

# Data Protection Impact Assessment (DPIA) Template

|                                     |  |
|-------------------------------------|--|
| Proposal/<br>Project/Activity title | Access to Service User data for<br>Migrant Help under the Advice, Issue,<br>Reporting and Eligibility (AIRE)<br>contract |
| Information Asset<br>Owner(s)       | Andy Kelly<br><REDACTED>   |

Version 0.1

## Data Protection Impact Assessment (DPIA) Template

### Document Control

|   | Name       | Job Title            | Date   |
|---|------------|----------------------|--------|
| DPIA Drafted by                                   | <REDACTED> | Business Change Lead | 9/4/21 |
| Reviewed by                                       |            |                      |        |
| Lead DPP for business area                        |            |                      |        |
| Lead business owner /project manager/policy owner |            |                      |        |

### Version/Change history

| Version   | Date   | Comments    |
|-----------|--------|-------------|
| Draft 0.1 | 9/4/21 | First draft |
| Draft 0.2 |        |             |
| Draft 0.3 |        |             |
| Draft 0.4 |        |             |
| Final 1.0 |        |             |
| Final 1.1 |        |             |
| Final 1.2 |        |             |
|           |        |             |
|           |        |             |
|           |        |             |
|           |        |             |

### Approved by (Information Asset Owner (IAO) or person acting on behalf of the IAO):

IAO approval is only required if Stage 2 of this template is completed. Project manager sign off is sufficient if the questions outlined in Stage 1 are answered in negative.

| Name       | Title                          | Date   |
|------------|--------------------------------|--------|
| Andy Kelly | Deputy Director Asylum Support | 9/4/21 |

## Data Protection Impact Assessment (DPIA) Template

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## Data Protection Impact Assessment (DPIA) Template

Guidance on when and how to complete this template is provided in the Data Protection Impact Assessment (DPIA) Guidance on Horizon – **this guidance should be read before completing the DPIA.**

### DPIA Stage 1

#### Summary of the processing

**1. Does the proposal/project/activity involve the processing<sup>1</sup> of personal data, or is new legislation which relates to the processing of personal data being considered?<sup>2</sup>**

☒ Yes

☐ No

**If the answer to this question is 'No', then the rest of the form does not need to be completed. If the answer is 'Yes', please continue.**

**2. Does the proposal/project/activity involve any of the following?**

- a new way of processing personal data
- the use of a new form of technology for a new or existing process
- new legislation which relates to the processing of personal data being considered
- substantial changes to an existing project/programme/processes involving personal data, which would include a significant increase in the volume or type (category) of data being processed

☒ Yes

☐ No

**If the answer to this question is 'No', then the rest of the form does not need to be completed. If the answer is 'Yes', please continue.**

**3. What is the purpose of the processing?** Provide a brief (up to 100 words) description of the processing activity e.g. sharing with a third party; storing data in a new way; automating a data processing activity; developing a new policy that requires new legislation or amendments to existing legislation etc.)

**[NB: this question is repeated at 3.1 at which point you can add more detail/ background.]**

HO are required to share access to Service User data and the MACP portal (provided by PFS as part of Asylum Support Payments contract)

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<sup>1</sup> In relation to personal data, means any operation or set of operations which is performed on personal data or on sets of personal data (whether or not by automated means, such as collection, recording, organisation, structuring, storage, alteration, retrieval, consultation, use, disclosure, dissemination, restriction, erasure or destruction).

<sup>2</sup> Data protection legislation applies to 'personal data' which is defined as any information which relates to a living identifiable person who can be directly or indirectly identified by reference to an identifier. The definition is broad and includes a range of items, such as name, identification number, location data, or on-line identifier etc.

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with a third party, Migrant Help, to enable them to carry out their requirements as part of the Advice, Issue Reporting and Eligibility Contract.

### Screening questions

**4. Does the processing activity include the evaluation or scoring of any of the following?**

- profiling and predicting (especially from “aspects concerning the data subject's performance at work”)
- economic situation
- health
- personal preferences or interests
- reliability or behaviour
- location or movements.

☐ Yes

☒ No

**5. Does the processing activity include automated decision-making with legal or similar significant effect?** i.e. processing that is intended to take decisions about data subjects which will produce “legal effects concerning the natural person” or which could “significantly affect the natural person”.

☐ Yes

☒ No

**6. Does the processing activity involve systematic monitoring?** i.e. processing used to observe, monitor or control data subjects, including data collected through networks or “a systematic monitoring of a publicly accessible area” e.g. CCTV.

☐ Yes

☒ No

**7. Does the processing activity involve mostly sensitive personal data?** This includes special categories of personal data, data about criminal convictions or offences, or personal data with the security marking of Secret or Top Secret.

☒ Yes

☐ No

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- 8. Does the processing activity involve data processed on a large scale?** If sharing with a third party external to the Home Office large scale is defined as 1,000 plus pieces of personal data in a single transaction or in multiple transactions over a cumulative 12 month period.

