



DPIA Project Information

Title:

Contact Centre Procurement

Project ID:

335

Project Timeframe for Data Collection:

In 3-6 months

DPIA Screening Questions

| Question Number | Question | Answer |
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| 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? | 9/1/2023 |
| 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? | Data Protection Act 2018 Part 3 UK GDPR |
| 10 | Please outline the project including the types of data, software, processors, and how the data will be used | This is a procurement exercise currently in which we are looking for a telephony partner to help us to deliver a 24 hours, 7 days a week service provision (essential provision only Out of Hours) This includes phone and emails, and may include tools not yet known, such as web chat. The service is for all service users and residents of Kent. Digital First is expected for those |

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| | | <p>transactional and information services where customers have access to the internet.</p> <p>Other services such as emergencies or those serving the most vulnerable or elderly residents, need to have access to a telephony service with call type priority capability.</p> <p>The contact centre takes payments via secure system, accesses a range of KCC's service platforms including for social services and highways.</p> |
| 11 | Within your project are you planning to: | 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: | <p>Process sensitive data or data of a highly personal nature?</p> <p>Process personal data on a large scale?</p> <p>Process data concerning vulnerable data subjects?</p> <p>Carry out any innovative use of personal data or apply new technological or organisational solutions?</p> |
| 13 | Additional Information | This is the procurement stage at the moment, we are writing the specification with assistance with colleagues across the organisation, including commissioning, ICT commissioning, ICT security and legal |

DPIA Core Questions

| Question Number | Question | Answer |
|-----------------|---------------------------|---|
| 1 | What is your project aim? | <p>To provide contact centre services to the residents of Kent.</p> <p>The aim is to answer all enquiries at first point of contact and to minimise the need to be passed on to another area of Kent County Council by telephone. We are looking for a supplier who can assist us in our aim to be digital first and utilise technological advances to both reduce costs and make the customer transactions as efficient as possible. The supplier would however need to support our most vulnerable customers who are unable to utilise some technology, or enquiries that require an emergency response.</p> <ul style="list-style-type: none"> • Aim of the contract We are seeking a contractor that will deliver a high quality, value for money and efficient service to the residents of Kent. The council is focused on achieving efficiencies and value for money, whilst maintaining a quality service provision. New technologies could be implemented to achieve these aims. • Objectives of the contract <ul style="list-style-type: none"> • To deliver a value for money service whilst maintaining good quality outcomes. • To have a contact centre provision that has the resilience to manage change and drive more efficient service delivery. • To support customers to complete their transactions in the most efficient way, including through self-service options. • To ensure detailed reporting is available to track and manage trends to enable the council to identify areas for improvement. • To give customers the choice of which contact channel to use, particularly for those unable to access digital services or for emergencies, in order to support our most vulnerable customers. • To enable the council's professionals' time to be used for specialist service delivery. • To achieve a baseline standard of qualitative service delivery where customers received the correct information in a timely, professional, and polite manner. |

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| | | The service is for all service users and residents of Kent. Digital First is expected for those transactional and information services where customers have access to the internet. Other services such as emergencies or those serving the most vulnerable or elderly residents, need to have access to a telephony service with call type priority capability. The service is expected to have high quality standards as it is the front face of KCC's telephony services. |
| 2 | Are all of the categories of personal data identified in the data question necessary for you to achieve this aim? | <p>The centre will process calls from residents, service users and customers in relation to a wide range of subjects including Highways, Education, SEN, Adult and Children social services.</p> <p>The collation of data will be defined by the services necessary for carrying out the service required.</p> <p>For example date of birth is needed for education services but not for highways.</p> <p>The data collected will be defined by a corporate privacy notice and by individual services where relevant.</p> |
| 3 | What are the categories of data subjects whose data will be processed? | Members of the public which can involve vulnerable clients, and information relating to children at risk. |
| 4 | What is the nature of the relationship with the individual? | As a local authority, KCC is in a position of power compared to data subjects |
| 5 | Are there any other organisations other than KCC who will be involved in this project? | <p>Unknown</p> <p>Processor</p> |
| 6 | Please name the organisations and their roles. | This is unknown at this stage as we are currently going out to tender. Once we have shortlisted this DPIA will be up dated with the relevant information. |
| 7 | Tick to confirm which of the following you have in place with the organisations | None of the above |
| 8 | How will the personal data be collected? | Collected by an external organisation |

