



# Ministry of Housing, Communities & Local Government

## H-CLIC and personal data: guidance for local authorities

### 1. What this document is for

This document sets out guidance from the Ministry of Housing, Communities and Local Government (MHCLG) for local housing authorities to enable them to securely and appropriately collect and share their clients' personal data with the Department.

We have undertaken this development work with the advice and guidance of the Information Commissioner's Office (ICO) and Information Governance colleagues within the Department. As well as using this guidance, you should follow the ICO's data sharing code of practice, which can be found here:

[https://ico.org.uk/media/fororganisations/documents/1068/data\\_sharing\\_code\\_of\\_practice.pdf](https://ico.org.uk/media/fororganisations/documents/1068/data_sharing_code_of_practice.pdf)

This current guidance document is based on guidance issued to local authorities for the evaluation of the Troubled Families Programme in 2015. The evaluation and its design is a useful precedent for this current project on homelessness – it is a good example of a successful way of sharing data with our Department.

The Homelessness Case Level Information Collection (H-CLIC) is the new quarterly data return on local authorities' actions under statutory homelessness legislation. It replaces P1E for all new statutory homelessness assessments and cases on and from the 3<sup>rd</sup> April 2018. All cases where a homelessness application is taken and any legal duty accepted should be reported to MHCLG in the quarterly returns.

Local authorities have raised concerns about whether they can provide personal data as requested by MHCLG as part of their H-CLIC quarterly return.

This document explains:

1. why we are collecting the personal data;
2. data protection legislation and the legal bases for processing data (Digital Economy Act and to meet the new data protection legislation);
3. the need to use privacy notices to tell people how their data is being used, rather than informed consent; and,

4. how we assure our data security procedures to enable the secure and appropriate sharing of personal data.

## 2. Introduction – why we are collecting personal data

The 2017 Homelessness Reduction Act ('the 2017 Act') significantly reformed England's homelessness legislation by placing duties on local authorities to intervene at earlier stages to prevent homelessness in their areas. It also requires housing authorities to provide homelessness services to all those affected, not just those who have 'priority need'. The 2017 Act takes effect on 3<sup>rd</sup> April 2018.

H-CLIC collects data on, for example, demographic information such as nationality and ethnic group; the circumstances leading to and following on from a household's homelessness application being made; the actions taken by the local authority on each case; and all temporary accommodation placements.

In addition, MHCLG are requiring local authorities to separately provide personal data on households, such as names and addresses. This data needs to be collected through H-CLIC so that we can link the data collected on applicant households to other data sources. This will support the work being carried out by the Homelessness Policy Team in the Department. By linking data sources on homelessness, we will be able to measure the effectiveness of a range of homelessness programmes and monitor the implementation and impact of the 2017 Homelessness Reduction Act.

The addition of personal data to the H-CLIC return will mean use of the collection can be expanded to assess the longer term outcomes of those assisted with their homelessness, the success of other MHCLG intervention projects, or to collect wider characteristics about those who are homeless to better assess why some interventions fail or succeed.

We will use the personal and case level data provided through H-CLIC to create pseudonymised MHCLG identifiers that allow analysts to monitor the 2017 Act and to identify patterns within homelessness, by:

- tracking cases across local authority boundaries and the country; and,
- following families/individuals in their journeys over time.

We are also hoping to use the personal data provided to:

- link data from other homelessness evaluations being run within MHCLG; and,
- link to nationally-held administrative data. This is dependent on reaching agreements with other Government Departments but could include data on benefits, offending, health, education, and child safeguarding. We will create a pseudonymised dataset which includes H-CLIC data and data from other Government Departments to control for and take account of a wider range of factors affecting homelessness and outcomes.

It is important to note that the sharing of personal data and information for the H-CLIC project is for evaluation and research purposes only - it will not be used for operational purposes.

This project will provide robust information to further our understanding of repeat homelessness, the success of prevention activities, the outcomes of those in receipt of homelessness services, and the causes and factors associated with homelessness.

The results and analysis will be shared with policy colleagues here and published regularly to provide national and local policy makers with an evidence base on which to design better services and achieve better outcomes, such as which homelessness prevention activities are most effective with particular groups.

