

Data Protection Impact Assessment (DPIA)

Proposal/ Project/Activity title	Digital Status - Right to Rent (RTR)
Information Asset Owner(s)	REDACTED

Version 1.3

Document Control

	Name	Job Title	Date
DPIA Drafted by	REDACTED		02/03/2022
Reviewed by	REDACTED		29/04/2025
Lead DPP for business area	REDACTED		
Lead business owner /project manager/policy owner	REDACTED	Status Capability Lead	02/03/2022

Version/Change history

Version	Date	Comments
Final 1.1	11/06/2021	Existing DPIA transferred to new templated
Draft 1.2	02/03/2022	Draft to reflect removal of BRP/BRCs from the approved document list.
Draft 1.3	29/04/2025	Reviewed and updated IAO

Approved by (Information Asset Owner (IAO) or person acting on behalf of the IAO):

IAO approval is only required if Stage 2 of this template is completed. Project manager sign off is sufficient if the questions outlined in Stage 1 are answered in negative.

Name	Title	Date
REDACTED	REDACTED	29/04/2025

REDACTED

Guidance on when and how to complete this template is provided in the Data Protection Impact Assessment (DPIA) Guidance on Horizon – **this guidance should be read before completing the DPIA.**

DPIA Stage 1

Summary of the processing

1. Does the proposal/project/activity involve the processing¹ of personal data, or is new legislation which relates to the processing of personal data being considered?²

Yes No

If the answer to this question is 'No', then the rest of the form does not need to be completed. If the answer is 'Yes', please continue.

2. Does the proposal/project/activity involve any of the following?

- a new way of processing personal data
- the use of a new form of technology for a new or existing process
- new legislation which relates to the processing of personal data being considered
- substantial changes to an existing project/programme/processes involving personal data, which would include a significant increase in the volume or type (category) of data being processed

Yes No

If the answer to this question is 'No', then the rest of the form does not need to be completed. If the answer is 'Yes', please continue.

3. What is the purpose of the processing? Provide a brief (up to 100 words) description of the processing activity e.g. sharing with a third party; storing data in a new way; automating a data processing activity; developing a new policy that requires new legislation or amendments to existing legislation etc.)

[NB: this question is repeated at 3.1 at which point you can add more detail/ background.]

All landlords in England have a responsibility to carry out right to rent checks. This is done by landlords conducting simple checks before they rent a property, to make sure the individual is not disqualified from accessing the private rented sector.

¹ In relation to personal data, means any operation or set of operations which is performed on personal data or on sets of personal data (whether or not by automated means, such as collection, recording, organisation, structuring, storage, alteration, retrieval, consultation, use, disclosure, dissemination, restriction, erasure or destruction).

² Data protection legislation applies to 'personal data' which is defined as any information which relates to a living identifiable person who can be directly or indirectly identified by reference to an identifier. The definition is broad and includes a range of items, such as name, identification number, location data, or on-line identifier etc.

The Home Office has developed the online right to rent checking service to support landlords in conducting secure right to rent checks and make it easier for individuals to demonstrate their right to rent. The service allows landlords/agents to check that current/prospective tenants have the right to rent.

Screening questions

4. Does the processing activity include the evaluation or scoring of any of the following?

- profiling and predicting (especially from “aspects concerning the data subject's performance at work”)
- economic situation
- health
- personal preferences or interests
- reliability or behaviour
- location or movements.

Yes

No

5. Does the processing activity include automated decision-making with legal or similar significant effect? i.e. processing that is intended to take decisions about data subjects which will produce “legal effects concerning the natural person” or which could “significantly affect the natural person”.

Yes

No

6. Does the processing activity involve systematic monitoring? i.e. processing used to observe, monitor or control data subjects, including data collected through networks or “a systematic monitoring of a publicly accessible area” e.g. CCTV.

Yes

No

7. Does the processing activity involve mostly sensitive personal data? This includes special categories of personal data, data about criminal convictions or offences, or personal data with the security marking of Secret or Top Secret.

Yes

No

8. Does the processing activity involve data processed on a large scale? If sharing with a third party external to the Home Office large scale is defined as 1,000 plus pieces of personal data in a single transaction or in multiple transactions over a cumulative 12 month period.

