Bristol City Council

Information Impact Assessment
Project: Mobile Working for Social Care Teams

The proposal?
The proposal is to deploy tablets and a mobile Liquid Logic app to Social Care teams (social workers and other job roles) so that they can have access to the existing Social Care ICT system – LiquidLogic. Access will be through either WiFi, or through the Liquid Logic Mobile app. The mobile app allows download of specific records or caseloads, work while out of the office and then upload of the recoreds into the main database.   The mobile app has extended functionality allowing electronic signatures.   Photos can be taken and stored securely in the mobile app and are erased from the device when uploaded into the main database.   The use of tablets will increase the number of locations where Social Care teams can work.   **The proposal is to deploy better phones to Social Care teams (either better basic phones or smartphones). It will allow teams to be connected to email, texts and electronic calendars.**   **This proposal is to deploy smartphones to Reablement and Rehabilitation teams. This will allow access to the Staff Roster system and replace paper rosters. It will allow teams to be connected to email, texts and electronic calendars, as well as mapping apps.**   **The use of tablets and smartphones will allow connection to the internet** so that Social Care teams can connect service users with a "world of resources" eg info about support groups or local activities.

Document Control

General Document Information	
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Revision History			
Version	**Revision Date**	**Description /Reason for change**	**Author (name and role)**
1.01	18/08/2014	Updated form to new single change livery	James Gay

Project Details

PM Contact details	
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Project Timetable estimates	
Shaping	Start: End:
Planning:	Start: 1.9.17 End: 22.11.17:
Procurement:	Start: 23.11.17: End: 31.12.17
Delivery:	Start: 23.11.17 End: 31.12.18

Information Management Review (Completed by IM Team)

Information Management Team	Recommendation
Information Security Team: Bernadette Keen	
Senior Data Protection Officer: Lynne Miller	
Information Management Advisor: James Gay	

(Completed by IM Team)

Further Action Required	Action Required?
Internal Sharing Agreement **Required?**	Y/N
External Sharing Agreement **Required?**	Y/N
Information Security Risk Assessment **Required?**	Y/N
Information Risk Assessment **Required?**	Y/N
Is a Limited or Full Privacy Impact assessment **Required?**	Y/N Limited/Full

Information Questions – delete Y or N as appropriate

(a) Is the project likely to change the acquisition, processing, storage or disposal of information in any of the following categories?

> *NB: 'Acquisition' includes the collecting, buying, generating and obtaining from other bodies; 'Processing' includes the reading changing and combining; 'Storage' (in any format including paper); and 'Disposal' includes the retention, deletion, destroying or not disposing of information.*

Information Category	Acquisition	*Processing*	Storage	Disposal
Customers:	Y	Y	Y	Y
Children:	Y	Y	Y	Y
Adults:	Y	Y	Y	Y
General Public:	N	N	N	N
Council Employees:	Y	Y	Y	Y
Council property/buildings:	N	N	N	N
Council 'unfixed' assets e.g. vehicles /equipment:	N	N	N	N
Other property/buildings:	Y	Y	Y	Y
Council finances:	N	N	N	N
Payments (in or out):	N	N	N	N
Other organisations, their staff and clients:	N	N	N	Y
Business processes, performance and capacity:	Y	Y	Y	Y

(b) Does the project involve processing personally identifiable information fall outside the EEA region, if it is, is a Safe Harbour Agreement in place? For more information from the ICO, read [here](#)

No	**Is within EEA region**

(c) Will the project involve other organisations? Is this likely to involve exchanging information with them?

No	This is outside the scope of the current project. This project focuses on BCC ways of working and processes
	There is a future possibility that the Professional portal of the Liquid Logic product may be bought allowing secure exchange of information between health professionals.

(d) Is the project likely to provide or require new information or information analysis to support performance management, planning or decision making?	
Yes	Mobile working does require new or different management and performance management styles. These are already current within BCC.

