

# Urban & Civic

## Data Protection Impact Assessment (DPIA) Form Template

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This DPIA form follows the process set out in out by EU guidance as adopted by the Information Commissioner’s Office (ICO). You should start to fill out the template at the start of any major project involving the use of personal data, or if you are making a significant change to an existing process. The final outcomes should be integrated back into your project plan.

You must complete this section for every type of processing activity as part of U&C’s compliance requirements with UK GDPR, U&C is required to keep a register of the processing activities carried out with personal data, both when it is the controller of the personal data, or when it processes data on behalf of a third party.

Submitting controller details	
Role of U&C in the processing	Controller
Subject/title of Project	Hallmaster Booking system for The Community Buildings @ Waterbeach
Name of controller / processor DPO contact	James Scott

## Data Protection Impact Assessment (DPIA) screening questions

This document is a 'Screening Questionnaire' to decide if a full data Protection Impact Assessment (DPIA) is necessary in line with Data Protection Act & UK General Data Protection Regulation (GDPR). A DPIA is not required to be carried out for every processing operation which may result in risks for the rights and freedoms of natural persons. A DPIA is only mandatory where processing is "likely to result in a high risk to the rights and freedoms of individuals". In cases where it is not clear whether a DPIA is required one is to be carried out regardless. It is a useful tool. To help NHS Digital comply with data protection law.

1. Will the proposed activity involve collection of personal or sensitive data? (Yes)
2. Does the proposal involve any evaluation or scoring including profiling & predicting using information about a person? (No)
3. Does the proposed processing involve any automated decision making with personal or sensitive data? (No)
4. Does the proposal involve any systematic monitoring: processing used to observe, monitor or control individuals? (No)
5. Does the proposal involve any sensitive data or information of a highly personal nature e.g. health? (No)
6. Does the proposed processing involve data processed on a large scale? (No)
7. Does the proposal involve any data concerning vulnerable individuals who may be unable to easily consent or oppose the processing, or exercise their rights? (No)
8. Does the proposal involve any innovative use or applying new or cutting edge technological? (No)

If the answer to any of the above question is "Yes" then personal data is being processed and you will need to complete a Data Protection Impact Assessment.

If the answers to these questions are "No" then a full DPIA may not be necessary but the completed questionnaire itself is evidence that the processing was properly considered.

## Step 1: Identify the need for a DPIA

Explain broadly what project aims to achieve and what type of processing it involves. You may find it helpful to refer or link to other documents, such as a project proposal. Summarise why you identified the need for a DPIA.

### **Explain broadly what project aims to achieve and what type of processing it involves.**

Hallmaster is the booking service for U&C Waterbeach buildings / rooms that can be booked by the public. We use basic information Name, Address, Email and phone number as well as the name of the activity to book rooms within the rooms. The buildings / rooms covered by Hall Master are the following:

- Sports Hall
- The Studio
- The Community Room
- Squash Courts (2)
- Tennis Court (1)

The facilities are used for fitness classes, sports clubs, community groups, youth group, parties on a weekend and individuals using the squash and tennis courts.

More buildings will be added as they come onto the development and can be booked by the community.

## Step 2: Describe the processing

**Describe the nature of the processing:** how will you collect, use, store and delete data? What is the source of the data? Will you be sharing data with anyone? You might find it useful to refer to a flow diagram or other way of describing data flows. What types of processing identified as likely high risk are involved?

**how will you collect, use, store and delete data?**

Name, email, address and phone number are requested by email when a person would like to set up a Hallmaster account in order to book the facilities. These are then added by hand to Hall Master and held within the Hallmaster database and are deleted after 2 years of inactivity.

**What is the source of the data?**

Data subjects provide information.

**Will you be sharing data with anyone?**

No

**What types of processing identified as likely high risk are involved?**

None. The technology is commonly used in various sectors and has been trailed and tested by U&C in Alconbury and possibly on other developments. There will be an ongoing review and monitoring of the system to ensure functionality of the system to ensure any future issues and concerns are picked up.

**Describe the scope of the processing:** what is the nature of the data, and does it include special category or criminal offence data? How much data will you be collecting and using? How often? How long will you keep it? How many individuals are affected? What geographical area does it cover?