Yes

No

9. Does the processing activity involve matching or combining datasets that are being processed for different purposes? e.g. data originating from two or more data processing operations performed for different purposes and/or by different data controllers in a way that would exceed the reasonable expectations of the data subject. *NB:* This does not include matching or combining datasets from different IT systems that are processed for the same purpose and legal basis e.g. CID and CRS.

Yes

No

10. Does the processing activity involve mostly data concerning vulnerable data subjects or children?

Yes

No

11. Does the processing activity involve the innovative use or application of new technological or organisational solutions? e.g. combining use of fingerprints and facial recognition for improved physical access control, etc.

Yes

No

12. Will the processing activity in itself prevent data subjects from exercising a right (under Data Protection Legislation and the UK GDPR) or using a service (provided by) or a contract (with) the Department?

Yes

No

13. Is the introduction of new legislation or a legal regulatory measure which relates to the processing of personal data being considered?

NB: If yes, this may require consultation with the Information Commissioner.

Yes

No

If you have answered 'yes' to more than one of the above screening questions (Q 3 to 12), a DPIA must be completed. If you have answered 'no' to each of the screening questions but feel the planned policy/process/activity is significant, or carries reputational or political risk, you should complete the full DPIA. If you are not sure whether a DPIA should be completed, please consult the Office of the [Data Protection Officer](#) (ODPO).

If you have completed Stage 1 and do not need to complete Stage 2, send your Stage 1 assessment to the [ODPO](#).

DPIA Stage 2

Section 1: Background and contacts

1.1 Proposal/Project/Activity title:

Online Right to Rent Service

1.2 Information Asset title(s) (if applicable):

Right to rent status information is derived from a number of data sets relating to the casework of immigration cases within UKVI, Border Force and Immigration Enforcement which result in the creation of an immigration status. This data is held in the Person Centric Data Platform, which aggregates information held in the following caseworking and supporting systems:

Case Information Database (CID)

Central Reference System (CRS)

Atlas Caseworking System (Atlas)

Immigration & Asylum Biometric System (IABS)

Asylum Seekers Support System (ASYS)

Irish Visa Application Centre System (IVACS)

Pega

1.3 Information Asset Owner(s) (IAO):

Email: **REDACTED**

Name: **REDACTED**

Telephone Number: **REDACTED**

Information Asset title: Immigration status information

Email: Click or tap here to enter text.

Name: Click or tap here to enter text.

Telephone Number: Click or tap here to enter text.

Information Asset title: Click or tap here to enter text.

Email: Click or tap here to enter text.

Name: Click or tap here to enter text.

Telephone Number: Click or tap here to enter text.

Information Asset title: Click or tap here to enter text.

1.4 Person completing DPIA on behalf of the IAO named at 1.3 above):

Email: **REDACTED**
Name: **REDACTED**
Telephone Number: **REDACTED**
Business Unit/Team: Status Verification, Enquiries and Checking

1.5 Date DPIA commenced:

21/03/2022

1.6 Date processing activity to commence (if known):

25/11/2020

1.7 Information Asset Register reference (if applicable):

Digital Status.

1.8 DPIA version:

V1.2

1.9 Linked DPIAs *NB: attach word versions, do not provide links.*

- Online Right to Work Service
- View and Prove Online Status Service
- Digital Status Checker - right to free healthcare
- Digital Status Checker – DWP right to public funds
- Digital Status Checker – HMRC right to public funds
- Digital Status Checker – Right to enter API

1.10 DPIA proposed publication date (where applicable, and if known):

There is an intention to publish this DPIA proactively as we believe there is a public interest in doing so. However, a decision has not been made on what we will publish, in what format or when. Therefore, there is no set publication date and we reserve the right to just publish a summary of the key parts of this DPIA to aid transparency. It is envisaged the DPIA will be published in the second half of 2022.

Section 2: Personal Data

NB: These questions relate to the personal data being processed in the processing activity described within this DPIA only. It is acknowledged that in many instances the personal data being processed will originate from other HO sources and therefore be subject to their own set of rules governing access, retention and disposal.

