

Data Protection Impact Assessment

DPIA Name:

Source to Contract Business Case

Ref No:

DPIA-01020

IM&G Officer:

Saleem Aziz

Stage 1: DPIA Screening

	Question	Response
1	Author	Louis Price
2	Lead Service	Procurement and Commercial Services
3	Lead Directorate	Strategy and Resources
4	Information Asset Owner	Kieron Dennett
5	Contract Reference Number	NA
6	Work Request Number	-
7	Please provide a summary of what you are aiming to achieve (RQ1)	We have recently received initial approvals for a Source to Contract business case. One element of the business case is a new 'Source to Contract' system to replace our current procurement system. The system is used to advertise tenders to suppliers, allow them to bid, award contracts, etc. The system would be accessed by LCC staff and by staff of suppliers who register on the system. It will be a SaaS platform.
8	Does this DPIA relate to any of the following? (RQ2)	A new application

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Data Protection Impact Assessment

DPIA Name:

Source to Contract Business Case

Ref No:

DPIA-01020

IM&G Officer:

Saleem Aziz

9	Please provide the intended go live date (RQ3)	29/05/2024
10	Do you need to use personal or special category data (RQ4)	Unknown
11	Why do you need to use personal or special category data (RQ4a)	-
12	Could the aim be achieved using anonymised data (RQ5)	Unknown
13	Please indicate the types of personal data that are likely to be processed (RQ6)	Name(s)
14	Explain which Other types of Personal Data (RQ6a)	-
15	Please indicate the types of special category data that are likely to be processed (RQ7)	None/Not Applicable
16	Explain which Other types of Special Data (RQ7a)	-
17	Does the processing involve the data of vulnerable adults and/or children? (RQ8)	None of the above
18	Approximately how many individuals' personal data will be processed (RQ9)	100 to 999
19	Are you transferring or hosting any data outside of the United Kingdom? (RQ10)	No

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Data Protection Impact Assessment

DPIA Name:

Source to Contract Business Case

Ref No:

DPIA-01020

IM&G Officer:

Saleem Aziz

20	Will you be sharing information with another organisation(s) (RQ11)	Yes
21	Please provide details of the organisation(s) who LCC will be sharing information with (RQ11a)	Unknown at this point but the system will contain LCC employee names. This will be visible to the supplier hosting the system. LCC staff names will also be displayed for contact purposes for suppliers (eg: LCC procurement officers for suppliers to contact if they have a query. It's not clear to me if this constitutes personal data
22	Will you be using a contractor(s) to process any of the personal information (RQ12)	Yes
23	As you have selected 'Yes', please enter contractor details (RQ12a)	Unknow as this is at business case stage. If fully approved the successful supplier will have access to the names of LCC staff registered as users on the new system, and potentially email addresses / phone numbers
24	Is there an existing contract in place (RQ12b)	Yes
25	Will the project/process use a new or existing IT Application/System (RQ13)	New
26	Which IT Application/System (RQ13a)	Unknown - it will be a replacement for YORtender

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Data Protection Impact Assessment

DPIA Name:

Source to Contract Business Case

Ref No:

DPIA-01020

IM&G Officer:

Saleem Aziz

27	Are any of these IT Application/ systems hosted on servers outside of the United Kingdom (RQ13b)	Unknown
28	Are you planning to do any of the following (RQ14)	Unknown / Don't know at this stage

Data Protection Impact Assessment

DPIA Name:

Source to Contract Business Case

Ref No:

DPIA-01020

IM&G Officer:

Saleem Aziz

Stage 2: Data Protection Impact Assessment

Section A: Project Details

Question	Response
Summary of what project is aiming to achieve. (PD1)	We have recently received initial approvals for a Source to Contract business case. One element of the business case is a new 'Source to Contract' system to replace our current procurement system. The system is used to advertise tenders to suppliers, allow them to bid, award contracts, etc. The system would be accessed by LCC staff and by staff of suppliers who register on the system. It will be a SaaS platform.
If you wish to provide any additional information, please do so below. (PD1a)	-
Who is the Data Controller? (PD2)	Leeds City Council
Provide details of any consultation undertaken? (PD3)	-
Is there a data processor? (PD4)	Yes
Data Processor Details (PD4a)	Unknow as this is at business case stage. If fully approved the successful supplier will have access to the names of LCC staff registered as users on the new system, and potentially email addresses / phone numbers

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Data Protection Impact Assessment

DPIA Name:

Source to Contract Business Case

Ref No:

DPIA-01020

IM&G Officer:

Saleem Aziz

Please provide the intended go-live date (PD5)	29/05/2024
Does the processing involve the data of vulnerable adults and/ or children? (PD6)	None of the above
Approximately how many individuals' personal data will be processed? (PD7)	100 to 999
Will the project/ process use a new or existing IT Application/ System? (PD8)	New
Which IT Application/ System? (PD8a)	Unknown - it will be a replacement for YORtender
Is data moving outside of the UK? (PD9)	No
What types of personal data is being processed? (PD10)	Name(s)
'Other' please explain below (PD10a)	-
What is the legal basis you are relying on for the processing of personal data? (PD11)	Contractual Obligation

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Data Protection Impact Assessment

DPIA Name:

Source to Contract Business Case

Ref No:

DPIA-01020

IM&G Officer:

Saleem Aziz

How will consent be obtained and recorded? (PD11a)	-
How will customers be able to withdraw Consent? (PD11b)	-
How will a customer's data be deleted if required? (PD11c)	-
As you have selected Contract with customer, please give details (PD11d)	-
As you have selected Legal Obligation, which legislation are you relying on? (PD11e)	-
As you have selected Legitimate Interest, please give details (PD11f)	-
As you have selected Vital Interest, please give details (PD11g)	-
As you have selected Public Task, which legislation are you relying on? (PD11h)	-

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Data Protection Impact Assessment

DPIA Name:

Source to Contract Business Case

Ref No:

DPIA-01020

IM&G Officer:

Saleem Aziz

What types of Special Category Data is being processed? (PD12)	None/Not Applicable
'Other' please explain below (PD12a)	-
Details of lawful basis (IM&G only)	-
Should individuals be informed of processing? (PD13)	Yes
Please select how individuals are being informed (PD13a)	Other
Further details of notification method. (PD13b)	Via log in details
Are you planning to do any of the following? (PD14)	Unknown / Don't know at this stage
Will personal data be used for any other purposes? (PD15)	No
Please explain what other purposes (PD15a)	-
Can any of the aims be achieved by using less data or different types of data. For	Unknown

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Data Protection Impact Assessment

DPIA Name:

Source to Contract Business Case

Ref No:

DPIA-01020

IM&G Officer:

Saleem Aziz

example; anonymised or pseudonymised data (PD16)	
As you have selected 'No', please provide details (PD16a)	-
What processes are in place to ensure that the personal data obtained is accurate? (PD17)	-
How will information be kept up to date and checked for completeness? (PD18)	-

Data Protection Impact Assessment

DPIA Name:

Source to Contract Business Case

Ref No:

DPIA-01020

IM&G Officer:

Saleem Aziz

Section B: Records Management

Question	Response
Does the project relate to an existing Information Asset listed on the Information Asset Register? (RM1)	No
Name of asset (RM1a)	-
Asset Id (RM1b)	-
Where will the information be accessed/stored (RM2)	Externally Hosted Third Party Application; Externally Hosted Cloud Hosted Application
Which drive is the information stored on/accessed? (RM2a)	-
Does this have payroll number limited access? (RM2b)	-
What is the LCC System or Application Name? (RM2c)	-
What is the Application Name and Company Name? (External Third Party) (RM2d)	This is not yet known as a procurement exercise needs to be conducted to select a supplier. This DPIA will be attached to the Key Decision that will be submitted with the business case