### 3. Data Protection legislation: *GDPR and the new DPA*

From 25 May 2018 any processing (such as collecting/storing/sharing) of personal data must meet the requirements of the new European General Data Protection Regulation (GDPR) and revised Data Protection Act 2018 (DPA18). The GDPR, and revised DPA, bring an evolution to data protection law and should be read side by side.

Many concepts in the GDPR and revised DPA remain the same as the current Data Protection Act 1998 (DPA98). ***Any processing of personal data still has to comply with the data protection principles and you still need a lawful basis to process personal data as well as an additional condition to process special category data (what was sensitive data).*** The new legislation also introduces some ***key new or enhanced requirements***, such as increased transparency requirements and increased rights for individuals. There are new accountability provisions too which require organisations to keep much more detailed records to be able to demonstrate compliance and detect and report data breaches quickly if they happen. For more information and guidance about the GDPR go to:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>

### **Legal Powers to share data and Data Protection Considerations**

Local authorities should satisfy themselves that they have identified legal gateways to share data with MHCLG and that they have met the requirements of data protection legislation. Local authorities should set out to meet the new GDPR and DPA18 standards outlined above from the outset, even though the legislation is not yet in force.

There are equivalent lawful bases in both the current and future data protection legislation and many concepts remain the same. The current suggested legal gateways and data protection considerations up until 25 May 2018 are outlined in Annex B. The guidance immediately below sets out the future legal gateways and data protection considerations from 25 May 2018

onwards, as well as suggestions for how local authorities can meet the requirements of the new legislation.

Data sharing agreements will be agreed between MHCLG and local authorities before H-CLIC data collection starts in April 2018.

### **Suggested legal gateways for data sharing: *Digital Economy Act 2017***

The Digital Economy Act 2017 was given Royal Assent in April 2017. The Act removes the legal barriers to sharing data, while enforcing data protection laws.

The data sharing codes of practice and regulations are still being drafted and agreed.

Chapter 5, 'Sharing for Research Purposes' provides the legal basis for data sharing for this project. It allows for data sharing between public authorities (e.g. MHCLG and local authorities) as long as certain conditions are met. There are six conditions set out in the Act, we have summarised four of these below:

1. *It is unlikely that the person's identity can be deduced from the information. We have put in place measures to separate the identifiable data from the H-CLIC data and processing by two separate teams.*
2. *The sharing of data for research is for an agreed purpose. The data will be used by MHCLG to fulfil its functions (to reduce homelessness).*
3. *Measures are put in place to minimise the risk of disclosure of information that relates to a particular person. Measures will be put in place to ensure data security at all times. This will be an agreed security operating procedure which will include secure transfer of data, password protection, restricted access to data, and the separation of duties of two teams of analysts to process the data at MHCLG.*
4. *Anybody involved in the processing of data should be accredited and have regard to the Code of Practice in the Act. Staff at MHCLG will all be CTC cleared and will be bound by the conditions of the MHCLG contract. MHCLG will put in place a Security Operating Procedure which staff will have to follow while processing data to ensure data security at all times.*

#### 4. The lawful bases for processing data

**In order to process personal data, MHCLG and local authorities must meet the requirements of the GDPR.**

From 25 May 2018 organisations will be required to have a lawful basis to process personal data under Article 6 of the GDPR. If organisations are processing special category data they will also need to identify a valid condition for processing this data under Article 9.

Local authorities should satisfy themselves that they have a valid lawful basis for processing personal data as well as a valid condition under Article 9 for processing special category data. We have set out our suggestions for meeting the requirements of the GDPR and revised DPA below.

MHCLG will rely on the following reasons for processing personal data and additional special category data below:

##### **A. Lawful basis for processing personal data under Article 6 GDPR**

The processing is necessary for this reason:

- (E) Public task: *the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.***

##### **B. Additional condition for processing special category data under Article 9(2) GDPR**

Special category personal data may be processed if:

- (I) *processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject, in particular professional secrecy;***

To process the data lawfully the local authority will need to collect the personal data under the public task basis (to fulfil their functions, in this case provide housing services) and agree to share this data with MHCLG under the public task basis (to fulfil our functions as a Government Department, in this case to reduce homelessness).

