



DPIA Project Information

Title:

Families First Partnership Programme

Project ID:

606

Project Timeframe for Data Collection:

In 6+ months

DPIA Screening Questions

Question Number	Question	Answer
1	I understand that, by selecting Yes, I am confirming I am the project manager for the project or activity for which this DPIA screening tool is being carried out.	Yes
2	I understand that by ticking this box I am confirming that I have undertaken the Data Protection Essentials training module on delta.	Yes
3	Is this project a change to an existing process, or is it a new processing activity?	Change to an existing process
4	Has a DPIA for this been previously submitted?	No
5	If a DPIA was submitted - Was legal advice recommended?	No
6	When did the planning stage of this project begin?	02/06/2025
7	Is this screening tool for the use of a surveillance camera, including CCTV, dash cam and body worn cameras?	No
8	If Yes - Is this DPIA a proposal for a new deployment, or the expansion of an existing surveillance system?	
9	Which data protection regime will you be processing under?	UK GDPR
10	Please outline the project including the types of data, software, processors, and how the data will be used	The Families First Partnership Programme aims to implement key reforms including the development of targeted, multi-disciplinary Family Help services for children and families eligible for receiving targeted early help and/or Child in Need services, the establishment of Multi-Agency Child Protection Teams (MACPTs) including lead child protection practitioners (LCPPs), strengthening Family Group Decision Making practices, incorporating the voices of

		children and families throughout their journey, and improved data sharing through a new legal information-sharing duty and a consistent Single Unique Identifier. The Programme will process personal data including child and family identifiers (e.g. names, dates of birth, addresses), case history (e.g. assessments, referrals, outcomes), health and education records, safeguarding information (e.g. risk indicators, child protection status), and practitioner notes. Data from existing case management systems Liquid Logic EHM and Liberi will be used to support the implementation of targeted Family Help services, through the development of a Single Family Help Assessment to be used for families eligible for Targeted Early Help and/ Child In Need Services. Data from existing data integration and information sharing databases (e.g. SingleView, Kent & Medway Care Record, the SF Module) will be used to support Multi-Agency Child Protection Teams (MACPTs) though enabling proportionate multi-agency access to improve information sharing and embedding the use of a Single Unique Identifier in line with the Children’s Wellbeing Bill.
11	Within your project are you planning to:	Process special category data or criminal offence data on a large scale? Combine, compare, or match data from multiple sources? Process personal data which could result in a risk of physical harm in the event of a personal data breach?
12	Or are you planning to:	Process sensitive data or data of a highly personal nature? Process personal data on a large scale? Match or combine datasets? Process data concerning vulnerable data subjects?



13

Additional Information

N/A

DPIA Core Questions

Question Number	Question	Answer
3	What are the categories of data subjects whose data will be processed?	The Families First Partnership Programme will process personal data relating to the following categories of individuals: 1. Children and Young People: These are the primary service users of the programme. Includes children receiving: - Targeted Early Help - Child in Need services - Child Protection services Children are considered vulnerable data subjects under UK GDPR and ICO guidance due to their age and safeguarding context. KCC recognises its statutory duties under the Children Act 1989 and 2004, and ensures that all processing is lawful, proportionate, and in the best interests of the child. 2. Parents, Carers, and Family Members: Data will be processed to support whole-family approaches, including Family Group Decision Making. Vulnerability may arise due to: - Socioeconomic disadvantage - Mental health needs - Domestic abuse - Substance misuse - Criminal history - Involvement in care proceedings etc. KCC applies enhanced safeguards when processing data relating to vulnerable adults, in line with the Care Act 2014 and Working Together to Safeguard Children guidance. 3. Professionals and Practitioners: Includes KCC employees and staff from partner agencies (e.g. health, education, police, VCS). Data may be processed for coordination, accountability, and safeguarding purposes. While generally not vulnerable, employee data is subject to employment-related protections under the Employment Practices Code and internal KCC HR policies. 4. Wider Community Members: This may include