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| 9 | How will the personal data be collected from the individual? | Phone call |
| 10 | Will the data be shared with: | A different KCC team Your KCC team |
| 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 |
| 12 | Does the privacy notice state that data will be shared with your team for the purpose you will be using it for? | Yes |
| 13 | How will the data be shared with your team securely? | It is anticipated that the new supplier will access KCC systems with the permission of ICT security and services, to enable the collation of data in the relevant KCC systems. In addition calls may be recorded and there will be safeguards in place to allow for this to happen. |
| 14 | What steps will you take to ensure the data you collect and/or use is accurate? | It is likely that each service will have a process by which the contact centre agent will follow. The data will be verified over the phone as it is being captured. |
| 15 | In what system(s) will the data be stored? | Outlook Liberi Mosaic iCasework Other Other relevant KCC systems such as WAMS |
| 16 | Where are the servers for the system(s) located? | UK |
| 17 | What is the current state of technology in this area? | This is standard practice. There are multiple examples of other councils outsourcing their contact centres. KCC already has a partnership arrangement for the current contract. As part of the specification for the tender, we have reviewed the current processes and are working with internal services such as |

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| | | commissioning, ICT security and commissioning to ensure that any service that is procured is fit for purpose and follows the necessary regulations with regards to DPIA, GDPR, call recording, financial payments etc. |
| 18 | How will the security of the data be ensured when it is transferred outside of the UK? | Other This is to be determined in contract negotiations with ICT security and legal |
| 19 | How will the security of the data be ensured in transit and at rest? | Other This is to be determined in contract negotiations with ICT security and legal |
| 20 | Are there any prior concerns over this type of processing or any security flaws | The contract will cover a range of expectations of the contractor including; Necessary security provisions including personnel and ICT DBS checks for staff Adequate insurance Relevant accreditations Cyber-essentials ISO27001 PCI level 3 payment systems Relevant experience in the field Regulations for sub contractors Carry out regular call monitoring and training |
| 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. |
| 22 | Describe how the personal data will be used to achieve your project aim | The data collated will allow KCC to carry out the relevant transactions needed by the customer. This will be different depending on the call and the service being accessed. Information may be added directly to the relevant system, emailed or the call may be transferred to another member of staff within KCC. |
| 23 | How long will the data be retained for? | The data will be kept in line with KCC's data protection schedule. For call recording this is a maximum of 6 months after the call. |
| 24 | Is the same retention period cited in all documentation? | Yes |
| 25 | At the end of the retention period will the data be: | Deleted by processors Other Deleted Any information added to KCC systems will be |

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| | | deleted by the relevant system retention periods. |
| 26 | What processes do you have in place to ensure that the retention period is adhered to? | <p>We will have a process in place to ensure we know when the retention period ends</p> <p>We will keep a record of what happens to the data at the end of the retention period</p> <p>We will make sure a member of the team has responsibility for the steps to be followed</p> |
| 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 |
| 28 | Is there a KCC privacy notice for this use of personal data? | We are amending an existing KCC privacy notice to include this use of personal data |
| 29 | Please link to the draft/published privacy notice | https://www.kent.gov.uk/about-the-council/about-the-website/privacy-statement |
| 30 | Is there an easy read privacy notice for this use of personal data? | There will not be an easy read privacy notice for this use of personal data |
| 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? | <p>Other</p> <p>Before every call, customers are informed that their calls are recorded for monitoring and training purposes and that a copy of the privacy notice is available</p> |
| 32 | How will you support data subject rights | <p>Under the UK GDPR you have rights which you can exercise free of charge that allow you to:</p> <p>know what we are doing with your information and why we are doing it</p> <p>ask to see what information we hold about you (known as a Subject Access Request)</p> <p>ask us to correct any mistakes in the information we hold about you</p> <p>object to direct marketing</p> <p>make a complaint to the Information Commissioner's Office</p> <p>where we process information based on your consent, you have the right to withdraw your consent at any time.</p> <p>Depending on our reason for using your information you may also be entitled to:</p> <p>ask us to delete information we hold about you</p> <p>have your information transferred electronically</p> |

