



DPIA Project Information

Title:

Older Persons Residential and Nursing Care Home Services

Project ID:

453

Project Timeframe for Data Collection:

Personal data is already being processed

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.	No
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?	Yes
5	If a DPIA was submitted - Was legal advice recommended?	No
6	When did the planning stage of this project begin?	2/1/2024
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	This DPIA screening form is for the recommissioning of the Older Person's Residential and Nursing Care Homes (OPRN) contract. The service will be set up to meet the needs of Kent residents mostly aged 65 years and older who have a range of health and support needs including but not limited to: • Physical Disabilities • Dementia and other mental health needs • Medical needs



The aim of the project will be to recommission the existing services as the contracts expire 31 March 2026. The plan is to recommission the contract through an open Framework to enable as many providers as possible to express an interest and bid for the service.

Once providers have joined the contract, existing providers will have access to the full personal details of clients in need of a care home as and when placements are made by our Arranging Support Placement Teams (ASPT). Providers can then bid for business that way. The information that will be given to providers include: name, date of birth, social and health care needs.

There will also be occasions when ASPT send on referrals to providers who are not on the contract if they have been unable to source a suitable placement via the contract. The placements will be made as an individual contract.

All providers (contracted and non-contracted), who take on residents on the OPRN contract are required to sign up to KCC's contract which outlines our terms and conditions on Data Protection. The contract outlines our role as both processor and controller as well as the role of the provider as both controller and processor. There are clauses within the contract that state the provider must not treat the information obtained under the contract in an "unlawful manner" and all data must be treated with confidentiality.

The service specification also states that the provider will "comply with and store all information in accordance with Data Protection legislation".

With regards to access to data internally, some members of the Commissioning Team e.g. Commissioning Assistant, have access to Mosaic to periodically review personal data. Most members of the OPRN contract's Commissioning Team have access to Mosaic for mainly data analysis and reporting e.g., looking at the numbers of placements made over a specified period, the costs of placements and what types

		of placements are being made within a specified period.
11	Within your project are you planning to:	Make decisions on someone's access to a service product opportunity or benefit which is based on automated decision making (including profiling), or involves the processing of special category data? 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? Process special category data or criminal offence data on a large scale?
12	Or are you planning to:	Process personal data without providing a privacy notice directly to the individual? 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? Carry out any innovative use of personal data or apply new technological or organisational solutions? Use innovative technology?
13	Additional Information	This is a very large, complex contract where the processing of data involves many teams and external agencies. We may require additional support with ensuring we have completed the DPIA appropriately. We are aware of the Data Use and Access Bill currently going through Parliament and want to ensure we are working in line with new and developing legislation.



Care providers use a range of innovative technology/ equipment, including electronic care plans, technological enabled care solutions.

DPIA Core Questions

Question Number	Question	Answer
1	What is your project aim?	The aim of the project is to recommission the existing services as the current contract expires 31 March 2026. The intention is to recommission the contract through an open Framework Agreement to enable as many providers as possible to express an interest and bid for the service. There are approximately 270 older persons care homes in Kent, 203 (including 19 care homes outside of Kent) are part of the current contract. KCC is able to meet its legal and moral obligations to older persons in the county in need of a residential or nursing home. As a result, individuals have their needs met in an appropriate setting. Once providers have joined the contract, when a referral is made to them, they will have access to the full personal details of clients in need of a care home as this will be shared with them by the Arranging Support Placements Team (ASPT). The information that will be given to providers includes: name, date of birth, social and health care needs. This data needs to be shared in order to meet the needs of KCC residents in need of a care home. Sharing of data is required to ensure transparency and enables care providers to complete their own assessments to determine whether they can meet a persons needs. There will also be occasions when ASPT send referrals to providers who are not on the contract, if they have been unable to source a suitable placement via the contract. The placements will be made as an individual placement contract. ASPT establish, via email or telephone, providers with vacancies and then send on referrals to the provider(s) via secure email which is consistent with the way referrals are sent to providers on the contract. When a care home provider is unable to meet the needs of that resident, the home communicates this to ASPT who record this on the client's records in Mosaic and on local drives within a spreadsheet. The case with the provider is closed and the information is archived.
14	What steps will you take to ensure the data you collect and/or use is accurate?	Adult Social Care and Health Community Teams ensure the accuracy of information at point of interaction with an individual e.g. phone call or visit. This ensures that any paperwork completed or information to be added to an individual's record on Mosaic is the truth and is up to date and is accurate at point of collection. An individual also has the opportunity request their information to be rectified after being added or uploaded to Mosaic. This would be noticed by the individual when sharing

