

Information Management Framework
Data Protection Impact Assessment
London Borough of Barnet

The DPIA is to be undertaken when you have completed a **DPIA Need Checklist** and been assessed by IMT as **requiring a DPIA**.

Your completed **DPIA Need Checklist** must be attached to this DPIA.

You may not have all the information right now, which is fine. This assessment will evolve through your planning, implementation and transfer to business as usual. Please mark a question N/A or nil if you feel it does apply to your project/process.

We encourage you to include/attach **process maps**, **data flow diagrams**, or **organisational relationship maps**, as these are a good way to explain a process. These can be hand drawn.

This process is for use of personal data, but be aware that non-personal data implications also need to be managed correctly, with adequate records retention, such as use of address gazetteer data or PSMA licensing, copyright material and IPR. Speak to the Information Management Team for advice.

Name of lead officer completing the assessment

Date

<div>██████████ ██████████@paconsulting.com ██████████@barnet.gov.uk</div> <div>With support from ██████████ Argenti DPO ██████████@paconsulting.com</div> <div>Courtney Davis LBB Assistant Director Communities and Performance (interim)</div>	05/05/2020
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Process or Project

1. Description of the planned activity

Full DPIA for the Technology Enabled Care service delivered under contract for the council by PA Consulting (Argenti).

General description of the service.

Argenti is the Care Technology Service for the Council. It is a commissioned service starting on 1 April 2017. Adult Service make referrals to Argenti to provide care technology which can be defined as telecare; pendants, falls detectors, any equipment to keep service users safe and well. This includes Amazon Alexa voice-controlled assistants.

Whilst in receipt of the service the service user can press alarms given to them for help from the monitoring centre and for help to be summoned. Some alarms also automatically generate an alarm to the emergency services.

The Argenti partnership is made up of four organisations; PA Consulting (lead), Red Alert Telecare (Installations and maintenance and stock) and Appello (Call Monitoring) and Barnet Homes (Response service). Together these organisations work as Argenti to provide the end to end service. Data is collected/processed to provide the service from the Council, via the referral and from the service user, in the course of providing the service.

2. Is the processing novel or has anything similar been undertaken before? Will you be using any innovative technical or organisational solutions, like smart tech?

The telecare service in Barnet via Argenti has been in place since 2017 and uses smart tech (Internet of Things) devices like pendant alarms and voice assistants like Alexa.

3. Do you plan to carry out profiling on a large scale?

No, we do not carry out profiling.

4. Will you use systematic and extensive profiling or automated decisions to make significant decisions about people? Will you use profiling, automated decision making or special category data to make decisions about someone's access to a service, opportunity or benefit?

We do not undertake any form of profiling.

We do collect some special category data about service users to provide the service to them. For example, we collect medical information so that we can be inform emergency services or responders about emergency situations. It is not considered that this service has the intention to make decisions about a person's access to a service, opportunity or benefit.

5. Will you use children's personal data for profiling or automated decisions making; for marketing purposes; or for offering online services directly to them?

No.

6. Will you systematically monitor a public place on a large scale eg CCTV?

No.

7. Do you plan to combine, compare or match data from multiple sources *eg fraud prevention*?

No.

8. Will you process personal data in a way that involves tracking individuals' online or offline location or behaviour *eg vehicle tracking or monitoring an individual's social media*?

Yes. If the risk assessment from social care highlights risk of wandering, or this is raised when the client/client carer talks to the telecare team during set up, then there is functionality to monitor a client's location to show whether the client left the bounds that have been agreed in the system (such as outside their home). This is managed on a separate system.

We acknowledge that this is more intrusive collection of use of data than is historically done within social care. This level of data collection is essential to keep service users safe who are at risk of wandering and becoming lost.

9. Anticipated start date and duration of processing (ongoing if no set end date)

Ongoing, started on the 1st April 2017

Purpose & Benefits

10. What are the aims of the processing? What is the intended effect on individuals?

The primary aim is to provide a care technology service for the service users who meet referral criteria for telecare. We need the data collected to support the service users with their needs and get help for them if an incident occurs.