☒ Yes

☐ No

In total circa 50,000 Service User (SU) records will be processed by the Advice, Issue Reporting and Eligibility (AIRE) contract. This data is shared using SharePoint (SP) sites hosted by Migrant Help (MH), the Single Point of Contact (SPOC) for the AIRE contract, MoveIT and the Collaborative Business Portal (CBP) and ingested into the system developed by Migrant Help (MH) and their IT supplier, Connect Assist (CA). This system is called ELLIS (named after the founder of MH and not an acronym), it is built in Oracle Service Cloud (OSC). ELLIS pushes updates to ATLAS via a VPN.

- 9. Does the processing activity involve matching or combining datasets that are being processed for different purposes?** e.g. data originating from two or more data processing operations performed for different purposes and/or by different data controllers in a way that would exceed the reasonable expectations of the data subject. *NB:* This does not include matching or combining datasets from different IT systems that are processed for the same purpose and legal basis e.g. CID and CRS.

☐ Yes

☒ No

- 10. Does the processing activity involve mostly data concerning vulnerable data subjects or children?**

☐ Yes

☒ No

- 11. Does the processing activity involve the innovative use or application of new technological or organisational solutions?** e.g. combining use of fingerprints and facial recognition for improved physical access control, etc.

☐ Yes

☒ No

- 12. Will the processing activity in itself prevent data subjects from exercising a right (under Data Protection Legislation and the UK GDPR) or using a service (provided by) or a contract (with) the Department?**

☐ Yes

☒ No

- 13. Is the introduction of new legislation or a legal regulatory measure which relates to the processing of personal data being considered?**

*NB:* If yes, this may require consultation with the Information Commissioner.

☐ Yes

☒ No

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**If you have answered 'yes' to more than one of the above screening questions (Q 3 to 12), a DPIA must be completed.** If you have answered 'no' to each of the screening questions but feel the planned policy/process/activity is significant, or carries reputational or political risk, you should complete the full DPIA. If you are not sure whether a DPIA should be completed, please consult the Office of the [Data Protection Officer](#) (ODPO).

**If you have completed Stage 1 and do not need to complete Stage 2, send your Stage 1 assessment to the [ODPO](#).**

# Data Protection Impact Assessment (DPIA) Template

## DPIA Stage 2

### Section 1: Background and contacts

#### 1.1 Proposal/Project/Activity title:

Access and use of the MACP portal for Migrant Help under the Advice, Issue, Reporting and Eligibility (AIRE) contract

#### 1.2 Information Asset title(s) (if applicable):

Click or tap here to enter text.

#### 1.3 Information Asset Owner(s) (IAO):

Email: <REDACTED>  
Name: Andy Kelly  
Telephone Number: <REDACTED>  
Information Asset title: Asylum Support Service User Data

Email: Click or tap here to enter text.  
Name: Click or tap here to enter text.  
Telephone Number: Click or tap here to enter text.  
Information Asset title: Click or tap here to enter text.

Email: Click or tap here to enter text.  
Name: Click or tap here to enter text.  
Telephone Number: Click or tap here to enter text.  
Information Asset title: Click or tap here to enter text.

#### 1.4 Person completing DPIA on behalf of the IAO named at 1.3 above):

Email: <REDACTED>  
Name: <REDACTED>  
Telephone Number: <REDACTED>  
Business Unit/Team: Asylum Support Payments Project

#### 1.5 Date DPIA commenced:

16/04/2021

#### 1.6 Date processing activity to commence (if known):

03/05/2021

NB: if the processing activity is already ongoing, please explain why the DPIA is being completed retrospectively.

Click or tap here to enter text.



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### 1.7 Information Asset Register reference (if applicable):

Click or tap here to enter text.

### 1.8 DPIA version:

1.2

### 1.9 Linked DPIAs *NB*: attach word versions, do not provide links.

### 1.10 DPIA proposed publication date (where applicable, and if known):

The Home Office does not routinely publish DPIAs, as there is no legislative requirement to do so. This does not mean we would not make it available to the regulatory authority should the need arise – that being the Information Commissioners Office. We will also consider any request for publication received under FOI or on advice received by the Home Office Data Protection Officer or the ICO. *NB*: Provide below information about whether the DPIA will be published in part or in full, and the reason why it will be published.

Click or tap here to enter text.

## Section 2: Personal Data

*NB*: These questions relate to the personal data being processed in the processing activity described within this DPIA only. It is acknowledged that in many instances the personal data being processed will originate from other HO sources and therefore be subject to their own set of rules governing access, retention and disposal.

### 2.1 What personal data is being processed?

Name, address, DOB, Dependants, dependants DoB, telephone number(s), ethnicity, nationality and health.

### 2.2 Which processing regime(s) applies: general processing regime (UK GDPR/Part 2 DPA), and/or law enforcement processing regime Part 3 DPA?

*NB*: this question is repeated at Q.3.1.a.

