



Ref No: S/DPIA No. _____

SUMMARY DATA PROTECTION IMPACT ASSESSMENT TEMPLATE

IMPORTANT: The Council has a duty to do a Data Protection Impact Assessment (DPIA) in order to comply with the General Data Protection Regulations 2016 and the Data Protection Act 2018 where it intends to process (i.e. (anything you do with data) an individual's personal data that is likely to result in a high risk to the rights and freedoms of individuals).

In order to decide whether it is necessary to do a full DPIA please complete this Summary DPIA template as accurately as possible.

A full DPIA is an assessment process which will assist in identifying and minimising data protection risks associated with your project / initiative.

To complete check the **Yes/No** questions in the form as appropriate.

Please save a new version of this document and return your completed form to: mandy.byfield@bracknell-forest.gov.uk. Use the same email for any queries.

Author contact & submission details			
Name	Elizabeth Britton	Team	Commissioning
Email	Elizabeth.britton@bracknell-forest.gov.uk	Department	People
Tel no	01344 352798	Date submitted	07/10/2020
What prompted you to submit a summary DPIA?		Involvement in new project developed in order to respond to need. This project sees the development of a specialist dementia nursing and intermediate care service in Heathlands, an integrated care facility located in Bracknell Forest, due to open Dec 2021. EB CCG will direct	

	award a provider the contract for intermediate care service and BFC will award a provider the contract for dementia nursing following an open tender. This DPIA is to support the procurement process for the dementia nursing element. It is expected that EB CCG will complete a similar DPIA process for their ICS contract.
What is the legislation / authority under which you provide a service that gives rise to the need for the processing of personal data	Under the Care Act 2014, Local Authorities are required to ensure that there is a genuine choice of accommodation and types of service available to residents

*Project / initiative details		
*Note: a project can be a new or review of: policy/strategy / function/procedure / project / service / organisation change / data sharing agreement/arrangement		
Title: Heathlands		
Brief summary and description of the project / initiative:		
<p>To run an integrated care facility within Bracknell Forest, including the provision of long term Dementia nursing support.</p> <p>Heathlands Care Home is a major new health and care joint venture built on health and social care partners' aspiration to deliver integrated care to meet growing dementia and nursing need in Bracknell Forest. Heathlands will provide 66 single rooms over 3 floors in a modern, purpose-built setting, due to open at the end of 2021. At its heart it will provide person-centred care through reablement and rehabilitation aimed at helping people to return home. This will be alongside specialist dementia and nursing residential care.</p> <p>East Berks CCG will directly commission 20 Intermediate Care Service (ICS) beds on the top floor with Frimley Health Foundation Trust (FHFT). The remaining dementia nursing beds (or a portion thereof) will be commissioned by the council through an open tender process. The option on who should deliver / commission hotel services is currently being finalised.</p>		
Proposed 'go live' / implementation date	01/12/2021	
Will the proposal / project involve a procurement exercise	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

If YES, when will the tender be issued?	13/01/2021	
<p>Consequences if the project / initiative was delayed/ unable to proceed: <i>Factors may include: Consequences for the business, financial implications, consequences for service delivery and service users.</i></p> <p>This is a high-cost, high-profile project so there will be financial and reputational risk involved if the project is subject to delay or cancellation.</p>		
Has an Information Sharing Agreement for this proposal already been initiated with Legal Services?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Has a Privacy Impact Assessment / DPIA already been initiated/completed for a similar project/initiative?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
If YES, what was the name of the project/initiative?		

