

Understanding the impact of the Homelessness Programmes and the Homelessness Reduction Act 2017

Local Authority, MoJ/DWP and
HMRC/DfE Data Sharing

DATA PROTECTION IMPACT ASSESSMENT

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Document Control

0.1 Key personnel

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0.2 Summary

This is a data sharing exercise between MHCLG and local authorities in the first instance and may include national bodies (Ministry of Justice, Department for Education and Department for Work and Pensions/Her Majesty's Revenue and Customs). We have outlined three projects in this document that we would like to undertake now and in the future if all parties agree.

These bodies will be sharing data with the Ministry of Housing, Communities and Local Government (MHCLG) for the purposes of evaluating the impact and cost benefit of Homelessness Reduction Programmes and the implementation of the Homelessness Reduction Bill 2017; and the purpose of providing homelessness reduction programmes with aggregate level information about the impact of their programmes, subject to further discussion.

Data sharing will take place between local authorities and national public bodies and data sharing agreements will be agreed between MHCLG and each party.

In summary, the data sharing undertaken as part of this project aims to provide both central government departments, local public services and delivery partners with valuable information about the cycle of homelessness and its impact on outcomes, as well as the impact and cost benefit of interventions and services targeted at reducing homelessness. The information should be useful to inform future service reform and investment decisions.

Data sharing is necessary to observe the impact of Homelessness Programmes and the Homelessness Reduction Act 2017 on a wide range of different outcomes that it aims to affect, spanning the remit of different Government Departments; and to control for household and individual characteristics.

This datashare will improve the evidence base for homelessness and be used to inform policy and investment decisions across government and local public services. In particular, it will aid and improve understanding of how households and individuals cycle in and out of homelessness over time and across the country; how homelessness impacts on a range of outcomes for individuals and household members, in particular young people; whether Homelessness Programmes and the 2017 Act improve outcomes for households and individuals. MHCLG will use the data gathered to provide local areas and other government departments with the following information:

- the characteristics of individuals and households who are homeless;
- historic problems (e.g. health problems, levels of offending over previous years, whether members have experienced entrenched worklessness);
- the fiscal costs associated with these individuals/households before and after intervention; and
- assessments of effectiveness, covering a range of outcomes.

The results will be presented in published national reports and shared with key partners on a regular basis. Service providers will receive aggregate level reports of outcomes for their cohort of participants.

This version has been drafted to demonstrate compliance with the eight principles of the Data Protection Act 1998. This will be updated once the revised Data Protection Act 2018 has been agreed and the General Data Protection Regulations come into force. Equivalent articles in the GDPR have been referenced against the eight principles of the Data Protection Act 1998.

This version of the document sets out a project which includes linking with other data held by other Government Departments. This version does not include legal gateways for those Government Departments to share data with MHCLG or the security operating procedures at other Government Departments. This document will be updated to reflect any changes/amendments when this part of the project (and data sharing) has been agreed.

This is a full scale Privacy Impact Assessment and has been agreed with the Data Protection Officer at MHCLG.

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1. Project Outline/Context

1.1. The aims of the policy to reduce statutory homelessness:

The 2017 Homelessness Reduction Act ('the 2017 Act') significantly reformed England's homelessness legislation by placing duties on local authorities to intervene at earlier stages to prevent homelessness in their areas. It also requires housing authorities to provide homelessness services to all those affected, not just those who have 'priority need'. The 2017 Act takes effect on 3rd April 2018.

1.2. The aim of the homelessness data linking project :

The homelessness data linking project will support the work being carried out by the Homelessness Policy Team in the Department. By linking data sources on homelessness, we will be able to measure the effectiveness of a range of homelessness programmes and monitor the implementation and impact of the 2017 Homelessness Reduction Act ('the 2017 Act').

H-CLIC (Homelessness Case Level Information Collection) collects demographic data, for example, nationality and ethnic group; the circumstances leading to and following on from a household's homelessness application being made; the actions taken by the local authority on each case; and all temporary accommodation placements.

In addition, MHCLG require local authorities to provide personal data on households, such as names and addresses. This data needs to be collected through H-CLIC so that we can link the data collected on applicant households to other data sources.

The addition of personal data to the H-CLIC return will mean use of the collection can be expanded to assess the longer term outcomes of those assisted with their homelessness, the success of other MHCLG intervention projects or to collect wider characteristics about those who are homeless to better assess why some interventions fail or succeed.

We will use the personal and case level data provided through H-CLIC to create pseudonymised MHCLG identifiers that allow analysts to monitor the 2017 Act and to identify patterns within homelessness, by:

- tracking cases across local authority boundaries and the country; and
- following families/individuals in their journeys over time.

We are also hoping to use the personal data provided to:

- link data from other homelessness evaluations being run within MHCLG; and,
- link to nationally held administrative data, dependent on reaching agreements with other Government Departments. This could include data on benefits, offending, health, education, and child safeguarding. We will create a pseudonymised dataset which includes H-CLIC data and data from other Government Departments to control for and take account of a wider range of factors affecting homelessness and outcomes.

The sharing of personal data and information for the H-CLIC project is for evaluation and research purposes only - it will not be used for operational purposes or to make decisions that affect individuals or households (data subjects).

This project will provide robust information to further our understanding of repeat homelessness, the success of prevention activities, the outcomes of those in receipt of homelessness services, and the causes and factors associated with homelessness.

The results and analysis will be shared with policy colleagues here and published regularly to provide national and local policy makers with an evidence base on which to design better services and achieve better outcomes, such as which homelessness prevention activities are most effective with particular groups.

1.3. Projects for which H-CLIC data will be used

Project 1

To track people across homelessness cases and identify those whose homelessness was not prevented or relieved in the longer term across geographies and over time. This will help identify what truly works to prevent homelessness and monitor the performance of local authorities.

A Data Team will use the personal data to create MHCLG identifiers. The Homelessness Analysis Team uses the MHCLG identifiers to track cases over LA boundaries and over time.

Project 2

To identify and track individuals who have been offered assistance as part of other research projects and identify if the intervention truly worked to prevent homelessness in the longer term. We already have evaluations in progress, such as Housing First that would benefit from this analysis.

In addition to Project 1, MHCLG would set up a DataLab. This would provide the ability to link in other data relating to homelessness, such as evaluation data about rough sleeping interventions, such as Housing First and agencies providing homelessness interventions could send personal data of those undergoing interventions and request aggregate level outcomes.

Project 3

To identify the wider circumstances and outcomes of individuals who are homeless, such as educational outcomes, employment, benefits and health. This will enable us to identify the wider factors and estimate the costs of homelessness.

In addition to Project 1 and 2, MHCLG would use the personal data to match data from other Government Departments. This data could then be sent back to MHCLG to be linked to the H-CLIC data.

i. How will the project operate?

The process and datasets for the three projects are set out in the table and text below. All work carried out by MHCLG will be carried out by two separate teams using restricted access folders on a secure system. Appropriate security measures

and procedures will be put in place to ensure the privacy of individuals and households is maintained.

A diagram setting out data flows for each project can be found in the Annex (Annex A). The datasets and processing are as follows:

Project 1 – tracking of H-CLIC cases

The draft process for the personal data linking project is set out in the text and diagram below. There are several datasets created for the project set out in the table and text below. These are as follows:

Stage	Dataset	Description of dataset	Processing	Team responsible
Stage 1a	Dataset A1	LA IDs and personal data	Combination of data from LAs into 1 dataset	DELTA application
Stage 1b	Dataset A2	LA IDs and case level H-CLIC data	Combination of data from LAs into 1 dataset	DELTA application
Stage 2	Dataset B	MHCLG IDs, LA IDs and personal data	Create MHCLG IDs within Dataset A1	Data Team, MHCLG
Stage 3	Dataset C	MHCLG IDs and LA IDs only (look-up table)	Removal of personal data from Dataset A1	Data Team, MHCLG
Stage 4	Dataset D*	MHCLG IDs and H-CLIC data	Combination of Dataset A2 and Dataset C, removal of LA IDs	Homelessness Analysis Team, MHCLG

*Datasets highlighted in bold are used for analysis by the Homelessness Analysis Team at MHCLG

The project will use personal data, including LA individual and household level unique identifiers, supplied to MHCLG by local authorities on individuals and households presenting to services for homelessness services as well as case level data collected for homelessness statistics (a full list of variables sent by local authorities can be found in Annex B).

Within the DELTA application (MHCLG) personal data records provided by each Local Authority will be securely stored. These records are associated within the system and can be identified as “Dataset A1”. The data will be securely extracted from the DELTA application by the Data Team at MHCLG. The personal data will be stored in a restricted access folder to which only the MHCLG Data Team have access.

The Data Team will create MHCLG unique individual and household level identifiers based on the personal data using an algorithm¹. The Data Team will then attach the MHCLG identifiers to “Dataset A1” to create “Dataset B”.

The MHCLG Data Team will use “Dataset B” to create a “look-up” table of LA identifiers and MHCLG identifiers, i.e. without personal data (“Dataset C”). Dataset C will be provided to the Homelessness Analysis Team at MHCLG.

The H-CLIC data is associated within DELTA and identified as “Dataset A2”. The data will be securely extracted from the DELTA application by the Homelessness Analysis Team at MHCLG. The Homelessness Analysis Team will combine “Dataset A2” and “Dataset C” and remove LA IDs to create “Dataset D”. “Dataset D” will be used by Homelessness Analysis Team to track outcomes for individuals and households over time and across LA boundaries.

Project 2 – DataLab to evaluate homelessness interventions

Stage	Dataset	Description of dataset	Processing	Team responsible
Stage 1a	Dataset A1	LA IDs and personal data	Combination of data from LAs into 1 dataset	DELTA application
Stage 1b	Dataset A2	LA IDs and case level H-CLIC data	Combination of data from LAs into 1 dataset	DELTA application
Stage 1c	Dataset A3	Personal and programme participation data, organisational IDs	No additional processing	DELTA application
Stage 2	Dataset B	MHCLG IDs, LA IDs, organisational IDs and personal data, programme participation data	Create MHCLG IDs within Dataset A1 and Dataset A3	Data Team, MHCLG
Stage 3	Dataset C	MHCLG IDs and LA IDs, organisational IDs only, programme participation data (look-up table)	Removal of personal data from Dataset A1 and A3	Data Team, MHCLG
Stage 4	Dataset D*	MHCLG IDs, H-CLIC data and programme participation data	Combination of Dataset A2 and Dataset C, removal of LA IDs	Homelessness Analysis Team, MHCLG

¹ The algorithm creates household and individual level IDs using the personal data. These IDs ensure the analysts cannot identify individuals and the ID is created in such a way that it cannot be linked back to the personal data to identify individuals.