General processing (UK GDPR/Part 2 DPA) ☒

Law enforcement (Part 3 DPA) ☐

### 2.3 Does the processing include any of the following special category, or criminal conviction data?

Criminal conviction data ☐ Yes ☐ No

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|  |                                     |     |                             |
|--|-------------------------------------|-----|-----------------------------|
| Race or ethnic origin (including nationality)                                      | <input checked="" type="checkbox"/> | Yes | <input type="checkbox"/> No |
| Political opinions   | <input type="checkbox"/>            | Yes | <input type="checkbox"/> No |
| Religious or philosophical beliefs   | <input type="checkbox"/>            | Yes | <input type="checkbox"/> No |
| Trade union membership   | <input type="checkbox"/>            | Yes | <input type="checkbox"/> No |
| Genetic data or biometric data for the purpose of uniquely identifying individuals | <input type="checkbox"/>            | Yes | <input type="checkbox"/> No |
| Health   | <input checked="" type="checkbox"/> | Yes | <input type="checkbox"/> No |
| Sexual orientation or details of the sex life of an individual                     | <input type="checkbox"/>            | Yes | <input type="checkbox"/> No |

### 2.4 Does it include the processing of data relating to an individual aged 13 years or younger?

☒ Yes ☐ No

### 2.5 (If 'yes') What additional safeguards are necessary for this processing activity? If none, explain why.

The system uses the main applicant's National Asylum Support Service (NASS / AS) Reference (expected to be an adult) to identify the records. In that record, however, will be the details of dependents; it is not expected that a child would be the main applicant. although in exceptional cases there is the possibility of an unaccompanied child being the main applicant. For support purposes only, to ensure the correct level of support is received. Migrant Help will contractually be the single point of contact, for all supported service users on any issue experienced in asylum support. MH staff will receive training over how to store and respond to information collected, relating to minor SUs. MH and CA staff are also trained in PREVENT and other initiatives which have an impact on children. Training is monitored by the HO as part of the annual contract review and MH are also required to provide vetting and training matrices for all staff members. MH have a published Privacy Note, which also references the Borders, Immigration and Citizenship (BICS) privacy note on Gov.uk since UKVI is the data owner for the data they can view and they agree to the same standard.

### 2.6 Will data subjects be informed of the processing?

☒ Yes ☐ No

If 'yes' go to Q2.7 If no, explain why.

[Click or tap here to enter text.](#)

### 2.7 (If 'yes') How will they be informed/ notified?

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Generic subsistence letter. Under the AIRE contract SUs will be asked to acknowledge that their data will be shared with named third parties (PFS, UKVI and Migrant Help and the Asylum Accommodation Support Contract housing providers: Mears, Serco and Clearsprings Ready Homes (CRH)) to enable applications for support to be processed effectively, plus all SUs will be given an induction into the services MH will offer and how their data will be stored.

### **2.8. Which HO staff and/or external persons will have access to the data?**

HO teams - Aspen Operations Team, Asylum Support. Accommodation Management Team and Accommodation Reconciliation Team, Case Working Team. Migrant Help – Contact Centre staff (to enable them to support service user enquiries as part of their contractual requirements) and staff located in Initial Accommodation (to enable issuance of Aspen cards as part of the transition from Initial to Dispersed accommodation and as part of their contractual requirements).

#### **2.8a. How will access be controlled?**

Under AIRE Migrant Help use an Oracle service cloud platform, ELLIS to control information. Ellis has individual named user accounts, which are accessed only by appropriately cleared (CTC, SC depending on type of access). Migrant Help and the AASC providers also use SharePoint which also has individual, named accounts along with 2 Factor Authentication (2FA). 2FA is enabled and all users are 2FA enrolled, and enforced, prior to accessing the system. Oracle Service Cloud does not offer 2FA.

### **2.9 Where will the data be stored?**

Fdrive, shared data file area visible to Home Office staff. Under AIRE, data is stored on SharePoint and ELLIS (see above).

### **2.10 If the data is being stored electronically, does the storage system have the capacity to meet data subject rights (e.g. erasure, portability, suspension, rectification etc)?**

☒ Yes

☐ No

#### **If 'No' explain why not below and go to Q2.12**

Click or tap here to enter text.

### **2.11 If 'Yes' explain how these requirements will be met.**

ELLIS and SharePoint have the ability to delete users records, before any piece of hardware is disposed of by MH or CA it will be wiped to prevent anyone from being able to access the data. The data can be edited in the systems allowing for rectification and is part of the checks performed by a MH or CA case worker when a SU calls their services. Data can be transferred via an Application

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Programming Interface (API) or can be securely emailed. When a SU is no longer a 'customer' their records can be suspended within ELLIS and a 'flag' can be set in the files in SharePoint.

Data stored in ELLIS, SharePoint, CBP, ATLAS and MoveIT are all capable of meeting a data subject's rights.

**[2.12 For law enforcement processing only: If the data is being stored electronically, does the system have logging capability (as per s.62 DPA)?**

☐ Yes

☐ No

**If 'no', what action is being taken to ensure compliance with the logging requirement?]**

[Click or tap here to enter text.](#)

**[2.13 For law enforcement processing only: Will it be possible to easily distinguish between different categories of individuals (e.g. persons suspected of having committed an offence, victims, witnesses etc.) as well as between factual and non-factual information (as per s.38 DPA)? e.g. criminal record (fact); allegation (non-factual)**

☐ Yes

☐ No

**If 'no', what action is being taken to ensure compliance with s.38 DPA?]**

[Click or tap here to enter text.](#)

### **2.14 What is the retention period for the data?**

Under AIRE Migrant Help must adhere to Government data handling procedures. The document retention period is 2 years as defined in Home Office operation guidelines for Asylum Support.