Service users will therefore be supported by a service that understands their needs and is personal. The service helps an individual to live a more independent life for longer within their own accommodation, helps to meet the council's responsibilities under the Care Act 2014, and provides reassurance to family members that an at-risk adult has support in case of incident.

11. Why are you planning to undertake this processing? What legislation requires/affects your processing?

For personal data being processed the lawful basis is Art 6,1(c) legal obligation, Art6,1(e) public task.

For special category data the lawful basis is Art9(2)(g) substantial public interest, and Art9,2(h) provision of health and social care.

These bases come from the council's duties under the Care Act 2014 to deliver social care to adults in need. The Care Act 2014 gives local authorities a duty to carry out a needs assessment in order to determine whether an adult has need for care and support. Care and support needs can be met in different ways and local authorities also have a responsibility to ensure there is a range of provision of high quality, appropriate services to choose from.

It is noted that vital interests (Art6,1(d) and Art9,2(c)) will also apply in some circumstances.

The contractor is data controller (or joint data controller with the council) for personal data when delivering the telecare services to clients, for personal and special category personal data. The contractor has established its lawful basis conditions.

For individuals receiving support through Alexa (low number of clients), they have their own account with Amazon. The individual's account with Amazon forms a contractual arrangement between the participant and Amazon which will not involve the Council. The Council and Argenti will not have direct access to the information shared with Amazon or information that Amazon provides to the participant. In effect the Council's role will be to support the service user to use the equipment.

12. What are the benefits to the individual, society and the organisation(s) involved?

There is a great benefit in keeping residents in their own homes and the council uses Argenti as a contractor to support residents through care technology to have more independent lives.

Choice and control: Meeting care and support needs by providing choice and planning for service user as well as planning for Carer

Supporting carers: For example, by reducing sitting services/respite care /carer anxiety.

Supporting Reablement: Reminders to call friends and family/prompts for daily living tasks/ making requests from carers – professional and family. Medication reminders can be an important part of this.

Telecare support can help an individual to stay within their own accommodation, which often reduces overall cost to the public purse by avoiding expensive residential/hospital accommodation.

Eligible adults have access to telecare devices through the Argenti contract.

A small number of clients use Amazon Alexa. The benefits if the Alexa smart speaker include increased independence, knowledge more available and a variety of other uses that can benefit individual adults to their needs.

The use of voice-controlled devices will be used by adults for;

- Medication reminders
- Calendars,

- Shopping lists,
- Turning on lights/heating,
- Music,
- News and sports updates,
- Contacting friends and family,
- And other out of the box functionality built into Alexa.

13. What geographical area will the processing cover? *(This would generally be Barnet only, but your work may involve pan-London or national projects)*

Barnet only.

14. Do you plan to consult with any person, group or organisation? Consultation can include a survey, public meetings or committee papers, market research or even a review of previous customer complaints.

The contractor, Argenti, undertook consultation activity in Hampshire directly related to the privacy notice and ways in which we use equipment to support service users, which showed positive outcomes for individuals and benefits being achieved. Barnet service users have also provided feedback that the service has benefits for them. The contractor also regularly consults with industry bodies (TSA) and manufactures about the safety of their equipment.

Regular feedback is requested from clients in form of:

1. Every 100th referral undergoes a deep dive by the Argenti team which involves calling the service user, their responder (family) and the referrer to gather feedback
2. Every 6 months 10% of the active user based are sent a paper survey to gather feedback.
3. The Argenti QA board is responsible for all QA activity and often conducts deep dive activity of service users and gather user feedback. For example, a recent deep dive of all service users with epilepsy sensors and those within LD supported living.

During all these activities Argenti are looking to verify that the benefits sought are being achieved.