**Why consent may not be an appropriate lawful basis to process personal data.**

The GDPR raises the standard for consent. We have discussed this project with lawyers and information governance colleagues as well as the ICO and it

is our understanding that there are alternative legal bases to consent that will still meet the requirements of the GDPR.

The Information Commissioner explains on her website that there are **alternatives to relying on consent to process personal data**. If a local authority has identified the purposes for which they will process the data, a valid legal basis to share personal data, as well as told individuals what it is doing with the data then that local authority may not need consent from individuals.

The ICO has published some myth busting blogs around consent which can be found by clicking on the link below:

<https://iconewsblog.org.uk/2017/08/16/consent-is-not-the-silver-bullet-for-gdpr-compliance/>

The Information Commissioner gives the following advice about consent:

**Consent** from a data protection compliance perspective means offering individuals real choice and control and explicit consent requires a very clear and specific statement of consent.

Consent is appropriate if people can be given real choice and control over how their data is used, and public bodies want to build their trust and engagement. But if a genuine choice cannot be offered to people, consent is not appropriate. If the personal data would still be processed without consent, asking for consent is misleading and inherently unfair.

In relation to an **imbalance of power**, the GDPR emphasises that public authorities, employers and other organisations in a position of power may find it more difficult to show valid freely given consent and should avoid over-reliance on consent where it may not be needed. Further guidance on relying on consent can be found here:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/consent/>

## 5. The use of privacy notices to tell people how their data is being used

Under the GDPR, organisations must still comply with the data protection principles which include that personal data must be processed 'fairly'. In addition to this the GDPR introduces a specific right for individuals to be informed about how local authorities intend to use their personal data. We have followed ICO advice and recommend that it is both sufficient and necessary for local authorities to use privacy notices to ensure they meet their legal obligations regarding 'fair' process before submitting data information to DELTA<sup>1</sup> (MHCLG). These privacy notices should be issued to individuals and households presenting for support from Housing Options and a privacy notice

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<sup>1</sup> DELTA is MHCLG's new online data collection system.

to inform individuals/households of how their data is being used could be added to existing privacy notices issued by the local authority to those presenting for help (which already inform them of the ways in which the local authority uses the data).

Please refer to the ICO's data sharing code of practice for further information on legal obligations:

[https://ico.org.uk/media/fororganisations/documents/1068/data\\_sharing\\_code\\_of\\_practice.pdf](https://ico.org.uk/media/fororganisations/documents/1068/data_sharing_code_of_practice.pdf)

And advice on privacy notices that are GDPR compliant can be found at the following two links:

<https://ico.org.uk/for-organisations/guide-to-data-protection/privacy-notices-transparency-and-control/>

[https://ico.org.uk/media/for-organisations/documents/1610/privacy\\_notices\\_cop.pdf](https://ico.org.uk/media/for-organisations/documents/1610/privacy_notices_cop.pdf)

In issuing a privacy notice the aim is to ensure that people have a fair and equal chance of seeing the notice and to minimise the stress and burden placed on them. For the Troubled Families' evaluation, we worked with local authorities, frontline keyworkers, and families to get their feedback on draft privacy notices. The following advice is based on this feedback and our discussions with the ICO.

The following approach follows the ICO's "layered" approach to the provision of this kind of information.

We therefore recommend issuing the privacy notice in two ways:

i. **Posters in local public places or an information leaflet that you provide to households/individuals:** some of those requesting support with housing will not have ready access to digital or electronic mediums and we need to ensure that the notice is accessible to these people. To achieve this, you can provide a short information leaflet that provides the essential high level information and/or put up notices on the Housing Options noticeboards of the local authority or other places that they might be seen, for example health centres, jobcentres, and other relevant services. Posters can provide high-level information with more detail than available from caseworkers and/or electronically for those who want to find out more.

ii. **Electronically:** Notices may be placed on local authorities' Housing Options webpages (or similar). This is increasingly being used as a source of information for households or individuals wanting to know more about services available to them.

Rather than creating a new or different privacy notice for this project, we recommend **amend any existing privacy notices issued for your housing support services**. You could amend these to include some extra information about personal details being shared with MHCLG for research purposes (see below for information these should include). The ICO has advised us that

amending existing Housing Options services privacy notices is a straightforward way of meeting fair process with regards to this project so long as households/individuals can fully understand from the notices exactly what is being done with their data and why.

