# Bristol City Council
# Think Family
# Privacy impact assessment

# Contents

# 1. Document Information

| Document version | Date | Contributing Authors | Notes |
|---|---|---|---|
| V1.05 | July 2016 | James Gay<br>Helena Ashton<br>Gary Davis | First Release |
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## 2. The need for a PIA; programme objectives and benefits

With the current financial environment, reducing budgets and less resource to deliver public services it is critically important that resources are used to deliver efficient, value for money services which provide the maximum level of improved outcomes for families who have multiple and complex needs.

As part of Bristol early intervention strategy it is intended to use the data available to us to identify those families who have emerging issues which put them at risk of needing to access crisis services in the future or eventually requiring intensive support.

The early identification of such individuals or families means that targeted services can proactively engage with them and with their support agree to work together to put in place strategies which prevent their needs from escalating. Evidence suggests that the earlier this takes place there is more chance of changing that trajectory.

The collation of data relating to a multitude of social issues enables analysis to better understand the levels of risk, harm and vulnerability held by those individuals to target support services at them. It also provides the basis for trying to predict through use of modern software those individual and families who have a heightened risk of developing more entrenched social issues.

Early intervention for those individuals or families is most important in not only improving their outcomes but also in reducing the cost to public services. This style of work provides significant incentive for public services to work in a more integrated way. In addition the capacity to work with families and individuals has been grown overtime so that there is a real prospect of using this data in a meaningful way which demonstrates that it is a necessary and proportionate approach to tackling the very real issues in the community.

The information is crucial for understanding families in all their complexity, measuring success, engaging partners, designing services, sustaining and driving service transformation, and making the case for continued investment

In order for this programme to work we need to use personal information about individuals/families the need for PIA was therefore identified as a consequence of recognising the sensitivity of the information being used identified.

More information about the Think Family programme can be found from https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/409682/Financial_Framework_for_the_Expanded_Troubled_Families_Programme_april_2015.pdf

# 4. Project Initiation Documentation and Legal Gateways

[PDF] Bristol City Council
Think Family PID Int

[PDF] Bristol City Council
Think Family Legal G

# 5. Think Family information flows

The data hub consists of a range of data on social issues relating to individuals, families and households across the city. The data is existing data held by public agencies which has been shared through information sharing protocols and in response to statutory duties held in legislation placed upon local authorities and relevant partners. There are as of March 2016 30 sets of social issues and 170,000 individuals in the data hub. The data is merged to provide a single understanding of a person, family or household. That information is held in a secure database with the local authority IT systems. It is correctly governed, auditable and meets the security requirements set out. Only certain nominated people have access to the information. Any inaccuracies identified are rectified, any unnecessary information is removed and records are only kept for the purpose and duration of the programme. There is capacity across the city to work with in excess of 1,000 families a year as part of our early intervention strategy.

The data sets currently held are set out in the below

[PDF] Think Family Data
Measures (October 2

Diagram illustrating data flows

[PDF] Think Family Data
Process Map (Octobe

## 6. The following questions and answers helped to identify the need for a Privacy Impact Assessment

**1. Will the project involve the collection of new information about individuals?**

Yes, the project will identify those families who are eligible for support under the Think Family programme, by matching existing data sources, some internal and some external to the Council, this will create a new master data-set to be analysed to identity if certain families can then receive additional levels of support.

Data containing information on the following categories will be collected
* Parents and young people involved in crime or antisocial behaviour
* Children not attending school regularly
* Children who need help
* Adult out of work or at risk of financial exclusion and young people at risk of worklessness
* Families affected by domestic violence and abuse
* Parents and children with a range of health problems

**2. Will the project compel individuals to provide information about themselves?**

Once a family has been identified as meeting the threshold for support from this project, the Council will add an indicator to their records in order to identify that family is eligible for support under the programme.

Once the family is engaged, the key worker will obtain informed consent before obtaining more information, directly from the family and other sources, having fully informed the family and ensured that there is a legitimate and lawful basis to obtaining the information. The further information will help to assist the family in accessing the services that will best support them.  We may inform schools and some of our commissioned providers with information about those service users most likely at risk.  We are also required by law to share some information with other statutory bodies such as the Police and Central Government.