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*Dataset highlighted in bold are used for analysis by the Homelessness Analysis Team at MHCLG

The project will use personal data provided by local authorities, including LA individual and household level unique identifiers, supplied to MHCLG on individuals and households presenting to services for homelessness services as well as case level data collected for homelessness statistics (a full list of variables sent by local authorities can be found in Annex B).

In addition agencies/public bodies providing homelessness interventions provide personal data directly to the MHCLG Data Team via Egress and programme participation data through the DELTA application OR both personal data and programme participation data through the DELTA application.

Within the DELTA application (MHCLG) personal data records will be securely stored. These records are associated within the system and can be identified as “Dataset A1” and “Dataset A3”. The data will be securely extracted from the DELTA application by the Data Team at MHCLG. The personal data (via Egress and DELTA) will be stored in a restricted access folder to which only the MHCLG Data Team have access.

The Data Team will create MHCLG unique individual and household level identifiers based on the personal data using an algorithm². The Data Team will then attach the MHCLG identifiers to “Dataset A1” and “Dataset A3” to create “Dataset B”. “Dataset B” will include programme participation data for those who have been subject to homelessness interventions.

The MHCLG Data Team will use “Dataset B” to create a “look-up” table of LA identifiers and MHCLG identifiers, i.e. without personal data (“Dataset C”). This dataset will include programme participation data for those subject to homelessness interventions. Dataset C will be provided to the Homelessness Analysis Team at MHCLG.

The H-CLIC data is associated within DELTA and identified as “Dataset A2. The data will be securely extracted from the DELTA application by the Homelessness Analysis Team at MHCLG. The Homelessness Analysis Team will combine “Dataset A2” and “Dataset C” and remove LA IDs to create “Dataset D”. “Dataset D” will be used by Homelessness Analysis Team to track outcomes for individuals and households over time and across LA boundaries and to produce aggregate level results for those subject to homelessness interventions.

Project 3 – Linking to administrative data from other Government Departments

Stage	Dataset	Description of dataset	Processing	Team responsible
Stage 1a	Dataset A1	LA IDs and personal data	Combination of data from LAs into 1 dataset	DELTA application
Stage 1b	Dataset A2	LA IDs and case level H-CLIC data	Combination of data from LAs into 1 dataset	DELTA application
Stage 1c	Dataset A3	Personal and programme participation data,	No additional processing	DELTA application

² The algorithm creates household and individual level IDs using the personal data. These IDs ensure the analysts cannot identify individuals and the ID is created in such a way that it cannot be linked back to the personal data to identify individuals.

**Data linking to Evaluate Homeless Programmes and to
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		organisational IDs		
Stage 2	Dataset B	MHCLG IDs, LA IDs, organisational IDs and personal data, programme participation data	Create MHCLG IDs within Dataset A1 and Dataset A3	Data Team, MHCLG
Stage 3	Dataset C	MHCLG IDs, LA IDs only, organisational IDs programme participation data (look-up table)	Removal of personal data from Dataset A1 and A3	Data Team, MHCLG
Stage 4	Dataset D*	MHCLG IDs, H-CLIC data and programme participation data	Combination of Dataset A2 and Dataset C, removal of LA IDs	Homelessness Analysis Team, MHCLG
Stage 5	Dataset E	MHCLG IDs and personal data	Creation of dataset for processing by OGDs, removal of LA IDs from Dataset B	Data Team, MHCLG
Stage 6	Datasets F	MHCLG IDs and OGDs data	Matching Dataset E with OGD data, removal of personal data	OGDs
Stage 7	Dataset G	MHCLG IDs and derived variables from OGD data	Creation of derived variables using Datasets F	Homelessness Analysis Team, MHCLG
Stage 8	Dataset H*	MHCLG IDs, H-CLIC data and OGDs data	Combination of datasets D and G	Homelessness Analysis Team, MHCLG

*Datasets highlighted in bold are used for analysis by the Homelessness Analysis Team at MHCLG

The project will use personal data provided by local authorities, including LA individual and household level unique identifiers, supplied to MHCLG on individuals and households presenting to services for homelessness services as well as case level data collected for homelessness statistics (a full list of variables sent by local authorities can be found in Annex B).

In addition agencies/public bodies providing homelessness interventions provide personal data directly to the MHCLG Data Team via Egress and programme participation data through the DELTA application OR both personal data and programme participation data through the DELTA application.

Within the DELTA application (MHCLG) personal data records will be securely stored. These records are associated within the system and can be identified as "Dataset A1" and "Dataset A3". The data will be securely extracted from the DELTA application by the Data Team at MHCLG. The personal data (via Egress and DELTA) will be stored in a restricted access folder to which only the MHCLG Data Team have access.

The Data Team will create MHCLG unique individual and household level identifiers based on the personal data using an algorithm³. The Data Team will then attach the MHCLG identifiers to "Dataset A1" and "Dataset A3" to create "Dataset B". "Dataset B" will include programme participation data for those who have been subject to homelessness interventions.

The MHCLG Data Team will use "Dataset B" to create a "look-up" table of LA identifiers and MHCLG identifiers, i.e. without personal data ("Dataset C"). This dataset will include programme participation data for those subject to homelessness interventions. Dataset C will be provided to the Homelessness Analysis Team at MHCLG.

The H-CLIC data is associated within DELTA and identified as "Dataset A2". The data will be securely extracted from the DELTA application by the Homelessness Analysis Team at MHCLG. The Homelessness Analysis Team will combine "Dataset A2" and "Dataset C" and remove LA IDs to create "Dataset D".

The MHCLG Data Team will remove the LA IDs and programme participation data from "Dataset B" to create "Dataset E". "Dataset E" will be used by other Government Departments (MOJ/DfE/DWP) to match to their administrative data. MOJ/DfE/DWP will identify records for the individuals using the personal data in "Dataset E", remove the personal data and then supply the Homelessness Analysis Team with a data extract ("Dataset F") for the individuals they are able to match to their dataset: Police National Computer; Work and Pensions Longitudinal Study; Single Housing Benefit Extract; National Pupil Database. The Homelessness Analysis Team will use the data provided by MOJ/DWP/DfE (multiple "Datasets F") to create a dataset of derived variables "Dataset G".

The Homelessness Analysis Team will combine "Dataset D" with "Dataset G" to create "Dataset H". Dataset H will allow Homelessness Analysis Team to track outcomes for individuals and households over time and across LA boundaries, to produce aggregate level results for those subject to homelessness interventions and look at wider outcomes (offending, benefit, Child in Need and educational) for the cohort over time.

The national administrative data sources identified for inclusion in Project 3 have not yet been agreed with other Government Departments, but are likely to include the National Pupil Database and Individualised Learner Record, Police National

³ The algorithm creates household and individual level IDs using the personal data. These IDs ensure the analysts cannot identify individuals and the ID is created in such a way that it cannot be linked back to the personal data to identify individuals.

Computer, Prisons National Offender Management Information System (p-NOMIS), the Work and Pensions Longitudinal Study and Single Housing Benefit Extract. Additional new data sources may be identified in future and added to a revised version of this document. (There is potential for health to be incorporated into the project – this is likely to be subject to a separate Privacy Impact Assessment).

As the analysis will be carried out on pseudonymised data⁴ (“Datasets D and H”), and care will be taken to protect the anonymity of individuals in research outputs, with results presented at an aggregate level, the project will answer the research questions with minimal intrusion. The Data Team will be responsible for pseudonymising the data. For this project personal data on individuals will be collected, transferred and retained by Data Team (“Datasets A1, A2, A3, Dataset B and E”).

In the Memorandums of Understanding (with other Government Departments), the data sharing agreements with local authorities and in the sections below MHCLG will set out the ways in which the Department will protect, securely store and destroy the data. All efforts will be made to ensure the risk of data loss at any point is minimised and that we only request the minimum amount of data necessary to carry out the project (see points under Principle 3 of the DPA set out below).

The projects outlined above refer to analysis of data submitted to MHCLG on homelessness and national administrative datasets. The datasets expected to be included are:

- H-CLIC (Homelessness Data Collection System – Homelessness Case Level Information Classification)
- the Work and Pensions Longitudinal Study and Single Housing Benefit Extract (benefits and employment records, housing benefits)
- the National Pupil Database (school attendance, attainment, children in need)
- the Police National Computer (criminal histories, cautions and convictions)
- p-NOMIS (length of sentence served).

⁴ The Administrative Data Taskforce defines pseudonymised data in the following way: “Such data cannot directly identify an individual as the personal data have been removed, but they include a unique identifier that enables the person’s identity to be re-connected to the data by reference to separate databases containing the identifiers as identifiable data. The unique identifier allows datasets to be linked together without knowing the identity of the person.” Administrative Data Taskforce (2012) *The UK Administrative Data Research Network: Improving Access for Research and Policy. Report from the Administrative Data Taskforce*. December 2012. Pseudonymisation of this data will involve a technical process of replacing person identifiers in a dataset with a unique identifier available to the data user, from which the identities of individuals cannot be intrinsically inferred. The unique identifier themselves will not contain any information that could identify the individual to which they relate.

Records for individuals and households presenting to housing services will be found in H-CLIC and each of the nationally held administrative datasets using personal identifiers supplied by local authorities and agencies/public bodies delivering homelessness interventions.

This project includes the sharing of data for research and analysis purposes only (this includes evaluation and monitoring purposes). The aim of the project is to conduct an analysis of the data, not to make any decisions in relation to specific individuals. Therefore, having linked together H-CLIC data, programme participation data for homelessness interventions and the data extracts supplied by each of the government departments in order to monitor the impact of the Homelessness Reduction Act 2017, to understand repeat homelessness and the success of prevention activities, the linked data will not be matched to any other data. Indeed, since the linked dataset will only contain a pseudonymised identifier (MHCLG unique IDs), it will not be possible to match it to other datasets (outside of the project).

Two separate teams at MHCLG will process data: the Data Team will process the personal data and create the key; and the Homelessness Analysis Team will process the attribute data. MHCLG have put in place security measures to ensure the personal data and the attribute data is never linked (see data security measures outlined in Annex D).

The Data Team hold the key (personal information) and access will be restricted to that team alone. The personal data ("Datasets A1 and A3") will never be accessible to both MHCLG teams and held separately to the H-CLIC data ("Dataset A2") at all times to reduce the risk of individuals being identifiable. The Data Team will create a 'look up table' of MHCLG IDs and LA IDs ("Dataset C") (this contains no personal data) and provide this to the Homelessness Analysis Team to allow them to track individual and household outcomes over LA boundaries and over time, evaluate the effectiveness of homelessness evaluations as well as link the H-CLIC data to data from other government departments. The data will be shared and processed in a way that does not allow the Homelessness Analysis Team to be able to identify individuals.