For the evaluation of the Troubled Families Programme, the families we spoke to suggested that information should be ***simple, short, and jargon free, with the opportunity to find out more if they wanted to.*** Those who took part supported the sharing of personal information for research purposes, if it was clear that the ***results would be anonymised and that the information wouldn't be used to affect them personally.***

**We will circulate draft privacy notices for the H-CLIC project (both posters and a longer notice for websites) in March 2018.**

In terms of further information such as leaflets, or information on local authority websites, we suggest the following:<sup>2</sup>

1. Use simple language and be clear and concise. Privacy notices are written for households/individuals, not for organisations or the ICO. Avoid the use of terminology such as 'data processor' or 'critical partners' or 'agencies'.
2. It is helpful to say something about what the local Housing Options Team or approach is – what you're trying to achieve.
3. The privacy notice needs to be clear about what the information has been collected for and what will be done with it as well as why (e.g. for the purposes of research).
4. It should also include the lawful basis for processing, how long data will be retained for.
5. You should tell households that they can complain to the ICO if they are not happy with how you handle their data.
6. The privacy notice should (clearly and simply) describe the data flow (who will the information be shared with and what will be done with it).
7. Practical examples are helpful in clarifying what happens but should be consistent with the information on data flow.
8. Explaining that the data share will not affect the benefits or services families receive.
9. Including something that lets households or individuals opt-out is good practice.

## 6. Assurance around data sharing and security

### Sharing information

All local authorities have been asked to include sign up to the sharing of personal and case level information of all individuals/households as part of the H-CLIC data collection.

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<sup>2</sup> When we circulate draft privacy notices in March, terminology such as 'data processor' will be explained.

The personal information will be used to create pseudonymised MHCLG IDs<sup>3</sup> that allow analysts within the Department track cases across local authority boundaries and over time.

We are also putting in place measures to allow us to use the personal data to provide outcomes for MHCLG homelessness evaluations (such as Housing First) and matched to national administrative datasets held by other government departments and bodies (see [Annex C](#) for a full list of datasets) The personal data will be processed by a separate Data Team within MHCLG. A data sharing agreement between local authorities and MHCLG will be drafted for this purpose in March 2018 ahead of the first data share in May.

The sharing of information for the H-CLIC project is for evaluation and research purposes only - it will not be used for operational purposes. This document provides information regarding available legal powers and how to inform households about how their data is being used.

A detailed description of the research project process is included in [Annex D](#). A high-level summary is outlined below:

1. You provide a file containing personal information about household members receiving a service from the housing authority. This information will be uploaded onto DELTA as part of the Homelessness statistics data collection (H-CLIC). This file will include personal information (such as name, address, date of birth) (see [Annex C](#) for the full list of variables).
2. The personal data will be transferred automatically and securely to a Data Team here at MHCLG and stored in a secure access restricted folder using our secure database.
3. The Data Team here at MHCLG will use the information to create MHCLG identifiers and provide a look-up table of LA identifiers and corresponding MHCLG identifiers to the Homelessness Analysis Team at MHCLG. The Homelessness Analysis Team will use the MHCLG identifiers to replace the LA identifiers to further pseudonymise the data and allow tracking of households and individuals over time and across local authority boundaries.
4. The Data Team here at MHCLG will provide other Government Departments with the personal information to facilitate the matching of the information provided by local authorities to national datasets.
5. Our homelessness analysts will use a pseudonymised version of the data from other Government Departments matched to the pseudonymised H-CLIC data to carry out analysis.

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<sup>3</sup> An algorithm will be run on the personal data to create the MHCLG identifiers (to allow us to pseudonymise the H-CLIC data). The algorithm will create the same unique identifier based on the personal data, but be secure enough that it cannot be linked back to an individual's personal data.

6. The Data Team at MHCLG will also receive the personal data of individuals/households subject to homelessness interventions, such as Housing First, and use this information to create MHCLG identifiers. The MHCLG identifiers will be provided to the homelessness analysis team to evaluate the outcomes of those subject to homelessness interventions.

## **Data Security**

The privacy of households and the security of the data you send us are a priority. We are in the process of setting up systems and procedures within the Department to enable us to transfer, process, and store the personal data securely.