### **2.15 How will data be deleted in line with the retention period and how will the deletion be monitored?**

Currently there is a moratorium on the disposal of all records throughout the Home Office, including all operational records and case files as detailed in the BICS Privacy Information Notice. Once the moratorium is lifted, all data relating to Service Users remains the property of Home Office and will be returned to us on expiry of the contract. At that point we will either delete the data or store in line with KIMU guidance. We have also agreed an exit plan with PFS which is included in Schedule 10 (exit management) of the PFS contract and can be provided on request.

### **2.16 If physically moving/sharing/transferring data outside the Home Office, how will it be moved/shared?**

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Shared/moved by Movelt (secure web-based portal) Under AIRE 'ELLIS' is the the new Oracle Service Cloud platform, which the Authority and AASC Providers have been given secure web access to in line with data sharing protocols. Additionally each of the Asylum AASC Providers and the HO have their own SharePoint sites only the HO and MH / CA have the ability to view any other sites.

### 2.17 What security measures will be put in place to ensure the transfer is secure?

Users of Sharepoint and ELLIS will have individual named accounts. SP has 2 Factor Authentication enabled and all users are 2FA enrolled, and enforced prior to accessing the system. Oracle does not offer 2FA. For both systems web access is via HTTPS. Information Assurance activity has been undertaken on both systems and the results have been given Authority to Operate.

### 2.18 Is there any new/additional personal data being processed? This includes data obtained directly from the data subject or via a third party.

☒ Yes

☐ No

#### If 'yes', provide details below:

The service users will be required to provide this information to facilitate consideration of their application for financial support and accommodation. It is explained in briefing material provided to them why the information is required and who has access to it. This may sometimes be the first time a service user has shared some of the information requested.

Name

Address

DOB

Dependants

Telephone number(s)

Ethnicity

Nationality

Safeguarding information

The AIRE Contract established Migrant Help as the Single Point of Contact for issue resolution relating to asylum support and accommodation provided by UKVI and are therefore required to process the data covered under this impact assessment throughout the lifetime of the service user's support claim.

### 2.19 What is the Government Security Classification marking for the data?

OFFICIAL/OFFICIAL-SENSITIVE ☒

SECRET ☐

TOP SECRET ☐

### 2.20 Will your processing include the use of Cookies?

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☐ Yes

☒ No

If 'no' go to section 3.

If 'yes', what sort of Cookies will be used? Tick the correct categories:

1) Essential (no consent required) ☐ Yes ☐ No

2) Analytical (consent required) ☐ Yes ☐ No

3) Third party (consent required) ☐ Yes ☐ No

**2.20.a. If cookies fall into categories 2) & 3) how will you ensure data subjects are aware and can give active consent to the use of cookies?**

Click or tap here to enter text.

### Section 3: Purpose of the Processing

**3.1 What is the purpose of the processing?** Provide a detailed description of the purpose for the processing activity. This section needs to provide an overview (in plain English) that can be read in isolation to understand the purpose and reasons for the processing activity.

The purpose is to be able to share personal sensitive data of service users to enable the correct provision of support, action any accommodation issues, process various Home Office asylum support forms (ASF1, CoC, S95 and S98) and action and prioritise any requests in respect of the vulnerable. Migrant Help, as part of their requirements under the Advice, Issue, Reporting and Eligibility (AIRE) contract, will have access to:

a) service user information in respect of;

Name

Address

DOB

Dependants

Telephone number(s)

Ethnicity

Nationality

Safeguarding information

Payment details (historical to present) including amount and partial card reference

Financial situation (destitution)

Health issues

b) Access to Master Account Control Portal (MACP) – provided by PFS as part of Asylum Support Payments contract

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Name

Address

DOB

Dependants

Payment details (historical to present) including amount and partial card reference

Exchange of support queries sent by email from Migrant Help on behalf of the service user. This data processing is already conducted and is covered under a previous DPIA (see 1.9) but has been updated to reflect the change of provider from Sodexo to PFS.

### 3.1.a Which processing regime(s) applies: general processing regime (UK GDPR/Part 2 DPA), and/or law enforcement processing regime Part 3 DPA?

General processing (UK GDPR/Part 2 DPA) ☒ - go to question 3.2.a.

Law enforcement (Part 3 DPA) ☐ - go to question 3.2.b.

### 3.2.a. General processing only: What is the (UK GDPR Article 6) lawful basis for the processing? Choose an option from the list:

- |   |                                     |
|---|-------------------------------------|
| Consent                                   | <input type="checkbox"/>            |
| Contract                                  | <input type="checkbox"/>            |
| Legal obligation [see 3.3(a)]             | <input type="checkbox"/>            |
| Vital Interest                            | <input type="checkbox"/>            |
| Performance of a public task [see 3.3(a)] | <input checked="" type="checkbox"/> |
| Legitimate Interest                       | <input type="checkbox"/>            |

NB: Legitimate Interest cannot be relied upon by the Home Office for processing carried out in order to fulfil or support a public task.