The Homelessness Analysis Team will be provided annually with pseudonymised data from other government departments (multiple "Datasets F") and H-CLIC data throughout the project at quarterly intervals ("Dataset A2"). The Homelessness Analysis Team will overwrite/update copies of the H-CLIC data ("Dataset D") at pre-agreed intervals and the final pseudonymised linked dataset of derived variables ("Dataset G") indefinitely (see tables 2 for retention periods for data) (this latter part of the project is explained in detail in the Memorandums of Understanding with each Government Department).

Government Departments supplying data for the project and Local Authorities supplying personal data on individuals/households presenting for housing services will not have access to the linked pseudonymised data.

The results of the project will be provided by MHCLG analysts (Homelessness Analysis Team) to Departments participating in the data share as well as local authorities at least annually. Additional reports will be circulated containing additional analysis and these will be published/provided to Departments and local authorities at various points in the project.

The legal basis for the data share for **projects 1 and 2** have been agreed with lawyers at MHCLG and will be agreed with key stakeholders providing data for the project (see legal gateway used for the datashare under 4.1.2 Lawful Processing). The **Data Controllers** will be as follows:

- **Local Authorities** for the dataset of personal data and H-CLIC data and for the transfer of that data to MHCLG Delta System.
- **Agencies/public bodies** for the dataset of personal and programme participation data and for the transfer of that data to the MHCLG Delta System.
- **MHCLG** for the data provided by Local Authorities to the Delta System once it arrives at MHCLG (“Dataset A1” and “Dataset A2”), the personal data provided by agencies/public bodies (“Dataset A3”) once it arrives at MHCLG, “Dataset B”, “Dataset C”, the pseudonymised H-CLIC/homelessness intervention data “Dataset D”, the pseudonymised data supplied to the Homelessness Analysis Team by the Government Departments listed above (“Dataset F”) once it arrives at MHCLG, for the dataset of derived variables created by MHCLG (“Dataset G”) and “Dataset H” which will be created by MHCLG for the purposes of analysis for the evaluation. MHCLG will be data controller for the transfer of “Dataset E” to Government Departments by MHCLG.

[For Project 3 – not yet agreed with other government departments]

- **DfE** for the matched data in the form of “Dataset F” (DfE data (National Pupil Database) matched to “Dataset E”) and for the transfer of “Dataset F” to the Homelessness Analysis Team.
- **DWP** for the matched data in the form of “Dataset F” (DWP data (Work and Pensions Longitudinal Study, Single Housing Benefit Extract, Single Housing Benefit Extract) matched to “Dataset E”) and for the transfer of “Dataset F” to the Homelessness Analysis Team.
- **HMRC** for the matched data in the form of “Dataset F” (HMRC data (Work and Pensions Longitudinal Study) matched to “Dataset E”) and for the transfer of “Dataset F” to the Homelessness Analysis Team.
- **MOJ** for the matched data in the form of “Dataset F” (MOJ data (Police National Computer, P-Nomis) matched to “Dataset E”) and for the transfer of “Dataset F” to the Homelessness Analysis Team.

The **Data Processors** will be as follows:

- **Local Authorities** for providing the personal data and case level H-CLIC data
- **Agencies/public bodies** for providing personal data and programme participation data
- **The Data Team, MHCLG** for “Datasets B, C and E”,
- **The Homelessness Analysis Team, MHCLG** for “Datasets D”, and the matched data provided by government departments (multiple “Datasets F”), “Datasets G and H”. The Homelessness Analysis Team will combine H-CLIC information supplied by Local Authorities, programme participation data and derive variables from the data supplied by government departments for the purpose of the evaluation.

[For Project 3 – not yet agreed with other government departments]

- **DWP** will be data processor for HMRC for “Dataset F”, i.e. the matching of HMRC data from the Work and Pensions Longitudinal Study.
- **CapGemini** (or in the event this contractor changes their successor) will be data processor for DfE for “Dataset F”, i.e. the matching of DfE data from the National Pupil Database.

In summary:

- This proposed data matching exercise forms an important and integral part of a project to monitor and evaluate the implementation of the Homelessness Reduction Act 2017, bringing together homelessness data and a large range of national datasets to understand more about repeat homelessness and how prevention activities relate to outcomes for those who have been homeless.
- The data sharing undertaken as part of this project aims to provide both central government departments and local public services with valuable information about the impact of their investment in homelessness initiatives to help inform future service reform and investment decisions.
- Data sharing is essential for this work to proceed and is a priority for MHCLG and has ministerial backing.

2. Design of the proposal

This Data Protection Impact Assessment sets out three projects. These projects seek to use the personal data to: track the outcomes of individuals and households at risk of homelessness over local authority boundaries and over time; evaluate the effectiveness of homelessness interventions; and match to offending, prisons and probation data (PNC, P-NOMIS), employment and benefit data (WPLS, SHBE) and pupil data on academic achievement and engagement with education and children in need (NPD, ILR). MHCLG analysts will be looking across the combined datasets for relationships between behaviour/outcomes and the families, e.g. whether a household with at least one child in need and/or adult/child cautions are related to housing outcomes.

The variables required from Local Authorities, agencies/public bodies and each Government Department dataset and the variables within each dataset (referred to below) will be included in a full excel spreadsheet in the final version of this PIA. The spreadsheet will include access control spreadsheets which will be used to record where the data will be held at all stages in the project. The templates will be used by MHCLG and the government departments supplying data to ensure that the location of the data is known at all times and to ensure that the data are securely destroyed to the agreed timetable (set out below and in the MoUs). A list of variables collected for H-CLIC has been included in Annex B. As inclusion of other datasets are agreed this document will be updated.

The project incorporates different data flows carried out simultaneously, which complicates the setting out of data flows and naming of datasets. The project and data flows will work as follows (more detail is provided below and in Annex A – project data flows):

Stage 1a	Dataset A1	LA IDs and personal data	Combination of data from LAs into 1 dataset	DELTA application
Stage 1b	Dataset A2	LA IDs and case level H-CLIC data	Combination of data from LAs into 1 dataset	DELTA application
Stage 1c	Dataset A3	Personal and programme participation data,	No additional processing	DELTA application Data Team,

	organisational IDs		MHCLG
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Stage 1a Each Local Authority will submit to the MHCLG Delta System individual level personal data gathered as part of assessments for housing services. This will include individual and household level Local Authority identifiers.

Stage 1b Each Local Authority will submit case level data on homelessness (H-CLIC) to the Delta System. This will include individual and household level Local Authority identifiers.

Stage 1c Agencies/public bodies will submit individual level personal and programme participation data to the Delta System or directly to MHCLG Data Team.

Stage 2	Dataset B	MHCLG IDs, LA IDs, organisational IDs and personal data, (and programme participation data)	Create MHCLG IDs within Dataset A1 and Dataset A3	Data Team, MHCLG
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Stage 2 “Dataset A1” and “Dataset A3” will be used by the Data Team to create MHCLG unique identifiers (individual and household level) and will be attached to “Dataset A1”/“Dataset A3” to create “Dataset B”.

Stage 3	Dataset C	MHCLG IDs, LA IDs and organisational IDs only, (and programme participation data) (look-up table)	Removal of personal data from Dataset A1 and A3	Data Team, MHCLG
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Stage 3 The Data Team will remove the personal information from “Dataset B” to create a look-up table of only MHCLG and LA unique identifiers (“Dataset C”). The Data Team will send “Dataset C” to the Homelessness Analysis Team.

Stage 4	Dataset D*	MHCLG IDs, H-CLIC data and programme participation data	Combination of Dataset A2 and Dataset C, removal of LA IDs	Homelessness Analysis Team, MHCLG
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Stage 4 The Homelessness Analysis Team will combine “Dataset C” with the H-CLIC data (“Dataset A1”), removing LA unique identifiers to create “Dataset D”. “Dataset D” will be used by the Homelessness Analysis Team to look at a range of factors associated with homelessness and to gain a better understanding of repeat homelessness and to evaluate homelessness interventions.

Stage 5	Dataset E	MHCLG IDs and personal data	Creation of dataset for processing by OGDs, removal of LA IDs from Dataset B	Data Team, MHCLG
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Stage 5 The Data Team will remove the LA unique identifiers from “Dataset B” to create a dataset for processing by other Government Departments (“Dataset E”). “Dataset E” will be sent by the Data Team to each Government Department for matching.

Stage 6	Datasets F	MHCLG IDs and OGDs data	Matching Dataset E with OGD data, removal of personal data	OGDs
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Stage 6 Each Department will match “Dataset E” to their administrative data to create multiple “Datasets F”. They will remove personal data from the matched datasets, but leave in the MHCLG unique identifier.

Stage 7	Dataset G	MHCLG IDs and derived variables from OGD data	Creation of derived variables using Datasets F	Homelessness Analysis Team, MHCLG
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Stage 7 “Datasets F” will be sent by OGDs to the Homelessness Analysis Team at MHCLG. MHCLG will use the matched data (multiple “Datasets F”) to create a dataset of derived variables “Dataset G” which includes the MHCLG unique identifier. (“Dataset G” will not include names, addresses or dates of birth or the LA unique identifier).

Stage 8	Dataset H*	MHCLG IDs, H-CLIC data and OGDs data	Combination of datasets D and G	Homelessness Analysis Team, MHCLG
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Stage 8 “Dataset G” (the pseudonymised dataset of derived variables based on the matched data) will be combined with “Dataset D” (H-CLIC data, (programme participation data)) using the MHCLG unique identifiers to create “Dataset H”. This work will be carried out by the Homelessness Analysis Team. The Homelessness Analysis Team will use “Dataset H” for analysis of a wider range of outcomes associated with homelessness prevention and to gain a better and broader understanding of repeat homelessness.

More detail on each stage is set out in a fuller DPIA held by MHCLG.

Publication of evidence

No personal data is currently or will be made publicly available. The Memorandum of Understanding with each Government Department and data sharing agreements with local authorities supplying data for the project which accompany this document contain rules around publishing results from any analysis which are designed to maintain the confidentiality of individuals and households.

MHCLG will carry out a thorough check of the data and ensure that all steps are taken within its powers to minimise the risk that any outputs lead to identification of a person by a third party. MHCLG will also inform local authorities and inform and consult colleagues at MOJ, DWP, HMRC and DfE in advance of any published use of the data, to check and sign-off analysis and/or publications and confirm that the data is being used and described appropriately.

The results of the analysis will be made public in aggregated form providing all parties agree to the publication plans. MHCLG will consult parties (local authorities, DWP, HMRC, DfE and MOJ) in advance of any published use of the data, to quality assure, check and sign-off analysis and/or publications and to confirm that the data are being used and described appropriately.

3. Potential data protection issues (risks of data sharing/processing, damage that could be caused) and how the risks will be mitigated

The main risk to data protection is that a third party manages to gain access to data obtained in the course of the project, either at the point when local authorities, MHCLG and Government Departments are compiling or processing the data. This risk will be managed by keeping the amount of information held alongside personal data to the minimum required for the execution of the project, transferring and storing the data securely and by limiting access to a small number of named individuals (as outlined in each of the stages described above). Measures to mitigate the risk of data loss/a data breach will be put in place and agreed with local authorities and each Government Department involved in data sharing.