**What is the nature of the data, and does it include special category or criminal offence data?**

No special category information. Individuals are asked for name, address, email and a phone number.

**How much data will you be collecting and using? How often?**

As part of the principle of data protection, data minimization has been considered and only information required as listed above is collected to ensure U&C is able to meet its obligation of offering an effective and fit for purpose booking system. Data is used to do the invoicing on a monthly basis.

**How long will you keep it? How many individuals are affected?**

The information collected is kept for as long as it is necessary to do so and if people are using the U&C facilities. After 2 years of inactivity data is deleted securely in line with U&C deletion practice.

**What geographical area does it cover?**

Immediate vicinity of Waterbeach

**Describe the context of the processing:** what is the nature of your relationship with the individuals? How much control will they have? Would they expect you to use their data in this way? Do they include children or other vulnerable groups? Are there prior concerns over this type of processing or security flaws? Is it novel in any way? What is the current state of technology in this area? Are there any current issues of public concern that you should factor in? Are you signed up to any approved code of conduct or certification scheme (once any have been approved)?

**what is the nature of your relationship with the individuals?**

It is assumed that members of the public, or those living in U&C developments will be most likely to use the service. In some cases if it is the general public using the service there may be no prior relationship.

All Individuals provide their information willingly and **receive the booking form via the website.(need to check this is possible)** On request all data held on Individuals can be disclosed or destroyed. If information is removed from Hallmaster they will no longer be able to book U&C facilities at Waterbeach.

**How much control will they have?**

Individuals will have all rights as stipulated by the DPA 2018 & UK GDPR. U&C privacy notice clearly informs individuals on their rights and upon receipt of any request the data protection team will follow our internal process in dealing with all Data Subject Rights Requests. U&C privacy notice link <https://www.urbanandcivic.com/privacy/>

**Would they expect you to use their data in this way?**

Yes, all individuals signed up to use this service would expect U&C to use their information for the purpose of invoicing and allocation of spaces for the duration of time booked. The individuals would have also accepted the T&C during registration and setting up of their profile.

**Do they include children or other vulnerable groups?**

The processing may include vulnerable individuals however U&C would not have this information and has not requested, nor will it collect any form of special categories of personal data. There may be a possibility of children using the space however they will be under parental supervision and the responsibility of the parents while using the space. Children under 16 years will not have access to the booking system

**Are there prior concerns over this type of processing or security flaws?**

There are no prior concerns over this type of processing and no high risk is envisaged.

**Are there any current issues of public concern that you should factor in?**

There are no issues of public concern envisaged however, if this should change the DPIA will be updated accordingly

**Are you signed up to any approved code of conduct or certification scheme?**

No

**Describe the purposes of the processing:** what do you want to achieve? What is the intended effect on individuals? What are the benefits of the processing – for you, and more broadly?

Data is held to allow for booking and invoicing purposes and so we know who is using the U&C Facilities at any given time. Private businesses (yoga, tai chi), community groups (youth group, toddler group) and residents request to book the separate spaces via Hall Master and then we approved the booking and invoice from that information all via Hall Master.

**what do you want to achieve?**

Hall Master has been introduced to help support the public in booking the spaces and to reduce administration and finance support from the central U&C team in London.

**What is the intended effect on individuals?**

The intended outcome for individuals is a seamless booking system which would be self-service. Once the individual has booked the slot, an admin approves and then an email is sent automatically.

## Step 3: Consultation process

**Consider how to consult with relevant stakeholders:** describe when and how you will seek individuals' views – or justify why it's not appropriate to do so. Who else do you need to involve within your organisation? Do you need to ask your processors to assist? Do you plan to consult information security experts, or any other experts?

Information requested is the minimum needed to maintain a booking system for the U&C facilities in Waterbeach and is not excessive in any way.

**Describe when and how you will seek individuals' views – or justify why it's not appropriate to do so.**

Full consultation was offered in bring forward the community space in line with S106 requirements. Extensive research was conducted on the best possible booking system and the Alconbury Weald U&C team were asked about their experience of using Hall Master, which they introduced in 2022.