### [3.2.b. Law enforcement processing only: What is the (Part 3 DPA) lawful basis for the processing? Choose an option from the list:

- |   |                          |
|---|--------------------------|
| Consent                                 | <input type="checkbox"/> |
| Necessary for a law enforcement purpose | <input type="checkbox"/> |

**3.3.** If you have selected 'legal obligation' or 'performance of a public task' for general processing (for Q3.2.a), OR if the processing is for a law enforcement purpose

**Indicate below the legal basis and relevant legislation authorising the processing of the data:**

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**Common law (list HO function/objective below)**

☐

Click or tap here to enter text.

**Royal Prerogative (HMPO only)**

☐

**Explicit statute/power (list statute below)**

☒

1999 Immigration and Asylum Act – Sections 4, 95, 98

**Implied Statute power (list statute below)**

☐

Click or tap here to enter text.

**3.4.a. General processing only:** If processing special category data or criminal convictions data (see Q2.2 above)

**What is the (UK GDPR Article 9) condition for processing the special category data?**

- |                                     |                                     |
|-------------------------------------|-------------------------------------|
| N/A                                 | <input type="checkbox"/>            |
| Consent                             |                                     |
| Employment/Social Security          | <input type="checkbox"/>            |
| Vital Interests                     | <input type="checkbox"/>            |
| In the public domain                | <input type="checkbox"/>            |
| (Exercising/defending) legal rights | <input type="checkbox"/>            |
| Substantial Public Interest         | <input checked="" type="checkbox"/> |
| Public healthcare                   | <input type="checkbox"/>            |
| Archiving or Research               | <input type="checkbox"/>            |

**[3.4.b. Law enforcement processing only:** If processing sensitive data for a law enforcement purpose: **What is the (DPA Schedule 8) condition for the processing?**

- |  |                          |
|--|--------------------------|
| Consent  | <input type="checkbox"/> |
| Substantial public interest (for a statutory purpose)              | <input type="checkbox"/> |
| Administration of justice  | <input type="checkbox"/> |
| Vital Interests (of the subject or another)                        | <input type="checkbox"/> |
| Safeguarding children and individuals at risk                      | <input type="checkbox"/> |
| Data already in the public domain                                  | <input type="checkbox"/> |
| Legal claims (seeking advice, legal proceedings, defending rights) | <input type="checkbox"/> |
| Judicial acts  | <input type="checkbox"/> |
| Preventing fraud (working with anti-fraud organisations)           | <input type="checkbox"/> |
| Archiving  | <input type="checkbox"/> |

**3.5 Is the purpose for processing the information described at 3.1 above the same as the original purpose for which it was obtained by the Department?**

☒ Yes ☐ No

**If 'no', what was the original purpose and lawful basis?**



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Original purpose: Click or tap here to enter text.

|                        |                            |                          |
|------------------------|----------------------------|--------------------------|
| Original Lawful basis: | Consent                    | <input type="checkbox"/> |
|                        | Contract                   | <input type="checkbox"/> |
|                        | Legal obligation           | <input type="checkbox"/> |
|                        | Vital Interest             | <input type="checkbox"/> |
|                        | Performance of public task | <input type="checkbox"/> |
|                        | Legitimate Interest        | <input type="checkbox"/> |

### Section 4: Processing activity

#### 4.1 Is the processing replacing or enhancing an existing activity or system?

If so, please provide details of what that activity or system is and why the changes are required.

☒ Yes ☐ No

Partial replacement – The Migrant Help contract has been in place since September 2019 but a new provider of Asylum Support Payments has been contracted. From 27<sup>th</sup> May these services will be provided by PFS rather than Sodexo and the MACP portal will be in use rather than the SAM portal as current.

**If the answer is ‘yes’ go to 4.3**

#### 4.2 Is the processing a new activity? This description should include details (if appropriate) of what resources are needed to build the model? (e.g. FTEs, skills, software, external resource)

☐ Yes ☒ No

**How many individual records or transactions will be processed (annually) as a result of this activity?**

c 17,500

#### 4.3 Is this a one-off activity, or will it be frequent and/or regular?

Ongoing, regular – the contract is for 10 years.

#### 4.4 Does the processing directly relate to the processing of personal data that includes new legislative measures, or of a regulatory measure based on such legislative measures? If ‘no’, move onto 4.6.

☐ Yes ☒ No

#### 4.5 If the answer is yes, please explain what that processing activity is, including whether or not the HO will be accountable for the processing of personal data?

Click or tap here to enter text.

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**4.6 Does the processing activity involve another party?** (This includes other internal HO Directorates, external HO parties, other controllers or processors).