		extended family or individuals involved in referrals or support networks. Data processing is limited to safeguarding-related purposes and subject to strict minimisation and access controls. KCC acknowledges that many data subjects within this programme are vulnerable, particularly children and families in crisis. As such: - Consent is not relied upon as the lawful basis for processing, in line with ICO guidance and the new statutory information-sharing duty. - Privacy notices are tailored to different audiences, including child-friendly formats where appropriate (Is this the case?) - Data will be access on a role-basis with data minimisation, and regular reviews Legal bases for processing are clearly defined under UK GDPR and the Data Protection Act 2018, including: Article 6(1)(e) – public task Article 9(2)(g) – substantial public interest Schedule 1, Part 2, Paragraph 18 – safeguarding of children and individuals at risk.
2	Are all of the categories of personal data identified in the data question necessary for you to achieve this aim?	Yes, all the categories of personal data identified: basic, special category and criminal data, are necessary to achieve the aims of the Families First Partnership Programme. The Programme is designed to deliver targeted, multi-disciplinary support to children and families, which inherently requires a comprehensive understanding of their circumstances, needs, and risks. Most of this information as it pertains to families eligible for Targeted Early Help and Child in Need services, is currently held within existing systems (EHM and Liberi), therefore as it is required that the two services are joined within the new Family Help Service, this data will be processed internally. There are also existing multi-agency databases whereby information is shared externally. The Programme aims to extend and improve this, thus processing of a larger volume of personal data is required. Justification for Each Data Category: Basic Data: This is essential for identification, communication, and coordination across



services. It is anticipated that the NHS number will represent the Single Unique Identifier across services therefore this will ensure accurate data linkage and avoid duplication or fragmentation of records.

Special Category Data:

Understanding health, racial, religious, and sexual orientation factors is vital for delivering culturally competent, inclusive, and needs-based support. These data points help tailor interventions, ensure equity, and uphold safeguarding responsibilities. As aforementioned, this data is already held and improvements will take place in terms of where it is moved and how it is shared externally.

Criminal Data:

Criminal history or involvement is directly relevant to safeguarding and risk assessment. It informs the work of Multi-Agency Child Protection Teams and supports early intervention strategies aimed at preventing escalation into Care proceedings.

To ensure that only the minimum necessary data is collected and used:

Purpose-driven collection:

Data is only collected where it directly supports the programme's objectives; such as improving safeguarding, enabling earlier intervention, and reducing the need for care proceedings.

Role-based access controls:

Access to sensitive data is restricted to professionals with a legitimate need, such as Lead Child Protection practitioners, Multi-Agency Child Protection Teams or Family Help workers/ Lead Practitioners assigned to specific families.

Data governance oversight:

The programme includes a governance strand that reviews data flows and ensures compliance with data protection principles, including necessity and proportionality.

Legal basis and safeguards:

The Families First Partnership Programme is underpinned by the Children's Wellbeing and

		Schools Bill, which introduces a statutory duty for multi-agency information sharing. This provides a clear legal basis for processing personal, special category, and criminal offence data for the purposes of safeguarding and promoting child welfare. Review and audit: Data categories and usage are subject to regular review to ensure ongoing relevance and necessity. Any data that is no longer required is securely deleted or anonymised Further clarification as per questions left 14/04: The 'other' data processed will be information surrounding social care involvement with the family and general family circumstances. Clarification surrounding the identifier - the guidance refers to a universal identifier across organisations which is likely to be the NHS number however, this is yet to be confirmed. As a local authority, KCC is in a position of power compared to data subjects
4	What is the nature of the relationship with the individual?	
28	Is there a KCC privacy notice for this use of personal data?	There is a published KCC privacy notice for this use of personal data
13	How will the data be shared with your team securely?	Referrals will be made through the Front Door Service for Early Help/Social Work teams as is the existing process in the current iteration of Integrated Children's Services. There are existing data sharing agreements in place for data sharing between partners where regular data sharing takes place.
16	Where are the servers for the system(s) located?	UK US EU
21	Please tick to confirm the following statement is true:	I am assured that the personal data being processed in this project is protected in transit and at rest from unauthorised access and loss.
31	How will you ensure data subjects read the privacy notice and understand how their data will be used at the point of data collection?	We will read a script and inform them of where to access the privacy notice online We will link to the privacy notice on our webpages We have an easy read privacy notice