**3. Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information?**

Where new information is to be shared with other organisations prior informed consent will be sought from the relevant individual/s unless there is a statutory duty to share this information with other relevant Partners and Central Government.

**4. Are you using information about individuals for a purpose it is not currently used for, or in a way it is not currently used?**

Yes.  The Think Family Programme will combine information about families with multiple high cost problems, poor school attendance, youth crime, anti-social

behaviour, unemployment, domestic violence and younger children who need help and with a range of physical and mental health problems.

The programme will use this information to identify families that fall within six headline problems covering crime, education, domestic abuse, health, child safeguarding and financial exclusion agendas.

It will be used for predicative analysis by reviewing those people who currently demonstrate poor outcomes and establishing those people most at risk of also demonstrating these outcomes into the future.

Once a family has been identified as meeting the threshold for support from this programme, the Council are then able to allocate limited resources to work more effectively with families who have multiple needs.

The data gathered will also be used as a part of a prevention strategy trying to identify families who may not meet the threshold for direct support from this project but who are possibly on the wrong trajectory and, if not worked with, may become more troubled.  This information may be shared with relevant partners as part of our early intervention strategy.

The data will be embedded in the information and intelligence Hub.

In many cases a detailed individual/family information pack, which details their suitability for the programme, will be created prior to a keyworker arriving at an address.

**5. Does the project involve you using new technology that might be perceived as being privacy intrusive? For example, the use of biometrics or facial recognition.**

No, the data analysis used to support the Think Family programme will develop a new database which will be in use for the length of the programme. This will contain sensitive data from many sources and approval to use this information will be sought from all appropriate Information Asset Owners prior to the data being obtained.

Only a limited number of people will be able to access this data. Permissions to the database will be managed using BCC security standards, administered by the Business Intelligence Team. The Think Families Coordinator will be the custodian for this database and authorise user access.

It is intended that the programme will take advantage of software becoming available on the market.  This won't include technology that uses biometrics or facial recognition.

**6. Will the project result in you making decisions or taking action against individuals in ways that can have a significant impact on them?**

Yes, in matching this data a master data set is constructed, which makes it possible to identify which families meet the threshold criteria for the troubled families programme. It also allows the tracking of families in terms of their progress or identification of those who are in need of support.

Once a family has been identified as meeting the threshold for support from this programme, the Council are then able to allocate limited resources to work more effectively with families who have multiple needs.

The data gathered will also be used as a part of a prevention strategy trying to identify individuals/families who may not meet the threshold for direct support from this project but who are possibly on the wrong life trajectory and, if not worked with, may be at risk of developing multiple complex issues.

**7. Is the information about individuals of a kind particularly likely to raise privacy concerns or expectations? For example, health records, criminal records or other information that people would consider to be private.**

Yes, the Think Family Programme will focus on families with multiple high cost problems and continue to include families affected by poor school attendance, youth crime, anti-social behaviour and unemployment, it will also reach out to families with a broader range of problems, including those affected by domestic violence, with younger children who need help and with a range of physical and mental health problems.

**8. Will the project require you to contact individuals in ways that they may find intrusive?**

No, an individual/family will be invited to be work with a key worker or service provider.

Prior to this happening, professionals from a range of organisations may be asked for their views to help make the best decision about how to approach the individual/family by considering the needs of that individual/family.

## 7. Consultation requirements

Internal Consultation

- We have been discussing security and privacy implications with the Information Security Manager at Bristol City Council and will continue to work closely with IS during the implementation of this project
- We will be working closely with the subject matter experts (those who have been involved in the project previously)
- We will be working closely with the subject matter experts based in services (Information Asset Owners and their representatives in the steering group)
- Legal advice has been sought and given on the Legal Basis that underpins the ability to share the data and on meeting the requirements of the Data Protection Act 1998.

External Consultation

- We will be working to recognised standards and recommendations, including BS7666
- We will consult with agencies across the region who can advise on industry standards and best practice

## 8. Identified privacy and related risks



Think Family Risk
Log.xlsx

## 9. Sign off and record of the PIA outcomes

All Risks above and all solutions above.

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## 10. Contact point for future privacy concerns

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