Data shared for the purpose of this project will be adequate, relevant and not excessive in relation to the purpose for which they are being processed in accordance with the third Principle of The Data Protection Act 1998 (DPA). Different options on the number of administrative records to be included in this data sharing study have been assessed and agreed to ensure that there is an appropriate and defensible balance between the legitimate aims pursued by the data sharing study and the requirements of the DPA and Article 8 of the ECHR. The quantity of records is uncertain at present, however we estimate the project will involve the matching of approximately 825,000 individuals per year assessed when they present for housing services.

MHCLG, Local Authorities, MoJ, DfE and DWP/HMRC will take every opportunity to minimise any risks initially and control the risk should it occur. This includes

- Approval and guidance given from lawyers and data compliance experts in each local authority, Government Department
- The Homelessness Analysis Team, MHCLG will only work with pseudonymised data sets.
- The number of variables gathered and used by analysts will be relevant and sufficient to expedite the research as outlined in the MOUs/data sharing agreements.
- A MOU/data sharing agreement is in place to control the access and activity of analysts with access to the data and the variable exchanges between Local Authorities/MHCLG/Departments.

The Table below outlines the risk of breach of privacy, the impact on the individual and steps taken to minimise this risk:

Event	Impact on privacy	Rationale and steps taken to minimise impact/data breach	Consideration of alternative ways to lessen adverse privacy impacts
<p>Data is shared, processed (matched/linked) and stored for the purposes of matching personal data with nationally held administrative data. This is to enable monitoring and evaluation of Homelessness and Housing Services and the implementation of the Housing Reduction Act – to identify whether or not the legislation and services are meeting their aims.</p>	<p>Some people may feel a loss of autonomy (if they haven't given consent for their data to be shared).</p> <p>Some may not be aware of or understand how their data is being used.</p>	<p>The statutory basis for data collection is permitted by law (see 4.2 below).</p> <p>Local Authorities have been asked to inform families that their data is being passed onto MHCLG for the purposes of this project through the use of privacy notices and/or consent forms. This is an approach developed in discussion and agreed with the Information Commissioner's Office and local authorities (see 4.1 below for further discussion of fairness and use of privacy notices).</p>	<p>Obtaining informed consent from all individuals and households was considered. Gaining consent from every individual and household whose data will be passed on would fall to staff in housing services. It is considered burdensome, costly and could affect the data provided for homelessness statistics. Privacy notices will be issued to individuals and households with information about the project, the data being passed onto MHCLG and the purpose. Our discussions with the ICO about the new requirements for informed consent also suggest that issuing privacy notices is preferable, to avoid issues around imbalance of power (households feeling they have to give consent for data to be shared to receive services) and to reduce the burden on local authorities (the new requirements around record keeping for informed consent are stringent).</p>

	<p>There is potential for a data incident, for example the personal/matched/linked data to be accessed illegally during transfer and whilst being stored, an email sent mistakenly to incorrect recipient, for a MHCLG laptop to be stolen or lost in a public place/or paper copies or CD copies being lost/misplaced.</p>	<p>Strict controls will be put in place to ensure: only the minimum amount of data necessary to carry out the project will be shared (see under Principle 3 of the DPA below); that the data is only accessed by named individuals; and data is processed according to the written agreements.</p> <p>Processes will be put in place to ensure the secure transfer, handling, storage and destruction of the data, including protocols to ensure that data is only accessed securely on encrypted laptops, etc. Individuals accessing the data have been security checked and informed of their lawful obligations and processing requirements (see Annex D). These include encrypting and password protecting (with strong passwords) all datasets being transferred and providing passwords separately, accessing data only through a secure network and saving data to the secure network only at all times.</p> <p>Whilst at MHCLG, the data will be</p>	<p>Consideration was given to retaining the data within home Government Departments and the MHCLG analysts analysing the data on a standalone computer (silo linkage). This would not allow the MHCLG researchers to carry out the more complex analysis which allows MHCLG to look across the outcome measures for relationships in the data, e.g. whether homelessness interventions are related to outcomes including criminal activity, school attendance/attainment.</p> <p>Consideration was given to different secure methods for transferring data – these have been agreed according to Departmental preference (using secure email systems or secure CDs). Any method agreed has been checked by the CLAS consultant to ensure it meets Pan-Government security standards.</p>
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		<p>held securely at all times and personal data (“Datasets A1, A3, B and E”) will be stored and accessed separately to the H-CLIC data (“Datasets A2 and D”) and datasets containing matched data from other Government Departments (multiple “Datasets F, G and H”). Access controls will ensure data is only accessed by those with permission to do so.</p> <p>At MHCLG the data will be stored according to pan-Government security standards and for analysis purposes in a restricted access folder. Individuals accessing the data have passed CTC checked and been informed of their legal obligations.</p>	
	<p>There is a risk that individuals could be identified from the pseudonymised matched data (“Datasets D, G and H and multiple datasets F”).</p>	<p>Pseudonymisation (removal of personal data, but leaving a unique identifier in the dataset) and recoding variables (e.g. ages recoded into categories) of the matched data (“Datasets G and H”) and destroying the raw data at regular intervals reduces the possibility of identifying individuals. At no point will the data be linked or used alongside</p>	<p>Complete anonymisation of the dataset was considered, however this would not allow for MHCLG to track individuals and households across LA boundaries or over time or for any analysis at a household level (as the data will be collected at an individual level) and/or by characteristics, such as age and gender.</p> <p>Silo-linkage of each dataset was also</p>

		<p>the personal data “Datasets A1, A3, B or E”. “Datasets A1, A3, B and E” will be stored separately and securely by the Delta team in access restricted folders and staff will be made aware of their legal obligations around handling and storing the data. A security operating procedure (Annex C) sets out how data security will be maintained. This has been signed off by the CLAS consultant and meets pan-Government security standards.</p>	<p>considered (keeping MOJ data separate from DfE data, and so on, i.e. looking at each matched dataset separately). This would not allow for the analysis we need to carry out where we consider the household as a whole and the impact of different factors on housing outcomes, for example benefit and offending histories. .</p>
<p>Documentation and publication of the results (see Stage 7 above)</p>	<p>There is a risk that individuals could be identified in outputs (publications).</p>	<p>Any published results are subject to strict controls to reduce the potential to identify individuals and all outputs will be checked thoroughly and agreed by all parties to maintain the confidentiality of individuals. The results of the analysis may be made public in aggregated form providing all parties agree to the publication plans.</p> <p>MHCLG will carry out a thorough check of the data and ensure that all steps are taken within its powers to minimise the risk that any outputs lead to identification</p>	<p>It is in the public interest to publish results of whether housing services and the legislation has contributed to reducing homelessness and improving other outcomes (e.g. for children). We are committed to publishing findings whilst maintaining the confidentiality of individuals.</p> <p>No other ways to reduce privacy impacts have been considered.</p>

		<p>of a person by a third party. This will include a requirement that local authorities have provided a sample of a minimum size before MHCLG is able to provide local results.</p> <p>MHCLG will also inform and consult colleagues at MOJ, DWP/HMRC and DfE (and local authorities where relevant) in advance of any published use of the data, to check and sign-off analysis and/or publications and confirm that the data is being used and described appropriately.</p>	
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4. Compliance with the eight Data Protection Act Principles

Personal data to be gathered for this project includes the following (with sensitive personal data highlighted in bold):

Names
Dates of birth
Postcode
Ethnicity
Gender
National Insurance Number
Support needs of household applying for help with homelessness
Activities associated with Prevention or Relief Duty
Decisions and Duties
Assistance provided
Temporary accommodation

National Pupil Database

Children in care
Length of time in care
Children in need
Child Protection Plans
Length of time in care
Time on unauthorised absences
Proportion of time spent absent
Exclusions from school (temporary and permanent)
SEN
Eligibility for free school meals
Pupil attainment (at the key stages and for each subject)
Whether attending a pupil referral unit
Length of time attended a pupil referral unit
Type of setting

Work and Pensions Longitudinal Study

Whether adults are claiming benefits and type of benefit (present and past)
Whether participating in any work Programmes
Whether adults are in employment
Nature of health problem, if on incapacity benefits
Income, tax and tax credits

Single Housing Benefit Extract

Income (to identify low paid workers)
Tenancy type
Benefit type (housing benefit, council tax relief)

Police National Computer

Number of criminal convictions (present and past)
Number of offences and type
Disposals

P-NOMIS

Length of prison sentence
Length of prison sentence served

1st principle:

*Personal data shall be processed **fairly and lawfully** and, in particular, shall not be processed unless—*

- (a) At least one of the conditions in Schedule 2 is met, and*
- (b) In the case of sensitive personal data, at least one of the conditions in Schedule 3 is met.*

The equivalent in the GDPR is Article 5(1)(a): personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject.

1. Fairness

MHCLG will rely on Schedule 2 condition 5 (c) of the DPA for lawful processing of the data to allow datasets to be matched/linked rather than the consent of individual subjects. This will help avoid the problems that may arise if a large number of individuals withhold consent, or if there are systematic differences between those who consent to data linking and those who do not. This is an approach supported by the Administrative Data Taskforce, which states it would be impractical to require explicit consent from research subjects before linking large de-identified administrative datasets (Administrative Data Taskforce 2012: 19) and that it could potentially invalidate the analysis by biasing the sample: if individuals who consent to data linking are not typical of the wider population of those who are homeless or at risk of becoming homeless the analysis may provide a poor estimate of the effects of intervention designed to prevent homelessness; and if the number of individuals who give consent to linking is low the impact estimate may prove inconclusive.

MHCLG has held regular discussions about the project with the Information Commissioner's Office. These discussions have included working through how to best inform people about how their data is being used. It has been agreed that local authorities should make every effort to inform families about how their personal data will be used for this project. Local authorities should where possible and practical tell people directly about the research and should issue privacy notices in person and/or in public places (discussed in more detail below).

Privacy notices

MHCLG has determined that the privacy notices are necessary in order to inform participants about the use of their data and local authorities have informed participants about the use of their data in this way through privacy notices. In light of the sensitive nature of the project and vulnerability of certain groups, MHCLG have agreed the following methods of communicating the notice in discussion with the Information Commissioner's Office. The Information Commissioner has suggested a layered approach to issuing privacy notices with high level information issued on posters/signage and more detail available on websites:

- Notices as part of the assessment process and/or in public places such as Housing Options office, Job Centres, Community Centres, Support Group venues, GP surgeries/hospitals etc. To ensure participants have an opportunity to see these, they should be displayed in places and services that they are likely to visit, e.g. GP surgeries, children's services, benefit offices, drug treatment services, etc.