☒ Yes

☐ No

**If the answer is “No” go to 4.7.**

**If the yes answer is ‘yes’ and where the other party is external to the HO, please ensure section 6 is completed.**

**4.6.a In what capacity is the other party acting?**

- Part of the HO ☐
- Controller in their own right (i.e. non HO) ☐
- Joint Controller with the HO ☐
- Processor (public body) on behalf of the HO ☐
- Processor (non-public body) on behalf of the HO ☒

**Provide details here:**

Migrant Help are a charity and not a Private Sector organisation, they are supported by Connect Assit who are a Social Enterprise and provide information, advice and guidance to service users as part of the AIRE contract

**4.7 Will any personal data be transferred outside the UK?**

☐ Yes

☒ No

**If ‘no’ go to 4.8. If ‘yes’, provide brief details of the countries and complete Section 7.**

[Click or tap here to enter text.](#)

**4.8 Does the proposal involve profiling that could result in an outcome that produces legal effects or similarly significant effects on the individual?**

☐ Yes

☒ No

**If yes, provide details**

[Click or tap here to enter text.](#)

**4.9 Does the proposal involve automated decision-making?**

☐ Yes

☒ No

**If yes, provide details**

[Click or tap here to enter text.](#)

**4.10 Does the processing involve the use of new technology?**

☒ Yes

☐ No

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If 'no', go to question 5.1.

### 4.11 If 'yes': Describe the new technology, including details of the supplier and technical support.

MACP is a portal that displays details of service user asylum support payments and is provided by Prepaid Financial Services (PFS) as part of their contract to provide said payments. It is a replacement for the current Sodexo SAM portal and is the primary source of data relating to card funds, spend etc and once live will be supported by PFS and by HO Live Services.

### 4.12 Are the views of impacted data subjects and/or their representatives being sought directly in relation to this processing activity?

☐ Yes ☒ No

#### a) If 'yes', explain how this is being achieved

[Click or tap here to enter text.](#)

#### b) If 'no', what is the justification for not seeking their views?

The purpose is categorised as performance of a public task and support related issues and any views are not relevant or applicable. Support recipients are advised that HO and Migrant Help will exchange data relating to the support application in order to ensure the correct support is put in place or to correct any problems arising. They are required to acknowledge this before the application can be initiated.

## Section 5: Risks of the Processing

### 5.1 Are there any other known, or anticipated risks associated with the processing of personal data that have been identified by the project/ programme/initiative owner, which have not been captured in this document?

☐ Yes ☒ No

#### If 'yes' provide details and go to question 5.2.

[Click or tap here to enter text.](#)

### 5.2 What steps have been taken to mitigate these risks?

[Click or tap here to enter text.](#)

### 5.3 Can you demonstrate that the risks to the individuals are sufficiently balanced by the perceived public protection benefits?

☒ Yes ☐ No

#### If 'yes' provide details and go to question 5.4.

Data is held by Migrant Help solely for the purposes of supporting Service Users with their asylum support claim and any issues arising whilst they are in the asylum system. It is not shared outside of MH or their subcontractor (Connect Assist) and is an essential requirement of the AIRE contract – if they

## Data Protection Impact Assessment (DPIA) Template

were unable to access this data it would put Service Users at risk of homelessness and destitution which would increase risk to the wider public and HO reputation.

### 5.4 Are these risks included within a risk register?

☒ Yes

☐ No

## Section 6: Data Sharing/Third party processing

Complete this section if you have answered 'yes' to question Q.4.6.

### 6.1 External contact details for data exchange/ processing

Name: <REDACTED>  
Grade: Director of Asylum Services  
Organisation: Migrant Help  
Business Unit/Area: Customer Care  
Contact email: <REDACTED>  
Contact telephone: <REDACTED>

Name: Click or tap here to enter text.  
Grade: Click or tap here to enter text.  
Organisation: Click or tap here to enter text.  
Business Unit/Area: Click or tap here to enter text.  
Contact email: Click or tap here to enter text.  
Contact telephone: Click or tap here to enter text.

### 6.2 What is the legal basis/power/statutory gateway for the processing activity?

**Common law (list HO function/objective below)** ☒

Prevention of Asylum Seeker destitution and homelessness

**Royal Prerogative (HMPO only)** ☐

**Explicit Statute/power (list statute below)** ☐

Click or tap here to enter text.

**Implied Statute/power (list statute below)** ☐

Click or tap here to enter text.

### 6.3 How long will the data be retained by the receiving organisation or processor for the purpose for which it is received?

**\*See 2.14**

Data relating to Asylum Support payments is to be deleted from MH systems within 48 hours of an asylum claim ending – this is covered in Schedule 29 (General Data Protection Regulations) of the AIRE contract

### 6.4 How will it be destroyed by the receiving/ processing organisation once it is no longer required for the purpose for which it has been received?

**\*See 2.15**

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The Providers are contractually required to destroy data in accordance with the HMG Information Security Standard number 5.

**6.5 Is the data sharing process underpinned by a non-binding arrangement (Memorandum of Understanding (MoU) or equivalent) or binding agreement (Treaty or contract)?**

☒ Yes

☐ No

**If no, provide details why a formal written arrangement is not required and move to 6.7**

**6.6 Provide details of the proposed HO MoU/Contract signatory** and confirm they have agreed to be responsible for the data sharing/processing arrangement detailed in this document.

