Data Protection Impact Assessment (DPIA)

SMBC has adopted the privacy by design approach to projects that promotes privacy and data protection compliance from the start. This approach ensures privacy and data protection is a key consideration in the early stages of any project, and then throughout its lifecycle.

Data Protection Impact Assessments (DPIAs) are a tool used to identify the most effective way to comply with General Data Protection obligations and meet individuals' expectations of privacy by identifying and fixing problems at an early stage, reducing the associated costs and damage to reputation which might otherwise occur. DPIAs are an integral part of taking a Privacy by Design approach.

To ensure that the DPIA is an effective document, it must be used throughout the development and implementation of a project, using existing project management processes.

A DPIA will allow you to systematically and thoroughly analyse how a particular project or system will affect the privacy of the individuals involved.

Version number	Summary of change	Author Name	Role	Date
1.0	Amalgamated original SMBC PIA, Practical Law DPIA template and GMIGG DPIA template	Naveed Malik	Data Protection Officer	20/08/2018
1.1	Implemented sections from ICO template to make more user friendly. Added options for different types of project.	Callum Lyons	Senior Information Governance Officer	

Reviewers:

Reviewer name	Role	Version reviewed	Date
Will Gregory	Senior Information Governance Officer	1.1	17/09/2019

Your Information:

Officer Completing the form	Job Title	Project Name	Telephone Number	Email Address
Lindsay Yates	Project Manager	Family Context	07800 618353	Lindsay.yates@stockport.gov.uk

High Risk Processing Screening Questions

The questions below will help us understand whether the processing activity is likely to present a high risk to the rights and freedoms of individuals or to the council.

Please answer the below questions, if you answer 'Yes' to any of the below, you must complete the full DPIA.

If you have answered 'No' to all questions, only fill out Section 1 and send this to the Information Governance team to review.

Does the processing involve any of the following activity:	Example	Yes	No	Unsure
Profiling - Systematic evaluation of the attributes or characteristics of individuals.	*Using customer-profiling software to identify customers who would benefit from low-level interventions to raise their independence and resilience.*	☐	☑	☐
Automated decision-making - Making decisions about individuals without any human involvement	*The introduction of speed enforcement cameras that automatically issue speeding fines to the registered keeper of a vehicle when an infringement is recorded.*	☐	☑	☐
Large scale processing (Sensitive data) - Processing a large amount of personal data related to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership; sex life and sexual orientation.	*An initiative to share adult social care personal data, including ethnic origin and religious beliefs, with third parties.*	☐	☑	☐
Large scale processing (Health data) – Processing large amounts of personal data related to the physical or mental health of an individual, including the provision of health care services, which reveal information about health status.	*Contracting a new Occupational Health Provider that will undertake employee health assessments on behalf of the organisation.*	☑	☐	☐
Large scale processing (Criminal data) - Processing large amounts of personal data related criminal offences and convictions.	*Collecting and holding DBS certificates for employees as part a suitability check*	☑	☐	☐

Large scale processing (Monitoring) - Monitoring a large number of individuals in a public or private space	*Introducing CCTV operation in the town centre*	☐	☑	☐
New technologies - Deploying new and advanced technologies or using existing technologies in a novel way	*Using personal data in Artificial Intelligence or machine learning applications*	☐	☑	☐
Biometric Data - Processing any information about the physical, physiological or behavioural characteristics of individuals	*Deploying facial recognition technology in a public area for the purpose of the apprehension of offenders*	☐	☑	☐
Genetic data – Personal data related to inherited or acquired genetic characteristics, in particular, from an analysis of a biological sample.	*Sending data on biological samples to a research provider*	☐	☑	☐
Data Matching - Matching, combining and comparing information about individuals from multiple sources	*Matching council tax, NNDR and licensing personal data to detect potential electoral fraud.*	☑	☐	☐
Tracking - Processing personal data which involves tracking an individual's geolocation or behaviour, including but not limited to the online environment.	*Attaching a tracking device to council vehicles and monitoring or recording the location data.*	☐	☑	☐
Marketing to Children and Vulnerable Individuals - processing information about children or vulnerable individuals, for the specific purpose of marketing	*Sharing pupil data with a third party, who targets pupils/parent/guardians with homework support services*	☐	☑	☐

Section 1: Background Information

Is this project;

Completely new processing ☐   Change of a current process ☑   An upgrade to an IT system ☐

Project Manager	Lindsay Yates
Information Asset Owner: *(Senior member of staff that has overall responsibility for the information)*	Rebecca Key
Date project due/estimated to go live: *(if applicable)*	Pilot – September 2021 Phase 2 – Rollout – February 2022
What does this project involve? *(Explain broadly what the project aims to achieve and what type of processing it involves.)*	Our goal is to ensure children and families in the Stockport locality access the right support at the right time. The project enables social workers undertaking child social care assessments with families to access and use data on the family and their interaction with various in-house and external services when assessing the level and type of need to ensure the right support is provided. Phase 2 involves the roll-out of a tool (The Family Context Tool) which will put vital data at the fingertips of the social workers whilst undertaking these assessments. The tool is focussed on providing key information from relevant internal teams, partners and third parties. This will be orientated towards specific, key data sets including a SPOC for each party, contact details and some very specific data items which have been identified as valuable by social workers.
What is the purpose for processing personal information? *(What purpose does the collection/processing of personal information serve in the project?)*	**Family Context** The project seeks to enable social workers to have better insight into the needs and risks present in families at the point of referral to statutory services and assessment of need and strength.

	The project enables social workers to access information on the family and facilitates conversations between practitioners:
	- to better safeguard and protect children, to better identify and understand needs and strengths of children and families; - to respond to the needs of children and their families efficiently and effectively; and - to provide children and families access to the right services at the right time.
Which organisations are involved in this initiative? *(Eg, other local authorities, a company offering a service etc)*	Stockport Metropolitan Borough Council Stockport Homes (https://www.stockporthomes.org/) Social Finance (https://www.socialfinance.org.uk/) Department of Levelling Up, Housing and Communities https://www.gov.uk/government/organisations/department-for-levelling-up-housing-and-communities Ealing Council Youth Offending Service
What Types of data subjects involved? *(Eg, employees, residents, patients etc)*	Children and families who will be subject to triage/assessment via The MASSH at SMBC Vulnerable adults

Section 2 - Project Description and scope

Project/change outline *(What is it that is being planned? A Project Initiation Document or Business Case can be referenced here)*	Family Context is a tool which has been designed to identify service involvement with Children and Families at any one time. The tool shows key information for each agency working with the family such as allocated worker's name and contact number. It also provides a snapshot of additional information to enable Social Workers to have further direct conversations with those professionals.