2.1 What personal data is being processed?

- Forename
- Surname
- Middle name(s) (if known)
- Aliases (if known)
- Last known address (including postcode)
- Photograph
- Right to rent entitlement
- Start and end date of entitlement
- Document number (BRC/BRP/C/Nationality ID card/Passport)

The scope of the service extends to those who have been granted immigration status and issued a Biometric Residence Permit or Card, those granted status under the EU Settlement Scheme (EUSS) or the UK's points-based immigration system, those granted a British National Overseas (BNO) visa or a Frontier workers permit and have been given online access to their immigration status information.

The service will also increasingly support those with a pending application/appeal who have continuing rights in the UK. Landlords will no longer be able to rely on a Biometric Residence Permit and Biometric Residence Card to generate a statutory excuse against payment of a civil penalty. Prospective tenants/tenants will need to share their right to rent digitally to prove their right to rent in England. Biometric Residence Cards and Biometric Residence Permits are still being issued to customers and must be used to access and share their right to rent digitally, however the physical document cannot be used by a landlord in England to generate a statutory excuse.

The immigration case history is used to determine the individuals current immigration status and right to rent entitlement, along with any conditions or restrictions attached to this. This data is used to provide a headline 'right to rent status' that is shown on the individual's profile.

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There are two ways to access the online service, dependent on your circumstances.

UKVI Account holders:

For people who applied for EUSS or on the Points Based System, they will have created a UKVI account which they will use to the access Right To Rent service.

They will enter their ID documentation no and their date of birth. They will then enter their email or phone number to receive the two factor authentication code.

BRP/C Holders:

For individuals who hold either a BRC or BRP, they will log in using their BRP/C number and their date of birth. BRC/P holders will not be asked for authentication details via SMS or email and will go directly to their profile. In the case of a BRP/C holder, if the card has been cancelled as reported as lost or stolen, it cannot be used to access the service.

This authentication is used to determine the identity of the individual, establishing their case history and entitlements.

The name and a facial image of the person is displayed following successful authentication, along with their confirmation that they have a right to rent. They can choose to share this with a landlord or letting agent by generating a 'share code'.

Landlords of letting agents:

When the landlord or letting agent accesses the service, they are required to input information for the purposes of audit records. For landlords this will be their name, for agents this will be the company name. The landlord or letting agent can then see the same information as was presented to the individual.

Home Office staff:

Where individuals require help to use online services, due to digital exclusion, the HO Resolution Centre (RC) will be able to assist them with sharing their status. This includes RC agents being able to access the service at the individual's request, using their log in details and generate a share code on their behalf, to be provided to the landlord/agent. To be able to do this, the RC agent will input their details into the agent view of the service to support customers. The RC agent would input their username and their POISE user ID, name and surname for audit purposes.

2.2 Which processing regime(s) applies: general processing regime (UK GDPR/Part 2 DPA), and/or law enforcement processing regime Part 3 DPA?

NB: this question is repeated at Q.3.1.a.

General processing (UK GDPR/Part 2 DPA)

Law enforcement (Part 3 DPA)

2.3 Does the processing include any of the following special category, or criminal conviction data?

Criminal conviction data	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/> No
Race or ethnic origin (including nationality)	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/> No
Political opinions	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/> No
Religious or philosophical beliefs	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/> No
Trade union membership	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/> No
Genetic data or biometric data for the purpose of uniquely identifying individuals	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/> No
Health	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/> No
Sexual orientation or details of the sex life of an individual	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/> No

2.4 Does it include the processing of data relating to an individual aged 13 years or younger?

Yes No

2.5 (If 'yes') What additional safeguards are necessary for this processing activity? If none, explain why.

[Click or tap here to enter text.](#)

2.6 Will data subjects be informed of the processing?

Yes No

If 'yes' go to Q2.7 If no, explain why.

Click or tap here to enter text.

2.7 (If 'yes') How will they be informed/ notified?

The service relies on data that has previously been submitted by the individual as part of a visa application or through the EUSS. The data is collected in line with the standard Border Immigration and Citizenship System Privacy Information Notice and is retained within the PCDP. Both the applicant and landlord sides of the service also have their own privacy policy notice, accessible from the service (<https://view-immigration-status.service.gov.uk/privacy> for individuals and <https://view-immigration-status.service.gov.uk/view/privacy> for landlords).