- Notices on Local Council and MHGLC websites

Local Authorities have been asked by MHCLG to update their privacy notices and information provided to households assessed when they present for help with housing to let participants know that their personal data will be shared for the purposes of evaluating the programmes related to Homelessness. This is left to the discretion of the Local Authority. MHCLG consider it the Local Authority's responsibility to put in place measures which ensure they adhere to the requirements of the Data Protection Act/revised Data Protection Act/GDPR.

The processing by local authorities, Departments and MHCLG will be in accordance with the first data protection principle requiring that the data be processed fairly and lawfully:

- all personal identifiers will be held in the secure data laboratory and held separately (by the Data Team at MHCLG) from the matched data to reduce the risk of individuals being identified from the pseudonymised dataset;
- the pseudonymised matched data will only be shared where necessary and only between government departments and Ministry of Housing and Communities and Local Government;
- the data will not be processed to support measures or decisions with respect to particular individuals;
- the data will not be processed in such a way that substantial damage or substantial distress is or likely to be caused to any data subject; and
- appropriate security measures will be in place to prevent unauthorised use of the information.

See also page 37 – 3. Conditions for processing for discussion of schedules 2 and 3.

MOJ, DWP and DfE have their own privacy notices which inform the public of why and how their data is used. These can be found on each Department's websites or can be provided on request.

2. Lawful processing

MHCLG will obtain and use this information for the research purposes outlined in this Data Protection Impact Assessment (these will also be included in MOUs/data sharing agreements) in exercise of its common law powers. The detail of the legal gateways for data sharing will be updated after May 25th 2018, when the Digital Economy Act 2017 comes into force.

MHCLG

MHCLG, as an emanation of the Crown with benefit from the Royal Prerogative, has ordinary common law powers to do whatever a natural person may do (subject to overarching legal constraints), in contrast with bodies which have powers conferred on them by statute and no powers under the common law and can share and process data for the purposes of research so long as it complies with the Data Protection Act 1998, Human Rights Act 1998 and common law duty of confidentiality. Compliance with the Data Protection Principles are explored further in section 4 of this PIA.

Local Authorities

Local authorities are seeking to rely on the general power of competence under section 1 of the Localism Act 2011 and powers under section 111 of the Local Government Act 1972 to share data for the purposes of the project. Local authorities have been asked to satisfy themselves that the legal powers are in place to allow them to supply all of the information for the evaluation.

Legal gateways for sharing data between MHCLG with other Government Departments have not been included in this version of the DPIA. These will be updated as discussions with other government departments progress, including amending legal gateways accordingly.

Common Law Duty of Confidentiality

Common law is not written in statute, but established by court decisions over time. Accordingly, use of personal data for purposes which the data subject did not anticipate or authorise, could be found to be unlawful because such a use shares characteristics with the kinds of breaches of confidence that courts have judged unlawful.

The common law duty of confidentiality recognises that some information has a quality of confidence, which means that the individual or organisation that provided the information has an expectation that it will not be shared with or disclosed to others.

For information to have a quality of confidence it is generally accepted that:

- it is not “trivial” in its nature
- it is not in the public domain or easily available from another source
- it has a degree of sensitivity
- it has been communicated for a limited purpose and in circumstances where the individual or organisation is likely to assume an obligation of confidence.

However, confidentiality is a qualified right. The Department is able to override a duty of confidentiality when it is required by law, or if it is in the public interest to do so.

What does this mean in practice?

The Department must balance the duty of confidentiality with the public interest test when it is considering sharing or disclosing information. It has to make a decision about protecting confidentiality balanced against serving the public interest. In doing so, the Department have considered:

- the nature of the information to be disclosed
- what use will be made of the information
- how many people will have access to the information
- the confidentiality and security arrangements in place to protect the information from further disclosure
- the potential for distress or harm to data subjects

The information to be sent by local authorities to MHCLG and the other government departments is considered personal data. Some of the information provided by OGDs will have been provided in confidence by the individuals/families. The risk of a breach of duty of confidence to information provided by OGDs is minimal as the information is pseudonymised before being passed to the Homelessness Analysis Team at MHCLG and security measures ensure those handling the matched data do not know the identity of the individuals (different staff at MHCLG (Data Team) handle the personal information (names, dates of birth, etc.) to those handling the matched data (Homelessness Analysis Team). In circumstances where a person has revealed information on the assurance/understanding that it will remain confidential, it is left to the discretion of Local Authorities to decide whether they can lawfully disclose this information to MHCLG for the purpose of the project. The information will not be used for any other purpose other than that which is outlined in the data sharing agreement and memorandum of understanding between the parties – i.e. to measure the achievement of desired outcomes and to estimate the costs and benefits homelessness programmes deliver.

MHCLG have considered the common law duty of confidentiality and whilst it accepts that personal data may have been given in confidence by the data subject, such interference is justified and is in the public interest because:

- The overriding aim of the project is linked with the wider programme of homelessness work, which aims to reduce homelessness and improve outcomes for households (children and adults) who are homeless or at risk of becoming homeless. This includes determining whether households have better outcomes as a result of homelessness interventions such as safeguarding children and/or vulnerable adults, reducing offending behaviour, improving school attainment – this project will improve the evidence base about the factors associated with homelessness and outcomes associated with homelessness programmes in accordance with the objectives of the Act;
- The Department have also considered the potential risk of harm to the data subjects in the event of data loss or unauthorised disclosure and the Department have sought to minimise such risks by putting in place safeguards. The Department, local authorities and other government departments will only use and share the minimum and proportionate amount of information required for the project;
- Access to confidential information will be on a strict need-to-know basis;
- All parties understand their responsibilities in relation to data protection legislation;
- Every effort will be made to consider and minimise risks of identification (or re-identification) to data subjects and their families arising from all aspects of data handling.
- Measures will be taken to remove the sensitivity of the data through pseudonymisation and anonymisation; and
- technical and security measures will be put in place and strictly adhered to by those sharing the data.

Human Rights Act 1998 – Article 8 European Convention Human Rights

Data sharing by public authorities must comply with the European Convention of Human Rights (now part of the UK domestic law as a result of the Human Rights Act 1998), and in particular Article 8, which provides:

“Everyone has the right to respect for his private and family life, his home and his correspondence.

There shall be no interference by a public authority with the exercise of this right except such as is in accordance with the law and is necessary in a democratic society in the interests of national security, public safety or the economic well-being of the country, for the prevention of disorder or crime, for the protection of health or morals, or for the protection of the rights and freedoms of others.”

Processing personal data (including sharing it) will often constitute an ‘interference’ with the right to respect for private and family life within the meaning of Article 8.2.

The Department’s view is that the interference with Article 8 is justifiable on the basis that it is necessary and proportionate in the interests of the economic well-being of the country, for the prevention of disorder or crime, the protection of health or morals and the protection of rights or freedoms of others.

The Homelessness Data Linking Project will improve understanding of the effectiveness and cost benefit of the Homelessness Reduction Act and housing support in supporting households who are homeless or at risk of homelessness - such as reducing their offending behaviour, levels of unemployment, and improving educational outcomes. It will also provide essential information about how the services delivered by local authorities might be improved further, by gaining an understanding of what is and isn’t working well. The interference is, therefore, necessary in the interests of the economic well-being of the country, for the prevention of disorder or crime, the protection of health or morals and the protection of rights or freedoms of others.

The Department’s view is that any interference with Article 8 is proportionate to the pursuit of this legitimate aim as information processed for the Homelessness Data Linking Project will be the minimum information needed to achieve this aim and this project is accompanied by appropriate safeguards as outlined in this assessment.

3. Conditions for processing

Condition for processing personal data under Schedule 2 to the DPA

At least one of the conditions under Schedule 2 to the DPA is met as:

Schedule 2 paragraph 5(c) - “The processing is necessary... for the exercise of any functions of the Crown, a Minister of the Crown or a government department.” This condition covers the processing of personal data relating to functions carried out by MHCLG and other government departments and offices (it is a departmental responsibility and priority to reduce homelessness).

Schedule 2 paragraph 5(d) – The processing is necessary for the exercise of any other functions of a public nature exercised in the public interest by any person. This condition is more broadly worded. This condition covers processing provided that it is

in support of a public function that is in the public interest (in this case supporting households who are homeless or at risk of homelessness).

The processing of personal data is to further our understanding of repeat homelessness, the success of prevention activities, the outcomes of those in receipt of homelessness services, and the causes and factors associated with homelessness (spanning the remit of a number of different government departments). It is also the best method to control for family and individual characteristics.

The results of this data share will be used to inform policy across Departments and decision making by local authorities.

The shared data will be used to inform future policies aimed at those who are homeless or at risk of becoming homeless. In particular it will be used to assess whether the approach by local authorities and the Homelessness Reduction Act are effective at improving the outcomes of those who approach local authorities for help.

See the 'Project Outline' section of this PIA for more information on the necessity of this project.

The equivalent lawful basis for processing personal data in the GDPR is Article 6(1)(e): Public task - the processing is necessary to perform a task in the public interest or for official functions, and the task or function has a clear basis in law.

Condition for processing sensitive personal data under Schedule 3 to the DPA.

Where the personal data to be processed is sensitive personal data it will be possible to rely on paragraph 7(1)(c) of Schedule 3 to the DPA as a condition for processing as for the reasons outlined above, the processing is necessary for the exercise of the functions of a government department. It will also be possible to rely on the condition for processing sensitive personal data specified in article 9 of the Data Protection (Processing of Sensitive Personal Data) Order 2000. This allows for the processing of sensitive personal data where it:

- is in the substantial public interest;
- is necessary for research purposes (which expression shall have the same meaning as in section 33 of the Act);
- does not support measures or decisions with respect to any particular data subject otherwise than with the explicit consent of that data subject; and
- does not cause, nor is likely to cause, substantial damage or substantial distress to the data subject or any other person.

If the approaches used by local authorities to reduce homelessness are effective (and this is the key source of information to allow us to assess this), this project will demonstrate the savings to the Government and the tax payer as well as improve the lives of those who are homeless or at risk of homelessness.

Learning from this project will be used to improve future housing services and should increase the effectiveness of services, reducing the harm and cost to society.

The equivalent condition for processing special category data in the GDPR is Article 9(2)(g), special category personal data may be processed if processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

In addition the DPA 2017 will provide a lawful basis to process criminal offence data (as required by Article 10 GDPR).

2nd principle:

Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes

The equivalent in the GDPR is Article 5(1)(b): personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

The second data protection principle is satisfied as the information is to be obtained for a specified and lawful purpose. In addition, by virtue of section 33(2) of the DPA, the further processing of personal data for research purposes such as this is not to be regarded as incompatible with the purposes for which they are obtained for the purposes of the second data protection principle so long as (a) the data are not processed to support measures or decisions with respect to particular individuals and (b) that the data are not processed in such a way that substantial damage or substantial distress is or likely to be caused to any data subject.