	Prior to implementation it was identified when Social Workers first interacted with Families, they did not have access to key information, such as who was linked to the families and which services were currently or recently involved. The consequences of this were incomplete information which often led to the wrong decisions and outcomes for those Families.

In addition, Social Workers wasted crucial time chasing information rather than spending that quality time with the Families themselves.

The Family Context tool will enable social workers to access timely and valuable information on children and their families related to needs, risks and services involved.

We are now at Phase two – rollout to all Social Workers in Stockport and have conducted some steering groups to identify how the project is going and what Social workers are finding useful. One of the purposes of these groups is to find out what other data sets may be useful for workers and whether these are feasible.

The Family Context tool will be embedded in the social care assessment process to ensure social workers always have access to the information needed to make the right choice.

For more detail – please find a link to the outputs from the Beta Phase below:

https://github.com/CSCDP/Family-Context-PrivateBeta

Attached below is the training guidance for the tool which includes what the tool is for, what it looks like and how to use it.

PDF
Family Context training 2022.pdf |
| **Relevant previous Data Protection Impact Assessment/Privacy risk assessment**
(Please provide details of any previous Data Protection Impact Assessment/Privacy Risk Assessment) | DPIA's were completed for both the Pilot and Alpha phases of the Family Context Project.
These can be made available. |

| Input of specific business functions
(Please list stakeholders involved in this project. Include internal departments, external organisations and any person or group likely to be affected by the project (e.g. local residents or service users) and summarise any advice/input provided.) | Lindsey Yates - Project Manager for Family Context
Stockport MBC
Email address: lindsey.yates@stockport.gov.uk
Connection to initiative: Project Manager

Steve Kilroy-Jolley - Lead BI Developer
Stockport MBC
Email address: steve.kilroy-jolley@stockport.gov.uk
Connection to initiative: Data development

Jonathan Hadley - Technical Architect
Stockport MBC
Email address: Jonathan.hadley@stockport.gov.uk
Connection to initiative: Front end development

Will Gregory - Information Governance Manager
Stockport MBC
Email address: will.gregory@stockport.gov.uk
Connection to initiative: Advisory

Sarah Burke - Communications Officer
Stockport MBC
Email address: sarah.burke@stockport.gov.uk
Connection to initiative: Communication of the tool both internally and externally.

Craig Hughes - Head of Data
Stockport MBC
Email address: craig.hughes@stockport.gov.uk
Connection to initiative: Head of Data |
| Input of data subjects and/or their representatives:
(Please confirm if views were sought and by what method. For example, obtained through studies, questionnaires, discussion with data | We conducted in-depth user research with residents who've previously experienced children's social care to capture their voice. We will continue conducting user research with residents throughout the project.

Since the project live rollout to social Work teams, the MASSH information sharing agreement and guidance on usage of the tool have been updated. These documents provide guidance on how the tool is communicated |

subject representatives (customers, patients, staff))	to service users to ensure 'agreement/buy-in' is gained from families at the referral stage of the social care process. Guidance for Usage of the Family Context Since the Pilot was conducted no further work has been carried out with the data subjects. However, under the information sharing policy, parents are informed at the stage of referral, at the point of triage and at the point of any further assessment that their information will be shared with and by other agencies which is relevant to the work being carried out with them at that time.
Approximately how many records are being collected, accessed, held or shared? *(Eg. 1200 council tax records, 50 adult social care records)*	The tool contains details of individuals who have records in the Liquid Logic system for Children's and Adult Social Care, and the Synergy Education system. It also includes details for persons who are tenants of Stockport Homes, or have been involved in an anti-social behaviour case relating to Stockport Homes properties. As at August 2022 the broad numbers (to the nearest 1,000) of individuals were as follows: Liquid Logic Adult: 138k Liquid Logic Child: 135k Synergy: 244k As some of these persons will appear in more than one system, the total number of individuals who appear in one or more of these systems is: 456k The data handling for importing persons from Stockport Homes is slightly different, so we do not have a figure for the total numbers of persons held in their systems – however, as of August 2022 School attendance and exclusion data is included from Phase 2 of the project, but will be limited to information for the most recent three complete terms and any term still in progress, and only shown for those young persons who are still on roll at a school. This is currently approximately 51k individuals.

What frequency is the personal data collected, accessed, held or shared? *(Eg. Ad-hoc, daily, etc)*	The data is accessed through Family Context on an ad hoc basis from the enterprise data warehouse. The data in the enterprise data warehouse updates on a daily basis (overnight) and Family Context is refreshed from the data warehouse and from housing data sources at the same frequency

Section 3 – The data involved

PERSONAL DATA - meaning any information relating to an identifiable person who can be directly or indirectly identified, in particular by reference to an identifier.

What data items are being processed e.g. for collection, storage, use and deletion: If there is a chart or diagram to explain please attach as an appendix			
Personal Data	**Specific Data Items** *Check all that apply*	**Why are these items needed?** *Please provide justification below (if unsure please contact the IG team)*	*Where is this data item held?* *Eg. personnel file, child record in an IT system, etc*
Personal details *Information that identifies the individual and their personal characteristics*	☑ Forename(s) ☑ Surname ☑ Address ☑ Postcode ☑ Date of Birth ☑ Age ☑ Gender ☐ Physical description ☑ Home Telephone Number ☑ Mobile Telephone Number ☑ Other Contact Number ☑ Email address ☑ GP Name and Address ☑ Legal Representative Name (Next of Kin) not sure about this ☑ NHS Number	**Please provide details for each item ticked:** Please provide details for each item ticked: To enable social workers to access appropriate information to make the right decisions and produce the right outcomes for families in a timely manner. For example, if a referral is received regarding a child with an injury, it is crucial access to the relevant health professionals is gained immediately as this could potentially result in a S47	**Please provide details for each item ticked:** Liquid Logic (LCS, EHM and LAS) Stockport Homes Northgate Synergy (Education) Emis (health). Intention to ask for GP, Health Visitor, Midwife and School Nurse information. **For Individuals** Data on forename/ surname/ DOB/ Gender is sourced from the data warehouse for those individuals who appear in either Liquid Logic Adult (LAS), Liquid Logic Child (LCS) or Synergy. For