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| | | <p>to yourself or to another organisation object to automated decisions being made that significantly affect you</p> <p>object to how we are using your information stop us using your information in certain ways. We will always seek to comply with your request, however, we may be required to hold or use your information to comply with legal duties. Please note, your request may delay or prevent us delivering a service to you.</p> <p>You may not, however, have the right to object to the Council using your personal data for statistical purposes where it is necessary for the performance of a public task carried out for reasons in the public interest.</p> |
| 33 | <p>What measures will you put in place to prevent data being used beyond the purposes outlined in your privacy notice?</p> | <p>Limit access to the storage location to only those who require access for specified purposes</p> <p>Ensure those with access to the data have read the privacy notice and are aware of the purposes it has been collected for</p> |
| 34 | <p>Are there any current issues of public concern that you should factor in?</p> | <p>None</p> |
| 35 | <p>Consultation: Please summarise the responses of data subjects you have consulted with on the topic of this project.</p> | <p>No consultation has been carried out, this is a continuation of a service already in existence but will potentially be a new provider</p> |
| 36 | <p>Consultation: ICT Compliance and Risk</p> | <p>Awaiting tenders.</p> <p>Will be consulting on the specification which is currently being finalised.</p> |
| 37 | <p>Consultation: Please summarise the Caldicott Guardian's response and any recommendations</p> | <p>Not applicable - continuation of service</p> |
| 38 | <p>Consultation : please summarise the responses and recommendations of any other individuals or organisations you have consulted with.</p> | <p>Information has been included in the specification where relevant. The terms and conditions will be drafted with the assistance of legal</p> |
| 39 | <p>Are you signed up to any approved code of conduct or certification scheme?</p> | |

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When is the processing of personal data for this project due to begin?

In over 6 months

Data Collection

| Data Category | Data being Collected |
|----------------------|---|
| Basic Data | Name Date of birth Email address Telephone/mobile number Address Postcode Financial Information |
| Basic Data | Name Date of birth Email address Telephone/mobile number Address Postcode Financial Information |
| Basic Data | Name Date of birth Email address Telephone/mobile number Address Postcode Financial Information |
| Basic Data | Name |



Date of birth
Email address
Telephone/mobile number
Address
Postcode
Financial Information

Basic Data

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| | <p>Address</p> <p>Postcode</p> <p>Financial Information</p> |
| Basic Data | <p>Name</p> <p>Date of birth</p> <p>Email address</p> <p>Telephone/mobile number</p> <p>Address</p> <p>Postcode</p> <p>Financial Information</p> |
| Basic Data | <p>Name</p> <p>Date of birth</p> <p>Email address</p> <p>Telephone/mobile number</p> <p>Address</p> <p>Postcode</p> <p>Financial Information</p> |
| Basic Data | <p>Name</p> <p>Date of birth</p> <p>Email address</p> <p>Telephone/mobile number</p> <p>Address</p> <p>Postcode</p> <p>Financial Information</p> |



Basic Data

- Name
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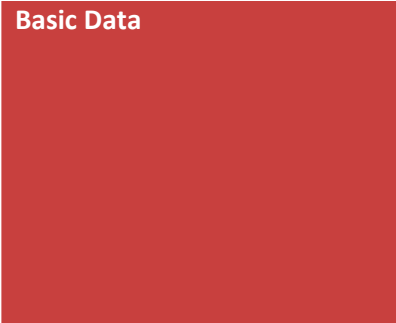
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| Basic Data | Name Date of birth Email address Telephone/mobile number Address Postcode Financial Information |
| Basic Data | Name Date of birth Email address Telephone/mobile number Address Postcode Financial Information |
| Special Category Data | Physical or mental health |
| Special Category Data | Physical or mental health |

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| Special Category Data | Physical or mental health |
| Special Category Data | Physical or mental health |
| Special Category Data | Physical or mental health |
| Special Category Data | Physical or mental health |
| Criminal Offence Data (UK GDPR) | No data is being collected under this category |
| 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: | (c) Processing is necessary for compliance with a legal obligation to which the controller is subject Please note you will be required to state the name and section of the legislation which gives you the statutory duty.–(b) Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (eg providing a service in exchange for payment). Please note this contract must be with the data subject.–(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.–(f) Necessary for legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child. Please note that this cannot be relied on when a public authority is performing their tasks as a public authority. A legitimate interests assessment must be carried out when relying on this basis. |
| Basic Data | 2 | Please outline which element of the project relies on the identified lawful basis | The contact centre delivers front line services for a variety of services across KCC. The lawful basis will depend on the service |

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| | | | and is covered by KCC's published privacy statement. |
| | | | https://www.kent.gov.uk/about-the-council/about-the-website/privacy-statement |
| | | | The majority of cases will be Necessary for the performance of a public task in the public interest. |
| | | | Individual service DPIA's should cover the contact centre's involvement and processing of their information depending on their processes and systems. |
| Special Category Data | 1 | Please identify the Article 9 basis being relied upon for the processing of special category data | (e) Relates to data manifestly made public by the data subject-(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 | Not applicable to this project |
| 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 call centre receives calls from individuals relating to their care with Social Services, trained agents will have access to some |

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| 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 | elements of their records to complete their duties. (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 | 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 | Customers in the course of accessing our service in the Contact Centre may make elements about themselves known, for example I am hard of hearing or I am neurodiverse and need information to be presented in a particular format or way. |