MHCLG will ensure the information is only used to meet the aims of the project and only process the data in a manner compatible with the purpose of the project.

The purposes for which personal data are obtained for this project are outlined in the privacy notice.

3rd principle

Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.

The equivalent in the GDPR is Article 5(1)(c): personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation').

The number of items of personal data to be used in this project will be limited to the minimum required to identify records relating to the relevant individuals within each dataset. Likewise, the variables to be included in the data extracts is limited to those that are essential to the aims and purposes of the data share, which helps to make this option proportionate. Further details as to why variables are necessary at each particular stage will be set out in an Annex once they have been agreed.

The data sharing practices are not unclear, nor intrusive; the data collected will be pseudonymised and its use will be for specific purposes set out in a DSA. It is not intended to use any of the data collected in relation to any specific individual.

Data shared for the purpose of this project will be adequate, relevant and not excessive in relation to the purpose for which they are being processed in accordance with the third Principle. Different options on the number of records held in administrative datasets to be included in this data sharing study have been assessed to ensure that there is an appropriate and defensible balance between the legitimate aims pursued by the data sharing study and the requirements of the DPA and Article 8 of the ECHR. The quantity of records is uncertain at present. We estimate the project will involve the processing and matching of approximately 825,000 individuals (275,000 households) per year.

4th principle

Personal data shall be accurate and, where necessary, kept up to date.

The equivalent in the GDPR is Article 5(1)(d): personal data shall be accurate and, where necessary, kept up to date.

Local authorities will collect personal information as part of their assessment process when households present for help. This information should be accurate at the time of collection and therefore at the time it is provided to MHCLG.

Personal information collected from Local Authorities will be kept to the minimum required to create a MHCLG pseudonymised identifier and to get a good match in administrative datasets, and will include National Insurance Number where possible to ensure good match rates. Any data supplied by Local Authorities will be uploaded securely to the MHCLG Delta system using XML or a form.

Datasets containing the attribute data (H-CLIC data, the matched dataset created by Government Departments) will contain a MHCLG pseudonymised identifier (to allow the MHCLG Homelessness Analysis Team to link individuals and households data together for analysis) and an indication of match quality provided by other Government Departments. The match quality variable should ensure that only those for whom a 'good quality match' is found in the administrative datasets of other Government Departments will remain in Dataset H.

H-CLIC data will be refreshed and updated every quarter. Each time the H-CLIC data is used for this project, it will be over-written with the most up-to-date data for each household.

5th principle

Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose of those purposes.

The equivalent in the GDPR is Article 5(1)(e): personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.

Section 33(3) of the DPA provides that personal data which are processed only for research purposes in compliance with the relevant conditions may, notwithstanding the fifth data protection principle be kept indefinitely. The relevant conditions will be satisfied for this project as they are:

- that the data are not processed to support measures or decisions with respect to particular individuals, and
- that the data are not processed in such a way that substantial damage or substantial distress is, or is likely to be, caused to any data subject.

The personal data and the pseudonymised dataset retention will be reviewed annually to ensure the data is being held for the right reasons.

The datasets have been broken up into three categories and set out in two tables below. Retention period starts from the creation of each dataset – these will be reviewed annually. Dates haven't been included as this project does not have a specified end date.

Table 2a: Retention and destruction of datasets – those needed for a short time and for carrying out QA checks

Dataset	Description of dataset	Parties retaining dataset	Team responsible	Retention Period
Dataset A1	LA IDs and personal data	MHCLG (Delta)	Automated process	18 months
Dataset A3	Personal and programme participation data	MHCLG (Delta/Data Team)	Automated process/Data Team	18 months
Dataset B	MHCLG IDs, LA IDs and personal data, programme participation data	MHCLG (Data Team)	Data Team	3 years
Dataset C Look up table	MHCLG IDs and LA IDs only, programme participation data (look-up table)	MHCLG (Data Team and HA Team)	Data Team and HA Team	3 years
Dataset E	MHCLG IDs and personal data	MHCLG (Data Team)	Data Team	3 years
Datasets F	MHCLG IDs and OGDs data	DfE, DWP, MoJ. MHCLG (HA Team)	DfE, DWP, MoJ. HA Team	1 year
Dataset G	MHCLG IDs and derived variables from OGD data	HA Team, MHCLG	HA Team	1 year

HA Team: Homelessness Analysis Team

Table 2b: Retention and destruction of datasets – those needed to be retained for longer/indefinitely

Dataset	Description of dataset	Parties retaining dataset	Team responsible	Retention Period
Dataset A2	LA IDs and case level H-CLIC data	MHCLG (Delta)	N/A	indefinitely
Dataset C Look up table	MHCLG IDs and LA IDs only, programme participation data (look-up table)	MHCLG, Data Team	Data Team	indefinitely
Dataset D*	MHCLG IDs, H-CLIC data and programme participation data	MHCLG, (HA Team)	HA Team	10 years
Dataset H*	MHCLG IDs, H-CLIC data and OGDs data	MHCLG, (HA Team)	HA Team	10 years

HA Team: Homelessness Analysis Team

6th principle

Personal data shall be processed in accordance with the rights of data subjects under the Act.

Personal data processed for this project (to be used only for this particular research purpose) are exempt from right of access to personal data under section 7 of the Data Protection Act. This is because the conditions outlined in Section 33(1) of the DPA, referred to above (4.5 5th principle) will be satisfied. The results of the research and the resulting statistics will not be made available in a form which identifies any data subjects.

If a complaint is received from an individual about the use of their personal data, MHCLG will take into account its obligations under the Data Protection Act when considering how to respond.

The equivalents in the GDPR are Articles 12 to 22: these set out individual rights. MHCLG will take into account its obligations under the GDPR when considering how to respond to requests relating to individual rights. The individual rights are:

1. ***The right to be informed*** – this is covered by privacy notices issued by local authorities
2. ***The right of access*** - MHCLG will respond appropriately to any subject access requests within 30 calendar days. The project will be set up in a way that the personal data cannot be linked or matched to the H-CLIC data or any other attribute data, i.e. any data used for research will be pseudonymised.
3. ***The right to rectification*** – local authorities should be able to deal with requests to correct any data. MHCLG will not be able to link or match the personal data to the H-CLIC data or any other attribute data held.
4. ***The right to erasure*** – this does not apply, as the data processing is NOT based on consent. The data will be deleted when processing is no longer justified.

5. **The right to restrict processing** – measures have been put in place to ensure all processing is compliant
6. **The right to data portability** – this doesn't apply as the data is not processed by automated means or based on consent
7. **The right to object** – there is no requirement to comply as the processing is necessary for the performance of a public interest task.
8. **Rights in relation to automated decision making and profiling** - the data will not be used by MHCLG for automated decisions or profiling.

7th principle

Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.

The equivalent in the GDPR is Article 5(1)(f): personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').

MHCLG data security experts have confirmed the security measures are sufficient for this project. They meet the required standard for data security which is for OFFICIAL-SENSITIVE data (BIL3).

Measures will be taken to ensure the security of the data throughout the project. This includes: individuals with access to the data; the transfer of data from Local Authorities to MHCLG and from MHCLG to Government Departments; how data is used, held and stored by all parties. These measures are outlined above under each of headings for the six stages of the work and in Annex D (see 2. Design of the proposal and Annex D: Security Operating Procedure).

8th principle

Personal data shall not be transferred to a country or territory outside the EEA unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

The equivalents in the GDPR are Articles 44 to 50. The processing of personal data shall be in accordance with these rights.

The personal data is provided by the Local Authorities to MHCLG. Personal data will be stored securely by MHCLG, as outlined in the Data Sharing Agreements. MHCLG is subject to data protection regulation. The data will not be transferred to a third party that falls outside data protection regulation.

MHCLG has no intention of processing the data outside the UK.

5. Stakeholder Analysis

Stakeholders directly involved:

- **MHCLG:** Homelessness Analysis Team, Troubled Families Team, Legal Directorate, IT and Data Security Team.

- **Local Authorities**
- **MOJ**
- **DWP**
- **HMRC**
- **DfE**
- **Information Commissioner's Office**

- **Households presenting to local authorities for housing services, those subject to homelessness interventions**

Stakeholders benefiting:

- Local Authorities
- Local Government Association
- NOMS: Prison and probation service
- Cabinet Office
- MOJ policy/operational teams
- DWP policy/operational teams
- DfE policy/operational teams
- Academics
- General public

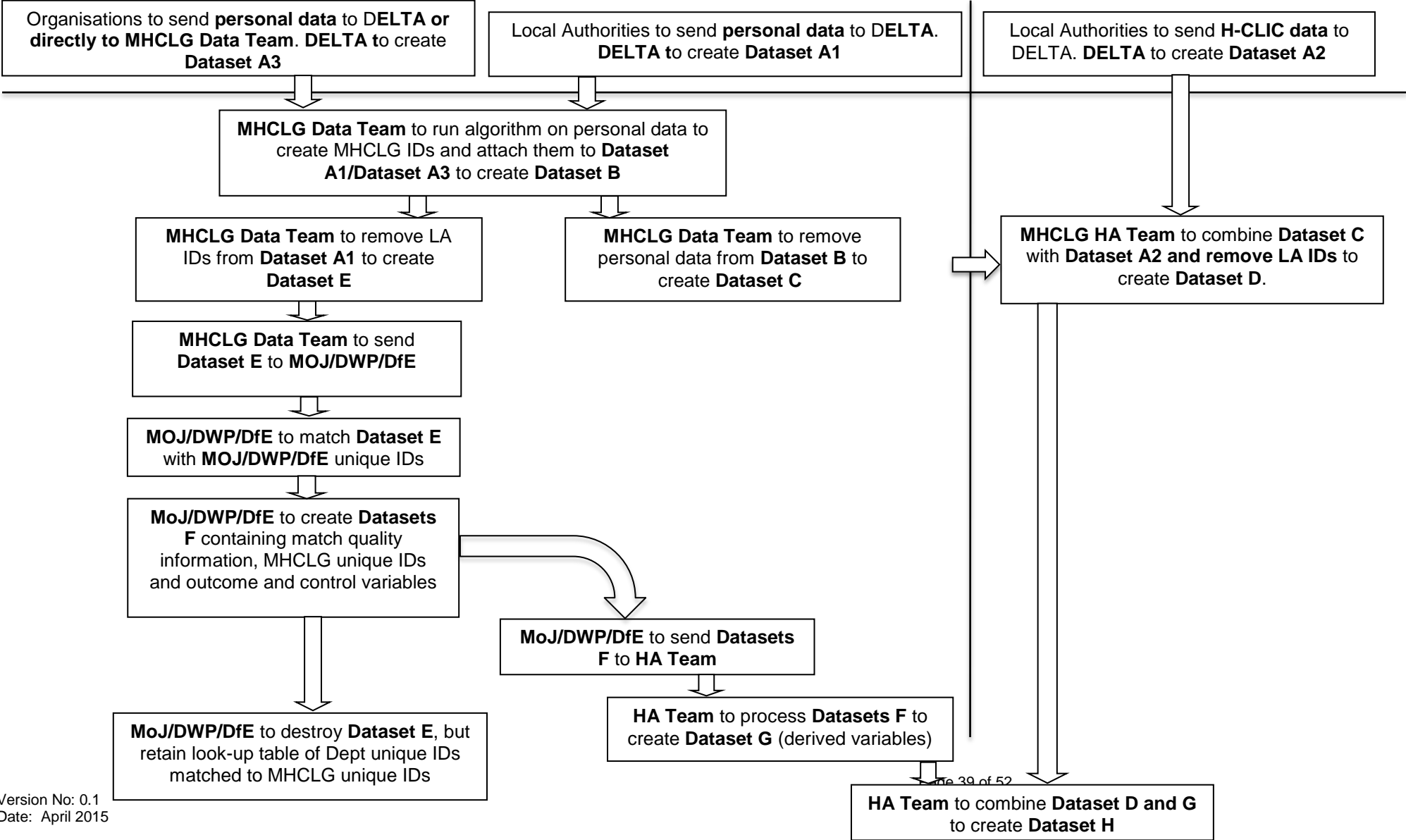
Households who are homeless or at risk of homelessness are not included here as stakeholders. The outcome of the research should improve services being provided to this group, but it will not benefit them as individuals/households.