39	Are you signed up to any approved code of conduct or certification scheme?	
23	How long will the data be retained for?	This programme involves the wider Family Help team which will comprise of the targeted Early Help, Child in need and Child protection functions that are currently carried out across the present delivery model. Depending on the nature of the information there will be different policies which may apply which currently sit under sections CS1 and CS2 of the retention schedule. Notable entries which will commonly apply are CS1.1.1 Looked After Children: Records on children who are in the care of KCC (i.e. subject to an Order under the Children Act or who are accommodated by KCC) (DOB+75 years), CS1.4.1 All Other Records relating to Children and Young People Records of children and young people who don't fall into any of the above categories, including Children in Need, and general papers where a file has not been opened (DOB+25 years) and CS2.1.1 Child Protection Records of children who have been the subject of a Child Protection Conference whether or not they are placed on the Child Protection Register (DOB+40 years) Following central government's independent inquiry into child sexual abuse, there is currently a moratorium on files relating to child sexual abuse and a decision remains outstanding as to the new retention policies. DPIA 416 refers however once a decision is made, any new retention policies will be retrospectively applied
32	How will you support data subject rights	For KCC controlled data, there are established teams within the Information Governance team who are dedicated to facilitating subject rights requests. All staff are trained on how to identify subject rights requests and what to do when they receive one to ensure that these can be dealt with expeditiously. There are dedicated teams within CYPE Management Information and Intelligence who QA data held as part of Integrated Children's Services who ensure the accuracy of data
11	Do you have a copy of the privacy notice that data subjects will be provided	Yes

	with at the point their data is collected?	
40	When is the processing of personal data for this project due to begin?	In 3 - 6 months
37	Consultation: Please summarise the Caldicott Guardian's response and any recommendations	The Caldicott Guardian's response: "Currently, as the DPIA is still fairly high level, I don't have any Caldicott concerns as whilst services may be delivered differently, data about children and families is still flowing in the same way and being stored in the same way".
9	How will the personal data be collected from the individual?	Other Online survey/form Phone call Personal data directly from individuals for the programme's core delivery or transformation work will be collected from operational KCC teams through the Front Door Service as per existing children's services referrals (e.g. Early Help, Children's Social Work) and external partners (e.g. NHS, Police, schools) during service delivery, and then processed via case management and information systems by the Management Information Team.
7	Tick to confirm which of the following you have in place with the organisations	Data Sharing Agreement Article 28 compliant contract Strategic Commissioning's annex 1 Legal advice sought on documentation
24	Is the same retention period cited in all documentation?	Yes
35	Consultation: Please summarise the responses of data subjects you have consulted with on the topic of this project.	N/a
14	What steps will you take to ensure the data you collect and/or use is accurate?	Data will be subject to existing QA processes that already exist in the wider children's services. There is a dedicated QA team within Children's Management Information and Intelligence to ensure data quality.
20	Are there any prior concerns over this type of processing or any security flaws	No

8	How will the personal data be collected?	Collected from the individual by another KCC team Collected by an external organisation Collected directly from the individual by your team
5	Are there any other organisations other than KCC who will be involved in this project?	Processor Joint Controller
15	In what system(s) will the data be stored?	SharePoint Liberi
33	What measures will you put in place to prevent data being used beyond the purposes outlined in your privacy notice?	Limit access to the storage location to only those who require access for specified purposes Ensure those with access to the data have read the privacy notice and are aware of the purposes it has been collected for We have an unauthorised access policy
34	Are there any current issues of public concern that you should factor in?	No
38	Consultation : please summarise the responses and recommendations of any other individuals or organisations you have consulted with.	This has come from National Government Guidance, it is a statutory reform. Have had conversations with pathfinder local authorities to learn best practice. Numerous Task and Finish Groups happening with membership from differing services: - Family Help Model - Children's Social Care (KCC) - Front Door (KCC) - Adolescent Services (KCC) - Early Help (KCC) - Management Information (KCC) - Strengthening Independence Service (KCC) - HR (KCC) - Police - Health - Research & Analytics (KCC)