**Who else do you need to involve within your organisation?**

Various stakeholders within the business have been consulted for example the Communications and Estates teams reviewed and approved the project. Prior to introducing Hall Master at Alconbury, the data protection team were involved in ensuring this risk assessment was undertaken compliantly and IT provided guidance on cyber security and technical measure required in line with article 32 of the GDPR to ensure all measures have been adequately implemented.

**Do you need to ask your processors to assist?**

Hallmaster is an external system provider with a contract to supply.

**Do you plan to consult information security experts, or any other experts?**

Hallmaster are the experts on this. The Final Step (U&C IT support) have also been consulted from U&C as well as Mark Robertson who manages our website.



## Step 4: Assess necessity and proportionality

**Describe compliance and proportionality measures, in particular:** what is your lawful basis for processing? Does the processing actually achieve your purpose? Is there another way to achieve the same outcome? How will you prevent function creep? How will you ensure data quality and data minimisation? What information will you give individuals? How will you help to support their rights? What measures do you take to ensure processors comply? How do you safeguard any international transfers?

There is no other way to achieve the same process. The information we ask for is proportionate and limited.

### **what is your lawful basis for processing?**

The processing of data must be lawful. U&C is responsible for establishing that the processing is based in law.

There are 6 lawful bases for processing data under Article 6(1) and at least one will apply in order to comply with the principles of lawfulness and accountability;

- The consent of the data subject

To withdraw consent individuals would need to contact U&C to withdraw their booking

### **Does the processing achieve your purpose?**

Yes, this processing achieves the core purpose

### **How will you prevent function creep?**

Information will only be used for the purpose it was collected for and will not be used for another purpose.

### **what information will you give individuals?**

As noted above individuals will be provided with the T&Cs and directed to U&C privacy notice

### **How will you help to support their rights?**

U&C team are available to support their rights if there are any queries. The data protection team have an email to protect their rights, alternatively they can contact the data protection manager.

### **What measures do you take to ensure processors comply?**

Working with Hallmaster and The Final Step who have compliant contracts in place.

### **How do you safeguard any international transfers?**

There are no envisaged transborder or international transfers

Step 5: Identify potential risks				
Risk (number)	Potential Risk	Severity of Impact	Risk Likelihood	Notes / Comments
		Low Medium High	Low Medium High	
1	Data breach	Low	Low	Information held is in the public domain.
2	Is there a possible risk that individuals will be unable to exercise their data rights?	Low	Low	Emails not being checked regularly.
3	Is there a possibility of cyber security attack?	Low	Low	
4	Is there a possibility that data may be held longer than the retention period?	Low	Low	
5	Is there a possibility of staff not being trained adequately in managing the system for example?	Low	Low	Hallmaster support is available if required
6	Is there a risk that data collected is used for another purpose?	Low	Low	

8	Oversite of not approving booking.	Low	Low	Emails not being checked

## Step 6: Identify measures to reduce risk

**Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 5**

Risk	Options to reduce or eliminate risk	Effect on risk  Eliminate Reduce Accept	Residual risk  Low Medium High	Measure approved  Yes/No

## Step 7: Sign off and record outcomes

Item	Name/position/date	Notes
Measures approved by:	Name: Caroline Ward Job Role: Community Development Lead Signature: C.Ward Date: 28/06/23	Integrate actions back into project plan, with date and responsibility for completion
Residual risks approved by:	N/A	If accepting any residual high risk, consult the ICO before going ahead
DPO advice provided:	Name: James Scott Job Role: DPM Signature: JDS Date:28/06/2023	DPO should advise on compliance, step 6 measures and whether processing can proceed
Summary of DPO advice: <a href="#">Low risk processing activity, scoped and controlled by the team.</a>		
DPO advice accepted or overruled by:	N/A	If overruled, you must explain your reasons
Comments: <a href="#">N/A</a>		
Consultation responses reviewed by:	N/A	If your decision departs from individuals' views, you must explain your reasons
Comments:		
This DPIA will kept under review by:	<a href="#">To be kept under review by JDS</a>	The DPO should also review ongoing compliance with DPIA