| What data items are being processed e.g. for collection, storage, use and deletion: ||||
| If there is a chart or diagram to explain please attach as an appendix ||||
Personal Data	**Specific Data Items** *Check all that apply*	**Why are these items needed?** *Please provide justification below (if unsure please contact the IG team)*	***Where is this data item held?*** *Eg. personnel file, child record in an IT system, etc*
	☐ National Insurance Number ☐ Photographs/Pictures of persons ☑ Other – if this is ticked please list 'Other' personal data items to be processed below:	enquiry, where an immediate response is required.	individuals who appear in data sets supplied by Stockport Homes, but who are not present in the data warehouse from the other systems, this information is currently sourced from 3 separate systems used by that organisation, although this is due to be replaced by a single system ('Phoenix') in late 2022. Similarly, information on address/postcode will be sourced from the data warehouse for the same individuals, with the address with the most recent start date being shown where multiple addresses show as current in different systems (there are a number of valid reasons why an individual could have multiple 'current' addresses, however we are also working to improve data quality across systems to ensure that these are kepy aligned as closely as possible once any single system is updated) All individuals who appear in the data warehouse will be able to be found by searching in Family Context, regardless of whether they have any relevant information in relation to the contextual areas (some may return a result of 'no information available' or 'no records exist' for those areas Contact details for the individual such as email and telephone are NOT currently included in

	What data items are being processed e.g. for collection, storage, use and deletion:		
	If there is a chart or diagram to explain please attach as an appendix		
Personal Data	**Specific Data Items** *Check all that apply*	**Why are these items needed?** *Please provide justification below (if unsure please contact the IG team)*	*Where is this data item held?* *Eg. personnel file, child record in an IT system, etc*
			family context, although a request for contact telephone numbers to be included where these exist is currently being considered for technical feasibility NHS number is also not currently included, nor are NoK/Legal representative details **for Professionals Identified as contacts in relation to an individual** Information will include their name, and an email and/or contact telephone number – in the cases of housing data and school staff this is often a generic contact number for the team/organisation/school rather than a direct contact for the individual All of these items of information are stored in a secure SQL database hosted on premise by the Council, with access being limited to authorised users/user groups only
	Health Visitor name and contact number Midwife name and contact number School nurse name, contact number and to which school they are attached.		GP/School Nurse/HV/School Head of Year details are all items not currently included, but requested for future inclusion.

What data items are being processed e.g. for collection, storage, use and deletion: If there is a chart or diagram to explain please attach as an appendix			
Personal Data	**Specific Data Items** *Check all that apply*	**Why are these items needed?** *Please provide justification below (if unsure please contact the IG team)*	***Where is this data item held?*** *Eg. personnel file, child record in an IT system, etc*
Offences including alleged offences *Information relating to any offences committed or alleged to have been committed by the individual*	☑ Yes ☐ No ☐ Not applicable List any data items below or attach as an appendix: Click here to enter text.	**Please provide details for each item ticked:** To enable social workers to access appropriate information to make the right decisions and produce the right outcomes for families in a timely manner. For example, if a referral is received regarding a child with an injury, it is crucial access to the relevant health professionals is gained immediately as this could potentially result in a S47 enquiry, where an immediate response is required.	**Please provide details for each item ticked:** Youth Offending Service Data from Youth Justice 'Childview' system is currently in the process of being added, and data from probation has been requested. This will identify whether an individual has a current intervention with the relevant agency, or one which has been open within a defined time period of 2 years For youth justice, there will also be the possibility of adding in information for whether the individual has any proven offences in the same period – it is worth noting that this will be either in the form of an indicator for the total number of offences in the period, or a simple Y/N to say that one or more offences exist – NO information in relation to the nature of any offence or the outcomes will be included in the tool As this data, along with other data sets, will be refreshed daily, nothing outside of this time period will appear in the Family Context Tool. It has also been a longer term aim to have information available in relation to adult offending via Greater Manchester Police, but this

What data items are being processed e.g. for collection, storage, use and deletion: If there is a chart or diagram to explain please attach as an appendix			
Personal Data	**Specific Data Items** *Check all that apply*	**Why are these items needed?** *Please provide justification below (if unsure please contact the IG team)*	*Where is this data item held?* *Eg. personnel file, child record in an IT system, etc*
			is currently on hold subject to renewed data sharing protocols being implemented, and technical issues relating to the supply of data being resolved.
Criminal proceedings, outcomes and sentences *Information relating to criminal proceedings outcomes and sentences regarding the individual*	☑ Yes ☐ No ☐ Not applicable List any data items below or attach as an appendix: Click here to enter text.	**Please provide details for each item ticked:** To enable social workers to access appropriate information to make the right decisions and produce the right outcomes for families in a timely manner. For example, if a referral is received regarding a child with an injury, it is crucial access to the relevant health professionals is gained immediately as this could potentially result in a S47 enquiry, where an immediate response is required.	**Please provide details for each item ticked:** Youth Offending Service Information from youth justice will include details of whether there has been any service involvement, and who the current/most recent caseworker is – the tool will simply indicate that such an intervention exists within the relevant time period as above, but not provide any further details. This will also include details where young persons have been involved with services on a voluntary basis rather than via a court mandated order, so will not necessarily be an indication that an offence or conviction exists
Financial details *Information relating to the financial affairs of the individual*	☐ Income ☐ Salary ☐ Benefits ☐ Not applicable ☑ Other – please specify below:	**Please provide details for each item ticked:** To help inform decisions about Families and adults and any further support needs they may have. For example, rent arrears	**Please provide details for each item ticked:** Stockport Homes This information is currently limited to current tenants of Stockport Homes only, and will identify tenants with current rent arrears over a certain multiple of their current weekly rent, or those who

What data items are being processed e.g. for collection, storage, use and deletion: If there is a chart or diagram to explain please attach as an appendix			
Personal Data	**Specific Data Items** *Check all that apply*	**Why are these items needed?** *Please provide justification below (if unsure please contact the IG team)*	***Where is this data item held?*** *Eg. personnel file, child record in an IT system, etc*
	Rent arrears information within Stockport Homes system - This information is currently limited to current tenants of Stockport Homes only, and will identify tenants with current rent arrears over a certain multiple of their current weekly rent, or those who have had proceedings started such as the issuing of a Notice of Seeking Possession (NoSP) or an eviction order within the past 12 month period	could lead to eviction and homelessness. To see rent arreas initially could prevent escalation where a child could potentially have to be placed in care should their parents become homeless	have had proceedings started such as the issuing of a Notice of Seeking Possession (NoSP) or an eviction order within the past 12 month period Information extracted from Stockport Homes systems is stored on a secure on-premise SQL server hosted by Stockport Council. This data is held in a staging database relating ONLY to Family Context, and is accessible only to the development team and authorised users of the Family Context tool – it is not shared more widely with other parts of the data warehouse.