Does the proposal involve :	Yes	No
1. Processing *high volumes of personal data that affects a large number of individuals?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>2. *Large scale processing of data of special category or criminal offence data including:</p> <ul style="list-style-type: none"> • racial or ethnic origin • political opinions, • religious or philosophical beliefs, • trade union membership, • genetic data (e.g. DNA) • biometric data (where used for ID purposes) (e.g. fingerprints) • health (including provision of social care services) • Sex life or sexual orientation • Data related to criminal allegations, convictions or offences related security measures <p><small>*Large scale – Consider, a) the number of individuals concerned, either as a specific number or as a proportion of the relevant population, b) the volume of data and/or the range of different data items being processed, c) the duration or permanence of the data processing activity, d) the geographical extent of the processing activity.</small></p> <p>In order to provide the service it will be necessary to gather and store information relating to each patient/resident, particularly around their health/care needs. Knowledge of culture and religious beliefs may also be necessary to care for individuals appropriately. Ethnicity data will likely be captured as part of</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<p>equalities monitoring.</p> <p>As the service will be operated by an external provider rather than the Council directly it is difficult to confirm at this stage how the information will be processed – i.e. if the Council’s existing data systems will be used/accessible on site or if the provider will run an entirely separate system that does not necessarily link to or share data directly.</p>		
<p>3. Processing <u>any</u> biometric and/or genetic data?</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>4. Use systematic and extensive <u>profiling or automated decision-making</u> to make significant decisions about people?</p> <p>Decisions around admission/care needs will depend on a person’s circumstances however these are not anticipated to be made automatically, instead will be considered on an individual basis.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>5. Profiling individuals on a *large scale? See 2. above.</p> <p>Although personal data will be collected this will not be analysed via an algorithm or Artificial Intelligence system, nor will it be used to predict an individual’s behaviour.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>6. Profiling children or automated decision-making or for marketing purposes, or offering or targeting marketing or online services at children (aged under 13)?</p> <p>This service will only support adults (18+)</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>7. Use profiling, automated decision-making or special category data to help make decisions on someone’s access to a service, opportunity or benefit?</p> <p>Special category data (i.e. information about a person’s health needs) may be considered as part of a decision to admit however as stated above this will not be an automated process.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>8. Matching data or combining datasets from different sources?</p> <p>The service will require sharing data from different sources however this will likely be done on an individual basis as required rather than combining large data sets.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>9. Tracking an individual’s location or behaviour?</p> <p>TBC – as the service/s will be supporting people with dementia it may be necessary to implement telecare equipment (e.g. falls sensors, motion detectors etc.) this will need to be considered on a case by case basis in the person’s best interests.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<p>10. Processing data could result in a risk of physical harm in the event of a security breach.</p> <p>The project will include data relating to an individual's health and social care information which, according to the ICO, meet this condition.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>11. Collecting personal data from a source other than the individual without providing them with a privacy notice (this is termed 'invisible processing')</p> <p>For example: The Council receives personal data from third parties without the individuals being aware, because issuing a privacy notice would prove impossible or involve disproportionate effort</p> <p>Yes – the service will receive referrals from hospitals, GPs etc. and although the expectation will be that the individual has consented to the service, they may not receive a privacy notice from the Council.</p> <p>The Service may also receive information relating to an individual (i.e. medication information or test results) that is necessary in order to provide care.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>12. Systemic monitoring of individuals / public areas using overt or covert methods e.g. CCTV?</p> <p>For the safety of staff and residents, CCTV will be used in communal areas on each floor of the building.</p> <p>Additionally, individuals may be monitored via other methods e.g. telecare equipment however this should be assessed as necessary and proportionate, not indiscriminately installed.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>13. Use of new technologies (inc. introducing new or amending existing technology, systems or software)?</p> <p>As mentioned, telecare equipment may be implemented if deemed appropriate. Use of remote working software (video calling etc.) may also be used to facilitate medical consultations or family visits where face to face is not possible.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>14. Processing of data where the primary purpose is criminal law enforcement?</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>15. Processing of data outside of the European Economic Area?</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>16. Use of innovative technology in combination with any of the criteria in the European guidelines.</p> <p>As with 13 – telecare equipment may be utilised, as well as Bluetooth-enabled smart speakers (alexa, google assistant etc.) As this is a long term project, new technology that may benefit the residents may be implemented in future if it would improve the service/quality of life for the residents.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<p>17. There is a change to the nature, scope, context or purposes to our processing. Not anticipated at this stage however if this were to occur, the DPIA will be reviewed.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Where you have answered yes to the scale questions (1, 2 or 5 above) Indicate how many individuals will be affected</p> <p>The home is intended to accommodate a maximum of 66 persons at any one time.</p> <p>The dementia element will hold a maximum of 46 service users at any one time.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Information Sharing

Does the proposal involve:	Yes	No
<p>Sharing personal data or special category data on a regular basis with an external third party?</p> <p>Information may be shared between health and social care organisations in order to provide a holistic and integrated service and as part of ongoing governance of the service</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>If 'Yes' is there a valid Information Sharing Agreement (ISA) in place for the sharing you wish to undertake?</p> <p>This will need to be drafted with the provider of each service once identified.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Changing the scope of an existing Information Sharing Agreement?</p> <p>No ISA is in place.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Please complete and return this form to: mandy.byfield@bracknell-forest.gov.uk

You will then be contacted with the outcome of the assessment of the summary DPIA and proposed next steps.

Legal Services - Office Use

Data Protection Officer Review			
DPIA required?	Yes	<input type="checkbox"/>	No <input type="checkbox"/>
CCTV DPIA required?	Yes	<input type="checkbox"/>	No <input type="checkbox"/>
Is Investigatory Power Act authorisation required?	Yes	<input type="checkbox"/>	No <input type="checkbox"/>
Criminal Law Enforcement data processing?	Yes	<input type="checkbox"/>	No <input type="checkbox"/>
Comments including rationale:			

Procurement involved?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Is a pre and post procurement DPIA likely to be required?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Comments including rationale:				
Information Sharing Agreement required?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Comments including rationale:				
Next Steps / Recommendations for risk mitigation (including dates and any meetings arranged with business)				
				Click here to enter a date.
				Click here to enter a date.
Name				
Job Title				
Date of review				
Submitter informed of next steps	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Date	Click here to enter a date.			

When completed the above section may be sent as part of the Summary DPIA assessment response.