

Draft Privacy Impact Assessment Relating to the Proposed Project – Agile working for Social Care teams (20/02/18)

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

Information is currently collected about individuals, but improved technology will offer opportunities to do direct work recording conversations with citizens and will allow direct electronic recording of visit notes and decisions

It will be possible to take photos of children, their families and their homes with the new technology. This is compliant with best practice social care relating to recording the lives of looked after children and is a statutory responsibility of the Council

It is hoped that electronic signatures will be enabled allowing quicker and more direct authorisation and agreements to be reached with service users and to reduce paper copies of documents.

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

There will be no new requirement placed on service users to provide information.

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

It is not envisaged that information about individuals will be disclosed to organisations or people who have not previously had routine access to the information as a result of this project

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?

We plan to enable electronic signatures

We plan to enable taking photographs

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.

It is not envisaged that this project will involve new technology that is privacy intrusive

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 decisions are made as a result of social care visits that have significant impact on individuals including children, adults and families – this is currently the case, and this project does not change the type of decisions or action that is made.

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.

All information held on mobile devices is held securely and uploaded to the main database once the BCC member of staff returns to an office base. There are no new privacy concerns or expectations, in the future information will be recorded electronically while the member of staff is out visiting.

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

The project may increase the ways the council can contact individuals which they may find less intrusive eg by text. This would be managed with their permission.

Consultation

1. Who is involved in this project/change? Please list stakeholders, including internal, external, organisations (public/private/third) and groups that may be affected by this system/change.

2. How will you carry out the consultation? You should link this to the relevant stages of your project management process.

Please provide your answers here:

Data being collected

1. What data is being collected, shared or used?			2. Justifications? There must be justification for collecting the particular items and these must be specified here – consider which data items you could remove, without compromising the needs of the project?
Personal data	Yes	N/A	Justification
Name	✓		This is not new data being collected – it is already held on BCC databases. The data will be accessed via a mobile device eg a tablet in order to work with the Service users.
Any ID number e.g. Passport number, NI, NHS, internal ID.	✓		
Location data (e.g. Address)	✓		
Online identifiers*		✓	
Physical data		✓	
Physiological data		✓	
Information relating to the financial affairs of the individual		✓	
Information relating to the family of the individual and the individuals lifestyle and social circumstances	✓		May be held in the notes section of the Liquid Logic system
Racial origin	✓		Personal details may be held in the Social care ICT system
Ethnic origin	✓		Personal details may be held in the Social care ICT system
Political opinions		✓	
Information relating to the individual's religion or other beliefs		✓	
Philosophical beliefs		✓	
Information relating to the individual's membership of a trade union		✓	
The processing of genetic data		✓	
Biometric data identifiers e.g. Voice, CCTV images		✓	
Information relating to the individual's physical or mental health or condition	✓		Information relating to citizens social care needs will be held in the Social Care ICT system
Information relating to the individual's sexual life		✓	
Information relating to any offences committed or alleged to be committed by the individual	✓		Information relating to citizens social care needs will be held in the Social Care ICT system
Information relating to criminal proceedings, outcomes and sentences regarding the individual	✓		Information relating to citizens social care needs will be held in the Social Care ICT system

Information which relates to the education and any professional training of the individual		√	
Employment and career history		√	
Sexual orientation	√		Information relating to citizens social care needs will be held in the Social Care ICT system
Genetic data		√	

*Online identifiers - cookies, IP addresses, radio frequency ID tags, applications etc.

6. Information Flows and Business Processes

Describe the information flows of the project. Detail the collection, use, storage and deletion of the information. Explain who it is obtained from and disclosed to and who will have access to it. Identify the potential future uses of information, even if they are not immediately necessary. Identify how many individuals are likely to be affected by the project.

This process can help to identify potential 'function creep' - unforeseen or unintended uses of the data (for example data sharing). Consult with the people, who will be using the information, identify any practical implications.

Please insert visual representation here.

To be identified as the new technology becomes available.

The mobile applications are designed so that citizen records are downloaded onto the mobile device eg tablet before a visit, and information recorded at the visit is uploaded onto the main database on return to the office base. Data is not stored on the mobile device beyond this.