SPECIAL CATEGORY PERSONAL DATA

Special Category Personal Data Item	**Specific data item(s)**	**Why are these items needed?** *Please provide justification below (if unsure please contact IG)*	***Where is this data item held?*** *Eg. personal file, child record in an IT system etc*
Physical or mental health or condition *Information relating to the individuals*	☑ Yes ☐ No ☐ Not applicable	**Please provide details for each item ticked:** This information is used to understand family dynamic and identify any potential risk. For	**Please provide details for each item ticked:** Liquid Logic (LAS)

physical or mental health or condition.	List any data items below or attach as an appendix: Click here to enter text.	example should a parent of a child be suffering with mental health issues, a risk assessment is required to ensure the child is not at any immediate risk. Eligibility criteria for a person to be receiving support from adult social care requires them to have a physical or mental condition (Care Act 2014)	As per previous areas, the indicator will show only whether an adult has a current involvement with Adult Social Care, or has had one which has closed within the last 12 months, and provides details of the current/most recent caseworker
Genetic data or biometric data *Genetic data or biometric data where processed to uniquely identify a person*	☐ Yes ☑ No ☐ Not applicable List any data items below or attach as an appendix: Click here to enter text.	**Please provide details for each item ticked:**	**Please provide details for each item ticked:**
Race or ethnic origin *Information relating to a person's race or ethnic origin*	☐ Yes ☑ No ☐ Not applicable List any data items below or attach as an appendix: Click here to enter text.	**Please provide details for each item ticked:**	**Please provide details for each item ticked:**
Religious or other beliefs of a similar nature *Information relating to the individuals religion or other beliefs*	☐ Yes ☑ No ☐ Not applicable List any data items below or attach as an appendix:	**Please provide details for each item ticked:**	**Please provide details for each item ticked:**
Political opinions	☐ Yes ☑ No	**Please provide details for each item ticked:**	**Please provide details for each item ticked:**

Information relating to the individuals political opinions	☐ Not applicable List any data items below or attach as an appendix: Click here to enter text.		
Sexual identity and life *Information relating to the individuals sexual life*	☐ Yes ☑ No ☐ Not applicable List any data items below or attach as an appendix: Click here to enter text.	**Please provide details for each item ticked:**	**Please provide details for each item ticked:**
Trade union membership *Information relating to the individuals membership of a trade union*	☐ Yes ☑ No ☐ Not applicable List any data items below or attach as an appendix: Click here to enter text.	**Please provide details for each item ticked:**	**Please provide details for each item ticked:**

Section 4 – The Flow of Data

[INSERT DATA FLOWS DIAGRAM (if possible)]

Data flow – It is essential that each flow of data is identified, documented and specifies the security measures in place. **Please complete this section only when personal data is being shared internally or externally.**					
An example flow is given below:					
Flow description	**Going from**	**Going to**	**Method of access/transfer and control**	**Specify the security control(s) in place for the flow**	**Where will the data be stored after access/transfer?**
Adult Social Care	BIWH	Elastic Search	System transfer	Automated FME ETL process secured through ADS	Server - network drive - on organisations premises
Stockport Homes	Northgate/ REACT/	Elastic Search	System transfer	Automated FME ETL process secured through ADS	Server - network drive - on organisations premises
YOS	ChildView	Elastic Search	System transfer	Automated FME ETL process secured through ADS	Server - network drive - on organisations premises
Education	Synergy	Elastic Search	System transfer	Automated FME ETL process secured through ADS	Server - network drive - on organisations premises
Teams recording of Social Workers Use of Family Context	Family Context Front-End	Sharepoint	Screen Recording (thru Teams)	Network communications in Teams are encrypted by default. By requiring all servers to use certificates and by using OAUTH, TLS, Secure Real-Time Transport Protocol (SRTP), all Teams data is protected on the network. For more detail - https://docs.microsoft.com/en-us/microsoftteams/teams-security-guide	Data stored via SharePoint Online which is encrypted (with one or more AES 256-bit keys). The encryption process is FIPS 140-2 Level 2 validated. Access to Sharepoint is protected via multi-factor authentication methods to stop unauthorized access.

List any applicable electronic systems/software to this initiative (current and/or new):		
System name	**Used by e.g. organisation and dept.**	**Parties/system supplier**
Liquid Logic Children's (EHM and LCS)	Children's social care	Liquid Logic
Liquid Logic Adults (LAS)	Adult social care	Liquid Logic
Synergy	Schools	Synergy
Child view	Youth offending Service	
Civica	Council Tax	Civica
Stockport Homes	Stockport Homes	Northgate/React (to be replaced by Phoenix in late 2022/early 2023)
Microsoft Teams	Social Finance	Microsoft
Sharepoint	Social Finance	Microsoft
	Probation	

Confirmation of IT involvement – IT lead(s)/support		
Name	**Organisation**	**Involved Y/N but planned**
Steve Kilroy-Jolley	SMBC BI	Y
	SMBC – Adults (LAS)	Y
	SMBC – Childrens (LCS)	Y
Lindsey Yates	SMBC – Childrens (EHM)	
	SMBC-Education/ Childrens	Y
	Social Finance	Y