Individuals (data subjects)

15. What types of data subjects are involved? Tick all that apply.

- | | |
|--|--|
| <input checked="" type="checkbox"/> Customers or Service users | <input type="checkbox"/> Traders or people subject to inspection |
| <input type="checkbox"/> Service providers / Contractors | <input type="checkbox"/> People captured on CCTV |
| <input type="checkbox"/> Residents | <input type="checkbox"/> Representative of another organisation |
| <input type="checkbox"/> Complainants | <input type="checkbox"/> Licence and permit holders |

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- | | |
|--|---|
| <input type="checkbox"/> Claimants | <input type="checkbox"/> Employees (previous or current) |
| <input type="checkbox"/> Recipient of benefits | <input type="checkbox"/> Councillors, MPs, elected officials |
| <input type="checkbox"/> Volunteers | <input type="checkbox"/> Professional adviser or consultant (eg doctor or lawyer) |
| <input type="checkbox"/> Any | |

16. Are the data subjects considered vulnerable eg children or domestic abuse victims? What is the council's relationship with the data subject? Is there an imbalance of power, as with employees? How much control will data subjects have?

Yes, the individuals are vulnerable. The referral to the Argenti-run service is based on a social care assessment which has highlighted a need. The service user is always a known service user of the Council. The individual has choice about whether they accept and use the telecare service, but do not have choice on what happens to their data. When we begin to provide the service each service user is given information about their rights towards their own data in the privacy notice. (attached as appendix 1).

17. Expected volume of data subjects *eg number of people or number of records*

We receive roughly 30 referrals for new service users each week. Currently there are 5000 service users.

18. How is the individual being informed of the processing (*privacy notices*)? Do you plan to process personal data without providing a privacy notice *eg investigations or covert surveillance*?

The telecare service is explained to individuals during the assessment and referral process undertaken by the social care team. Each service user receives a privacy notice in the Argenti service user set up guide that is provided at each install (attached as appendix 1). This information is also available at any time and service users are informed of this.

19. How do you plan to support the Rights of Data Subjects (*eg access to information*)?

Within the contractual agreements between council and contractor, Argenti are required to notify the council within five working days of a data subject's request for access to personal data. Argenti have a process to support the council in providing the data that Argenti holds on the individual.
Argenti manages its own requests where it is data controller.

The rights of service users are outlined in the privacy notice. Council staff receive mandatory data protection training and the council has published processes for

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handling data subject rights requests. All Argenti staff receive training on these rights and processes are in place to ensure they are protected and honoured by Argenti staff.

20. Will your processing prevent individuals from exercising a right, or using a service or contract?

No.

Data

21. What type of information will be collected? Tick all that apply.

- | | |
|---|---|
| <input checked="" type="checkbox"/> Name | <input checked="" type="checkbox"/> Social services information |
| <input checked="" type="checkbox"/> Address | <input type="checkbox"/> Human Resources information |
| <input checked="" type="checkbox"/> Contact details | <input type="checkbox"/> Employment |
| <input checked="" type="checkbox"/> DOB | <input type="checkbox"/> Education information |
| <input checked="" type="checkbox"/> Equalities information | <input checked="" type="checkbox"/> Housing information |
| <input type="checkbox"/> Financial information | <input checked="" type="checkbox"/> Family / relationship information |
| <input checked="" type="checkbox"/> Property information | <input type="checkbox"/> Information from another local authority |
| <input type="checkbox"/> Criminal (allegation or prosecution) information | <input type="checkbox"/> Images in photographs, film or CCTV |
| <input checked="" type="checkbox"/> Health / Medical information | <input checked="" type="checkbox"/> Referral / Assessment information |
| <input checked="" type="checkbox"/> NHS number | <input type="checkbox"/> Referees |
| <input type="checkbox"/> Support network | |

22. Are you processing?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Special category data | <input type="checkbox"/> Criminal / allegation offence data |
|---|---|

Please specify.

Medical information including health conditions and medication currently being taken
Safeguarding information about the service user and those living with them.