To use this service, the individual can access their own information, and then choose to share it with a third party (landlord).

Landlords using the service will be asked to provide their name, and agents will be asked to provide the company name. . The service privacy policy sets out that this information is collected so that the Home Office has a record that the landlord has made the check, along with other information on how this data will be used and stored. This information will then be available to HO staff for audit purposes

Individuals may also refer at anytime to the range of Privacy Information pertaining to Home Office immigration practices on the gov.uk website, including the Borders, Immigration and Citizenship Notice and Personal Information Charter.

2.8. Which HO staff and/or external persons will have access to the data?

The information underlying the individuals' right to rent status profile is drawn from existing HO caseworking systems, so is already accessible by HO caseworkers.

REDACTED

2.8a. How will access be controlled?

REDACTED.

2.9 Where will the data be stored?

The service relies on data that has previously been submitted by the migrant during the application process. The data is collected when they apply for an

immigration product and is retained within the Person Centric Data Platform (PCDP).

2.10 If the data is being stored electronically, does the storage system have the capacity to meet data subject rights (e.g. erasure, portability, suspension, rectification etc)?

Yes

No

If 'No' explain why not below and go to Q2.12

[Click or tap here to enter text.](#)

2.11 If 'Yes' explain how these requirements will be met.

For prospective tenants, the service provides a quick and easy way to share only the information relevant to their right to rent, rather than providing documents containing other personal information. It also puts the prospective tenant in control of their data, choosing who they give access to, and being able to correct information on their digital profile before sharing this, if they feel it is inaccurate. Individuals know how to act on their rights via public facing privacy information, rights will be assessed on a case by case basis.

[2.12 For law enforcement processing only: If the data is being stored electronically, does the system have logging capability (as per s.62 DPA)?

Yes

No

If 'no', what action is being taken to ensure compliance with the logging requirement?]

[Click or tap here to enter text.](#)

[2.13 For law enforcement processing only: Will it be possible to easily distinguish between different categories of individuals (e.g. persons suspected of having committed an offence, victims, witnesses etc.) as well as between factual and non-factual information (as per s.38 DPA)? e.g. criminal record (fact); allegation (non-factual)

Yes

No

If 'no', what action is being taken to ensure compliance with s.38 DPA?]

[Click or tap here to enter text.](#)

2.14 What is the retention period for the data?

Underlying data is retained only as long as it is required, in line with wider HO published data retention policy. Audit information will similarly be retained in line with requirements.

Landlords are required to retain evidence that they have conducted appropriate checks for the duration of the individual's tenancy, plus one year, and therefore retention of this data is to support Home Office compliance requirements.

The service temporarily stores data to support the sharing activity between the individual and the landlord. This is contained within a secure service to support the journey whereby a landlord accesses an individual's information. This process creates a temporary account that is valid for 90 days, after which time it is deleted

2.15 How will data be deleted in line with the retention period and how will the deletion be monitored?

Deletion of underpinning data will be in line with wider management of HO data. This will be performed following review of data relevance in light of moratoria.

2.16 If physically moving/sharing/transferring data outside the Home Office, how will it be moved/shared?

To enable the landlord to access this information, the individual can choose to generate a unique share code. The landlord then needs to enter the share code and the individual's date of birth.

The service temporarily stores data to support the sharing activity between the individual and the landlord. This is contained within a secure service to support the journey whereby a landlord accesses an individual's information. This process creates a temporary account that is valid for 90 days, after which time it is deleted.

There remains a requirement to check that the photograph provided by the online checking service is the prospective tenant, in the same way that they do this when conducting the existing document-based check. The online checking service provides a high-quality facial image.

2.17 What security measures will be put in place to ensure the transfer is secure?

REDACTED

2.18 Is there any new/additional personal data being processed? This includes data obtained directly from the data subject or via a third party.

Yes

No

If 'yes', provide details below:

REDACTED

2.19 What is the Government Security Classification marking for the data?

OFFICIAL/OFFICIAL-SENSITIVE

SECRET

TOP SECRET

2.20 Will your processing include the use of Cookies?

Yes No

If 'no' go to section 3.