Section 5 – Assessment

Question	Response (identifying risks and including necessary further measures/actions)
Lawfulness, fairness and transparency *(Data is processed lawfully, fairly and in a transparent manner)*	
Fairness and Transparency	
1A **Will individuals be informed as to what is happening with their data? Is new fair processing/privacy notice information required?** *The fair processing notice/privacy notice is the information that you give to a person when collecting their data to inform them how their data is to be used, who it is to be shared with, how long it will be kept for etc.*	https://www.stockport.gov.uk/stockport-family-privacy-notices At the point of referral families are informed a referral to the Multi Agency Safeguarding and Suport is being made. They are again informed at the point this is picked up by a Social Worker within the MASSH and again at the point an assessment is undertaken.
Lawful basis: Part 1 *A lawful basis is the clause that allows you to process personal data. No basis is 'better' than another, however one will be more appropriate than another - depending on the processing. Each lawful basis has its own conditions, see the below links for guidance around each basis.* *The ICO have created an interactive tool to aid you in identifying a basis:* *https://ico.org.uk/for-organisations/gdpr-resources/lawful-basis-interactive-guidance-tool/*	
2A **Which one of the following lawful basis are you using to process this personal data?** *A: Consent* *B: Performance of a contract* *C: Legal Obligation* *D: Vital Interests* *E: Public Task* *F: Legitimate Interests*	**B. Legal Obligation** Article 6(1)(c) of the UKGDPR "processing is necessary for compliance with a legal obligation to which the controller is subject;" And **E. Public Task** Article 6(1)(e) of the UKGDPR

	Legal Obligation guidance; https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/legal-obligation/ **Public Task guidance;** https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/public-task/	"processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;" **Article 9 Condition** Article 9(2)(h) of the UKGDPR "processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or Member State law;" DPA 2018 Schedule 1 condition: Health or social care purposes 2 (1) This condition is met if the processing is necessary for health or social care purposes. (2) In this paragraph "health or social care purposes" means the purposes of— (e) the provision of social care, or (f) the management of health care systems or services or social care systems or services. The authority will also rely on Article 10 of the UKGDPR to process criminal offence data.
Lawful Basis: Part 2 *(Depending on which lawful basis you are relying on, please fill in the below section.)*		
Legal Obligation	**Please identify the legal obligation and where it appears in the relevant legislation**	**Please provide details:** **See Appendix A**

Public Task	What is the official task carried out in the public interest? This should be laid down by law.	Please provide details: See Appendix A
Purpose limitation *(The purpose for which data is collected on any occasion must be specified, explicit and legitimate, and must not be processed in a manner that is incompatible with the purpose for which it is collected)*		**Response (identifying risks and including necessary further measures/actions)**
3A	Does you project plan cover all of the purposes for processing personal data? Are potential new purposes likely to be identified as the scope of the project expands?	Please provide details: As the project develops, new data sets will be identified and added but this will be discussed and agreed in partnership with the Information Governance and other relevant stakeholders to ensure it is in line with the original objectives of the project. At this stage new purposes are not in scope. Where new purposes are identified in the future, where they do not align with original lawful basis to process the data, a full evaluation of that usage case will be carried out.
Data Minimisation *(personal data must be adequate, relevant and not excessive in relation to the purpose for which it is processed)*		**Response (identifying risks and including necessary further measures/actions)**
4A	Is the information that you are using likely to be of good enough quality for the purpose?	Please provide details: Yes, data quality mechanisms are in place for each source system. Where matching algorithm have been necessary, these have been thoroughly tested.
4B	Have you considered ways in which the amount of data processed can be minimised? *It is important to identify the minimum amount of personal data needed to satisfy the project*	Please provide details: Yes, we conducted user testing in discovery and alpha with social workers, team managers and families to establish the minimum personal data needed.

| | | In the rollout phase we have gathered additional requirements from Social Workers using the tool and these have been discussed and agreed with relevant stakeholders and IG before being added to the tool to ensure the minimum personal data is used.

Family Context will utilise the data warehouse to only include the information we need for the project. In addition, extract, transform and load processes have been put in place to extract only the data required. |
|---|---|---|
| **Accuracy** (*Personal data must be accurate and, where necessary, kept up to date*) | | **Response (identifying risks and including necessary further measures/actions)** |
| **5A** | **Are you able to amend information when necessary to ensure it is up to date?** | **Please provide details:**

No, we are only looking at data from the data warehouse which is pulled from existing source systems. There will be no mechanism for users to amend information from each source system.

There are plans to formalise a method of feedback for where workers can highlight questions about data quality for further investigation. This is yet to be in development and will form part of the BAU phase of the Family Context Tool project. |
| **5B** | **Are you able to ensure that personal data obtained from individuals or other organisations is accurate?**

Describe a process for validating data if you have one | **Please provide details:**

Yes, methods are already in place for each source system to ensure personal data obtained from individuals or other organisations is accurate. |
| **Storage Limitation** (*Personal data must be kept for no longer than is necessary for the purpose for which it is processed*) | | **Response (identifying risks and including necessary further measures/actions)** |
| **6A** | **Have you identified retention periods for this processing?** | **Please provide details:**

Most of the service involvements that we are highlighting in FC relate to issues within the past 1-2 years (currently longer for Stockport Homes ASB data), which is well within the source system retention limits |

6B	Are there likely to be exceptional circumstances for retaining certain data for longer than the standard retention period?	Please provide details: No
6C	How will you destroy the information when it has reached it's retention period?	Please provide details: Elastic Search database will be over written each night, all new data will conform to the provider systems' retention policy. Any items deleted or amended in source systems will be reflected in Family Context within a maximum period of 24 hours Usability Testing and User Research Deletion processes align to Data Protection Act 2018 and Cyber Essentials Plus accredit. These proceses involve: a) The personal data will be completely removed from all physical and electronic systems, including any backup, storage media and archiving systems; b) All personal data on hardware will be securely deleted and the hardware sanitized before re-use; and c) Items deemed for refurbishment and/or re-use go through a full diagnosis, test and data cleansing process.
6D	If you are procuring software does the system allow you to delete information in line with retention schedules?	Please provide details: Yes, the extract, load and transform processes that will supply the data to Family Context will have retention policies added to the workflow. Usability Testing and User Research Yes, all systems (Sharepoint) allow for the deletion of information include with retention schedules.