Privacy Assessment

	Question	Response
Legal compliance – is it fair and lawful?	1. Is the processing of individual’s information likely to interfere with the ‘right to privacy’ under Article 8 of the Human Rights Act ?	No
	2. It is important that individuals affected by the initiative are informed as to what is happening with their information. Is this covered by fair processing (Privacy Notices) information already provided to individuals or is a new or revised communication needed?	<i>To be confirmed</i>
	3. If you are relying on consent to process personal data, how will consent be obtained and recorded, what information will be provided to support the consent process and what will you do if permission is withheld or given but later withdrawn?	<i>To be confirmed</i>
	4. Does the project involve the use of existing personal data for new purposes?	No – there is no intention of using existing data for new purposes. The existing data will be used in a more direct way with service users as it will be available during visits to citizens homes
Purpose	5. Are potential new purposes likely to be identified as the scope of the project expands?	This is possible and it is expected that electronic signatures will be introduced which it is hoped will improve service delivery. A photo policy will be required
	6. Is the information you are using likely to be of good enough quality for the purposes it is used for?	Yes
Adequacy	7. Will any of the data be classed as Open Data?	No

	8. Are you able to amend information when necessary to ensure it is up to date?	Yes – the mobile devices will enable this to happen and for information to be held in real time.
Accurate and up to date	9. How are you ensuring that personal data obtained from individuals or other organisations is accurate?	BCC professional conduct during visits/interviews
	10. What are the retention periods for the personal information and how will this be implemented?	To be confirmed
Retention	11. Are there any exceptional circumstances for retaining certain data for longer than the normal period?	Looked after children can expect the authority will hold data about their childhood for their lifetime. This needs to be planned and a policy will be needed.
	12. How will information be fully anonymised or destroyed after it is no longer necessary?	To be confirmed
	13. How will you action requests from individuals (or someone acting on their behalf) for access to their personal information once held?	See above – policy required
Rights of the individual	14. How will you locate, isolate, delete or restrict access to the data of an individual who has exercised their right to erasure or restriction of processing?	See above – policy required
	15. How will you locate, isolate and provide data to an individual who requests their data is provided in machine readable form for transfer to another data controller – i.e. the right of portability? This right applies where either contract or consent is used as the legal basis for processing.	See above – policy required
	16. What procedures are in place to ensure that all staff with access to the information have adequate information governance training?	See above – policy required

Appropriate technical and organisational measures	17. If you are using an electronic system to process the information, what security measures are in place?	Mobile devices have penetration testing and are subject to ICT standard security measures including remote disablement of lost or stolen devices, password protection.
	18. How will the information be provided, collated and used?	To be confirmed
	19. What security measures will be used to transfer the identifiable information?	To be confirmed
	20. Will individual's personal information be disclosed internally/externally in identifiable form and if so to who, how and why?	To be confirmed where partner working is in place. New policy may be needed for this area of work
Transfers both internal and external including outside of the EEA	21. Will personal data be transferred to a country outside of the European Economic Area? If yes, what arrangements will be in place to safeguard the personal data?	No
	22. Who should you consult to identify the privacy risks and how will you do this? Identify both internal and external stakeholders. <i>Link back to stakeholders on page 3.</i>	To be confirmed where partner working is in place. New policy may be needed for this area of work
Consultation	23. Following the consultation – what privacy risks have been raised? E.g. Legal basis for collecting and using the information, security of the information in transit etc.	A pilot project will include privacy issues

Guidance used	24. List any national guidance applicable to the initiative that is referred to.	n/a
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Identified privacy and related risks and evaluate privacy solutions



BCC Privacy Impact Assessment Risk Log

All risks and privacy solutions above are signed off by the following:

Project lead:

Name:	Stephen Beet / Angela Clarke
Position:	Service Leads for Social Care Teams
Organisation name:	The City Council of Bristol

Information Asset Owner:

Name:	To be confirmed
Position:	
Organisation name:	The City Council of Bristol

Data Protection Officer:

Name:	To Be confirmed
Position:	Data Protection Officer
Organisation name:	The City Council of Bristol

PIA Review Date:

Date	20/02/18
Reviewer:	Kate Broadbridge – Project Manager