If 'yes', what sort of Cookies will be used? Tick the correct categories:

1) Essential (no consent required) Yes No

2) Analytical (consent required) Yes No

3) Third party (consent required) Yes No

2.20.a. If cookies fall into categories 2) & 3) how will you ensure data subjects are aware and can give active consent to the use of cookies?

A banner is displayed on the site when they access the service giving them the option of accepting or rejecting (non-essential) cookies. The preference is retained for one month when given, in addition, there is a dedicated page that individuals can access to view which cookies might be used, what they are for and how long they will be valid for before expiring.

Section 3: Purpose of the Processing

3.1 What is the purpose of the processing? Provide a detailed description of the purpose for the processing activity. This section needs to provide an overview (in plain English) that can be read in isolation to understand the purpose and reasons for the processing activity.

All landlords in England have a responsibility to carry out right to rent checks. This is done by landlords conducting simple checks before they rent a property to someone, to make sure the individual is not disqualified from accessing the private rented sector.

The residential tenancies provisions of the Immigration Act 2014 ('the act') came into force in parts of England on 1 December 2014 in the cities of Birmingham and Wolverhampton and the Metropolitan Boroughs of Dudley, Sandwell and Walsall, and on 1 February 2016 in the rest of England. Under section 22 of the Immigration Act 2014 a landlord should not authorise an adult to occupy property as their only or main home under a residential tenancy agreement unless the adult is a British or Irish citizen, or has a 'right to rent' in England. Someone will have the 'right to rent' in England provided they are present lawfully in accordance with immigration laws.

Section 23 of the act allows the Secretary of State to serve a landlord with a notice requiring the payment of a penalty of a specified amount where they have let property to an unqualified person in a tenancy.

The Home Office has developed the online right to rent checking service to support landlords in conducting secure right to rent checks and to make it easier for individuals to demonstrate their right to rent.

The service allows landlords to check that current or prospective tenants have the right to rent in England, and any associated restrictions or conditions in respect of that right to rent. The service design puts the individual in control of their data, choosing who and when they allow access. The service is part of the broader Status Checking project, which is delivering common components to calculate status values (such as right to rent) and developing mechanisms through which this information can be queried and presented – such as publicly available user interfaces or system to system APIs.

This service is both automating the derivation of the right to rent status information from caseworking data and also enabling this to be shared with a 3rd party (through the choice of the individual to whom the data relates).

The service has been built by resources associated with the wider Status Checking project, consisting mainly of java and front-end developers, testers, analysts and dev ops. Technology used aligns to the wider Immigration Technology Portfolio technical stack.

3.1.a Which processing regime(s) applies: general processing regime (UK GDPR/Part 2 DPA), and/or law enforcement processing regime Part 3 DPA?

General processing (UK GDPR/Part 2 DPA) - go to question 3.2.a.

Law enforcement (Part 3 DPA) - go to question 3.2.b.

3.2.a. General processing only: What is the (UK GDPR Article 6) lawful basis for the processing? Choose an option from the list:

- Consent
- Contract
- Legal obligation [see 3.3(a)]
- Vital Interest
- Performance of a public task [see 3.3(a)]
- Legitimate Interest

NB: Legitimate Interest cannot be relied upon by the Home Office for processing carried out in order to fulfil or support a public task.

[3.2.b. Law enforcement processing only: What is the (Part 3 DPA) lawful basis for the processing? Choose an option from the list:

- Consent
- Necessary for a law enforcement purpose

3.3. If you have selected 'legal obligation' or 'performance of a public task' for general processing (for Q3.2.a), OR if the processing is for a law enforcement purpose

Indicate below the legal basis and relevant legislation authorising the processing of the data:

Common law (list HO function/objective below)

Click or tap here to enter text.

Royal Prerogative (HMPO only)

Explicit statute/power (list statute below)

IANA 2006 and Immigration Act 2014, and secondary legislation made under these Acts, which legislate for an online checking service (SI 2014/2874, 2021/689 and 2022/242).

Implied Statute power (list statute below)

Click or tap here to enter text.

3.4.a. General processing only: If processing special category data or criminal convictions data (see Q2.2 above)

What is the (UK GDPR Article 9) condition for processing the special category data?