Name: Andy Kelly  
Grade: Deputy Director Asylum Support  
Business Unit/Area: UKVI  
Contact email: <REDACTED>  
Contact telephone: Phone <REDACTED>

**6.7 Will the other party share any HO data with a third party including any 'processors' they may use?**

☒ Yes

☐ No

**If yes, please provide the identity of the processor and confirm details of that arrangement will be included in the formal written arrangement between the HO and the receiving/processing organisation.**

MH were awarded the contract to provide the new AIRE services, Migrant Help share data with the AASC Providers Serco, Mears and Clearsprings Ready Homes; and for payments PFS

## Technical impact and viability

**6.8 Which of the following reflects the data processing?** The process may meet several of these descriptions.

Data extract: *Are you working through and assessing data to secure relevant information?*

☒ Yes

☐ No

Data matching: *Are you comparing several sets of data?*

☐ Yes

☒ No

Data reporting: *Are you processing data to produce accurate analysis?*

☒ Yes

☐ No

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Data exchange/feed: *Are you sharing the data between programmes?*

☒ Yes

☐ No

Direct access: *Are you obtaining data by going directly to where it is physically located?*

☒ Yes

☐ No

Other

☐ Yes

☒ No

a) If 'Other, please provide details

[Click or tap here to enter text.](#)

**6.9 Has any analysis or feasibility testing been carried out?** For example, through a proof of concept or pilot exercise?

☒ Yes

☐ No

**If yes, provide details. If no, explain why it is not required.**

Home Office Contractors have been party to Witness testing (as part of Business Assurance) that has taken place on the ELLIS system, using test data, at all stages of the deployment.

**6.10 Confirm if:**

**development work is required to ensure systems are DP compliant?**

☐ Yes

☒ No

**If yes, provide details including time frame**

[Click or tap here to enter text.](#)

## Security Checklist

**6.11 Given the security classification of the data, are you satisfied with the proposed security of the data processing/transfer arrangements detailed at 2.16 and 2.17 above?**

☒ Yes

☐ No

**6.12 Confirm you have read the associated guidance and, if necessary, consulted with HO Security and the relevant DDaT teams, including Home Office Cyber Security (HOCS):**

NB: If your processing activity involves any use of IT systems or physical documentation being sent outside of the Home Office to a non-governmental organisation, you *must* consult with HOCS, prior to your DPIA being submitted. I have read the attached guidance as required.

## Data Protection Impact Assessment (DPIA) Template

**6.13 If the answer is 'no': What needs to happen to ensure that adequate security arrangements are achieved?**

[Click or tap here to enter text.](#)

**6.14 Will the data be stored and be accessible off-site?**

☐ Yes

☒ No

**6.15 If 'yes', have you considered the security arrangements that need to be in place to prevent the data from being accidentally or deliberately compromised? Please provide details.**

☐ Yes

☐ No

[Click or tap here to enter text.](#)

## Section 7: International transfers

**Only complete this section if you have answered yes to question 4.7.**

**7.1 Does the activity involve transferring data to a country outside of the UK (including Crown Dependencies, Overseas Territories and Sovereign Base Areas)?**

☐ Yes

☒ No

If 'yes', specify the country. If 'no', go to Section 8.

[Click or tap here to enter text.](#)

**7.2 Does the country have a positive adequacy decision?**

☐ Yes

☐ No

**a) If 'no', under what legal basis do you propose to transfer the data?**

**i) General processing only:**

- Pursuant to a legally binding Treaty which contains appropriate safeguards for the rights of data subjects and includes effective legal remedies for those rights ☐
- Pursuant to an administrative (non-binding) arrangement approved by the UK Information Commissioner which recognises the rights of data subjects and includes binding rules providing effective legal remedies for those rights ☐
- On the basis that the transfer is necessary for 'important reasons of public interest' which are recognised in statute or common law (and set out in a non-binding MoU) ☐

**ii) Law enforcement processing only:**

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- Pursuant to a legally binding Treaty which contains appropriate safeguards for the rights of data subjects and effective legal remedies for those rights  
☐
- On the basis that the transfer is necessary for 'in individual cases for any of the law enforcement purposes' which are recognised in statute ☐

### 7.3 Does the HO already have a binding or non-binding data sharing arrangement with this country?

☐ Yes

☐ No

If no, skip 7.4 a)

#### a) If 'yes', does the arrangement cover the purpose(s) for which you need to share data?

☐ Yes

☐ No

If you have selected no for 7.3, you will need to consider reviewing the existing agreement to include the new processing activity

- I. If 'yes', does the arrangement recognise the rights of data subjects? Does it include effective legal remedies for data subjects' rights; or set out important reasons of public interest and how those reasons are legally founded; or set out why the transfer is necessary in individual cases for a law enforcement purpose?

☐ Yes

☐ No

If yes go to Section 8

- II. If 'no', how do you propose to document the terms of the understanding with the other country?

Click or tap here to enter text.