1. **Care Technology assessment:** detail on the clients' requirements and suitable equipment
2. **Equipment information:** detail on what types of equipment and monitoring are in use by the client
3. **Monitoring information:** details on calls and alerts made to the monitoring centre
4. **Safeguarding concerns:** where the telecare assessor or monitoring centre has concerns and reports these back
5. **Need for social care review:** where the telecare assessor or monitoring centre identifies the need for a social care assessment or review when assessing/installing equipment or through calls to the monitoring centre

23. Will you be processing biometric data? Please specify.

No

24. Will you be using the above special category, biometric or criminal data on a large scale? Please specify.

There are 5,000 telecare users and a medium level of personal and special category information is processed for each user when providing telecare services.

25. Is there a risk of physical harm in the event of a security breach *eg fraud investigations or child exploitation?*

Medium/High risk as referral information contains a medium volume of personal and special category data that could be used in the wrong hands to approach an individual to cause them physical or financial harm.

Whilst the council and contractor are not responsible for the individual's use of Alexa and the information from this processed by Amazon, it is noted that such devices can be used against an individual if hacked/released. We protect this information and uphold the highest security standards.

In all cases Argenti and the council recognise that there is an inherent risk with collecting information about service users and providing them with equipment that collects some information about the individual. Only data that is essential is collected but if used unlawfully or by those unauthorised to could be abused. Argenti and the council take steps to mitigate these risks as outlined within this DPIA.

26. How is the information being collected? Where are you getting it from?

2 sources.

1. From the referral from the Council during assessment and delivery of social care support
2. Direct from the service user in the course of providing the service, during acceptance of service, installation visit and processes, and continually through the life of service delivery.

For individuals receiving support through Alexa, they have their own account with Amazon. The Council and Argenti will not have direct access to the information shared with Amazon or information that Amazon provides to the participant. In effect the Council's role will be to provide and support the service user to use the equipment.

27. Are you processing personal data for a different purpose than it was originally collected?

No

28. Volume of data *eg number of records?*

We receive roughly 30 referrals for new service users each week. Currently there are 5000 service users.

29. How often will you be using the data *eg every day or annually?*

24/7, the service runs all the time to support service users.

30. How is the information being stored, including backups, paper files in off-site storage, copies etc?

See data map attached as appendix 2.

We store information in the following places

1. Council systems (outlook)
2. Mosaic – information is passed to us through Mosaic and our team access Mosaic to process the referrals received.
3. CareNet – our monitoring and information system
4. Office 365 (Outlook) by Red Alert Red Alert

31. How will you ensure good data quality? *eg regular checks or updating processes*

The contractor updates data processes regularly through the Quality assurance board each quarter. Data is updated all the time by call handlers and all service users receive an annual call to check the data is accurate that we hold for them.

We also correct and check data ad hoc when contacted by service users or their family network. It can be corrected and updated by multiple authorised people so ensure data is updated when needed.

32. What processes are/will be in place for editing or deleting information? We must be able to amend and fully delete personal data from systems.

The contractor's system (CareNet) allows data to be edited easily in real time by the Argenti team. All data can be amended. Data can be deleted from the system at request. The council's referral information is on the main social care system and can be amended and deleted as necessary.

Argenti do record all calls to our monitoring centre. These calls stay as evidence on the service for 6 years after.

Our retention policy calls for data of service users who are no longer on the service to be deleted after 6 years. The Argenti group QA board is responsible for implementing this policy and run a report each 6 months of those whose data is due to be deleted and the QA is lead is responsible for this action.

33. Are you using contractors/service providers to process the data?

Yes. The telecare service is delivered by the council's contractor, Argenti. Argenti uses sub-contractors to deliver and host systems, including CareNet.

34. How is the information to be transported/transferred (*electronic and paper*)?

See data processing map as appendix 2.

We only transfer data to partners securely through secure email as outlined in the data map

35. How will access to the data be managed and monitored *eg audit trails, logs*? Which officers/roles will have access to the asset?

All data accessed on CareNet is logged to the user. User access is protected for authorised personal only within the three main organisations. See Appendix 3 CareNet specification for further information about the system

36. What security measures will be in place?

The council's normal data security processes and standards apply to any data hosted on LBB systems. The contractor's data security processes and standards have been accepted through the original contracting process. The contractor employs sub-contractors for aspects of the service.

