-purchasing card provider at this time and are supportive of this approach.</p> <p>Engagement has taken place with colleagues in Procurement and Commercial Services who have provided support and guidance.</p>	
<p>Implementation date: for example the timescales required for completion, implementation date</p>	<p>The current contract expires 18th August 2024 and a new contract needs to be in place ahead of this date.</p>	
<p>Relationships / Partnerships: (e.g. with NHS, or private organisation, stakeholders, please also if possible state whether they are designated as data controllers or data processors)</p>	<p>Contracted bank (Pcard provided) would be a data processor.</p>	
<p>Project Manager:</p>	Name:	Nicola Bruce
	Job Title:	Assistant Head of BSC Financial Services
	Service:	Shared Services (BSC)
	Telephone:	01133787566
	Email:	Nicola.Bruce@leeds.gov.uk
	Name:	Mariana Pexton
	Job Title:	Director Strategy & Resources

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Information Asset Owner(s) All information assets must have an information asset owner (IAO). IAO are usually Heads of Service or Chief Officers.	Service:	Strategy & Resources
	Telephone:	01133788244
	Email:	Mariana.Pexton@leeds.gov.uk
System Administrator (if applicable)	Name:	Alison Lewis
	Job Title:	Financial Services Manager
	Service:	Shared Services (BSC)
	Telephone:	01133784483
	Email:	Alison.Lewis@leeds.gov.uk

Section B: Data Protection Impact Assessment (please complete all questions as fully as possible)

	Question	Response	Guidance document
Processing			
1	Please state the purpose for the processing of the data / information: (for example, service provision, research, audit, employee administration)	Issuing of Pcards to individuals to enable procurement of goods and services. Setting up of system user profiles to allow review and approval of transactions within the back office system.	
2	Please tick the data items/ information that will be processed	<input checked="" type="checkbox"/> Name <input type="checkbox"/> Address/Postcode <input checked="" type="checkbox"/> Date of Birth <input checked="" type="checkbox"/> Telephone no/email <input type="checkbox"/> Next of Kin <input type="checkbox"/> National Insurance Number <input type="checkbox"/> NHS Number <input type="checkbox"/> Gender <input type="checkbox"/> GP / Consultant <input type="checkbox"/> Pseudonymised	

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2b	Special categories and Criminal data	<input type="checkbox"/> Sexual Orientation <input type="checkbox"/> Political opinions/trade union membership <input type="checkbox"/> Religion <input type="checkbox"/> Physical health <input type="checkbox"/> Mental health <input type="checkbox"/> Medical history <input type="checkbox"/> Ethnic Origin <input type="checkbox"/> Sexual life <input type="checkbox"/> Criminal convictions	
2c	Other (please specify)	Title – Mr, Mrs, Miss, Ms. Etc. Address – Workplace address only. Payroll number. User determined account verification password.	
3a	What is the legal basis you are relying on for the processing of the data/information. (please see guidance section on processing for all of question 3)	DPA 18 (Part 2, Chapter 2 Section 8) Lawfulness of processing: public interest etc. In Article 6(1) of the GDPR (lawfulness of processing), the reference in point (e) to processing of personal data that is necessary for compliance with a legal obligation to which the controller is subject, includes processing of personal data that is necessary for— (c) the exercise of a function conferred on a person by an enactment or rule of law. Legal obligation or public task under the Digital Economy Act 2017 – Chapter 4 Fraud Against the Public Sector, 56	
3b	If you are relying only on consent, did you consider any other legal basis?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
3c	If using consent, how will that consent be obtained and recorded	Implied. A prospective cardholder or system user provides their details on	

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	and withdrawn if requested? (please state)	completion of a card application (or on the accompanying approval of an application).	
4	Will personal data items be collected which have not been collected before?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5	The data of approximately how many individuals will be affected?	<input type="checkbox"/> 1-10 <input type="checkbox"/> 10-100 <input type="checkbox"/> 100-1000 <input checked="" type="checkbox"/> 1000-10,000 <input type="checkbox"/> 10,000+	
6	How is the personal data obtained?	<input type="checkbox"/> From Client/Service User <input type="checkbox"/> From partner agencies <input type="checkbox"/> From 3 rd Party/ Another Individuals <input type="checkbox"/> For employment purposes <input checked="" type="checkbox"/> Internal services <input type="checkbox"/> Other	
7	Have the individuals been informed of this processing?	<input type="checkbox"/> Yes (explicit) <input type="checkbox"/> Yes (implicit i.e. through Privacy notice, website, leaflet etc) <input checked="" type="checkbox"/> No	If no please record as a risk in section C
8	Does the information involve new linkage / matching of personal data with data in other collections, or is there significant changes in data linkages / matching?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes please record as a risk in section C
9	Does this project involve utilising data for the purposes of automated decision making/profiling. If so add details (please see guidance section on processing)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Records Management			
10	Does this project create a new Information Asset?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

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<p>10a</p>	<p>How will the information be kept up to date and checked for accuracy and completeness?</p>	<p>A user can inform the Pcard Team of a change to their information i.e. change of name, phone number etc. Change requests would typically be received by email to the Pcard Team shared mailbox. Details would then be updated against an individuals' account by email or phone call to the contractor bank customer service team.</p> <p>Changes in employment status is picked up on a monthly leavers SAP report which results in the Pcard Team contacting the contractor bank customer service team to arrange for the Pcard to be closed. The Pcard team then close the users system profile to revoke access rights.</p>	<p>If there are no documented procedures to evidence this answer, please record as a risk in section c</p>
<p>10b</p>	<p>What processes are in place for data quality checking?</p>	<p>Data collected is from user Insite profile so accuracy responsibility is that of the individual.</p> <p>All applications are reviewed and approved before processing firstly by a nominated spend approver and secondly by the budget holder.</p> <p>Monthly leavers report highlights staff that have left LCC employment and who's card and/or user access should be closed.</p>	
<p>11</p>	<p>If this project involves a new system, does it have the ability to quarantine information/restrict processing? (See guidance for details)</p>	<p>The existing back office system has the ability to close a user profile and restrict use of that profile (lock out). Any new contractor would be expected to have the same functionality</p>	<p>Please see guidance</p>