Commissioning Service (KCC)

Social Connections (KCC)

KPAS (KCC)

Education Psychologists (KCC)

Occupational Therapy (KCC)

Child Protection Chair (KCC)

- Family Help Lead Practitioner

Children's Social Care (KCC)

Front Door (KCC)

Early Help (KCC)

Workforce Development (KCC)

HR (KCC)

Strengthening Independence Service (KCC)

Management Information (KCC)

Adolescent Service (KCC)

Fostering Service (KCC)

Education

Police

Health

VCSE

- Family Help Single Assessment

Will be an extension of the Family Help Model

T&F group so will have membership of same services listed

- Family Help Revised Threshold Document

Front Door (KCC)

KSCMP (KCC rep)

Quality Assurance (KCC)

Corporate Policy (KCC)

Early Help (KCC)

Children's Social Care (KCC)

Health

Police

Family Hubs (KCC)

Education

VCSE

Management Information (KCC)

Domestic Abuse (KCC)

Commissioning (KCC)

Housing

- Family Group Decision Making

Social Connections (KCC)

Children's Social Care (KCC)

Front Door (KCC)

Early Help (KCC)

Participation and Engagement Team (KCC)

Strengthening Independence Service (KCC)



Child Protection Chairs (KCC)
Family Hubs (KCC)
Quality Assurance (KCC)
Education
Management Information (KCC)

- Multi-Agency Child Protection Teams
Children's Social Care (KCC)
Quality Assurance (KCC)
Public Health
Education
Police
Health
Front Door (KCC)
Adolescent Services (KCC)
Child Protection Chairs (KCC)
HR (KCC)
Safeguarding (KCC)
Strengthening Independence Service (KCC)
Youth Justice
MARAC
Information Governance (KCC)
Management Information (KCC)

- Lead Child Protection Practitioner
Quality Assurance (KCC)
Child Protection Chair (KCC)
Workforce development (KCC)
Children's Social Care (KCC)
HR (KCC)
Front Door (KCC)
Adolescent Services (KCC)
Information Governance (KCC)
Management Information (KCC)

- Workforce Development
HR (KCC)
Workforce Development (KCC)
Business Learning and Development (KCC)
Children's Social Care (KCC)
Quality Assurance (KCC)
Family Hubs (KCC)
Early Help (KCC)
Police
Health
KSCMP
Front Door (KCC)
Education
Information Governance (KCC)
Management Information (KCC)

		Policy & Strategy (KCC)
		This project has been discussed with CYPE IG lead and the service manager for the Integrated Children's Services systems team (Maureen Robinson).
1	What is your project aim?	The Families First Partnership Programme aims to implement key reforms including the development of targeted, multi-disciplinary Family Help services for children and families eligible for receiving targeted early help and/or Child in Need services, the establishment of Multi-Agency Child Protection Teams (MACPTs) including lead child protection practitioners (LCPPs), strengthening Family Group Decision Making practices, incorporating the voices of children and families throughout their journey, and improved data sharing through a new legal information-sharing duty and a consistent Single Unique Identifier. From the perspective of KCC, the Programme aims to improve information sharing between agencies, offering a more seamless approach to child wellbeing and safeguarding services. It also aims to reduce costly Care proceedings through earlier intervention, contributing to better outcomes for children and families. Children and families will also avoid the repetitive and often traumatic experience of having to retell their stories multiple times throughout their journey across services, resulting in an overall much more positive experience.
29	Please link to the draft/published privacy notice	https://www.kent.gov.uk/about-the-council/information-and-data/access-to-information/gdpr-privacy-notices/integrated-childrens-services/childrens-social-care-privacy-notice https://www.kent.gov.uk/about-the-council/information-and-data/access-to-information/gdpr-privacy-notices/integrated-childrens-services/early-help-and-preventative-services-privacy-notice These are the current privacy notices covering the elements of Children's Services that will be covered by this project. The ultimate aim of this