Red Alert holds ISO27001 certification, and has confirmed that the data on their systems will be secured by MPR and AVG Anti-virus. Red Alert runs the latest generation Cisco ASA firewall with the enhanced security pack and FirePower.

Appello holds ISO27001 and has confirmed that the data on their systems. In addition, both Red Alert and Appello have confirmed compliance with all LBB policies around the handling of data, and information transfer protocols through the sub-contract with PA.

All subcontractors who have access to personal data are Criminal Records Checked (either through DBS or Disclosure Scotland) checked and receive appropriate and ongoing data protection training.

See appendix 3 CareNet specification

37. Are there any plans to store data outside the UK? Consider hosted sites, disaster recovery and IT support.

Yes, some data is stored in European data centres in line with GDPR.

This is Office 365 used by Red Alert in accordance with Microsoft's global policies on data storage. Office 365 is a standard product with terms outlined at: <https://www.microsoft.com/en-gb/servicesagreement/>

Please also see the appendix listing the details of the Carenet system.

38. Will reports be generated from this information, or statutory returns? If so, will the information be personally identifiable or anonymous?

All reports to the Council will be pseudonymised (Mosaic IDs are used) and some more generic anonymous reports on activity. The contractor only produces internal reports for quality improvement or to contact service users about equipment they have and to maintain their service. The council uses the personal information to monitor the contract with PA Consulting (Argenti). There are no statutory returns within this contract.

39. What is the retention period for this information? Consult the council's Retention Schedule. If your processing is not listed, contact recordsmanagement@barnet.gov.uk

Industry standard for telecare is 6 years in line with TSA. We are happy to match this period to the Council's own retention period.

40. What process is/will be in place to implement this retention period?

The contractor's quality assurance board controls this process and it is a regular agenda item each quarter to review and has a process of deleting void information each quarter.

Our retention policy calls for data of service users who are no longer on the service to be deleted after 6 years. The Argenti group QA board is responsible for implementing this policy and run a report each 6 months of those whose data is due to be deleted and the QA is lead is responsible for this action.

41. What is the process for managing/transferring/destroying personal data during start-up and close down?

Personal data is securely transferred between the council and contractor. More information is in Appendix 2 for regular transfers. The contract describes the close down process and any specifics will be agreed at least one month before end of contract. At end of contract Argenti will keep data for which they are data controller.

42. If the organisation/service ceases, what will happen to the information?

In accordance with the contract with LBB the contractor will transfer all data processed on the council's behalf back to the council and delete it from the systems. Argenti will keep data they are required to keep (eg financial records or under health and safety law), within their own retention periods.

43. Can data be anonymised or pseudonymised? How will ensure you only use the minimum amount of data required to complete the aim?

Service delivery requires personal data that often cannot be pseudonymised. However, where possible the Mosaic ID is used instead of name to minimise risks.

44. Who do you plan to share information with? Tick all that apply

- | | |
|---|--|
| <input type="checkbox"/> DWP | <input type="checkbox"/> Ofsted |
| <input type="checkbox"/> Council legal service | <input type="checkbox"/> Voluntary agencies / Third sector |
| <input checked="" type="checkbox"/> Legal representatives | <input checked="" type="checkbox"/> Housing providers |
| <input type="checkbox"/> Police | <input type="checkbox"/> Expert witnesses |
| <input type="checkbox"/> Insurance companies | <input checked="" type="checkbox"/> Professional regulatory bodies |
| <input type="checkbox"/> Other local authorities | <input type="checkbox"/> Trade unions |

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- | | |
|--|---|
| <input type="checkbox"/> Home Office
<input type="checkbox"/> Health agencies
<input type="checkbox"/> Judicial agencies eg Courts
<input type="checkbox"/> Other council services (specify below)

<input type="checkbox"/> Specialist organisations (specify below) | <input type="checkbox"/> Credit reference agencies
<input type="checkbox"/> UK Border Agency
<input type="checkbox"/> Prison / Probation services
<input type="checkbox"/> HMRC

<input type="checkbox"/> Government departments (specify below) |
|--|---|

45. What information is shared?

Barnet Homes provide a 24 hour responder service for the contract, which means that they are needed to go out to service users in need. Basic information about the user is shared with Barnet Homes when the service user is signed up to the service and the privacy statement makes that clear.