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		as a minimum when next contract is awarded.	
11a	Does the system have the ability to amend or add notes to data/information at a single data field level?	No.	Please see guidance
12	What checks have been made regarding the adequacy, relevance and necessity for the collection of data?	In order to set up a Pcard account and issue a Pcard or set up a user profile and provide necessary access rights the listed fields are required as a minimum.	If no checks have been made please record this as a risk in section C
13	Where will the information be stored / accessed? (please see guidance section on Record Management for further information about cloud storage)	<input checked="" type="checkbox"/> LCC System/ Application <input type="checkbox"/> Sharepoint <input checked="" type="checkbox"/> LCC email system <input type="checkbox"/> Paper filing system <input type="checkbox"/> LCC File-Shares (e.g Network Drives) <input type="checkbox"/> Removable media <input checked="" type="checkbox"/> External to LCC (cloud, web hosted) <input type="checkbox"/> other	
14	What are the retention periods?	Financial retention is six years plus current	If there are no documented retention periods please record as a risk in section C
15	How will the information be destroyed when it is no longer required?	Current arrangement has not been in operation for 6 years as yet and this does need to be considered further.	
15a	If held electronically, can the destruction be certified?	No	
15b	Can the information be deleted at a singular data field level?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Please see guidance

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Security			
16	Who will access the information? (i.e. Services, roles, organisations)	Purchasing card team. Contractor bank.	
17	Is there an Access Control Policy in place? (Please see guidance section on Security for further information)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
18	Is there an ability to audit access to the information? (Please see guidance section on Security for further information)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If no please record as a risk in section C .
19	Detail what security measures have been implemented to secure access and limit the use of personal information?	Password protected and only administrator user profiles enable access to this data and are only issued to Pcard team members. Access to the Insite form repository is restricted to Pcard team members only.	
20	Does this project involve privacy invasive technologies? (Please see the guidance)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes please detail	
21	Is there a business continuity and a disaster recovery plan in place?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If no please record as a risk in section C
22	Where external parties are accessing LCC information has it been identified that they require IG training?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Sharing			
23	Will any of the information be shared with other organisations or LCC services?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes please record as a risk in section C
23a	Please list all organisations/LCC services involved with sharing	On request from LCC services. Typical information requests include details of Pcard holders in a service area/team.	
23b	What is the legal basis for sharing?	The information is only shared with the LCC Officers with an	Please note that your legal basis for processing may be different from your legal

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		<p>involvement/managerial role in the process i.e. a request for the details of Pcard holders in a service area from the HoS of that area.</p> <p>The sharing with the supplier is via a contractual arrangement.</p>	<p>basis for Sharing. Please refer to guidance</p>
24	Will there be signed information sharing agreements in place	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>If no please record as a risk in section C</p>
25	Which method will be used to transport information if it is going off site?	<input checked="" type="checkbox"/> Standard email <input type="checkbox"/> Secure email (e.g. GCSx) <input checked="" type="checkbox"/> Website <input type="checkbox"/> Via courier <input type="checkbox"/> By hand <input type="checkbox"/> Via external post <input checked="" type="checkbox"/> Via telephone <input type="checkbox"/> Removable Media <input checked="" type="checkbox"/> Secure file transfer protocol (eg. mail express) <input type="checkbox"/> Other file transferring applications (dropbox) <input type="checkbox"/> Social Media <input type="checkbox"/> Providing access via LCC systems <input type="checkbox"/> Other (please give details)	<p>If no please record as a risk in section C</p>
26	Are you transferring any personal identifiable data/information to a country outside the United Kingdom	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>If yes please record as a risk in section C</p>

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Section C: Identify the Information, Privacy and related risks

Identify the key risks. All risks identified from the questionnaire in section B should be included, plus any others of relevance. Describe the actions you could take to reduce the risks and any future steps which would be necessary (e.g. the production of new procedures or future security elements for systems).

Please note if your project has a large number of risks there is an alternative spreadsheet you can use, (please ask your IG officer) or simply continue onto a separate sheet.

Risk	Solution	Result: is the risk eliminated, reduced, or accepted?	Evaluation: is the final impact on individuals after implementing each solution justified, compliant and proportionate response to the aims of the project?
7. Individuals have not been informed of the processing of data to enable card application or back office system set up	The minimum information necessary is requested from the prospective cardholder and system user in order to set up a card account and issue a card or set up a user profile for use with the back office system. Need to amend guidance/ information given to prospective applicant to make this clear.		
18. No ability to audit access to the information within the back office system.	Access to user information in the system and on card applications is restricted to Pcard team staff only. An audit history of changes exists and can be checked however no audit history of a member of the Pcard team accessing the information is available unless the accessing results in a change/update being made.	Accepted	
23. Information will be shared with other organisations or LCC services.	There is a need to share key pieces of information with the Pcard contracted provider to enable the issue of Pcards and user access rights to the back office system.	Accepted	
24. No signed information sharing agreements in place.	Application for a card is instigated by prospective cardholder who provides required information. At the end of the process and email is sent to the individual to	Eliminated	

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	confirm that their application has been sent to the contracted bank for processing and for a card to be issued. Need to highlight the requirement to share the data with the Pcard supplier bank to make this explicit by making the application they are agreeing to this.		