

Data Protection Impact Assessment

DPIA Name:

Ref No:

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
0.1	First Draft	12 April 2024	First Draft	Kirsty Aldersey

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)	Cavity & Loft Insulation Improvements to Properties Throughout Leeds Area.											
Background/ Objectives: (why is the new system / change required?)	<p>As part of the council’s activity to tackle the climate emergency, and address fuel poverty, works are planned to carry out insulation improvements to various properties throughout the Leeds area.</p> <p>The works will involve surveying of insulation, lofts and cavities. Updating Energy Performance Certificates and installing loft & cavity insulation.</p>											
Information flow diagram* (please see examples in guidance) see section on data mapping	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 33%;">Strategy & Investment Team</th> <th style="width: 33%;">Contractor (ENGIE)</th> <th style="width: 33%;">Resident / Leaseholder</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;"> <div style="border: 1px solid gray; border-radius: 50%; padding: 10px; display: inline-block;"> Personal data (UDCs) collected from Orchard/ CIVICA CX </div> </td> <td style="text-align: center;"> <div style="border: 1px solid gray; padding: 5px; display: inline-block;"> Resident data provided to contractor to fulfil contractual requirements </div> </td> <td style="text-align: center;"> <div style="border: 1px solid gray; padding: 5px; display: inline-block;"> Residents receive communication/ details about work in area/on their property. </div> </td> </tr> <tr> <td style="text-align: center;"> <div style="border: 1px solid gray; padding: 5px; display: inline-block;"> Strategy & Investment team receive information that resident has had property works completed and updates Orchard/CIVICA CX accordingly </div> </td> <td style="text-align: center;"> <div style="border: 1px solid gray; padding: 5px; display: inline-block;"> Contractor records that work has been done on resident’s property </div> </td> <td style="text-align: center;"> <div style="border: 1px solid gray; padding: 5px; display: inline-block;"> Resident has retrofits/ improvements carried out on property </div> </td> </tr> </tbody> </table>			Strategy & Investment Team	Contractor (ENGIE)	Resident / Leaseholder	<div style="border: 1px solid gray; border-radius: 50%; padding: 10px; display: inline-block;"> Personal data (UDCs) collected from Orchard/ CIVICA CX </div>	<div style="border: 1px solid gray; padding: 5px; display: inline-block;"> Resident data provided to contractor to fulfil contractual requirements </div>	<div style="border: 1px solid gray; padding: 5px; display: inline-block;"> Residents receive communication/ details about work in area/on their property. </div>	<div style="border: 1px solid gray; padding: 5px; display: inline-block;"> Strategy & Investment team receive information that resident has had property works completed and updates Orchard/CIVICA CX accordingly </div>	<div style="border: 1px solid gray; padding: 5px; display: inline-block;"> Contractor records that work has been done on resident’s property </div>	<div style="border: 1px solid gray; padding: 5px; display: inline-block;"> Resident has retrofits/ improvements carried out on property </div>
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<p>All data will be sent to the contractor via secure email from an LCC account to a named account/s from the contractor. Info received back</p>												

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	from the Contractor will be stored on Civica CX and will be linked to property, not resident.	
State who is the Data Controller* see glossary	Michael Field, Capital Programme Manager (Communities, Housing and Environment)	
Benefits: (explain what the project aims to achieve, what benefits to the organisation, to individuals and to other parties)	This scheme will benefit residents by reducing fuel costs and help with the citywide reduction of carbon, greater levels of health and wellbeing will also be achieved through the reduction of condensation levels.	
Consultation: (If required detail here any consultation undertaken with the public, partners, internal or external stakeholders)	<p>Consultation has been carried out by Strategy & Investment’s Asset Management Team to identify properties that have a EPC rating of below C to find properties that require this work.</p> <p>Statutory teams, including the Asbestos teams will be consulted prior to commencement of the planned works.</p>	
Implementation date: for example the timescales required for completion, implementation date	The works are planned to run on site from September 2024 to September 2025.	
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>Internal stakeholders</p> <ul style="list-style-type: none"> - Director of Communities, Housing & Environment - Chief Officer – Housing - Head of Strategy & Investment - Strategy & Investment team - Executive Member (Cllr Debra Coupar for Communities) - Ward Members - Housing Leeds staff - Finance – Housing - Planning Department - Procurement and Commercial Services - Highways Department - Asbestos Department <p>External stakeholders</p> <ul style="list-style-type: none"> - Tenants of the hosues - Construction contractor - Media / Local Press - European Development Fund (ERDF) 	
Project Manager:	Name:	Kirsty Aldersey
	Job Title:	Capital Programme Project Manager
	Service:	Communities, Housing & Environment
	Telephone:	07891274862