**Full details of the security arrangements will be made available in April 2018 and will inform the data sharing agreements we will draw up for this work.**

These arrangements will meet current Government Standards to ensure the security of the data. We are putting in place robust security arrangements for handling and matching the different sources of data together.

DELTA has independent security accreditation, in line with the Government Digital Service (GDS) Guidelines. Prior to go-live, the DELTA application underwent an IT Health Check carried out by independent security specialists contracted by MHCLG. All testing was undertaken under the [CESG CHECK](#) scheme resulting in accreditation of DELTA to hold classified information up to and including OFFICIAL.

Once the personal data is transferred securely to the Department the data will be processed and stored by two separate teams within MHCLG with clearly defined and separate duties (referred to as the Data Team and the Homelessness Analysis Team). A security operating procedure and secure processes will be put in place for each team. Proposals for the IT system and data security procedures within the Department have been checked by independent security specialists to ensure they meet current standards for holding OFFICIAL data. The MHCLG IT system that will store the personal data is accredited hold OFFICIAL data.

Secure processes that will be put in place include: files transferred automatically using an API (application processing interface); all files encrypted and password protected; passwords only shared with nominated personnel (all [SC](#) cleared); data stored in restricted access folders; and, two members of the team will process data at all times.

An algorithm will be run on the personal data to create the MHCLG identifiers (to allow us to pseudonymise the H-CLIC data). The algorithm will create the same unique identifier based on the personal data, but be secure enough that it cannot be linked back to an individual's personal data.

## Annex A: FAQs

### ***Who will carry out the research using the personal data, and who will the data be shared with?***

We are setting up the data linking project so that the data processing will be carried out by analysts at MHCLG and the personal data shared with other Government Departments for matching to their administrative data. Any analysis will be carried out for research purposes only and carried out on a pseudonymised version of the data.

We intend in the future to match the personal data provided with information from other homelessness evaluations, as well as data held by the Department for Work and Pensions, Department for Education, Ministry of Justice, NHS Digital, and Public Health England. This work is in development.

To do this, the Data Team at MHCLG will put in place data sharing agreements and send the personal data you provide onto the government departments/health agencies listed above. The departments will then match this to their databases and send a pseudonymised version of the matched attribute data to the Homelessness Analysis Team. The pseudonymised data from other Government Departments will be matched using the MHCLG identifiers to the H-CLIC data and used by the Homelessness Analysis Team for analysis.

### ***We don't have consent from families to share personal details for research purposes. Can we still share the data?***

Consent is not the only basis for sharing personal data under the GDPR. Another basis is where processing is necessary for a task carried out for a core function of the Department or in the public interest.

In relation to the requirement to process data fairly, we have sought advice from the ICO. The use of privacy notices should ensure you meet your legal obligations regarding fair process before submitting the information to DELTA as requested. See [section 5](#) of this guidance document for more information.

### ***Do we have to issue a privacy notice?***

Yes. Individuals and households have a specific right to be informed under GDPR. To be 'fair', information about the data sharing should be given to the people concerned (those making a homelessness application with the local housing authority in this case). We recommend that local authorities achieve this via a privacy notice. This is particularly important as the information being shared is personal data. Local authorities would be able to add this element to existing privacy notices relating to the services provided by the Housing Options Team.

### ***How do we ensure that our project meets the requirements of the GDPR?***

To meet the requirements of the GDPR each local authority needs to satisfy itself that it has identified a legal basis on which to share the data with MHCLG. See [section 4](#) of this document for the legal bases for processing personal data.

In addition to this each local authority should ensure they have addressed the relevant schedules of the GDPR and revised DPA, please refer to [section 4](#) and [section 5](#) of this guidance.

The ICO have helpful advice on their website to get ready for the GDPR which can be found at these links:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/>

## Annex B: Current legal gateways

### Processing personal data by local authorities

A **local authority** participating in the study may rely on ***the implied statutory power provided by the general power of competence under section 1 of the Localism Act 2011***. This gives local authorities the power to do anything that individuals generally may do. This power may be combined with the power in section 111 of the Local Government Act 1972, which allows local authorities to do anything which is calculated to facilitate, or is conducive or incidental to, the discharge of any of the functions of a local authority. Together these provide a legal basis for sharing data.