		project is to bring these service areas together and therefore the structure of privacy notices is likely to change as the programme is implemented, however, the processes and activities will be fundamentally the same.
30	Is there an easy read privacy notice for this use of personal data?	There is a published easy read privacy notice for this use of personal data
12	Does the privacy notice state that data will be shared with your team for the purpose you will be using it for?	Yes
17	What is the current state of technology in this area?	Technology in this area is well established, we are using existing software and not using any new software or re-purposing existing software.
25	At the end of the retention period will the data be:	Deleted Returned to KCC by processors
10	Will the data be shared with:	A contracted service provider Other Your KCC team Data may be processed by third-party systems (e.g. Microsoft, case management platforms)
27	Please tick to confirm the following statement is true	I am assured that there are adequate processes in place to ensure retention periods are adhered to, in line with the Article 5 principle of storage limitation in the UK GDPR
6	Please name the organisations and their roles.	1. Joint Controllers These organisations work with KCC to jointly determine the purposes and means of data processing, particularly in the context of Family Help (where the FHLP sits outside of KCC) and Multi-agency Child Protection Teams - Kent Police: involved in safeguarding and risk assessment. - NHS Kent and Medway Integrated Care Board (ICB): contributes health data and supports integrated family help. - Education settings (schools, academies): provide data and participation in safeguarding and Family Help processes. Joint Controller Agreements will be developed in line with Article 26 of UK GDPR to clarify roles and responsibilities.

		2. Processors These organisations process personal data on behalf of KCC, under instruction and without determining the purpose: - Microsoft (Teams, Forms, SharePoint, OneDrive) – used for communication, collaboration, and data collection as it pertains to the management of the programme - Case management systems (e.g. Liquidlogic - EHM/ Liberi, Mosaic etc.) – used to record and manage case data. - Shared databases (e.g. KMCR, SF Module, SingleView) - Data analytics platforms used for performance monitoring and reporting (e.g. PowerBI).
26	What processes do you have in place to ensure that the retention period is adhered to?	We will have a record of the locations where the data is stored We will have a process in place to ensure we know when the retention period ends We will keep a record of what happens to the data at the end of the retention period We will make sure a member of the team has responsibility for the steps to be followed Our contract with our processor(s) include a requirement for the processor to return the data to KCC at the end of the contract
19	How will the security of the data be ensured in transit and at rest?	ICT Compliance and Risk have carried out a technical risk assessment for the software we are using There is an Article 28 compliant contract in place with the data processor Users will have different levels of access to ensure only people who need to access the data have access to it
22	Describe how the personal data will be used to achieve your project aim	Data will be used by the KCC Research and Analytics Manager to help determine the new Family Help Model, and Multi-agency Child Protection Teams and to identify the level of

		need for team quantity. The data used will be quantitative and will have no identifying factors. CaRT risk assessment not applicable.
36	Consultation: ICT Compliance and Risk	Liberi has been used for many years within KCC and has previously been risk assessed for this purpose.
18	How will the security of the data be ensured when it is transferred outside of the UK?	There are Standard Contractual Clauses in place and we have carried out a transfer risk assessment
		Other
		There is an Article 28 compliant contract in place with the data processor
		ICT Compliance and Risk have carried out a technical risk assessment

Data Collection

Data Category	Data being Collected
Basic Data	Identification number
	Other
	NHS number
	Postcode
	Address
	Telephone/mobile number
	Email address
	Date of birth
	Name
Basic Data	Identification number
	Other
	NHS number
	Postcode
	Address
	Telephone/mobile number
	Email address
	Date of birth
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Basic Data	Identification number
	Other
	NHS number
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Special Category Data	Racial or ethnic origin Religious or philosophical beliefs Physical or mental health Sexual orientation or sex life
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Special Category Data	Racial or ethnic origin
	Religious or philosophical beliefs
	Physical or mental health