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	Email:	kirsty.lindley@leeds.gov.uk
Information Asset Owner(s) All information assets must have an information asset owner (IAO). IAO are usually Heads of Service or Chief Officers.	Name:	Adam Crampton
	Job Title:	Head of Property Management
	Service:	Communities, Housing & Environment
	Telephone:	01135351218
	Email:	adam.crampton@leeds.gov.uk
System Administrator (if applicable)	Name:	Kirsty Aldersey
	Job Title:	Capital Programme Project Manager
	Service:	Communities, Housing & Environment
	Telephone:	07891274862
	Email:	kirsty.lindley@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)	Data will be processed within this project for the purpose of Service Provision; supplying whole home efficiency improvements to the Boggart Hill area of Seacroft.	
2	Please tick the data items/ information that will be processed	<input checked="" type="checkbox"/> Name <input checked="" type="checkbox"/> Address/Postcode <input 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 checked="" type="checkbox"/> Physical health <input checked="" type="checkbox"/> Mental health <input type="checkbox"/> Medical history <input type="checkbox"/> Ethnic Origin <input type="checkbox"/> Sexual life <input type="checkbox"/> Criminal convictions Special category data will be shared with contractor for the purposes ensuring H&S of resident	
2c	Other (please specify)	Spoken Language	

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<p>3a</p>	<p>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)</p>	<p>The council is relying on the following conditions under GDPR to process the data. Article 6(1)(e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of office authoring vested in the controller. The underlying legislation that the council is relying on is set out in the Housing Act 2004.</p> <p>The processing of data in relation to the monitoring of energy use, the council is relying on Article 6(1)(a) and Article 6(1)(b) consent.</p> <p>Article 9.2(g): processing is necessary for reasons of substantial public interest;</p> <p>The processing of special category data under Article 9 also requires the following conditions for processing from the UK Data Protection Act 2018 to be met:</p> <p>The aims and objectives of this project are deemed within the public interest and the tasks outlined in the project plan have a clear basis in law as below.</p>	
<p>3b</p>	<p>If you are relying only on consent, did you consider any other legal basis?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No N/A</p>	
<p>3c</p>	<p>If using consent, how will that consent be obtained and recorded and withdrawn if requested? (please state)</p>	<p>The installations work are not optional and fall under the terms of the tenancy</p>	

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		agreement, allowing the council to make improvements to its properties.	
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 checked="" 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 checked="" type="checkbox"/> Other	
7	Have the individuals been informed of this processing?	<input type="checkbox"/> Yes (explicit) <input checked="" type="checkbox"/> Yes (implicit i.e. through Privacy notice, website, leaflet etc) <input type="checkbox"/> No <p>Communications are planned throughout the programme to provide information, advice and guidance to all project stakeholders; where data is processed.</p> <p>A privacy notice has been issued with the tenancy agreement detailing that information may be used for strategy and investment planning. The privacy policy is also located on the website below www.leeds.gov.uk/privacy confirming that data will be processed in conjunction with</p>	If no please record as a risk in section C

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		DPA and GDPR guidelines, including informing of all individuals of their rights.	
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	
10a	How will the information be kept up to date and checked for accuracy and completeness?	<p>A member of the Strategy & investment team will be tasked with ensuring and all data held is kept up-to-date and checked for accuracy and completeness in line with Data Protection and GDPR guidelines. This will be done through spot checks and where feedback has been given that the data is not up to date or accurate, this will be corrected immediately by the Strategy & Investment team.</p> <p>Any data collected and processed from the appointed contractor will be kept up-to-date in line with contractual agreements which will be based upon the NEC4 ECC Option A contract.</p>	If there are no documented procedures to evidence this answer, please record as a risk in section c

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10b	What processes are in place for data quality checking?	<p>Data quality checking will be conducted on collected and processed data by the appointed contractor, in line with contractual requirements of an NEC4 Engineering & Construction Short Contract.</p> <p>The Strategy & Investment team will have discretion to raise queries over any data supplied, these queries will be resolved by the construction contractor in line with contractually agreed terms commensurate with Data Protection and GDPR guidelines as outlined within an NEC4 Engineering & Construction Short Contract.</p> <p>The council will add the new information asset to the current information asset register.</p>	
11	If this project involves a new system, does it have the ability to quarantine information/restrict processing? (See guidance for details)		
11a	Does the system have the ability to amend or add notes to data/information at a single data field level?	Civica CX has the capability though to amend/add notes in at a single data field level.	Please see guidance
12	What checks have been made regarding the adequacy, relevance and necessity for the collection of data?	The project team have reviewed all the proposed data to be collected, all data scoped is necessary to fulfil the proposed service, provide and maintain the necessary levels of heat energy and comfort levels to the Boggart Hill Area of Seacroft, Leeds.	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	<input checked="" type="checkbox"/> LCC System/ Application-CIVICA CX	