6. Decision about the scope of the DPIA

This DPIA will be updated as the project progresses (it is in its early stages and various elements need to be agreed with key parties), because of the sensitive nature of the data being collected and analysed. This includes the consideration of the following:

- Legal gateway established and accepted by MHCLG, local authorities and in future MoJ, DWP, HMRC and DfE legal departments
- Secure data storage arrangements at MHCLG [and MoJ, DWP and DfE]
- Secure data transit arrangements between Local Authorities and MHCLG
- [Secure data transit arrangements between Government Departments and MHCLG.]
- DSA/MOUs in place to control access to data, scope of project and security arrangements.
- Data will only be used for analytical purposes.
- The retention period will be reviewed annually, or more frequently if required to ensure that the data is not retained any longer than necessary.

ANNEX A: Project Data Flows



- *1. Every Local Authority is expected to provide personal data over the lifetime of the evaluation – there are 329 LAs
- *2. The MHCLG unique identifier is retained but other personal information is removed.

Data at **MoJ** will be stored on secure workstations with password protected access to a limited and designated number of analysts.

Data at **DWP** will be stored in a restricted access folder on a secure server which meets the need for storing sensitive data with protected access to a limited and designated number of analysts.

Data at **DfE/held by CapGemini** (or in the event this contractor changes their successor) will be stored on a secure server with access to a limited and designated number of analysts.

Transfer of data will be secure at all times - data will be encrypted and password protected or sent securely (see SYOP)

The data will be stored securely (BIL3) at **MHCLG**. It will be handled by 2 separate teams, password protected and access limited to a designated number of analysts.

Data Team, MHCLG

HA Team: Homelessness Analysis Team, MHCLG

Dataset E will be processed by MHCLG Data Team and Datasets D, F, G and H processed by HA Team

Annex B: Data collected from local authorities for the project

Personal Data

Personal data will be provided separately to H-CLIC via a separate XML upload. This is to ensure the separation and security of identifiable personal data. MHCLG will either request this information at the quarter end or as otherwise required.

Field code	Field description	Further description	Options
A1.1	Local Authority Code and Case Reference Number	Should match the unique identifying code provided in the Main section.	
A1.2	Person identifier	Should match the unique person identifier provided in the People section.	
A1.3	Date of birth		Date
A1.4	Forename	Forename of the household member.	
A1.5	Surname	Surname of the household member.	
A1.6	National Insurance Number		NI Number, if provided
A1.7	Property name or number of current or last settled accommodation		Postcode
A1.8	Postcode of current or last settled accommodation		Postcode

The Homelessness Case Level Information Collection (H-CLIC) to monitor the Homelessness Reduction Act 2017

There are ten sections to the H-CLIC data collection:

1. **Main** - information on the main applicant and details of the homelessness application for the household.
2. **People** – the characteristics of each household member.
3. **Support** - any support needs in the household.
4. **Prevention** - activity if the Prevention Duty is owed.
5. **Relief** - activity if the Relief Duty is owed.
6. **Decision** – activity if the case proceeds to an assessment for a final homelessness duty, (the section 193(2) duty, the section 193C(4) duty, or the section 195A(1) duty).
7. **Final duties** - activity if the case was assessed as owed a final homelessness duty.
8. **Assistance** - assistance with support needs received by the household.
9. **Temporary accommodation** – provision of temporary accommodation and/or if a temporary accommodation duty is owed.
10. **Reviews** - any reviews requested of decisions made by the local authority.

1. The MAIN Section

The information collected in this section relates to the **main applicant** and details of the homelessness application.

Fields

Field code	Field description	Further description
1.1	Local Authority Code and Case Reference Number	The identifying code for the local authority prefixed to the Council's own Case Reference Number (CRN) for the case.
1.2	Previous Case Reference Number	A previous case reference number for the main applicant if they have previously received assistance from the authority. Optional
1.3	Reasons for eligibility for assistance	
1.4	Number of children	The number of children under 18, including expected children, in the household at the time of application
1.5	Date of assessment of circumstances and needs	Date of the original assessment or reassessment (if a successful review has been made)
1.6	Assessment of circumstances and needs	Whether the household is homeless, at risk of homelessness and whether a duty is accepted. Also whether the household is a legacy case.
1.7	Ethnic group	
1.8	Sexual orientation	
1.9	Nationality	
1.10	Employment status	
1.11	Benefits towards housing costs	
1.12	Benefits towards other living costs	
1.13	Accommodation at time of application	The accommodation in which the main applicant is living at the time of the application.
1.14	Accommodation when last settled	If the applicant is not currently settled, their last settled accommodation.
1.15	Main reason for loss of settled home	The main reason the main applicant is homeless or at risk of homelessness.
1.19	Referrals into the authority	Whether applicant was referred to the local authority.
1.22	Date homeless application made	The date that the application was made
1.23	Employment status of main applicant's partner	

1.16	Reason for loss of Assured Shorthold Tenancy	Reason AST ended.
1.17	Reason for loss of social rented tenancy	Reason the applicant has left / is leaving social rented housing.
1.18	Reason for loss of supported housing	Reason the applicant has left / is leaving supported housing.
1.20	Referral agency	Which agency referred the applicant.
1.21	Local Connection authority	Which local authority made a Local Connection referral

The PEOPLE Section

The variables in this section are completed for **each household member**.

Fields

Field code	Field description	Further description
2.2	Person identifier	A unique identifier for the household member.
2.3	Gender	
2.4	Age	Age at date of homelessness application. Provided in years.
2.5	Relationship	The household member's relationship to the main applicant – child, partner etc.
2.6	Date joined household homeless application	
2.7	Date left household homeless application	
2.8	Age at quarter end	Age at end of the quarter. Provided in years.

2. The SUPPORT Section

The questions in this section are completed if there are any support needs for the main applicant and/or any household members, in the judgement of the local authority officer. Multiple support needs can be recorded.

Field code	Field description	Further description
3.2	Support Needs of Main Applicant and Household members	

3. The PREVENT Section

Field code	Field description	Further description
4.2	Date Prevention Duty started	When prevention duty started. This would be expected to match the assessment date.
4.3	Prevention activity	The main activity offered to and engaged with by the household.
4.4	Engaged with support needs	Yes / No. Whether the household were engaged with help for their support needs before the prevention duty ended. The assistance offered will be captured in the assistance table.
4.5	Date Prevention Duty ended	
4.6	Reason Prevention Duty ended	
4.7	Temporary accommodation provided or duty owed	To identify whether the household was owed a temporary accommodation duty or temporary accommodation was provided.
4.8	Accommodation outcome	Accommodation status at the end of the prevention duty
4.9	Local authority location of accommodation outcome	

4. The RELIEF Section

The questions in this section are only completed if the relief duty is owed and relief activities are undertaken. Only one relief duty per case should be submitted. If many relief methods are used, only the main activity that resulted in or contributed most to the relief outcome should be reported.

Field code	Field description	Further description
5.2	Date Relief Duty started	The date the relief duty was started. This should match either the assessment date of the main table or the prevention duty end date.
5.3	Relief activity	The relief that was offered to and engaged with by the household.
5.4	Engaged with support needs	Yes / No. Whether the household were engaged with help for their support needs before the relief duty ended. The assistance offered will be captured in the assistance table.
5.5	Date Relief Duty ended	
5.6	Reason Relief Duty ended	
5.7	Temporary accommodation provided or duty owed	To identify whether the household was owed a temporary accommodation duty or temporary accommodation was provided.
5.8	Accommodation outcome	Where the main applicant was residing when the relief duty had ended.
5.9	Local authority location of accommodation outcome	
5.10	Local Connection Destination Authority	For applicants referred to another local authority.

5. The ASSISTANCE Section

The questions in this section are completed if the household was recorded as having any support needs in the SUPPORT Section. Multiple forms of assistance can be recorded, where an applicant has engaged with support before the case has been closed.

Field code	Field description	Further description
6.2	Assistance with support needs	Assistance with support needs that the household was referred to and engaged with. This relates to the engagement with support needs that was achieved during the time the household was worked with by the local authority.

6. The DECISION Section

The questions in this section are completed if relief was unsuccessful and the case proceeds to an assessment of whether a 'main duty' (section 193(2), section 193C(4), or section 195A(1)) is owed.

Field code	Field description	Further description
7.1	Main duty decision date	The date when the decision is issued on what duty (if any) is owed when relief stage ends (the main duty). This decision may be issued before the end of the relief duty but the outcome of this would not apply until the relief duty ends.
7.2	Date main duty decision takes effect	The date when the main duty decision comes (if any) is owed. This date must coincide with the date an unsuccessful relief duty ends.
7.3	Outcome of decision	
7.4	Relief offered to legacy cases	For legacy cases found to be intentionally homeless or to not have priority need.
7.5	Priority need decision	
7.6	Temporary accommodation provided or duty owed	To identify whether the household was owed a temporary accommodation duty or temporary accommodation was provided.
7.7	Accommodation outcome	Where the main applicant was residing following the decision on whether a duty is owed.
7.8	Local Connection Destination Authority	For applicants referred to another local authority.
7.9	Local authority location of accommodation outcome	

7. The FINAL DUTIES Section

The questions in this section are only completed if prevention and/or relief were not successful and the case was assessed as owed a 'main duty' (either a section 193(2), a section 193C(4), or a section 195A(1) duty).