- N/A
- Consent
- Employment/Social Security
- Vital Interests
- In the public domain
- (Exercising/defending) legal rights
- Substantial Public Interest
- Public healthcare
- Archiving or Research

Appropriate Policy Document: Special Category Data Part 2

[3.4.b. Law enforcement processing only: If processing sensitive data for a law enforcement purpose: **What is the (DPA Schedule 8) condition for the processing?**

- Consent

- Substantial public interest (for a statutory purpose)
- Administration of justice
- Vital Interests (of the subject or another)
- Safeguarding children and individuals at risk
- Data already in the public domain
- Legal claims (seeking advice, legal proceedings, defending rights)
- Judicial acts
- Preventing fraud (working with anti-fraud organisations)
- Archiving

3.5 Is the purpose for processing the information described at 3.1 above the same as the original purpose for which it was obtained by the Department?

- Yes No

If 'no', what was the original purpose and lawful basis?

Original purpose: [Click or tap here to enter text.](#)

- Original Lawful basis:
- Consent
 - Contract
 - Legal obligation
 - Vital Interest
 - Performance of public task
 - Legitimate Interest

Section 4: Processing activity

4.1 Is the processing replacing or enhancing an existing activity or system?

If so, please provide details of what that activity or system is and why the changes are required.

- Yes No

As we improve our digital offering, the online checking service will make it easier and more efficient for landlords to conduct checks. The online service also enables migrants/prospective tenants to only share the required personal data to fulfil this check thereby improving security of their personal data.

If the answer is 'yes' go to 4.3

4.2 Is the processing a new activity? This description should include details (if appropriate) of what resources are needed to build the model? (e.g. FTEs, skills, software, external resource)

- Yes No

4.3 How many individual records or transactions will be processed (annually) as a result of this activity?

REDACTED**4.4 Is this a one-off activity, or will it be frequent and/or regular?**

Frequent.

4.5 Does the processing directly relate to the processing of personal data that includes new legislative measures, or of a regulatory measure based on such legislative measures? If 'no', move onto 4.7.

Yes No

4.6 If the answer is yes, please explain what that processing activity is, including whether or not the HO will be accountable for the processing of personal data?

Click or tap here to enter text.

4.7 Does the processing activity involve another party? (This includes other internal HO Directorates, external HO parties, other controllers or processors).

Yes No

If the answer is "No" go to 4.7.

If the yes answer is 'yes' and where the other party is external to the HO, please ensure section 6 is completed.

4.7.a In what capacity is the other party acting?

- Part of the HO
- Controller in their own right (i.e. non HO)
- Joint Controller with the HO
- Processor (public body) on behalf of the HO
- Processor (non-public body) on behalf of the HO

Provide details here:

Third parties accessing the data through the controlled process.

4.8 Will any personal data be transferred outside the UK?

Yes No

If 'no' go to 4.8. If 'yes', provide brief details of the countries and complete Section 7.

Click or tap here to enter text.

4.9 Does the proposal involve profiling that could result in an outcome that produces legal effects or similarly significant effects on the individual?

Yes No

If yes, provide details

Click or tap here to enter text.

4.10 Does the proposal involve automated decision-making?

Yes No

If yes, provide details

Click or tap here to enter text.

4.11 Does the processing involve the use of new technology?

Yes No

If 'no', go to question 5.1.

4.12 If 'yes': Describe the new technology, including details of the supplier and technical support.

Click or tap here to enter text.

4.13 Are the views of impacted data subjects and/or their representatives being sought directly in relation to this processing activity?

Yes No

a) If 'yes', explain how this is being achieved

Engagement with stakeholders representing landlords, letting agents and migrants is established. A number of workshops have been undertaken between the project delivery team and stakeholders to identify areas of concern as well as mitigation steps to minimize any residual risks. A private beta trial phase was undertaken with a range of landlords/agents before releasing the service more widely, and regular updates have been provided via stakeholder fora. The service will also continue to be developed/iterated based on feedback from users of the live service, via the service feedback form.

b) If 'no', what is the justification for not seeking their views?

Click or tap here to enter text.

Section 5: Risks of the Processing

5.1 Are there any other known, or anticipated risks associated with the processing of personal data that have been identified by the project/programme/initiative owner, which have not been captured in this document?