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	guidance section on Record Management for further information about cloud storage)	<input type="checkbox"/> Sharepoint <input 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 type="checkbox"/> External to LCC (cloud, web hosted) <input type="checkbox"/> other	
14	What are the retention periods?	<p>Retention period for construction contractor will be limited to 3-4 weeks following completion of the construction period.</p> <p>This will also be added to the risk log.</p>	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?	<p>The project seeks to keep anonymised data and to remove identifiable personal data on the termination of tenancy, in line with LCC's retention internal policies and procedures.</p> <p>We will also be ensuring that the contractor does not hold information once it has been sent over to LCC through adding details about retention periods and the need for contractors to delete tenants data following completion of the works.</p>	
15a	If held electronically, can the destruction be certified?	Electronic certification of data destruction will be obtained as agreed with contractors in line with NEC4 ECC Option A contract. Where there are no terms relevant to this project, new ones will be added.	

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		This requirement will also be added to the project's Risk Log which will ensure that discussions at the point where the data management technology is defined will include requirements under the data protection act and GDPR guidelines.	
15b	Can the information be deleted at a singular data field level?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Civica Cx has this functionality.	Please see guidance
Security			
16	Who will access the information? (i.e. Services, roles, organisations)	<ul style="list-style-type: none"> • Strategy & Investment – LCC • Housing Management - LCC • Property Management - LCC • 3rd party principal contractor staff. • Named Subcontractors (Names being confirmed with the Principal Contractor). 	
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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No Contractor will be expected to be able to provide evidence of appropriate technical and organisational measures.	If no please record as a risk in section C .

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		Civica CX also provide this functionality.	
19	Detail what security measures have been implemented to secure access and limit the use of personal information?	<p>Contractual obligations within the NEC4 Engineering & Construction Short Contract.</p> <p>Within the contract with the contractor it will name specific individuals (contract lead's) who will receive this information/data. Access to this data will be limited to these named individuals and data will never be sent to a shared mailbox.</p> <p>Personal data will also only be transferred from a secure LCC outlook account and the winning bidder will be required to undertake LCC data protection training as part of the contractual requirements.</p> <p>Other internal governance procedures will be followed in order to ensure that GDPR legislation is followed.</p>	
20	Does this project involve privacy invasive technologies? (Please see the guidance)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
21	Is there a business continuity and a disaster recovery plan in place?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <ul style="list-style-type: none"> - Civica systems are providing this functionality. - Contractor will be expected to be able to provide evidence of appropriate technical and organisational measures as 	If no please record as a risk in section C

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		part of their tender submission.	
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 Any data stored by external parties will be contractually held to carry out and evidence Information Governance training requirements.	
Sharing			
23	Will any of the information be shared with other organisations or LCC services?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The information will be shared with sub-contractors. As part of the NEC4 Engineering & Construction Short Contract documentation are required to inform LCC of sub-contractors to allow due diligence checks to be carried out. Named sub-contractors are then bound by the same contractual terms as the terms of data protection and information governance.	If yes please record as a risk in section C
23a	Please list all organisations/LCC services involved with sharing	- TBC	
23b	What is the legal basis for sharing?	Contractor – statutory functions as a landlord	Please note that your legal basis for processing may be different from your legal basis for Sharing. Please refer to guidance
24	Will there be signed information sharing agreements in place	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No - Sharing agreements will be in place with the contractor and the contractual documentation requires the contractor to follow LCC data protection	If no please record as a risk in section C

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		requirements with any of its subcontractors to ensure LCC tenant data is protected with any subcontractors.	
25	Which method will be used to transport information if it is going off site?	<input type="checkbox"/> Standard email <input checked="" type="checkbox"/> Secure email <input type="checkbox"/> Website <input type="checkbox"/> Via courier <input type="checkbox"/> By hand <input type="checkbox"/> Via external post <input type="checkbox"/> Via telephone <input type="checkbox"/> Removable Media <input 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)	If no please record as a risk in section C
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	If yes please record as a risk in section C

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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?
Residents may be unaware of planned works on their housing estate.	To consult with residents and make them aware of the planned works. Form a communication plan and regularly update with support from the Project Manager.	Reduced	Jusified
Risk of retention.	Data retention periods will be agreed in line with Data Protection and GDPR guidelines, as well as Leeds City Council's internal policies and procedures and the Housing Act 2004.	Elminated	Compliant
Tenant does not consent to photos of property	Images will not be captured	Eliminated	Compliant