Field code	Field description	Further description
8.2	Section 193(2), section 193C(4), or section 195A(1) Duty end date.	
8.3	Reason the section 193(2), section 193C(4), or section 195A(1) Duty ended.	
8.4	Accommodation outcome	Where the main applicant was residing when the duty ended.
8.5	Local authority location of accommodation outcome	

8. The TEMPORARY ACCOMMODATION Section

This section is completed where the applicant is owed a temporary accommodation duty or the local authority uses its powers to provide temporary accommodation. This includes households owed a temporary accommodation but who remain in their property or who have made their own arrangements for temporary accommodation.

Fields

Field code	Field description	Further description
9.2	Date entered temporary accommodation	Date the household was first moved into temporary accommodation. This would be their first placement start date.
9.3	Date of entry into temporary accommodation placement	Date the household started a temporary accommodation placement.
9.4	Date of exit from temporary accommodation placement	Date the household left a temporary accommodation placement.
9.5	Type of temporary accommodation	Type of temporary accommodation. Consistent with the categories available in the old P1E.
9.6	Number of bedrooms within the temporary accommodation placement	Range from 0+. 0 refers to self-contained with no separate rooms for living and sleeping.
9.7	Duties under which temporary accommodation is provided	
9.8	Is temporary accommodation in other local authority district	
9.9	Date of exit from temporary accommodation	

9. The REVIEW Section

This section is to be completed for all reviews requested on decisions made by the local authority.

Field code	Field description	Further description
10.2	Date review requested	Date the review was requested
10.3	Date review completed	Date the decision on the review outcome was made
10.4	Review requested	Which decision the review related to
10.5	Decisions subject to County Court Appeal	Yes / No
10.6	Review outcome	Whether the applicant's review was successful. Yes/No

ANNEX C: LEXICON

Definition of key terms

<p>Strong Password</p>	<p>DWP standard adopted:</p> <ol style="list-style-type: none"> 1. A minimum password length of 9 characters; 2. It must comprise of characters from 3 of the following 4 categories: <ol style="list-style-type: none"> a) a-z lower case b) A-Z upper case c) Numeric 0-9 d) Special character, such as punctuation 3. No more than 2 consecutive characters can be the same 4. Must not be the same as the user name 5. Must be changed every 30 days <p>Staff should be issued with a reminder every 30 days that requires them to confirm that they have made the required change.</p> <p>Passwords must also be suitably protected using an appropriate one way hash, such as SHA1, SHA2 or MD5</p>
<p>Secure Drive or Folder</p>	<p>A directory within the server or desktop operating system file structure. Access constrained by Active Directory service with a managed Access Control List. The ACL to be managed by a nominated individual with a minimum of BPSS clearance. Membership of the ACL to be authorised and reviewed by the relevant SRO.</p>
<p>Secure Sanitisation</p>	<p>Cleansing of media used to store data batches (with IL3 data thereon) to the standards defined in Information Assurance Standard No5 post transfer or analysis:</p> <p>USB/SD devices: Physical destruction by shredding</p> <p>Magnetic Media: If disk is to be reused in an IL3 environment - Secure overwriting using a key secured by a machine-generated random password which would be destroyed once the data had been overwritten. If disk is end of life or otherwise leaving the IL3 environment the disk should be purged using either de-gaussing or secure overwriting followed by either shredding or smelting. A certificate of secure destruction should be produced.</p> <p>Optical Media: Physical destruction by breaking into pieces and shredding. Reference; CSEG Information Assurance Standard No5, Secure Sanitisation.</p> <p>Sanitisation should meet the standards defined in the CSEG Information Assurance Standard No 5..</p>
<p>Encryption</p>	<p>Data at rest: Data at rest should be protected to at least FIPS140-2. Devices should employ AES256 with a Diffie Hellman(DH) key exchange and a Diffie Hellman Elliptic Curve key of at least 64 bits where possible. Data in transit across a network should be protected by (at least) Transport Layer Security (TLS) using version 1.1 or higher using a suite that provides encryption and authentication using AES 128 encryption with Elliptical Curve Digital Signing Algorithm modulus >160 bits.</p>

Data Integrity	<p>A data integrity algorithm is used to construct a message authentication code, a method by which assurance as to the integrity and source of a set of messages may be gained.</p> <p>CESG prefers the data integrity algorithm SHA-1 since it is a public standard.</p> <p>A message authentication code should be created for each data batch and stored separately so as to confirm that the data has not been changed since creation</p>
ICO Privacy Impact Handbook	<p>An Information Commissioner Office publication available at: https://ico.org.uk/media/for-organisations/documents/1595/pia-code-of-practice.pdf</p>

ANNEX D: SECURITY OPERATING PROCEDURE

Data security arrangements for data security at MHCLG and for transferring data between local authorities and MHCLG

The procedures put in place will be reviewed periodically and any alternative data security and transfer method agreed by all parties. The Data Sharing Agreements will then be updated with details of the new data security measures and/or transfer method agreed.

The data share will have in place the following procedures for the **transfer of personal data and the H-CLIC data**:

1. Personal Data and H-CLIC data will be transferred securely to the Delta system using separate XML uploads or uploaded forms (depending on local IT arrangements) or via Egress. This is in line with the assessed impact level of the data, with the movement of all datasets to be recorded in the Access control templates. The transfer method has to be approved by MHCLG and local authority security experts.
2. The file will be password protected and become unusable if three incorrect passwords are entered. The password will be set to strong - i.e. contain at least 9 characters of upper and lower case.
3. The Delta system will automatically send an email to the local authority acknowledging successful upload of the data. If provided via Egress, the Data Team will send an email confirming receipt and successful transfer of the data.

Data security for the personal data:

4. The data will be securely extracted from the DELTA application by the Data Team at MHCLG. The Data Team will save personal data provided through DELTA or via Egress to an access controlled folder on the shared system. This data will be only accessible to the Data Team, password protected and stored only in the restricted access folder.
5. The Data Team will create a look-up table of LA IDs, organisational IDs and MHCLG IDs for the Homelessness Analysis Team. This dataset will be retained indefinitely and saved in a separate restricted access folder and used by the Homelessness Analysis Team to replace the LA ID on the H-CLIC data with the MHCLG ID and organisational ID.
6. The personal data will be retained for up to 3 years and look-up table will be retained indefinitely or until data sharing agreements expire. Retention will be reviewed annually and a full review carried out after 10 years and agreed by all parties. MHCLG agree to securely destroy all copies of "Datasets A1 and A3, B and E" (see Table 2: Retention and Destruction of Datasets below) (see Annex C – Lexicon for secure sanitisation).

Data security for the H-CLIC data:

7. The data will be securely extracted from the DELTA application by the Homelessness Analysis Team at MHCLG. The Homelessness Analysis Team will save the H-CLIC data to an access controlled folder on the shared system. This data will be only accessible to the Homelessness Analysis Team, password protected and stored only in the restricted access folder.
8. The H-CLIC data for statistical purposes will be retained indefinitely (it is pseudonymised), retention of Datasets D, G and H will be reviewed at regular periods and agreed by MHCLG and local authorities/other Government Departments. MHCLG will securely destroy all copies of “Datasets D, G and H” when agreed (see Tables 2: Retention and Destruction of Datasets) (see Annex C – Lexicon for secure sanitisation).

Procedures in place for data security at MHCLG

1. MHCLG has separated the duties of those handling personal data (Data Team) and those handling the outcomes/attribute data (Homelessness Analysis Team).
2. MHCLG has agreed to limit access to all the data to essential personnel required for data handling. These individuals will all be security cleared to CTC level.
3. At MHCLG the data is linked using only a unique ID (and no personal information)⁵.
4. At MHCLG data will be stored in a restricted access folder at all times and access to the data will be limited to authorised personnel only.
5. Individuals in the Data Team and Homelessness Analysis Team will be briefed on the legal requirements around handling and storing the data for this project.
6. The Data Team at MHCLG will store and have access to the personal data (“Datasets A1 and A3” and “Dataset B”). This will be held separately to the data held by The Homelessness Analysis Team: H-CLIC data (“Dataset A2” and “Dataset D”), the Datasets provided by other Government Departments (“Datasets F”), the dataset of derived variables (“Dataset G”) and the final matched dataset (“Dataset H”). The personal data from “Datasets A1 and A3” and “Dataset B” will not be combined with the matched data (“Datasets D, F, G and H”) or handled by the same members of staff. Only the MHCLG unique identifiers which are non-disclosive in nature and derived from “Dataset A1 and A3” will be matched to “Dataset D and H” using a look-up table (“Dataset C”).
7. At MHCLG, all datasets will be stored in a restricted access folder on a secure server (this meets the required standard for storing sensitive data on

⁵ At MHCLG the information is to be stored in the cloud. The production system is hosted offshore in Amazon’s datacentre in Ireland and the contingency system is in Amazon’s datacentre in Germany. The system has been accredited (to store OFFICIAL-SENSITIVE data) and the risk formally accepted by the SIRO at MHCLG.

individuals (BIL3)). The datasets will be password protected in line with IT standard password protocols.

8. MHCLG analysts in the Data Team and Homelessness Analysis Team can only access the database once they have an approved Business Case to do so and for a maximum of 6 months before review. Access will have to be approved by the Information Asset Owner.
9. Access will only be approved if the applicant has a legal and justified reason and has completed Departmental data protection and handling training within the past two years. Applicants will agree to a data sharing and protection agreement.
10. Access is audited and subject to random checks.
11. The system will deny access to anybody who attempts to access data to which he/she does not have permission.
12. On receipt of multiple "Datasets F" staff at MHCLG will securely overwrite/destroy the data on secure media.
13. The retention of all datasets including "Datasets F, G, H and D" will be reviewed annually or more frequently if appropriate to ensure correct and proper use of the data by the Information Asset Owner. If it is no longer required it will be securely destroyed.
14. After "Datasets F, G, H and D" have been destroyed, the Information Asset Owner at MHCLG will sign a declaration to confirm that "Datasets C and D" and all copies have been destroyed and to the required standards (set out in Annex C: Lexicon).

ANNEX E: APPLICABLE LEGAL AND REGULATORY REQUIREMENTS

The following legal and regulatory requirements have been considered:

Document	Website address
Data Protection Act 1998	http://www.opsi.gov.uk/Acts/Acts1998/ukpga_19980029_en_1
Data Protection Act 2017	
General Data Protection Regulations (2017)	
The Human Rights Act 1998	http://www.opsi.gov.uk/ACTS/acts1998/ukpga_19980042_en_1
Re-use of Public Sector Information Regulations 2005 (SI 2005 No. 1515)	http://www.opsi.gov.uk/si/si2005/20051515.htm
Equality Act 2010	