Yes No

If 'yes' provide details and go to question 5.2.

- Inadvertent sharing of individual's details.
- Unlawful disclosure of personal information, after the individual has withdrawn consent to share their data.
- Producing inaccurate results for landlords

REDACTED

5.2 What steps have been taken to mitigate these risks?

REDACTED

5.3 Can you demonstrate that the risks to the individuals are sufficiently balanced by the perceived public protection benefits?

Yes No

If 'yes' provide details and go to question 5.4.

Steps have been taken to minimise these risks, which we believe are outweighed by the benefit of delivering the right to rent policy and enabling individuals to exercise their rights digitally and landlords/agents to check right to rent more easily, securely and in a more Covid-compliant way.

5.4 Are these risks included within a risk register?

Yes No

Section 6: Data Sharing/Third party processing

Complete this section if you have answered 'yes' to question Q.4.7.

6.1 External contact details for data exchange/ processing

The service is accessed by a range of user controlled and auditable persons to facilitate the right to rent verification process.

6.2 What is the legal basis/power/statutory gateway for the processing activity?

Common law (list HO function/objective below)

Click or tap here to enter text.

Royal Prerogative (HMPO only)

Explicit statute/power (list statute below)

IANA 2006 and Immigration Act 2014, and secondary legislation made under these Acts, which legislate for an online checking service (SI 2014/2874, 2021/689 and 2022/242).

Implied Statute power (list statute below)

Click or tap here to enter text.

6.3 How long will the data be retained by the receiving organisation or processor for the purpose for which it is received?

*See 2.14

6.4 How will it be destroyed by the receiving/ processing organisation once it is no longer required for the purpose for which it has been received?

*See 2.15

6.5 Is the data sharing process underpinned by a non-binding arrangement (Memorandum of Understanding (MoU) or equivalent) or binding agreement (Treaty or contract)?

Yes

No

If no, provide details why a formal written arrangement is not required and move to 6.7

System is accessed as part of digital status verification by a range of relevant persons, use terms are controlled by security measures and user accounts.

6.6 Provide details of the proposed HO MoU/Contract signatory and confirm they have agreed to be responsible for the data sharing/processing arrangement detailed in this document.

N/A

6.7 Will the other party share any HO data with a third party including any 'processors' they may use?

Yes

No

If yes, please provide the identity of the processor and confirm details of that arrangement will be included in the formal written arrangement between the HO and the receiving/processing organisation.

The data can be used to facilitate the right to rent a property which may involve onward sharing by those accessing the system to facilitate this.

Technical impact and viability

6.8 Which of the following reflects the data processing? The process may meet several of these descriptions.

Data extract: *Are you working through and assessing data to secure relevant information?*

Yes

No

Data matching: *Are you comparing several sets of data?*

Yes

No

Data reporting: *Are you processing data to produce accurate analysis?*

Yes

No

Data exchange/feed: *Are you sharing the data between programmes?*

Yes No

Direct access: *Are you obtaining data by going directly to where it is physically located?*

Yes No

Other

Yes No

a) If 'Other, please provide details

[Click or tap here to enter text.](#)

6.9 Has any analysis or feasibility testing been carried out? For example, through a proof of concept or pilot exercise?

Yes No

If yes, provide details. If no, explain why it is not required.

A private beta phase was conducted with a select group of landlords to assess functionality and usability of the service.

6.10 Confirm if:

development work is required to ensure systems are DP compliant?

Yes No

If yes, provide details including time frame

Development work has been completed as part of the Status Checking project roadmap.

Security Checklist

6.11 Given the security classification of the data, are you satisfied with the proposed security of the data processing/transfer arrangements detailed at 2.16 and 2.17 above?

Yes No

6.12 Confirm you have read the associated guidance and, if necessary, consulted with HO Security and the relevant DDaT teams, including Home Office Cyber Security (HOCS):

NB: If your processing activity involves any use of IT systems or physical documentation being sent outside of the Home Office to a non-governmental organisation, you *must* consult with HOCS, prior to your DPIA being submitted.
Yes, I have read the guidance and/or consulted with HO Security

6.13 If the answer is 'no': What needs to happen to ensure that adequate security arrangements are achieved?

[Click or tap here to enter text.](#)

6.14 Will the data be stored and be accessible off-site?

Yes

No

6.15 If 'yes', have you considered the security arrangements that need to be in place to prevent the data from being accidentally or deliberately compromised? Please provide details.