**Note: You should consult guidance on Overseas Security and Justice Assistance (OSJA) to determine whether an assessment of human rights, International Humanitarian Law, political and reputational risks is required.**

## Section 8: Referral to ODPO

### 8.1 Referral to the ODPO

| Date referred to the ODPO | Reviewed by: | Date returned to the Author | Comments/ recommendations                             |
|---------------------------|--------------|-----------------------------|---|
| 15/04/2021                | <REDACTED>   | 26/04/2021                  | Thank you for submitting the DPIA. We need a bit more |



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|            |            |            |   |
|------------|------------|------------|---|
|            |            |            | information regarding the relationship of the external suppliers and there are also some other areas which require clarification. Please see my comments above. |
| 26/04/2021 | <REDACTED> | 27/04/2021 | Thank you for addressing my comments. There are just a couple of amendments required at 3.4a and 6.6  |

### 8.2 ODPO Review complete

*NB:* Any subsequent changes made to the DPIA by the business must be done clearly and transparently and in accordance with accepted version control convention. In the event of changes being made, earlier versions of this DPIA must be retained for auditing purposes and in-line with your agreed retention period.

If substantive changes are made to this DPIA, you must re-refer to the ODPO for a new review.

| Date referred to the ODPO     | Reviewed by | Date returned to the Author   | Comments/recommendations |
|-------------------------------|-------------|-------------------------------|--------------------------|
| Click or tap to enter a date. |             | Click or tap to enter a date. |                          |

### 8.3 IAO sign-off

| Date referred to IAO          | Name of IAO or person signing on behalf of | Date returned to the Author   | Comment (including approved to proceed Y/N) |
|-------------------------------|--|-------------------------------|---|
| Click or tap to enter a date. |  | Click or tap to enter a date. |   |

## Section 9: Referral to Data Board

This section is only required if one or more of the criteria for referral to the HO Data Board is met (see DPIA guidance). Referral to the HO Data Board will be

## Data Protection Impact Assessment (DPIA) Template

completed by the ODPO after consultation with the business owner(s) listed in part 1 of this DPIA. [Guidance](#) is available on Horizon.

9.1 Criteria for referral to the HO Data Board:

| Criteria   | Met |
|--|-----|
| ODPO have identified a risk that, in its opinion, requires escalation to the ICO (regardless of risk severity; guidance will be produced in due course once examples indicate how this might be revealed). The view of the Chair of the Data Board will be sought in advance of any such escalation. |     |
| ODPO reason for referral if not one listed below: [ODPO insert detail]   |     |
| <b>There is a significant impact, either qualitative and/or quantitative, upon individual rights, this may be one or more of the following:</b>  |     |
| An instance where the proposal will not meet the Home Office obligations to meet the individual rights and protections of data subjects as defined in UK GDPR and DPA18.   |     |
| An instance where the proposal is likely to result in any person(s) individual privacy/data protection rights being compromised.   |     |
| A particular concern is identified having regard to the purpose, method of processing and location of processing that in combination warrants further escalation or consideration.   |     |
| High sensitivity – the nature of the personal data itself is so sensitive, even though the rest of the risks around processing were low. The board could be asked to scrutinize but equally the Board could determine that it did not need to do so.   |     |
| It is not possible to implement all recommended controls/mitigations. (Where controls and mitigations have been identified but result in a short period of heightened risk this <b>would not</b> warrant escalation).  |     |
| High likelihood of challenge or regulatory enforcement being brought, or a high likelihood of such a challenge or action being successful against the HO.  |     |
| Where a proposal resulted in advice that the processing would be unlawful, and the project has since revised (tweaked) the proposal this should be referred to the Board.  |     |
| <b>Specific referral circumstances:</b>  |     |
| Data processing has been promised by a Minister/ the Cabinet, but there are questions as to whether there is a sufficient legislative/technical /administrative framework in place to enable this.   |     |
| A decision has been made to prefer specific safeguards over others or a riskier approach.  |     |
| An issue that is business critical emerges e.g. essential work to a business-critical system, that may mean that data subjects rights may not be met.  |     |
| Where processing is likely to attract significant controversy.   |     |
| <b>Other:</b> [add detail]   |     |

### 9.2 Referred to the HO Data Board Secretariat

## Data Protection Impact Assessment (DPIA) Template

|   |   |                                     |                               |
|---|---|-------------------------------------|-------------------------------|
| Date referred to the Secretariat  | Referred to HO Data Board                                   | Date of Data Board (if appropriate) | Date returned to the Author   |
| Click or tap to enter a date.   | Yes <input type="checkbox"/><br>No <input type="checkbox"/> | Click or tap to enter a date.       | Click or tap to enter a date. |
| Recommendations/ findings/ comments from the HO Data Board/ Secretariat |   |                                     |                               |
|   |   |                                     |                               |

### 9.3 Action taken by the respective IAO(s)

|                         |  |
|-------------------------|--|
| <b>Effective Date</b>   | <b>2021</b>  |
| <b>Last Review Date</b> |  |
| <b>Next Review Date</b> |  |
| <b>Owner</b>            | <b>Data and Identity Directorate (D&amp;ID)</b>                |
| <b>Approved by</b>      | <b>DP Policies and Guidance Group, &amp; Head of D&amp; ID</b> |
| <b>Audience</b>         | <b>All HO Staff</b>  |