As necessary information may be provided to the council legal service in the event of legal action. Disclosure are made to the police, fire and ambulance service as necessary, as this is one of the main reasons for running the service. This may also apply in emergency resilience situations affecting the borough.

Delivery of social care is overseen by regulatory bodies like the Care Quality Commission.

The follow appendices have been provided

1. Appendix 1 - Privacy Notice (last page of service user guide)
2. Appendix 2 – Data Sharing Map
3. Appendix 3 – CareNet Spec
4. Appendix 4 – CareNet Cloud Compliance Information

Risks

46. Are there any known information risks, issues or public concerns? Has there been press interest or court cases relating to this type of processing?

Yes. Whilst the purpose of the service is to support the independence and wellbeing of individuals, the use of this type of technology is inherently intrusive.

The use of Amazon Alexa is a contract solely between the individual and Amazon, but as the council is in effect recommending this use, the council recognises that Alexa is more intrusive than other telecare devices. Referrals for the Alexa-related support are only made where:

- individuals have capacity to use/understand an Amazon Account Terms and Conditions (Cannot have Dementia or other forms or cognitive impairment)

- individuals understand the implications of a voice-controlled device (listed in the appendix) that the device listens to the adult when on and stores their preferences.
- at set up of the device, voice purchasing is turned off
- individuals are able to use a smartphone or tablet to set up the device through the Alexa app

There are multiple times at which concerns can be raised and the install stopped if the user is deemed not to have capacity to use the device.

Amazon devices make up a very small part of the work that we do (although they are perhaps the most intrusive) and only a limited number of devices are used. Other devices such as GPS support systems and activity monitoring systems are used by Argenti to meet the social care outcomes. These systems are only used in accordance with this DPIA. We assure ourselves fully of the compliance of those organisations we subcontract too as per our contract with LBB (see data sharing map). We accept that these systems are intrusive, and every effort is made to keep this data safe and proportionate to the outcomes being sought by Adult Services.

Strict processes are in place within the contractor that data is only processed when necessary and access controls apply to limit access to the data.

47. Any known activities and risks that will have a direct effect on this piece of work?

As above, there are inherent privacy risks with telecare technology, especially Alexa type devices. Processes are in place, as above, to minimise the risk to the rights and freedoms on individuals.

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Risk Table

Describe source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary.	Likelihood of harm	Severity of harm	Overall risk	Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved
	Remote, possible or probable	Minimal, significant or severe	Low, medium or high		Eliminated reduced accepted	Low medium high	Yes/no
Unauthorised access to personal information	Possible	Severe	Low	The council and contractor have processes in place to ensure that only authorised persons can access the system, new users can only be added with training and log in permissions being given by the programme manager for each area. Each interaction is logged and can be reviewed. All contractor staff accessing this data are DBS checked.	Reduced	Medium	Yes
Hacking or malicious attacks on our systems. Accidental or malicious loss of, or loss of integrity of, personal data. Accidental or malicious loss or disclosure breach.	Possible	Severe	Medium	Appendix 3 describes the contractor's approach to data security. Systems are protected by encryption and secure storage. Due diligence on any sub-contractors is carried out by Argenti.	Accepted	Low	Yes
Service user are not informed about the data rights and how data is processed	Remote	Significant	Low	All our engineers go through training and the information is provided to them. We audit every 100 referrals to ensure the information was left with the SU	Accepted	Low	Yes