Yes

No

See details at 2.17 above

Section 7: International transfers

Only complete this section if you have answered yes to question 4.7.

7.1 Does the activity involve transferring data to a country outside of the UK (including Crown Dependencies, Overseas Territories and Sovereign Base Areas)?

Yes

No

If 'yes', specify the country. If 'no', go to Section 8.

[Click or tap here to enter text.](#)

7.2 Does the country have a positive adequacy decision?

Yes

No

a) If 'no', under what legal basis do you propose to transfer the data?**i) General processing only:**

- Pursuant to a legally binding Treaty which contains appropriate safeguards for the rights of data subjects and includes effective legal remedies for those rights
- Pursuant to an administrative (non-binding) arrangement approved by the UK Information Commissioner which recognises the rights of data subjects and includes binding rules providing effective legal remedies for those rights
- On the basis that the transfer is necessary for 'important reasons of public interest' which are recognised in statute or common law (and set out in a non-binding MoU)

ii) Law enforcement processing only:

- Pursuant to a legally binding Treaty which contains appropriate safeguards for the rights of data subjects and effective legal remedies for those rights
- On the basis that the transfer is necessary for 'in individual cases for any of the law enforcement purposes' which are recognised in statute

7.3 Does the HO already have a binding or non-binding data sharing arrangement with this country?

Yes No

If no, skip 7.4 a)

a) If 'yes', does the arrangement cover the purpose(s) for which you need to share data?

Yes No

If you have selected no for 7.3, you will need to consider reviewing the existing agreement to include the new processing activity

- I. **If 'yes', does the arrangement recognise the rights of data subjects?**
Does it include effective legal remedies for data subjects' rights; or set out important reasons of public interest and how those reasons are legally founded; or set out why the transfer is necessary in individual cases for a law enforcement purpose?
- Yes No

If yes go to Section 8

- II. **If 'no', how do you propose to document the terms of the understanding with the other country?**

Click or tap here to enter text.

Note: You should consult guidance on Overseas Security and Justice Assistance (OSJA) to determine whether an assessment of human rights, International Humanitarian Law, political and reputational risks is required.

Section 8: Referral to ODPO

NB: Any subsequent changes made to the DPIA by the business must be done clearly and transparently and in accordance with accepted version control convention. In the event of changes being made, earlier versions of this DPIA must be retained for auditing purposes and in-line with your agreed retention period.

If substantive changes are made to this DPIA, you must re-refer to the ODPO for a new review.

Date referred to the ODPO	Reviewed by	Date returned to the Author	Comments/recommendations
11/03/2022	REDACTED	18/03/2022	REDACTED
30/04/2025	REDACTED	30/04/2025	REDACTED
22/05/2025	REDACTED	23/05/2025	REDACTED

8.3 IAO sign-off

Date referred to IAO	Name of IAO or person signing on behalf of	Date returned to the Author	Comment (including approved to proceed Y/N)

Section 9: Referral to Data Board

This section is only required if one or more of the criteria for referral to the HO Data Board is met (see DPIA guidance). Referral to the HO Data Board will be completed by the ODPO after consultation with the business owner(s) listed in part 1 of this DPIA. Guidance is available on Horizon.

9.1 Criteria for referral to the HO Data Board:

Criteria	Met
REDACTED	
REDACTED	
REDACTED	
REDACTED	
REDACTED	
REDACTED	
REDACTED	
REDACTED	
REDACTED	
REDACTED	
Specific referral circumstances:	
REDACTED	
REDACTED	
REDACTED	
REDACTED	

Other: [add detail]	
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9.2 REDACTED

REDACTED	REDACTED	REDACTED	REDACTED
REDACTED	REDACTED	REDACTED	REDACTED
REDACTED			

9.3 REDACTED

Effective Date REDACTED
Last Review Date REDACTED
Next Review Date
Owner REDACTED
Approved by REDACTED
Audience REDACTED