### Processing personal data by MHCLG

Furthermore, Ministers of the Crown have ordinary common law powers to do whatever a natural person may do. In this context the Secretary of State for **MHCLG** is undertaking the research in exercise of its ***common law powers*** and improving data and how we use it to inform policy decisions around homelessness are essential to this.

### Data Protection Act 1998

In addition to the identification of a legal basis on which to share the data for this project, the ***processing of the data***, including its disclosure, must comply with the various data protection principles contained in the ***Data Protection Act 1998***. An important aspect of this is that personal data must be processed 'fairly' and 'lawfully'.

The data subject (the individuals and households presenting to Housing Options for support) must be provided with the relevant and necessary information to ensure they fully understand what is being done with their data and why (i.e. in the form of a privacy notice). The processing must also relate to a function that the local authority has a statutory power or duty to carry out.

For personal data to be processed 'fairly' and 'lawfully', it should also meet at least one of the conditions in ***Schedule 2 of the Data Protection Act***. In the case of sensitive personal data (as with this project), at least one of the conditions in ***Schedule 3 of the Data Protection Act*** should also be met.

It is important to note that consent is not the only basis for sharing personal data under the Data Protection Act 1998. There are other conditions that can be used under schedules 2 and 3 if they apply. Local authorities could rely on the following conditions of the Data Protection Act for sharing this data with MHCLG.

### Relevant schedules of the Data Protection Act

***Data Protection Act, Schedule 2 condition 5(c)*** - "The processing is necessary... for the exercise of any functions of the Crown, a Minister of the Crown or a government department." This condition covers the processing of personal data relating to functions carried out by MHCLG and other

government departments and offices (it is a departmental responsibility and priority to reduce statutory homelessness).

***Data Protection Act, Schedule 2 condition 5(d)*** – “for the exercise of any other functions of a public nature exercised in the public interest by any person.” This condition is more broadly worded. This condition covers processing provided that it is in support of a public function that is in the public interest (in this case supporting households at risk of homelessness)

**Sensitive Personal Data:**

As some sensitive personal data will be shared, one of the conditions in Schedule 3 must also be fulfilled. In the case of this project the following condition may be relied upon:

***Data Protection Act, Schedule 3 condition 7 (1) (c)*** – The processing is necessary for the exercise of any functions of the Crown, a Minister of the Crown or a government department.

## **Annex C: Personal Data and nationally held administrative datasets**

### **Personal Data requested as part of the H-CLIC return**

Local authority unique individual identifier

Family unit identifier

Forename(s)

Surname

Date of Birth (dd/mm/yyyy)

Gender

Postcode

National Insurance number (9-character)

### **Nationally held administrative datasets**

The national datasets we plan to match against in the future are set out below.

- The Police National Computer and Prisons Database (held by the Ministry of Justice).
- The National Pupil Database and Individualised Learner Record (held by the Department for Education).
- The Work and Pensions Longitudinal Study (held by the Department for Work and Pensions)
- Hospital Episodes Statistics, Mental Health Minimum Dataset (held by the Health and Social Care Information Centre)
- National Drug Treatment Monitoring System (held by Public Health England)

The list of datasets will be updated and confirmed prior to matching.

We will keep local authorities informed regarding the process above.

## Annex D: Draft description of how the project will operate and the personal data flows

The draft process for the personal data linking project is set out in the text and diagram below. There are several datasets created for the project set out in the table and text below. These are as follows:

Stage	Dataset	Description of dataset	Processing	Team responsible
Stage 1a	Dataset A1	LA IDs and personal data	Combination of data from LAs into 1 dataset	DELTA application
Stage 1b	Dataset A2	LA IDs and case level H-CLIC data	Combination of data from LAs into 1 dataset	DELTA application
Stage 2	Dataset B	MHCLG IDs, LA IDs and personal data	Create MHCLG IDs within Dataset A1	Data Team, MHCLG
Stage 3a	Dataset C	MHCLG IDs and LA IDs only  (look-up table)	Removal of personal data from Dataset A1	Data Team, MHCLG
Stage 3b	<b>Dataset D*</b>	<b>MHCLG IDs and H-CLIC data</b>	Combination of Dataset A2 and Dataset C, removal of LA IDs	Homelessness Analysis Team, MHCLG
Stage 3c	Dataset E	MHCLG IDs and personal data	Creation of dataset for processing by OGDs, removal of LA IDs from Dataset B	Data Team, MHCLG
Stage 4	Datasets F	MHCLG IDs and OGDs data	Matching Dataset E with OGD data, removal of personal data	OGDs
Stage 5	Dataset G	MHCLG IDs and derived variables from OGD data	Creation of derived variables using Datasets F	Homelessness Analysis Team, MHCLG
Stage 6	<b>Dataset H*</b>	<b>MHCLG IDs, H-CLIC data and OGDs data</b>	Combination of datasets D and G	Homelessness Analysis Team, MHCLG