Integrity and confidentiality (information security) *Personal data must be processed in a manner that includes taking appropriate security measures as regards risks that arise from processing personal data. The risks include (but are not limited to) accidental or unauthorised access to, or destruction, loss, use, modification or disclosure of, personal data*	Response (identifying risks and including necessary further measures/actions)
7A **Have all staff with access to the information had appropriate information governance training?**	**Please provide details:** Yes, all council staff are required to complete mandatory training on information governance. All staff have also had full training on use of Family context with a guidance on usage added. Guidance for Usage of the Family Context
7B **If you are using electronic systems to process/store the information, what technical security measures are in place?**	**Please provide details:** Overview: The solution uses existing council and partner organisations' (e.g. police and housing) technical security policies, and processes to protect data and systems. Technical details: Data will be extracted and processed by the Council's FME ETL software. FME sits on a dedicated server secured through ADS. Data stored via SharePoint Online which is encrypted (with one or more AES 256-bit keys). The encryption process is FIPS 140-2 Level 2 validated. Access to Sharepoint is protected via multi-factor authentication methods to stop unauthorized access.

7C	**If you are storing/processing any information in physical formats (eg, paper files), what security measures are in place to keep this information secure?**	**Please provide details:** N/A
7D	**What security measures will be in place when transferring information?**	**Please provide details:** Overview: The solution uses existing council and partner organisations' (e.g. police and housing) technical security policies, and processes to protect data and systems. Technical details: Data will be extracted and processed by the Council's FME ETL software. FME sits on a dedicated server secured through ADS Network communications in Teams are encrypted by default. By requiring all servers to use certificates and by using OAUTH, TLS, Secure Real-Time Transport Protocol (SRTP), all Teams data is protected on the network. For more detail - https://docs.microsoft.com/en-us/microsoftteams/teams-security-guide
Individuals Rights *Explain how you will manage individual rights*		
8A	**Do all systems used in this project allow for data subject rights requests to be fulfilled?** *Right of access (copies of their own personal data that you hold)* *Right to recitification (personal data to be amended)* *Right to erasure (personal data to be permanently deleted)* *Right to restrict processing (personal data to be restricted)*	**Please provide details:** Yes. Although source systems would be used to fulfil any requests. Right to erasure does not apply.

	Right to object (data subject to object to the processing of their personal data)	
Automated decision-making/Profiling *Automated decision-making is where a decision is made solely by automated means without any human involvement. Profiling is the automated processing of personal data to evaluate certain aspects about an individual. Profiling can be part of an automated decision-making process.*		
9A	**Are individuals subject to automated decision-making or profiling?**	**Please provide details:** No
International Transfers		
10A	**Will an individual's personal information be disclosed externally in identifiable form and if so to who, how and why?**	**Please provide details:** No
10B	**Will any personal data be transferred outside the European Economic Area (EEA)?** *If so please list who the data will be shared with and in what countries*	**Please provide details:** No

Section 6 – Risk identification

Please fill out the following tables so we can identify the risks.

Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in Section 6.				
Risk	**Describe the source of risk and nature of potential impact on individuals.** **Include associated compliance and corporate risks as necessary.**	**Likelihood of harm** *None / possible / probable*	**Severity of harm** *Minimal / significant / severe*	**Overall risk** *Low / medium / high*
1	Malicious use of sensitive personal data (e.g. deliberately looking up family members or acquaintances)	Low	Significant	Medium
2	Loss of data or data sent to the wrong recipient	Possible	Significant	Medium
3	Children/families reacting negatively to the gathering/processing of their personal information	Possible	Significant	Medium
4	Inaccurate information being gathered/used to make key decisions	Possible	Significant	Medium
5	Business continuity on access to data or on system up-time	Possible	Significant	Medium
6	Inappropriate or accidental disclosure of passwords resulting in unsolicited access to information	Low	Significant	Low
7	Misinterpretation of the information provided by Family Context	Low	Medium	Low
8	Inadequate security measures (technical and organisational) in place resulting in loss of data or inappropriate access to systems and buildings.	Low	Significant	Low

Section 7 – Risk mitigation

Please use the below table to help mitigate the risks identified above.

Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in Section 6.				
Risk	**Options to reduce or eliminate risk**	**Effect on risk** *Eliminated / reduced / accepted*	**Residual risk** *Low / medium / high*	**Measure approved** *Yes / No*
1	Only named parties will be able to access Family Context data. There will be a log detailing access requests and actions (e.g. which data has been accessed when) for audit purposes and spot checks will be carried out periodically. The Family Context training manual will focus on the appropriate and ethical use of sensitive information. The manual will clearly state the limits of its use.	Reduced	Low	Yes
2	Family Context will only be accessible through secure devices. The training manual will encourage the continuation of existing processes, which seek to minimise the printing of sensitive information at large and advises the use of secure messaging systems to communicate sensitive information.	Reduced	Low	Yes
3	Feedback from families accessing social services indicate that they do not like having to repeat themselves. Resident user research has been conducted to capture their views on what data should be included in Family Context. A privacy notice is in place to inform residents that their data is being processed and used to provide services and support – including how to exercise their rights under GDPR. There will be measures in place to ensure that these rights are	Reduced	Low	Yes

	presented to families in an accessible way.			
4	Family Context practice model and tool focuses on facilitating conversations with practitioners. The information is only used to support practitioner-to-practitioner conversations. The information is not designed to be used in isolation from a conversation.	Reduced	Low	Yes
5	The Family Context training manual will advise on reverting back to current practice (manual, offline investigation) in the event that data becomes inaccessible for any reason.	Accepted	Medium	Yes
6	Family Context relies on the local authority's active directory service. Users are expected to be aware of current local authority password policies and the importance of not disclosing information.	Reduced	Low	Yes
7	Initial training and support will provide users with the knowledge to properly interpret the information presented by Family Context. This training will be updated periodically to ensure that all eventualities are covered. There will also be ongoing support by Children's Social Care and users will be encouraged to get in touch if they are uncertain about a particular use case.	Reduced	Low	Yes
8	Family Context conforms to all local authority policies, practices and procedures in regards security controls, access controls, audit, staff training and awareness. Social Finance is Cyber Essentials Plus accredited and has built relevant ISO27001 processes to ensure we meet our partners data protection requirements and recognised industry security standards, and always preserve the confidentiality, integrity and availability of personal information. Our ICT provider is ISO20071 accredited.	Reduced	Low	Yes

	Social Finance Limited is registered as a Tier 1 organisations with the ICO. Our registration number is Z1494575. We have in place both technical measures and organisational security measures that are compliant with the Data Protection Act 2018 and General Data Protection Regulation, as well as the latest ICO guidance.			