		social care paperwork with them e.g. sharing of their support plan. When the Commissioning team uses data from KCC systems, for example, Power BI, this provides the current information. Such data is taken to be accurate, unless there is a clear error or issue, although this is more likely to relate to areas such as an incorrect contract being used to purchase the placement. Where such issues are identified, these are questioned and corrected by the appropriate team, if needed. Where any analysis of such data is completed within the team, this will be anonymised and only the data that is required will be included in analysis. 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?	
3	What are the categories of data subjects whose data will be processed?	Data relating to members of the public will be processed, primarily older people, aged 65 and over. Some people will have additional social care and health care needs. The data of vulnerable data subjects will also be processed. Vulnerable data subjects could include any resident placed in a care home.
5	Are there any other organisations other than KCC who will be involved in this project?	Controller Processor
12	Does the privacy notice state that data will be shared with your team for the purpose you will be using it for?	Yes
18	How will the security of the data be ensured when it is transferred outside of the UK?	Not applicable, the data will only be stored on servers (including back-up servers) in the UK Not applicable, the data will only be stored in physical files in the UK
19	How will the security of the data be ensured in transit and at rest?	Users will have different levels of access to ensure only people who need to access the data have access to it Other

		ICT Compliance and Risk have carried out a technical risk assessment KCC standard equipment and software is used by KCC teams. Arranging Support Placements Team will send information to care homes by secure email. The care home provider will be required to have secure email and computer systems that are backed up and secure . The provider will consider systems with end-to-end encryption and encryption in transit measures, etc. for robust security.
15	In what system(s) will the data be stored?	Outlook Teams OneDrive Mosaic Other Physical file storage Care home providers will also store information - this will be either electronic or paper copies, kept in lockable storage. Some providers have a combination of both systems.
11	Do you have a copy of the privacy notice that data subjects will be provided with at the point their data is collected?	Yes
16	Where are the servers for the system(s) located?	UK
2	Are all of the categories of personal data identified in the data question necessary for you to achieve this aim?	The data processing is to support individuals in need of a care home to access the care and support to which they are entitled within an appropriate setting. Data is collected as part of statutory obligations under the Care Act 2014. In order to fulfil this obligation, KCC has to collect the following types of data - name, residential home address, MOSAIC number, health data linked to primary disability, additional health and social needs (linked to the individual's person-centred plan), care package details, social care needs, race and gender. The information is collected as part of the Care Act Assessment and needs to be shared to enable providers to determine whether

		they are able to meet a person's assessed needs. Due care is taken when sharing the data with providers to minimise data breaches by sending it by an encrypted mail.
20	Are there any prior concerns over this type of processing or any security flaws	Previous audit highlighted several concerns when a small number of homes were audited. Most of the concerns were about the inadequacies of some provider's GDPR policies. As a result of the audit, the annual self-assessment form was updated with questions on GDPR policies and breaches etc. KPIs for providers which were not being collated were also reintroduced. The providers who were audited were also informed of the outcomes of their audits in order to make changes such as: • Updating their data protection policies to ensure best practice is reflected • Identifying a DPO lead • Ensuring that training which was happening was being recorded clearly Furthermore, as part of the quality assurance process, provider's policies and practices are now being checked against the internet audit recommendations.
7	Tick to confirm which of the following you have in place with the organisations	Strategic Commissioning's annex 1
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/adult-social-care-and-health/general-notice-to-cover-adult-social-care-and-health Easy read version: https://www.kent.gov.uk/__data/assets/pdf_file/0008/81575/Easy-Read-General-ASCH-Privacy-Notice.pdf
26	What processes do you have in place to ensure that the retention period is adhered to?	We will have a process in place to ensure we know when the retention period ends
31	How will you ensure data subjects read the privacy notice and understand	We will provide a paper copy of the privacy notice We will link to the privacy notice on our webpages We have an easy read privacy notice

	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
23	How long will the data be retained for?	Standards and recommendations in the contract with providers - recommendation is 7 years. Health and Social Care Act 2008 (Regulated Activities) Regulations 2014: Regulation 17. KCC retention schedule: AS1.1 applies, excluding AS1.1.10, AS1.1.12 and AS1.1.14. A range of retention periods apply within this area.
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
25	At the end of the retention period will the data be:	Other
8	How will the personal data be collected?	Retention schedule states 'secure disposal'. Collected from the individual by another KCC team Collected by an external organisation
35	Consultation: Please summarise the responses of data subjects you have consulted with on the topic of this project.	Data subjects are made aware of what will happen to their data at the point of the care needs assessment taking place and have the opportunity to review the privacy notice. As part of the recommissioning, service users and service user interest groups, e.g. Healthwatch will be consulted regarding the project.
34	Are there any current issues of public concern that you should factor in?	No
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
17	What is the current state of technology in this area?	Data is stored on Mosaic and the Arranging Support Placements Team use secure emails to send the referrals on to providers. Providers are required to sign up to Microsoft's secure mail in order to view information being passed on. A number of care home providers store client data in paper copies in locked filing cabinets.