\*Datasets highlighted in bold are used for analysis by the Homelessness Analysis Team at MHCLG

The project will use personal data, including LA individual and household level unique identifiers, supplied to MHCLG by local authorities on individuals and households presenting to services for homelessness services as well as case level data collected for homelessness statistics (a full list of variables sent by local authorities and from each Department will be included in the Privacy Impact Assessment).

Within the DELTA application (MHCLG) personal data records provided by each Local Authority will be securely stored. These records are associated within the system and can be identified as “Dataset A1”. The DELTA application will send the data securely (using an API) to the Data Team at MHCLG. The personal data will be stored in a restricted access folder to which only the MHCLG Data Team have access.

The Data Team will create MHCLG unique individual and household level identifiers based on the personal data using an algorithm<sup>4</sup>. The Data Team will then attach the MHCLG identifiers to “Dataset A1” to create “Dataset B”.

The MHCLG Data Team will use “Dataset B” to create a “look-up” table of LA identifiers and MHCLG identifiers, i.e. without personal data (“Dataset C”). Dataset C will be provided to the Homelessness Analysis Team at MHCLG.

The H-CLIC data is associated within DELTA and identified as “Dataset A2”. The DELTA application will send the data securely (using an API) to the Homelessness Analysis Team at MHCLG. The Homelessness Analysis Team will combine “Dataset A2” and “Dataset C” and remove LA IDs to create “Dataset D”. “Dataset D” will be used by Homelessness Analysis Team to track outcomes for individuals and households over time and across LA boundaries.

The MHCLG Data Team will remove the LA IDs from “Dataset B” to create “Dataset E”. “Dataset E” will be used by other Government Departments (MOJ/DfE/DWP) to match to their administrative data. MOJ/DfE/DWP will identify records for the individuals using the personal data in “Dataset E”, remove the personal data and then supply the Homelessness Analysis Team with a data extract (“Dataset F”) for the individuals they are able to match to their dataset: Police National Computer; Work and Pensions Longitudinal Study; Single Housing Benefit Extract; National Pupil Database. The Homelessness Analysis Team will use the data provided by MOJ/DWP/DfE (multiple “Datasets F”) to create a dataset of derived variables “Dataset G”.