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Data Protection Impact Assessment

DPIA Name:

Source to Contract Business Case

Ref No:

DPIA-01020

IM&G Officer:

Saleem Aziz

What is the Application Name and Company Name? (External Cloud) (RM2e)	This is not yet known as a procurement exercise needs to be conducted to select a supplier. This DPIA will be attached to the Key Decision that will be submitted with the business case
Confirm who the SharePoint Site Owner and Administrator will be and how access to the site will be controlled (RM2f)	-
How will business critical data be stored outside of Outlook? (RM2g)	-
Have you considered if the records could be stored electronically, or if there is a long term solution to digitise these records? (RM2h)	-
If 'Yes', please give details (RM2h.1)	-
If 'No', please explain why paper records are the only viable option (RM2h.2)	-
Please list which devices are being used (RM2i)	-
How will you ensure that the paper records are stored securely to avoid unauthorised access to the information? (RM2j)	-

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Data Protection Impact Assessment

DPIA Name:

Source to Contract Business Case

Ref No:

DPIA-01020

IM&G Officer:

Saleem Aziz

Other: Please give details (RM2k)	-
Is this currently on the corporate retention schedule? (RM3)	Yes
How long does the data need to be kept for? (RM3a)	The system we intend to procure will store procurement and contract documents will are on the retention schedule. The retention periods vary based on the type of contract or document but it is most typically 6 years or 12 years.
Is there an audit log for when information is deleted/destroyed? (RM4)	No
Details of audit log (RM4a)	-
Do different record types exist that have different retention periods within this dataset? (RM5)	Yes
How will the information be deleted/destroyed when it is no longer required? (RM6)	Current system records are deleted (along with any attachments) when they reach they reach the end of their retention period. This is managed through reporting (such as utilisation of the Procurement Calendar) so while there isn't an audit log as such their is a process, some of it 'in-system'
Is there a need for individual records to be excluded from any normal retention rules for any reason? E.g	Yes

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Data Protection Impact Assessment

DPIA Name:

Source to Contract Business Case

Ref No:

DPIA-01020

IM&G Officer:

Saleem Aziz

ongoing legal dispute or Independent enquiry request? (RM7)	
Details of Retention Exclusion. (RM7a)	This could be possible, procurements and contracts can be subject to legal challenge. There are no current cases I am aware of where records have been excluded from retention rules
Are there large variations between the retention periods for records, where there is a risk that retention rules needed for a small number of records may be excessively applied to all records? (RM8)	Yes
Details of Retention Period variations. (RM8a)	Retention periods do vary, as noted some may be 6 years and some may be 12 years. These contracts are very distinct and it is highly unlikely that such rules may be excessively applied (and a new system which actually lessens risks around retention periods as it will have better functionality to manage records)

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Data Protection Impact Assessment

DPIA Name:

Source to Contract Business Case

Ref No:

DPIA-01020

IM&G Officer:

Saleem Aziz

Section C: Internal Sharing

Question	Response
Will you be sharing any of the information with another LCC department/service? (IS1)	Yes
As you have select 'Yes', please list LCC Department/Service names (IS1a)	It could apply to practically any service
Will any special category data be shared? (IS1b)	No
What information will be shared? (IS1c)	Note - the information would only be the names / emails of LCC members of staff (ie - the names of contract managers responsible for particular contracts). Information will be shared as reporting on contracts and procurement is a PACS responsibility. The names of these individuals will be shared with their own and potentially other departments, depending on need
Will there be an agreement in place that sets out the requirements and expectations when sharing data? (IS1d)	No
What is the legal basis for this sharing? (IS2)	Not sure

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Data Protection Impact Assessment

DPIA Name:

Source to Contract Business Case

Ref No:

DPIA-01020

IM&G Officer:

Saleem Aziz

How will Consent be obtained and recorded? (IS2a)	-
How will customers be able to withdraw consent? (IS2b)	-
How will a customer's data be deleted if required? (IS2c)	-
As you have selected Contract with customer, please give details (IS2d)	-
As you have selected Legal Obligation, which legislation are you relying on? (IS2e)	-
As you have selected Vital Interest, please give details (IS2f)	-
As you have selected Legitimate Interest, please give details (IS2g)	-
As you have selected Public Task, which legislation are you relying on? (IS2h)	-

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Data Protection Impact Assessment

DPIA Name:

Source to Contract Business Case

Ref No:

DPIA-01020

IM&G Officer:

Saleem Aziz

Which method will be used to transmit/transport the information? (IS3)	Digitally - Email; Other
As you selected 'Other' please explain below (IS3a)	Via Source to Contract System, potentially PowerBI dashboards

Data Protection Impact Assessment

DPIA Name:

Source to Contract Business Case

Ref No:

DPIA-01020

IM&G Officer:

Saleem Aziz

Section D: External Sharing

Question	Response
Will you be sharing any of the information with any external organisations? (ES1)	Yes
As you have selected 'Yes', please list the organisation names: (ES1a)	Whichever organisation is successfully awarded the contract following the procurement process. This will be a supplier of procurement / contract management SaaS platforms
Will any special category data be shared? (ES1b)	No
What information will be shared? (ES1c)	The names and email addresses of LCC staff who need to register on the system in order to use it
Will there be an agreement in place that sets out the requirements and expectations when sharing data? (ES1d)	Yes - In a contract
What is the legal basis for this sharing? (ES2)	Not sure
How will Consent be obtained and recorded? (ES2a)	-
How will customers be able to withdraw consent? (ES2b)	-

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Data Protection Impact Assessment

DPIA Name:

Source to Contract Business Case

Ref No:

DPIA-01020

IM&G Officer:

Saleem Aziz

How will a customer's data be deleted if required? (ES2c)	-
As you have selected Contract with customer, please give details (ES2d)	-
As you have selected Legal Obligation, which legislation are you relying on? (ES2e)	-
As you have selected Vital Interest, please give details (ES2f)	-
As you have selected Legitimate Interest, please give details (ES2g)	-
As you have selected Public Task, which legislation are you relying on? (ES2h)	-
Which method will be used to transmit/transport the information? (ES3)	Other
As you selected 'Other' please explain below (ES3a)	Unknown at present. It is most likely that users will register themselves on the system with a username / password combination

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Data Protection Impact Assessment

DPIA Name:

Source to Contract Business Case

Ref No:

DPIA-01020

IM&G Officer:

Saleem Aziz

Section E: International Transfers

Question	Response
Are you sharing personal data outside of the UK? (IT1)	No
Who are you sharing information with? (IT1a)	-
What country is the organisation in? (IT1b)	-
Why is the sharing necessary? (IT1c)	-

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Data Protection Impact Assessment

DPIA Name:

Source to Contract Business Case

Ref No:

DPIA-01020

IM&G Officer:

Saleem Aziz

Section F: International Transfers (IM&G)

Question

Response

“Information is everyone’s business and responsibility.”

Data Protection Impact Assessment

DPIA Name:

Source to Contract Business Case

Ref No:

DPIA-01020

IM&G Officer:

Saleem Aziz

Section G: Profiling and Automated Decisions

Question	Response
Does the Project involve Automated Decision Making or Profiling (AD1)	No
Please give details on what the automated decision making or profiling relates to (AD1a)	-

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Data Protection Impact Assessment

DPIA Name:

Source to Contract Business Case

Ref No:

DPIA-01020

IM&G Officer:

Saleem Aziz

Section H: Criminal Data

Question	Response
Are you processing Criminal Data? (CD1)	No
What types of criminal data are you processing? (CD2)	-
Are you processing criminal/offence data as a prosecuting authority in your official capacity? (CD3)	-
Can individuals be easily identified as e.g., suspects, convicted offenders, victims, witnesses? (CD4)	-
Is information based on fact made easily discernible from information based on personal assessment (e.g., can information be categorised as 'intelligence')? (CD5)	-
Is the following recorded: <ul style="list-style-type: none">• Collection, alteration, disclosure, consultation & erasure of records• The time and date of consultation and/or disclosure of the record• Who conducted the processing and why? (CD6)	-

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Data Protection Impact Assessment

DPIA Name:

Source to Contract Business Case

Ref No:

DPIA-01020

IM&G Officer:

Saleem Aziz

Section I: Marketing

Question	Response
Will you be using any data for marketing purposes? (MA1)	No
What are you intending to market to customers? (MA1a)	-
What is the format of the marketing? (MA1b)	-
Details of 'Other' marketing format (MA1b.1)	-
How will the customers agree to receive this marketing? (MA2)	-
As you have selected 'Other', please give details (MA2a)	-
How will customers be able to opt-out of future marketing? (MA3)	-
How will customers be withdrawn from marketing should they choose to opt-out? (MA4)	-
Please explain how this will work and when users will be unsubscribed (MA4a)	-
Who will be responsible for the maintenance of the marketing mail list? (MA5)	-
Where will details of customers marketing preferences be stored? (MA6)	-
Details of 'Marketing' application (MA6a)	-

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Data Protection Impact Assessment

DPIA Name:

Source to Contract Business Case

Ref No:

DPIA-01020

IM&G Officer:

Saleem Aziz

Details of 'Non marketing' application (MA6b)	-
Details of 'Other' storage option (MA6c)	-
Details of 'Council' application (MA7a)	-

Data Protection Impact Assessment

DPIA Name:

Source to Contract Business Case

Ref No:

DPIA-01020

IM&G Officer:

Saleem Aziz

Section J: Apps Processing

Question	Response
Is there a need for warnings and notes to be prominently displayed when processing an individual's records, based on an assessment of likely risks if not displayed? (AP1)	No
Is there a process in place for the review of warning notes or markers? (AP1a)	-
Will the UK GDPR right to portability apply? (AP2)	No
Please identify which system has responsibility for maintaining the master record for the individuals data (AP3)	This system holds the master record for the individuals data and there is no integration with other systems for changes to individuals data
Where personal data is integrated with personal data in other collections, identify the mechanisms for how data is to be maintained accurately across integrated systems (AP3a)	-
Is processing of individuals personal data a primary function of the system? (AP4)	No

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Data Protection Impact Assessment

DPIA Name:

Source to Contract Business Case

Ref No:

DPIA-01020

IM&G Officer:

Saleem Aziz

Is there a likelihood that a right to restrict processing will be exercised and agreed? Or any other circumstances where processing needs to be restricted? (AP5)	No
Details of processing needing to be restricted. (AP5a)	-
Where the right to restrict processing is likely to be exercised, is it essential that the system restricts access to, and the processing of those records? (AP5b)	-
Details of why system restricts access to records. (AP5b.1)	-
If there is a need for an individual's records to be shielded to prevent access to that record, please select why (AP6)	Other
Details of 'Other' shielding reason (AP6a)	There will need to be in-system shielding of some degree as procurements and contracts often contain sensitive data that should be restricted to relevant individuals. This is usually managed by internal system protocols (as in our current system) and will be a specified requirement when we go out to procure a new system

Data Protection Impact Assessment

DPIA Name:

Source to Contract Business Case

Ref No:

DPIA-01020

IM&G Officer:

Saleem Aziz

Section K: Specific Functionality

Question	Response
Please list the types of users that will be accessing the system and an outline of the data they will need to access for their role. (SF1)	This is not currently fully scoped but in high level terms the user types will be: PACS Users: Will include system administrators and staff with more advanced access as PACS staff manage multiple procurements Contract managers: service based contract managers who will need system access to manage contracts, access documents and communicate with suppliers. They would only have access to records for those contracts that are their responsibility. Procurers and Commissioners: services based individuals who need to access the system to undertake procurement or commissioning activity on behalf of their service. They would only have access to specific records related to their service (or under their direct responsibility)
Does the system contain many records where it would not be practicable for records to be deleted manually or on an individual basis due to the resources needed? (SF2)	No
A batch of individuals records can be identified, selected, and deleted by a defined process in line with the council's data Retention policy by reference to a retention rule set (e.g., By reference to the subject's dob, date of last involvement, date of last communication). (SF2a)	-

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Data Protection Impact Assessment

DPIA Name:

Source to Contract Business Case

Ref No:

DPIA-01020

IM&G Officer:

Saleem Aziz

Can records relating to individuals be permanently deleted from the application in line with the council's data retention policy or following a right to be forgotten request? (SF3)	Yes
Data retention policy can be defined via a configurable set of rules, with different data types having different retention times defined. (SF4)	Yes
Records can be manually marked for indefinite retention (e.g To support a subject access request or independent enquiry request) Which removes the record from any automatic or manual deletion processes. (SF5)	Yes
The deletion of records for data retention purposes includes processes for the deletion of personal data where the data is integrated with other systems. (SF6)	-
Data about people that is directly input into the system can be changed by non-technical users, including the deletion of records related to individuals. (SF7)	Yes
Where data about people is sourced from systems that are the primary record for that person's data, there are mechanisms to prevent the data being changed. (SF8)	-

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Data Protection Impact Assessment

DPIA Name:

Source to Contract Business Case

Ref No:

DPIA-01020

IM&G Officer:

Saleem Aziz

Notes or warning markers can be added to records (e.g., to highlight disputed information or potential risks). (SF9)	-
Notes or warning markers can be deleted from records. (SF10)	-
Validation is applied within the system to assist with the accurate recording of personal data? (SF11)	Yes
Records relating to individuals can be easily marked as duplicates or aliases and/or merged. (SF12)	Yes
Role-based access control is provided on the principle of least privilege. Records are shielded based on roles. (SF13)	Yes
Record-level security access is available (i.e., preventing access to a specific person's information). (SF14)	Yes
Individual's records can be quarantined so that their information is not processed (i.e., suspended). (SF15)	-
Protected records and/or fields can be highlighted (e.g., with a 'restricted' marker). (SF16)	-
Data masking functionality is provided where appropriate (e.g., replacing postcode or telephone number with ****,	Yes

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Data Protection Impact Assessment

DPIA Name:

Source to Contract Business Case

Ref No:

DPIA-01020

IM&G Officer:

Saleem Aziz

depending on what information is necessary for each role type to see). (SF17)	
The application includes functionality for the anonymization of personal data (e.g., automatic deletion of name, day and month of birth, telephone numbers, identification numbers but retaining other fields of record e.g., for statistical analysis). (SF18)	Not applicable
Test and training environments include some form of data scrambling/dummy data to prevent live personal data being used. (SF19)	Not applicable
Information relating to specific individuals could be easily identified and collated (i.e., can records be searched by name, dob, etc.) (SF20)	Yes
An audit log is available to users via a user interface which records key data changes made in the system, including what, who by, and when. (SF21)	Yes
Access to the logs is restricted (for example by role-based criteria) (SF22)	Yes

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Data Protection Impact Assessment

DPIA Name:

Source to Contract Business Case

Ref No:

DPIA-01020

IM&G Officer:

Saleem Aziz

Separate records are maintained for individuals' data held on the system (i.e., separate records for each individual) (SF23)	-
All data relating to a given individual can be easily exported by a user of the system (i.e., for a subject access request/ sar) (SF24)	-
All data relating to a given individual can be easily exported by a user of the system in a machine-readable industry-standard format (e.g., . Csv, xlsx, etc.) (SF25)	-
Consent is recorded within the application? (SF26)	-
The context of consent is consented (who consented, when they consent, what they were told, how they consent) (SF27)	-
Withdrawal of consent is recorded within the application (SF28)	-
Withdrawal of consent restricts the processing of an individual's records. (SF29)	-
Individuals can view and amend their own information (e.g. through a website account) (SF30)	-

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Data Protection Impact Assessment

DPIA Name:

Source to Contract Business Case

Ref No:

DPIA-01020

IM&G Officer:

Saleem Aziz

Mechanisms are provided for individuals to opt out of any profiling or direct marketing (SF31)

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“Information is everyone’s business and responsibility.”

Data Protection Impact Assessment

DPIA Name:

Source to Contract Business Case

Ref No:

DPIA-01020

IM&G Officer:

Saleem Aziz

Section L: CCTV

Question

Response

“Information is everyone’s business and responsibility.”

Data Protection Impact Assessment

DPIA Name:

Source to Contract Business Case

Ref No:

DPIA-01020

IM&G Officer:

Saleem Aziz

Section M: Risk Register

Risk Reference	Risk Title	Risk status	Please describe the risk	Existing controls	Probability with existing controls	Impact with existing controls	Initial risk rating	Probability after remedial actions	Impact after remedial actions	Residual Risk rating after remedial actions in place
RSK-1037	Control of Commercially Sensitive Data	Open - action required	Procurement platforms are used by suppliers to bid to work with the Council. Their tender responses or awarded contracts may contain commercially sensitive data which, if not handled correctly by the system and made available to other parties, could risk a data breach / legal action	Current system has security protocols that prevent commercially sensitive data in tenders / contracts from being visible or accessible to other parties	Unlikely	Low	Low	Unlikely	Low	Low
RSK-1038	Retention of Data or Documentation Beyond Retention Date	Open - action required	The current system is used to store contract and bid documentation and there is a risk without proper management that this data could be held for longer than the retention period	System notification, manual checks and Power BI database are used to manage the retention of contract and bid documentation in the system	Unlikely	Low	Low	Unlikely	Low	Low

“Information is everyone’s business and responsibility.”

Data Protection Impact Assessment

DPIA Name:

Source to Contract Business Case

Ref No:

DPIA-01020

IM&G Officer:

Saleem Aziz

RSK-1036	User Accounts	Open - action required	Need to ensure new system has capability to set security controls on user accounts to limit access where necessary and to remove access from leavers or individuals who change role. The purpose of procuring a new system is for better capability so this should lessen any risk	Current system has the ability to limit viewing/editing functions and user accounts are regularly reviewed to remove leavers	Unlikely	Low	Low	Unlikely	Low	Low
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Risk Register: Actions

Risk Reference	Action Reference	Remedial Action	Action Owner	Action Due Date	Notes	Action Status
RSK-1037	ACT-1021	Procurement of new system will set out necessary security protocols in specification / requirements so that commercially confidential or other sensitive data contained in bids or contracts is not visible to anyone than the supplier and procuring team / contract manager	Louis Price	01/09/2024	-	In progress
RSK-1038	ACT-1022	Procurement of the new system will state in specification / requirements that the system needs functionality to help with the management of retained data and documentation. As he new system should have better capability for this type of task it should lessen the risk of data being held longer than necessary by removing manual intervention.	Louis Price	01/08/2024	-	In progress

“Information is everyone’s business and responsibility.”

Data Protection Impact Assessment

DPIA Name:

Source to Contract Business Case

Ref No:

DPIA-01020

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RSK-1036	ACT-1020	Requirements / specification for procurement of new system will clearly set out security requirements for user accounts and functionality to remove non-active or leaver accounts. Will be drafted with advice from IDS colleagues	Louis Price	01/09/2024	-	In progress
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