38	Consultation : please summarise the responses and recommendations of any other individuals or organisations you have consulted with.	A previous draft of the DPIA, completed in 2023, was reviewed by and discussed with the Adult Social Care and Health Information Governance Lead and the Deputy Data Protection Officer (Governance, Law and Democracy). That version has been reviewed to ensure it remains accurate and has been used as a basis for completing this DPIA. The overall recommendation of the Deputy Data Protection Officer was as follows, a number of additional recommendations were also made: 1. The processing is not high risk and measures taken to reduce risk are such that any residual risk has been sufficiently mitigated. 2. The DPIA does not need to be sent to the ICO as sufficient measures have been taken to reduce risk. The DPIA completed in 2023 was shared at the time with an Assistant Director for Adult Social Care and Health and a Service Manager, both were in agreement for the DPIA to go through the usual channels. The Adult Social Care and Health Information Governance Lead has been further consulted for advice and guidance on the completion of this DPIA. Market engagement will take place with potential suppliers and data processors.
24	Is the same retention period cited in all documentation?	Yes
32	How will you support data subject rights	By ensuring that individuals are made aware of the nature of what is being shared and why. By also informing individuals of their rights to be informed, right of access, right to erasure etc. KCC has produced an easy read version of a privacy notice for Adult Social Care service users. Data Subjects also have the right to complain which they can exercise and have their complaint investigated.
37	Consultation: Please summarise the Caldicott Guardian's response and any recommendations	Response received 13/02/2025: Thank you for providing such a comprehensive summary of the DPIA for the Older Persons Residential and Nursing Care Home Services project. Providing high-quality, safe support services and accommodation is a priority for upper-tier authorities with statutory responsibilities for social care. Sharing information is essential to designing and commissioning these services effectively.

		Based on the information you have provided, I am content that the program, the identified risks, and the proposed mitigations are aligned with the Caldicott Guardian principles. Please let me know if you need any further input from me. Best regards, Richard Smith Corporate Director
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 Other We have an unauthorised access policy Care home providers sign up to being audited by both Locality Commissioners and the Care Quality Commission. Contract with providers stipulates that all data gathered under the service is to be processed in line with the Data Protection Act.
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.
39	Are you signed up to any approved code of conduct or certification scheme?	
36	Consultation: ICT Compliance and Risk	ICT CaRT has not been consulted during this process. The project is not new, it is a recommissioning of an existing contract and processes are already in place and would continue under the new contract. KCC software and equipment are being used for this project, which are widely used across KCC. It is understood that these would have been verified at the point of being commissioned/introduced for use by the organisation.
40	When is the processing of personal data for this project due to begin?	In less than 3 months
9	How will the personal data be collected from the individual?	Phone call Other

		KCC has a statutory obligation under the Care Act 2014 to assess individuals and meet their needs if they meet prescribed eligibility criteria. Social Workers carry out assessments, usually in-person, to determine if a person requires a residential or nursing home. As part of the assessment, information and personal identifiable data is collected and recorded on Mosaic and then shared with the Arranging Support Placements Team to source a care home placement. The data is shared with a range of providers via secure mail. The information is gathered from the data subject, family members, carers and other health professionals where appropriate and saved on Mosaic.
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
13	How will the data be shared with your team securely?	When data is shared with the Commissioning Team by providers, this will be sent by secure email, which ensures the information is safeguarded and reduces risk if sent to the wrong person. If it is not possible to use secure email, any documents which are to be shared will be password protected. The draft specification states the following: 'The Provider will ensure its information sharing with other organisations complies with all data protection and GDPR guidelines. When transferring personal or confidential information/ data, the Provider will ensure they use secure or encrypted email systems or that passwords are sent separately from the main body of the message in accordance with General Data Protection Regulation 2016'. If Microsoft Teams sites are set up to share information between KCC teams, one person approves the members of the site and approves/ declines any requests for access as appropriate. This ensures that access is only given to those that require it.
22	Describe how the personal data will be used to achieve your project aim	Where data is shared between KCC teams, this will be done using KCC's email system and data will be pseudonymised. KCC has a statutory obligation under the Care Act 2014 to assess individuals and meet their needs if they meet prescribed eligibility criteria. In order to fulfil this obligation, KCC has to collect these types of data - name, residential home address, Mosaic number, health data linked to primary disability, additional health and social needs (linked to the individual's person-centred plan), care package details, social care needs, race and gender. The information is collected as part of the Care Act Assessment and