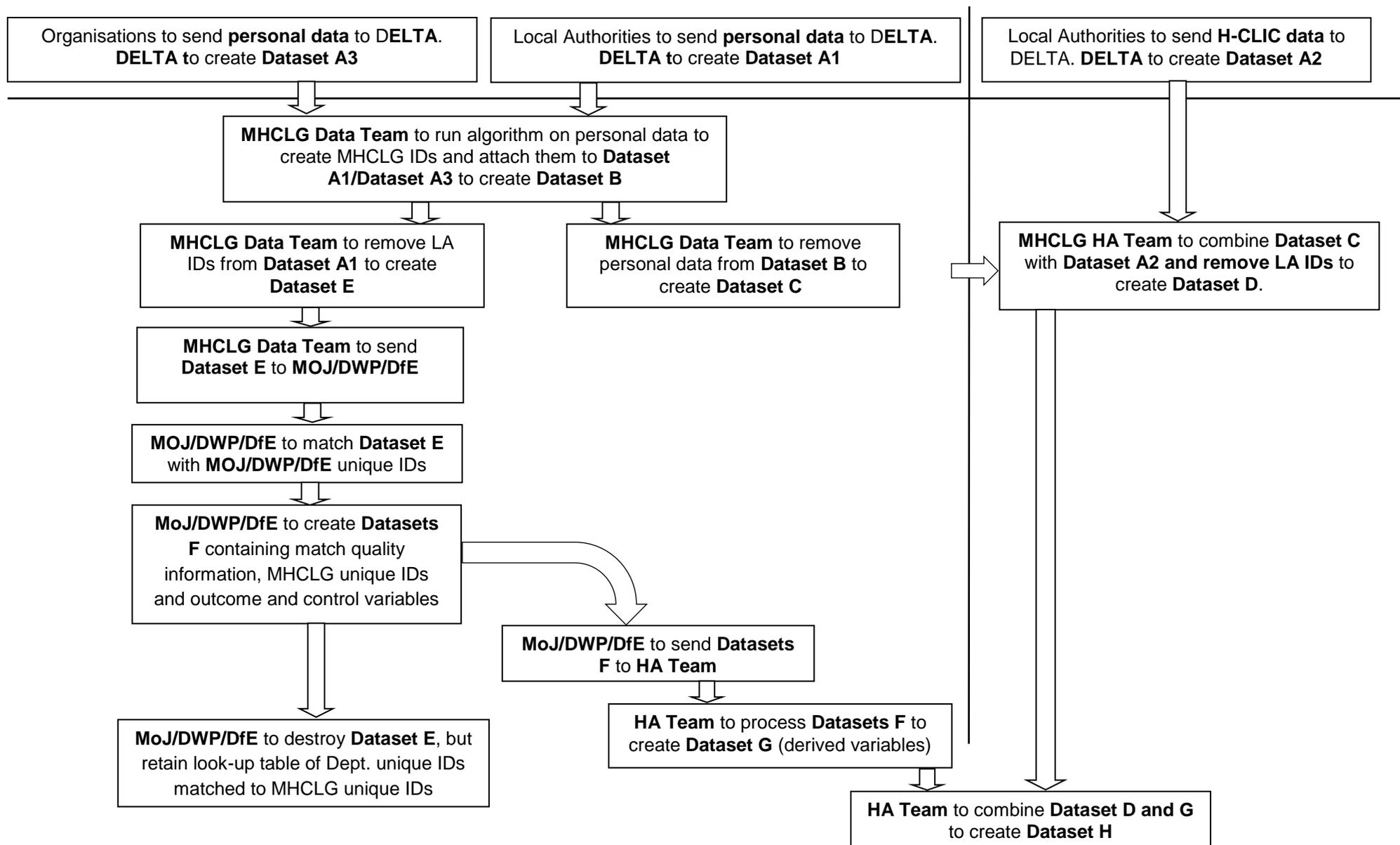
The Homelessness Analysis Team will combine “Dataset D” with “Dataset G” to create “Dataset H”. Dataset H will allow Homelessness Analysis Team to look at wider outcomes (offending, benefit, Child in Need and educational) for the cohort over time.

All work carried out by MHCLG will be carried out by two separate teams using restricted access folders on a secure system. Appropriate security measures and procedures will be put in place to ensure the privacy of individuals and households is maintained.

The data flows are set out on the following page:

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<sup>4</sup> The algorithm creates household and individual level IDs using the personal data. These IDs ensure the analysts cannot identify individuals and the ID is created in such a way that it cannot be linked back to the personal data to identify individuals.



\*1. Every Local Authority is expected to provide personal data over the lifetime of the evaluation – there are 326 local authorities.

\*2. The ONS unique identifier is retained but other personal information is removed.

Data at **MoJ** will be stored on secure workstations with password protected access to a limited and designated number of analysts.

Data at **DWP** will be stored in a restricted access folder on a secure server which meets the need for storing sensitive data with protected access to a limited and designated number of analysts.

Data at **DfE/held by CapGemini** (or in the event this contractor changes their successor) will be stored on a secure server with access to a limited and designated number of analysts.

Transfer of data will be secure at all times - data will be encrypted and password protected or sent using XML or API (see SYOP)

The data will be stored securely (BIL3) at **MHCLG** and linked by the DELTA application/SC cleared staff. It will be handled by 2 separate teams, password protected and access limited to a designated number of analysts.

**Data Team, MHCLG**

**HA Team:** Homelessness Analysis Team, MHCLG