

## PRIVACY IMPACT ASSESSMENT

Completing a Privacy Impact Assessment (PIA) is a legal requirement. Information Asset Owners are responsible for ensuring a PIA is completed at the project initiation stage.

The PIA process helps identify how the proposed project may impact on personal data privacy rights and freedoms and how you can mitigate against those risks. The form must be completed by the service/project lead and should be integrated with your project management process. One PIA should be completed for each proposed new process/change.

Please refer to the [Privacy by Design Policy](#) and the [Completing a Privacy Impact Assessment SOP](#) for guidance and to understand the requirements of the process.

Please contact the Information Governance Team for advice and guidance on completing the form and send the completed form to [ccs.accesstoinfo@nhs.net](mailto:ccs.accesstoinfo@nhs.net) for risk assessment and approval. Any risks identified as unacceptable by the DPO must be referred to the SIRO for approval and the project cannot be completed until this has been authorized as an acceptable level of risk by the SIRO.

In cases of high risk there may be a need to seek approval for the project from the Information Commissioner and your project plan must take account of this.

**Please enter your response in the white boxes**

### Q1 Details of IAO project lead

<b>Name</b>	
<b>Job Title</b>	
<b>Directorate</b>	
<b>Telephone</b>	
<b>Email</b>	

### Q2 Details of Information Asset Owner and the Information Asset Administrator for this project

Information Asset Owner		Information Asset Administrator	
<b>Name</b>		<b>Name</b>	
<b>Job Title</b>		<b>Job Title</b>	
<b>Directorate</b>		<b>Directorate</b>	
<b>Telephone</b>		<b>Telephone</b>	
<b>Email</b>		<b>Email</b>	

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<b>Q3 Name of the project/ change to process</b>	
<b>Q4 Project or scheme reference number</b>	
<b>Q5 Estimated project completion date</b>	
<b>Q6 Why has the project been initiated?</b>	
<b>Q7 Is it a new form of processing or use of data?</b>	
<b>Q8 What is the source of the data?</b>	
<b>Q9 What volume of personal data will be used?</b>	
<b>Q10 What is considered 'high volume' in your service area?</b>	
<b>Q11 Can any of the personal data be anonymized without limiting the aim of the project?</b>	
<b>Q12 Is the use of the data necessary and proportionate to the aim of the project?</b>	
<b>Q13 Is there another way you can achieve the project aim without the use of some or all the personal data?</b>	
<b>Q14 What are the benefits to the individual of their personal data being used for this project?</b>	
<b>Q15 What are any potential negative impacts to the individual's rights and freedoms as a result of their personal data being used? How will you overcome them?</b>	
<b>Q16 Would the data subjects expect such use of their data?</b>	
<b>Q17 Have individuals been given or will they be given the opportunity to refuse permission to use their data for this project? If the use of the data does not rely on consent to share confidential data, or consent as a lawful basis for processing, this may not be necessary.</b>	

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<b>Q18 Have they had an explanation of how this will impact their access to our service(s)?</b>	
<b>Q19 Have you consulted with stakeholders?</b>	
<b>If so, when and how?</b>	
<b>Q20 Does it use new technology? Please include hardware and software. If so, has the IT specification been approved by IT? Please provide a date and proof of authorisation</b>	

