

**Report to:** Management Committee – 27 May 2021  
**Prepared by:** Stewart Pattison: Compliance Manager  
**Subject:** Data Protection Impact Assessment  
Data Migration and Business Continuity for IT Solution 2021

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**1. Introduction**

1.1 At the meeting of 11 March 2021, Management Committee approved the appointment of Designer Software Limited to install a new integrated Housing Management and Finance System to replace Castleton Home-Team and Castleton Financials.

**2. Data Protection Impact Assessment (DPIA)**

2.1 It is good practice to do a DPIA for any major new project involving the use of personal data. For the implementation of the Designer Software Limited integrated Housing Management and Finance System it will be necessary to migrate information from the system currently in use. At the same business continuity must be maintained.

2.2 Appended to this report is Data Protection Impact Assessment for this exercise. The Data Protection Impact Assessment presented is based on an Information Commissioner's Office (ICO) sample DPIA template, bespoke for the purposes of this project.

**3. Recommendation**

3.1 It is recommended that Management Committee approve the Data Protection Impact Assessment attached at appendix 1.

## Appendix 1

### Yorkhill Housing Association Information Technology Solution 2021

#### Data Protection Impact Assessment (DPIA)

#### Data Migration and Business Continuity

<b>1.</b>	<b>Identified need for DPIA</b>	<b>What the project aims to achieve.</b>  The Association underwent a procurement exercise for a comprehensive Information Technology (IT) Solution to meet current and future business needs.  Designer Software Limited were awarded the contract.  This project aims to achieve a complete migration of all data held in the current systems to a new integrated housing and finance IT business solution; and at the same time ensure business continuity.
<b>2.</b>	<b>Nature of the processing</b>	<b>Used, stored and deleted?</b>  While ensuring continued data processing, each manager will identify data to be migrated and co-ordinate this for their area of business.  The data will be cleansed before migration to ensure only required data for legitimate processing is migrated. Any deletion will require to be authorised by the Senior Management Team.  Data processing will be in accordance with the Association Data Protection Policy and retention schedule.  The data will be cloud stored for the new IT solution.

3.	<b>Scope</b>	<p><b>What is the nature of the data and does it include special category or criminal data?</b></p> <p><b>Data cleansing and migration</b></p> <p>The scope of this exercise will include for the migration of all information including personal and special category sensitive data held. The exercise will include for determining retention requirements in accordance with the Association's retention schedule.</p> <p>The exercise will require input from all Yorkhill Housing Association staff.</p>
4.	<b>Context of processing</b>	<p><b>What is the nature of relationships with individuals? How much control will they have? Would they expect their data used in the way it is? Does data include children vulnerable groups? Is processing secure.</b></p> <p>The information processing requirement is to meet statutory, service and business obligations.</p> <p>Individuals are made aware of their rights through the privacy notices that all residents and waiting list applicants receive. Rights can be exercised through their ability to:</p> <ul style="list-style-type: none"> <li>• ask for a copy of their information that the Association holds;</li> <li>• tell the Association to correct any information that is wrong;</li> <li>• ask the Association to delete what personal information of theirs that the Association holds; and</li> <li>• object to receiving any marketing communications from the Association.</li> </ul> <p>The relationship with individuals is the processing of their information for legitimate, legal and business purposes.</p> <p>The information held includes data in relation to children and vulnerable groups.</p>

		<p>Information is processed in accordance with the Association's Data Protection Policy and Privacy Statements are issued.</p> <p>IT systems security is in place. Data Protection Policy approved.</p>
5.	<b>Purpose of processing</b>	<p><b>What do you want to achieve? What is the intended effect on individuals?</b></p> <p>The objectives of processing is to achieve effective and efficient service provision for all stakeholders, meet regulatory requirements and discharge statutory obligations in accordance with the Association's vision and strategic objectives.</p>
6.	<b>Consultation Process</b>	<p><b>Describe when and how you will seek the views relevant to the project.</b></p> <p>Consultation/liaison required with existing supplier, new supplier, IT support provider, senior management team and project consultant.</p> <p>Consultant engaged through competitive tender for procurement and implementation process.</p> <p>SMT continual monitoring and discussion.</p>
7.	<b>Compliance and Proportionality</b>	<p><b>What is the lawful basis for processing? How will the Association prevent function creep? How will the Association ensure data quality and data minimisation, individual's rights and ensuring processor compliance?</b></p> <p>The lawful basis for processing is the requirement to fulfil statutory, business and service user requirements in accordance with the Association's Data Protection Policy.</p> <p>Function creep is <b>what happens when organisations use technology and systems in ways beyond the original purpose.</b> Data integrity and processing requirements including data minimisation through retention schedule compliance will be addressed during data cleansing in preparation for the data migration exercise.</p>

		Individual's rights are addressed through compliance with data protection legislation. The Association have a Data Protection Officer, Data Protection Policy and service users are issued with Privacy Notices.
<b>8.</b>	<b>Sources of risk and nature of potential impact on individuals.</b>	Risk Assessment attached at Appendix 1.
<b>9.</b>	<b>Measures to reduce risk.</b>	Risk Assessment attached at Appendix 1.

No.	Risk	Gross Lhd (1-5)	Gross Imp (1-5)	Gross Risk Total	Managed by key systems/processes	Lead	Net Lhd	Net Imp	Net Risk Total	Action Required
1	Loss of data	3	4	12	Staff/ Supplier/ Consultant diligence.	SMT	2	4	8	Awareness raising to all staff and continual monitoring at SMT.  <b>SMT agenda item for duration of project.</b>
2	Data fit for purpose	3	4	12	Only migrating information required for legitimate business purposes.  Parameters set and monitored by SMT.  Compliance with retention schedules.	SMT	2	4	8	Managers checking legitimacy prior to migration.  Monitoring parameter compliance at SMT.  Compliance with retention schedules.  <b>SMT agenda item for duration of project.</b>
3	Corruption of data.	3	4	12	Continual checking of data migrated throughout the process.	SMT	2	4	8	Updates and monitoring through SMT.  <b>SMT agenda item for duration of project.</b>
4	Data breaches	3	4	12	Diligence/Data Protection Policy.	SMT	2	4	8	Awareness/Diligence. Cascade to all staff.

										<b>SMT agenda item for duration of project.</b>
<b>5</b>	Business continuity	3	4	12	Ensure sufficient training is, and resources are, available for the duration on the project.	CE	2	4	8	Staff training and time allocation.
<b>6</b>	Security	3	4	12	Customer Data Processing Agreement Yorkhill Housing Association/Designer Software Limited.  See also IT Risk Assessment.	DPO	2	4	8	Sign off Customer Data Processing Agreement.

**Net Risk Scores**

<b>I M P A C T</b>	<b>5</b>					
	<b>4</b>		<b>6</b>			
	<b>3</b>					
	<b>2</b>					
	<b>1</b>					
		<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>
<b>LIKELIHOOD</b>						

**Scores:** Likely-hood: 5 Very likely; 4 Likely; 3 Fairly Unlikely; 2 Unlikely; 1 Very Unlikely  
**Impact:** 5 Catastrophic; 4 Major; 3 Moderate; 2 Minor; 1 Negligible.  
**Abbreviations:** Lhd – Likely-hood, Imp – Impact.