Section 8 - High Risk Processing Assessment (TO BE COMPLETED BY INFORMATION GOVERNANCE)

	GDPR Article 35(3) and ICO guidance 35(4)	Yes	No	Unsure	**Comments** *Document initial comments on the issue and the privacy impacts or clarification why it is not an issue*
i)	Is there to be **systematic and extensive profiling with significant effects**: "(a) any systematic and extensive evaluation of personal aspects relating to natural persons which is based on automated processing, including profiling, and on which decisions are based that produce legal effects concerning the natural person or similarly significantly affect the natural person"	☐	☒	☐	Click here to enter text.
ii)	Is there **large scale use of sensitive data**:☐"(b) processing on a large scale of special categories of data referred to in Article 9(1), or of personal data relating to criminal convictions and offences referred to in Article 10".	☒	☐	☐	The process of completing child social care assessments involves the processing and sharing of sensitive and special category data regarding the family members involved. However, the use of the Family Context tool does not contain largescale detailed sensitive data, as the tool is designed to sign-post social workers and provide details for SPOCs at relevant organisations/teams rather than provide an exhaustive profile of an individual. I am satisfied the inclusion of sensitive information in the tool is proportionate, legal and fair and that the risks have been managed responsibly and appropriately.
iii)	Is there **monitoring of the public**: "(c) a systematic monitoring of a publicly accessible area on a large scale"	☐	☒	☐	Click here to enter text.
iv)	Does the processing involve the use of **new technologies**, or the novel	☐	☒	☐	Click here to enter text.

	application of existing technologies (including AI).				
v)	Is there any **denial of service**: Decisions about an individual's access to a product, service, opportunity or benefit which is based to any extent on automated decision-making (including profiling) or involves the processing of special category data	☐	☒	☐	Click here to enter text.
vi)	Does the initiative involve **profiling of individuals on a large scale**?	☐	☒	☐	Click here to enter text.
vii)	Is there any processing of **biometric** data?	☐	☒	☐	Click here to enter text.
viii)	Is there any processing of **genetic** data other than that processed by an individual GP or health professional, for the provision of health care direct to the data subject?	☐	☒	☐	Click here to enter text.
ix)	Is there any **data matching**: combining, comparing or matching personal data obtained from multiple sources?	☒	☐	☐	Data matching is an essential element of the Family Context Tool and this is carried out by the SMBC BI team to enable accurate data to flow into the tool. The process is carried out by qualified and experienced staff and is considered vital to the successful functioning of the tool.
x)	Is there any **invisible processing**: processing of personal data that has not been obtained direct from the data subject in circumstances where the controller considers that compliance with Article 14 would prove impossible or involve disproportionate effort.	☒	☐	☐	In order to maintain transparency, when commencing a child social care assessment Social Workers are trained to direct families to the SMBC Stockport Family Privacy Notices. They are also expected to have a clear and transparent conversation regarding information gathering and sharing from other relevant parties.
xi)	Is there any **tracking** of individuals: processing which involves tracking an individual's geolocation or behaviour, including but not limited to the online environment.	☐	☒	☐	Click here to enter text.

| xii) | Is there any **targeting of children or other vulnerable individuals**: The use of the personal data of children or other vulnerable individuals for marketing purposes, profiling or other automated decision-making, or if you intend to offer online services directly to children. | ☐ | ☒ | ☐ | Click here to enter text. |
| xiii) | Is there any **risk of physical harm**: Where the processing is of such a nature that a personal data breach could jeopardise the [physical] health or safety of individuals | ☐ | ☒ | ☐ | Click here to enter text. |

Section 9 - DPIA Summary

Item	Name/date	Notes
Data Protection Officer (DPO) advice provided:		*DPO should advise on compliance, only if the processing of personal data in this project is determined to be high risk*
Summary of DPO advice:		
DPO advice accepted or overruled by:		*If overruled, you must explain your reasons for this decision.*
Comments:		
Residual risks approved by:		*If accepting any residual high risk, the ICO should be consulted before going ahead with*

		the project. Contact with the ICO should be made via the Council's IG Team
Does the DPIA need to be submitted to ICO prior to the project commencing as it constitutes high risk processing?	**Date submitted to ICO**	**ICO Decisions/recommendations**

Section 10 - DPIA Sign-off

Please ensure that the relevant officers below have checked the details of the DPIA. Once satisfied the officers should enter their name in the appropriate field and complete the date of sign-off.

Role	Name	Date
Project Officer	**Lindsay Yates**	
Information Asset Owner/Information Asset Administrator		
Information Governance Officer *If processing is 'High Risk' this should be the Data Protection Officer*	**Will Gregory**	
Senior Information Risk Owner *Only complete if the processing is to be referred to the ICO*		

Appendix A

Legal Gateways

Legal Obligation	Please identify the legal obligation and where it appears in the relevant legislation	Please provide details:
		Working together to safeguard children 2018: Effective sharing of information between practitioners and local organisations and agencies is essential for early identification of need, assessment and service provision to keep children safe. Serious case reviews (SCRs13) have highlighted that missed opportunities to record, understand the significance of and share information in a timely manner can have severe consequences for the safety and welfare of children. Workers accessing the family context tool can use this to aid in gathering information around a child at risk of harm so that intervention is completed in a timely way. **RELEVANT LEGISLATION** **Data Protection Act 2018** You may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. Data Protection Act 2018 includes 'safeguarding of children and individuals at risk' as a condition that allows practitioners to share information without consent – • information can be shared legally without consent, if a practitioner is unable to, cannot be reasonably expected to gain consent from the individual, or if to gain consent could place a child at risk. • relevant personal information can be shared lawfully if it is to keep a child or individual at risk safe from neglect or physical, emotional or mental harm, or if it is protecting their physical, mental, or emotional well-being. **Children Act 1989**

Section 47 of the children act places a responsibility on the local authority to make enquiries when they have reasonable cause to suspect that a child who lives, or is found, in their area is suffering, or is likely to suffer, significant harm. In this event the authority shall make, or cause to be made, such enquiries as they consider necessary to enable them to decide whether they should take any action to safeguard or promote the child's welfare. This includes liaising with relevant services, gathering information that would aid in the enquiry.

In the event of a section 47 procedure, agreement from a family member to gather information from other agencies is not legally required.