		needs to be shared to enable providers to determine whether they are able to meet a person's assessed needs. Practitioners carry out assessments, usually in-person, to determine if a person requires a residential or nursing home. As part of the assessment, information and personal identifiable data (those listed above) is collected and recorded on Mosaic and then shared with the Arranging Support Placements Team to source a care home placement. The data is shared with a range of providers via secure mail, who will use the information to inform their own assessment. The information is gathered from the data subject, family members, carers and other health professionals where appropriate and saved on Mosaic. The processing enables KCC to refer people in need of a residential or nursing home to a service that can meet their needs. The referral process also allows providers to determine whether they can meet the needs of the person(s) referred.
6	Please name the organisations and their roles.	Private care home providers - will act as data processor and controller. There are approximately 270 older persons care homes in Kent, 203 (including 19 care homes outside of Kent) are part of the current contract. Information gathered by Practitioners and recorded on Mosaic as part of initial assessments and/ or case management notes will be shared with care home providers on a regular basis to enable placements and reviews. As part of managing quality in care homes, there may be a need to confidentially share information with the Care Quality Commission, Kent Police, Kent Fire and Rescue Service and the ICB. Data sharing agreements are in place with these organisations.
10	Will the data be shared with:	Your KCC team A contracted service provider A different KCC team Other Non-contracted service providers.

Data Collection

Data Category	Data being Collected
Basic Data	Name
	Date of birth
	Email address
	Telephone/mobile number
	Address
	Postcode
	NHS number
	Financial Information
	Identification number
	Other
Basic Data	Name
	Date of birth
	Email address
	Telephone/mobile number
	Address
	Postcode
	NHS number
	Financial Information
	Identification number
	Other
Basic Data	Name
	Date of birth
	Email address

	Telephone/mobile number
	Address
	Postcode
	NHS number
	Financial Information
	Identification number
	Other
Basic Data	Name
	Date of birth
	Email address
	Telephone/mobile number
	Address
	Postcode
	NHS number
	Financial Information
	Identification number
	Other
Basic Data	Name
	Date of birth
	Email address
	Telephone/mobile number
	Address
	Postcode
	NHS number

	Financial Information
	Identification number
	Other
Basic Data	Name
	Date of birth
	Email address
	Telephone/mobile number
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	Postcode
	NHS number
	Financial Information
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Basic Data	Name
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	Identification number
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Basic Data	Name

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	Financial Information
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	Date of birth
	Email address
	Telephone/mobile number
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	Identification number
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Basic Data	Name
	Date of birth
	Email address
	Telephone/mobile number
	Address
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	NHS number
	Financial Information
	Identification number
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Basic Data	Name
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Basic Data	Name
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Basic Data	Name Date of birth Email address Telephone/mobile number Address Postcode NHS number Financial Information Identification number Other
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Basic Data	Name
	Date of birth
	Email address
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	Other
Special Category Data	Racial or ethnic origin
	Religious or philosophical beliefs
	Physical or mental health
	Sexual orientation or sex life
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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 (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	KCC has a statutory obligation under the Care Act 2014 (section 9 - Assessing Needs) to assess individuals and meet their needs if they meet prescribed eligibility criteria. Section 9 of the Care Act 2014 informs that local authorities must: carry out an assessment of anyone who appears to have needs for care and support, regardless of whether those needs are likely to be eligible. Practitioners carry out assessments, usually in-person, to determine if a person requires a residential or nursing home. As part of the assessment, information and personal identifiable data is collected and recorded on Mosaic and then shared with the Arranging Support Placements Team to source a care home placement.
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)
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	The data processing is to support individuals in need of a care home to access the care and support to which they are entitled within an appropriate setting. Data is collected as part of statutory obligations under the Care Act 2014. Data collected as part of the Care Act Assessment includes name, residential home address, MOSAIC number, health data linked to primary disability, additional health and social needs (linked to the individual's person-centred plan), care package details, social care needs, race and gender. The information is recorded on Mosaic. The data of vulnerable data subjects will also be processed. Information which is collected by Practitioners (health or

			social work professionals) through the assessment process will be shared with the Arranging Support Placements Team to source a care home placement. The data is shared with a range of providers via secure mail, who will use the information to inform their own assessment.
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	Not applicable to this project
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	Not applicable to this project.
Special Category Data	7	If you are relying on condition (c), (d), (e), and/or (f) you must outline which element of the project relies on this condition	Not applicable to this project.
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	(29) Consent