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Intrusion of privacy for data subjects	Possible	Severe	Low	Privacy information is provided to individuals at the referral stage and referrals for the Alexa-related support are only made where There are multiple times at which concerns can be raised and the install stopped if the user is deemed not to have capacity to use the device.	Reduced	Medium	Yes
Failure for processing to achieve expected benefits for data subjects.	Possible	Minimal	Low	Service users may not feel they gain benefit from the service. Service can be removed at any time if this is the case.	Accepted	Low	Yes
Poor data quality at any stage of processing.	Remote	Significant	Low	Processes are in place to review data quality through the contractor's Quality Assurance Board each quarter. Data is updated all the time by call handlers and all service users receive an annual call to check the data is accurate that we hold for them.	Accepted	Medium	Yes
Excessive processing or excessive sharing.	Possible	Minimal	Low	Data could be shared with those not authorised to access it or do not have a right to it. Argenti team undergo mandatory GDPR training every year and the DPO for Argenti regularly shares best practice. Argenti are responsible for the handling of the data of SU as per the contract with LBB.	Reduced	Medium	Yes

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Poor or poorly managed retention.	Possible	Minimal	Low	System automatically flag records that have reached the retention period end. Records are held securely for their lifetime and can be manually delated as well. There is an exception to some call recordings that are linked to other service user files and some documents held for legal reasons.	Reduced	Low	Yes
Location data not safely used. Some equipment used uses location data to keep people safe from harm. This data needs to be secured and used effectively.	Possible	Significant	Low	This information is locked down within the Oysta system and is only accessed by authorised persons and can be audited at any time. We deem this access needed to keep the person safe.	Reduced	Medium	Yes

Approval

DPO advice provided by:	Victoria Blyth	Date: 05/05/20		
<p>DPO advice:</p> <p>Whilst inherently intrusive, this work is beneficial to individuals. There is a suitable lawful basis and appropriate processes for being fair and transparent with individuals about the personal data processing.</p> <p>The retention period does not currently fit within the council's retention schedule and this should be agreed with the Records Management Lead in IMT.</p> <p>The processing is covered by a privacy notice issued to individuals (created by the council and Argenti). It is also covered by the broad privacy notice for adult social care on the council website. However, given the intrusive nature of the processing a specific privacy notice for telecare should be published on the council website.</p>				
<p>Documents the service is required to complete/update:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; vertical-align: top;"> <input checked="" type="checkbox"/> Privacy Notice <input type="checkbox"/> ISA <input type="checkbox"/> Process documents <input type="checkbox"/> Other (specify below) </td> <td style="width: 50%; vertical-align: top;"> <input checked="" type="checkbox"/> ROPA <input type="checkbox"/> Contract / DPA <input type="checkbox"/> Internet pages/links <input type="checkbox"/> Procedure for data subject requests </td> </tr> </table>			<input checked="" type="checkbox"/> Privacy Notice <input type="checkbox"/> ISA <input type="checkbox"/> Process documents <input type="checkbox"/> Other (specify below)	<input checked="" type="checkbox"/> ROPA <input type="checkbox"/> Contract / DPA <input type="checkbox"/> Internet pages/links <input type="checkbox"/> Procedure for data subject requests
<input checked="" type="checkbox"/> Privacy Notice <input type="checkbox"/> ISA <input type="checkbox"/> Process documents <input type="checkbox"/> Other (specify below)	<input checked="" type="checkbox"/> ROPA <input type="checkbox"/> Contract / DPA <input type="checkbox"/> Internet pages/links <input type="checkbox"/> Procedure for data subject requests			
ICO advice sought	Date requested: N/A	Date received: N/A		
<p>ICO advice:</p> <p>N/A</p>				
SIRO advice sought from:	N/A	Date: N/A		

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SIRO views (Reasoning if differs from DPO advice): N/A		
Consultation responses reviewed by:	Adult Social Care and Argenti	If your decision departs from individuals' views, you must explain your reasons
Comments: Comments from users are incorporated into ongoing Argenti processes.		
This DPIA will kept under review by: <div style="background-color: black; width: 100px; height: 15px;"></div>	Date review to take place: May 2021	Date Agreed: 05/05/20