The Children Act 2004

Section 10 of the Act places a duty on each children's services authority to make arrangements to promote co-operation between itself and relevant partner agencies to improve the well-being of children in the area in relation to:
•   Physical and mental health, and emotional well-being
•   Protection from harm and neglect
•   Education, training and recreation
•   Making a positive contribution to society
•   Social and economic well-being

"Each children's services authority in England must make arrangements to promote co-operation between— (a) the authority; (b) each of the authority's relevant partners; and (c) such other persons or bodies as the authority consider appropriate, being persons or bodies of any nature who exercise functions or are engaged in activities in relation to children in the authority's area.''

Key organisations who have a duty under section 11 of the Children Act 2004 to have arrangements in place to safeguard and promote the welfare of children are:

• the local authority;
• NHS England;
• clinical commissioning groups;
• NHS Trusts, NHS Foundation Trusts;
• the local policing body;
• British Transport Police Authority;
• prisons;
• National Probation Service and Community Rehabilitation Companies;
• youth offending teams; and

		• bodies within the education and /or voluntary sectors, and any individual to the extent that they are providing services in pursuance of section 74 of the Education and Skills Act 2008
		National Health Services Act 2006
		Section 82 places a duty on NHS Bodies and local authorities to co-operate in order to secure and advance the health and welfare of people.
		Care Act 2014
		The Care Act 2014 sets out a clear legal framework for how local authorities and other parts of the system should protect adults at risk of abuse or neglect. Local authorities have safeguarding duties. Within this frameworker they must make enquiries, or request others to make them, when they think an adult with care and support needs may be at risk of abuse or neglect and they need to find out what action may be needed. It also requires services including local authorities, health and housing to co-operate in order to care and support vulnerable people.
		Section 1 (Promoting individual well-being) places a duty onto the local authority to promote individuals' well-being.
		Section 2 (Preventing needs for care and support) places a duty on the local authority to prevent or delay the need for care and support.
		Section 6 (Co-operating generally) places a duty on the local authority and relevant partners to cooperate (inc. sharing information) to protect adults with care and support needs.
		Mental Capacity Act 2005
		Section 1 contains 5 statutory principles concerning a person's lack of capacity to give consent to information sharing.
		Crime and Disorder Act 1998
		The primary objective of the Crime and Disorder Act 1998 was to give more responsibility to local authorities with regards to implementing strategies to help with the reduction of crime and public disorder within the local community. It also gives provision for the prevention of crime and disorder.

Section 17 applies to local authorities as defined by the Local Government Act 1972.

Section 17A of the Act states that a 'relevant authority' is under duty to share with all other relevant authorities' information of a 'prescribed description' which is relevant to the reduction of crime and disorder, including anti-social behavior (ASB), in any area of England or Wales.

Prescribed information will be information relating to:
•   Police recorded crime and police recorded incidents
•   Local authority recorded incidents of ASB or crime

Criminal Justice Act 2000

Section 325 of this Act describes arrangements for assessing risk posed by offenders.

A responsible authority must establish arrangements for the purpose of assessing and managing risks posed by sexual and violent offenders or other persons, who are considered by the responsible authority to be persons who may cause serious harm to the public (incl. children).

Responsible authority, in this context, refers to the chief officer of police, the local probation board and the Minister of the Crown exercising functions in relation to prisons, acting jointly.

In establishing these arrangements, the responsible authority must act in co-operation (where co-operation may include the sharing of information) with – among other services – every local housing authority or social services authority.

Education Act 2002

Section 175 of the Education Act 2002 lays out the duty of LEAs and governing bodies of maintained schools and further education institutions to make arrangements to carry out their functions with a view to safeguarding and promoting the welfare of children and follow the guidance in Safeguarding Children in Education (DfES 2004).

Section 21 of the Act places a duty on the governing body of a maintained school to promote the well-being of pupils at the school. Well-being in this section is defined with reference to section 10 of the Children's Act 2004.

This duty extends the responsibility of the governing body and maintained schools beyond that of educational achievement and highlights the role a school plays in all aspects of a child's life.

		There may be an implied power to work collaboratively and share information for this purpose if involvement of other services is necessary in order to fulfil the duty.
Public Task	**What is the official task carried out in the public interest? This should be laid down by law.**	**Please provide details:** **RELEVANT LEGISLATION** **The Digital Economy Act 2017** Section 35 Disclosure of information to improve public service delivery. The section states: A person (as specified in Schedule 4 of the Act) may disclose information held by them in connection with any of the person's functions to another specified person for the purpose of an objective which is a specified objective in relation to each of those persons. Specified objective, in relation to a specified person, means an objective specified in relation to that specified person in regulations made by the appropriate national authority. An objective may be specified by regulations under subsection (7) only if it complies with the following conditions. (9)The first condition is that the objective has as its purpose— (a)the improvement or targeting of a public service provided to individuals or households, or (b)the facilitation of the provision of a benefit (whether or not financial) to individuals or households. (10)The second condition is that the objective has as its purpose the improvement of the well-being of individuals or households. (11)The reference in subsection (10) to the well-being of individuals or households includes— (a)their physical and mental health and emotional well-being, (b)the contribution made by them to society, and (c)their social and economic well-being. (12)The third condition is that the objective has as its purpose the supporting of— (a)the delivery of a specified person's functions, or (b)the administration, monitoring or enforcement of a specified person's functions.

			The Digital Government (Disclosure of Information) Regulations 2016

The objectives for the disclosure of information in the Digital Economy Bill are set out in Section 29(6) – including

• Objective 1: (a) identifying individuals or households who face multiple disadvantages, and (b) enabling the public services to be provided to such individuals and households to be tailored to their needs.

• Objective 2: (a) identifying individuals or households who may be eligible for assistance under a relevant scheme, (b) contacting such individuals or households with a view to the provision of such assistance.

Local Government Act 1972

Section 111 gives a local authority power to do anything conducive or incidental to the discharge of their statutory functions.

Local Government Act 2000

Section 2 gives a local authority power to do anything which they consider is likely to achieve the promotion or improvement of the social well-being of their area.

Localism Act 2011

Local authorities have been given a general power of competencies (s.1). It gives local authorities the same power to act that an individual generally has and provides that the power may be used in innovative ways.

Housing Act 1996

Section 213 provides implied power for housing and social service authorities to share information in certain circumstances. See also section 213A. |