<b>Q21 Does the project use any of the following data?</b>	<p><b><u>Personal</u></b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Personal identifiable details (e.g. name, address, e-mail address, postcode, date of birth)</li> <li><input type="checkbox"/> Identifier numbers (e.g. NHS, national insurance, passport, driving license numbers)</li> <li><input type="checkbox"/> Family, lifestyle and social circumstances (e.g. marital status, housing)</li> <li><input type="checkbox"/> Education and training details</li> <li><input type="checkbox"/> Employment details</li> <li><input type="checkbox"/> Financial details</li> <li><input type="checkbox"/> Information related to legal proceedings</li> <li><input type="checkbox"/> Location data (e.g. GPS, vehicle tracking)</li> <li><input type="checkbox"/> Technology identifiers (e.g. IP addresses, cookie identifiers,</li> </ul> <p><b><u>Special</u></b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Health data ( physical or mental health ) outcomes, sentences including offences or alleged offences)</li> <li><input type="checkbox"/> Genetic data (e.g. DNA, an individual's gene sequence)</li> <li><input type="checkbox"/> Biometric data (e.g. fingerprints, facial recognition, retinal scans)</li> <li><input type="checkbox"/> Race or ethnic origin</li> </ul>
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	<input type="checkbox"/> Political opinions, religious or philosophical beliefs <input type="checkbox"/> Criminal proceedings (e.g. convictions or charges) <input type="checkbox"/> Vulnerable children or adults <input type="checkbox"/> Sex life or sexual orientation <input type="checkbox"/> Trade Union Membership
<p><b>Q22 Does the project include any of the following activities; this needs to identify any activity by CCS or a third party, including sub-contractors.</b></p>	<input type="checkbox"/> Evaluation or scoring, including profiling (e.g. credit scoring, fraud protection, questionnaire's that generate a profile to an individual) <input type="checkbox"/> Automated decision-making (where a decision is taken without human intervention e.g. automated system, algorithms) <input type="checkbox"/> Direct marketing (e.g. newsletters, postcards, telemarketing, e- mail subscriptions) <input type="checkbox"/> Systematic monitoring of individuals (e.g. CCTV, body camera's, health data through wearable devices) <input type="checkbox"/> Storing or transferring data outside the UK (e.g. cloud computing, accessing data outside the UK, ) <input type="checkbox"/> Processing data on a larger scale <input type="checkbox"/> Disclosure or sharing of information or data <input type="checkbox"/> Retrieval, obtaining, recording or holding information or data <input type="checkbox"/> Alignment, matching, combining, organisation, adaptation or alteration of information or data <input type="checkbox"/> Consultation or use of information or data <input type="checkbox"/> Blocking, erasure or destruction of information or data
<p><b>Q23 Where you have identified any of the above activities, please provide detail of what and how e.g. direct marketing by emailing service availability to school children</b></p>	

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<b>Q24 What is the lawful basis for collecting/processing this data?</b>	Personal: <span style="border: 1px solid black; padding: 2px;">Choose an item.</span> Special: <span style="border: 1px solid black; padding: 2px;">Choose an item.</span>
<b>Is this identified in the service's privacy notice?</b>	<span style="border: 1px solid black; padding: 2px;">Choose an item.</span>

<b>Q25 Do you have a process for deleting or amending data if an individual requests to be forgotten, it is wrong or there is a request to restrict processing?</b>	
<b>Q26 Describe the process/system which enables timely location and retrieval of personal data to meet subject access rights</b>	
<b>Q27 Are you planning to share this personal data with any other internal service? Provide details of who and why</b>	
<b>Q28 If you are planning to share this data with external services do you have a contract or an approved Information Sharing Agreement (ISA) in place? Please provide the reference number or name</b>	
<b>Q29 Who will have access to the system and how will access be controlled?</b>	
<b>Q30 Are you using a data processor?</b>	
<b>If so, have you got agreed terms?</b>	
<b>Q31 What measures will you take to ensure processor compliance? e.g. audit</b>	
<b>Q32 Where will the data be archived and for how long, if this is outside the Retention Schedule period.(hyperlink)</b>	

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Q33 How will you ensure that all users of the data have attended mandatory/follow up data protection training?		
Q34 What identified risks are involved with the use of the data? Please identify each risk		
How will each of those risks be mitigated?		
Q35 When and how will they be incorporated into the project plan?		
Q36 DPO's risk assessment of project compliance with GDPR and likelihood of non-compliance.	<b>Date:</b> <a href="#">Click here to enter a date.</a> <b>Risk Level:</b> <span style="background-color: #e0f2f1;">Choose an item.</span> <b>Likelihood:</b> <span style="background-color: #e0f2f1;">Choose an item.</span>	<b>Date:</b> <a href="#">Click here to enter a date.</a> <b>Risk Level:</b> <span style="background-color: #e0f2f1;">Choose an item.</span> <b>Likelihood:</b> <span style="background-color: #e0f2f1;">Choose an item.</span>
Q37 DPO conclusions regarding this project's overall compliance with GDPR.		
Q38 DPO recommendations for changes/refinements to the project which are required to ensure compliance.		

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<b>Q39 Has the DPO's advice been overruled? If so, this must be authorised by the SIRO before implementation can proceed.</b>	SIRO signature and date
<b>Q40 Is the project to be referred to the Information Commissioner's Office for approval?</b>	

# PRIVACY IMPACT ASSESSMENT

## DECLARATION

This DPIA form and declaration **must** be completed and returned to [ccs.accesstoinfo@nhs.net](mailto:ccs.accesstoinfo@nhs.net)

**Responsible project lead:**

**Project name:**

**Project or scheme reference number:**

**PIA reference number:**

**None** of the screening questions within this document apply to the above project; therefore I feel that it is not necessary to complete the full Privacy Impact Assessment.

**Signed:**

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**Dated:**

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