	Sexual orientation or sex life
Special Category Data	Racial or ethnic origin Religious or philosophical beliefs Physical or mental health Sexual orientation or sex life
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Special Category Data	Racial or ethnic origin Religious or philosophical beliefs

	Physical or mental health
	Sexual orientation or sex life
Criminal Offence Data (UK GDPR)	Criminal Data will be collected
Criminal Offence Data (UK GDPR)	Criminal Data will be collected
Criminal Offence Data (UK GDPR)	Criminal Data will be collected
Criminal Offence Data (UK GDPR)	Criminal Data will be collected
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Criminal Offence Data (UK GDPR)	Criminal Data will be collected
Criminal Offence Data (UK GDPR)	Criminal Data will be collected
Criminal Offence Data (UK GDPR)	Criminal Data will be collected
Criminal Offence Data (DPA Part 3)	No data is being collected under this category
Surveillance Camera	No data is being collected under this category

Data Collection Questions

Data Group	Question Number	Question	Answer
Basic Data	1	The Article 6 lawful basis for this processing activity is:	(e) Necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. Please note you will be required to state the name and section of the legislation which gives you the power.
Basic Data	2	Please outline which element of the project relies on the identified lawful basis	This processing is necessary to carry out the local authority's public tasks around safeguarding of children at risk of harm and to promote the welfare of children within its boundaries. These duties are imposed by Children Act 1989, Working Together to safeguard Children (2023 and 2026). There are further public tasks anticipated to be imposed by the Children's Wellbeing and Schools bill however this legislation is yet to be enacted and is subject to change.
Special Category Data	1	Please identify the Article 9 basis being relied upon for the processing of special category data	(h) Necessary for the purposes of preventative or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health and social care or treatment or the management of health or social care systems and services (subject to a DPA 18 condition) or pursuant to contract with a health professional and subject to the conditions and safeguards in Article 9(3)–(g) Necessary for substantial public interest (on the basis of a DPA 18 condition) and which shall be

			proportionate to the aim pursued, respect the essence of the right to data protection, and provide for suitable and specific measures to safeguard the fundamental rights and interests of data subjects
Special Category Data	2	If you are relying on condition (a) please state which element of the project relies on explicit consent, and outline the process you have for collecting, recording, and withdrawing consent	This condition is not being relied upon
Special Category Data	3	If you are relying on condition (b), (h), (i), and/or (j) you must also identify at least one of the additional conditions from Schedule 1, Part 1 of the DPA 2018	(2) Health or social care purposes
Special Category Data	4	If you are relying on condition (b), (h), (i) and/or (j) you must outline which element of the project relies on this condition	This programme relates to the operational delivery by Social Workers of the local authority's Children's Social Care duties imposed by the Children Act 1989 and Working Together to Safeguard Children 2023 and 2026
Special Category Data	5	If you are relying on condition (g) you must identify at least one of the additional conditions from Schedule 1 Part 2 of the DPA 2018	(18) Safeguarding of children and individuals at risk
Special Category Data	6	If you are relying on condition (g) (substantial public interest) you must outline which element of the project relies on this condition	This processing is necessary for the operational delivery of the Children's Social Care service in order to safeguard children through Front Door Service referrals, Child Protection Conferences and other information processing and sharing necessary to safeguard children at risk of serious harm in accordance with the local authority's responsibility under the Children Act 1989
Special Category Data	7	If you are relying on condition (c), (d), (e), and/or (f) you must	Not applicable to this project

		outline which element of the project relies on this condition	
Criminal Offence Data (UK GDPR)	1	Where you are processing criminal offence data under the UK GDPR, you must identify at least one of the additional conditions from Schedule 1, Part 3 of the Data Protection Act 2018	(36) Extension of conditions in Part 2 of Schedule 1 referring to substantial public interest