(e) Does the project itself (rather than its outcomes) need new information or analysis to succeed or operate at an acceptable level of risk? If so at which stage(s)?	
Learning:	Yes- User involvement and well managed pilots will be required to ensure mobile working is at an acceptable level of risk and that the project can succeed as expected at all stages of the process and across various job roles.
Shaping:	
Planning:	
Delivery:	
Business As Usual:	This will include deployment of new hardware (eg tablets) and mobile apps (eg Liquid Logic Adults and Childrens product) as well as new working processes (eg ability to access Social Care records in different environments such as in court/ in a service users home)

Privacy screening questions (recommended by the Information Commissioner)

(1) Does the project apply new or additional information technologies that have substantial potential for privacy intrusion? *NB: Examples of relevant project features include a digital signature initiative, a multi-purpose identifier, interviews and the presentation of identity documents as part of a registration scheme, and an intrusive identifier such as biometrics. All schemes of this nature have considerable potential for privacy impact and give rise to substantial public concern and hence project risk.*	
Yes	**The project enables the potential to allow Social Care staff to take photos and take electronic signatures from service users.** **Delivery of these features requires policy work and is not within the scope of the current proposed project. The current project is to deliver hardware (tablets and phones) and implement new software (Liquid Logic mobile apps)**

(2) Does the project involve new identifiers, re-use of existing identifiers, or intrusive identification, identity authentication or identity management processes?

No	There is no identity or authentication identifier aspect of this project

(3) Will the project mean that citizens will be able to use new or changed service anonymously or pseudonymously?

NB: Anonymous is used to describe situations where the acting person's name is unknown. Pseudonymity, meaning 'false name', is a state of disguised identity.

No	The project is to carry out existing tasks using mobile technology

(4) Will the project convert transactions that could previously be conducted anonymously or pseudonymously into personally identifiable transactions i.e. to an individual?

NB: Many business functions cannot be effectively performed without access to the client's identity. On the other hand, many others do not require identity. An important aspect of privacy protection is sustaining the right to interact with organisations without declaring one's identity.

No	There is no identifiable transaction aspect to this project, and no transactions that will be converted into identifiable transactions as a result of this project.

(5) Does the project involve multiple organisations, whether they are government agencies (e.g. in 'joined-up government' initiatives) or private sector organisations (e.g. as outsourced service providers or as 'business partners')?

NB: Schemes of this nature often involve the breakdown of personal data silos and identity silos, and may raise questions about how to comply with data protection legislation.

No	This project enables closer working with partners, but is outside of the scope of this project which focuses on deploying tablets and smartphone and the mobile app – Liquid Logic.

(6) Does the project involve new or significantly changed handling of personal data that is of particular concern to individuals?

NB: *'Sensitive personal data' such as racial and ethnic origin, political opinions, religious beliefs, trade union membership, health conditions, sexual life, offences and court proceedings. Other categories of personal data that may give rise to concern including financial data, particular data about vulnerable individuals, and data which can enable identity theft.*

Yes	Deployment of tablets and/or smartphones will allow ready access to take photos. If photos are taken within the Liquid Logic App they are secure and removed from the device when uploaded into the database. New photo management policies will be required.
	Ability to work in a mobile way with personal data will require new guidance and policies eg what data can be shown on screen, how to ensure privacy of data, if work relating to personal data is acceptable in a public building

(7) Does the project involve new or significantly changed handling of a considerable amount of personal data about each individual within a council database or system?

NB: *Examples include intensive data processing such as welfare administration, healthcare, consumer credit, and consumer marketing based on intensive profiles.*

Yes	The potential to take and store photos will involve a significant change and may generate a lot of data that needs managing.
	Mobile working allows generation of personal while out of the office. This is a significant change to handling of personal data and will require new policies and guidance
	Storage of signatures is a significant change and may be enabled by this project – although is beyond the scope of this project.

(8) Does the project involve new or significantly changed handling of personal data about a large number of individuals?

NB: *Any data processing of this nature is attractive to organisations and individuals seeking to locate people, or to build or enhance profiles of them*

Yes	There are 11,500 live current Adult Social care cases and x Childrens Social care cases. Records are stored indefinitely. The Council have a statutory duty to keep information relating to social care –particularly relating to Looked after Children.

(9) Does the project involve new or significantly changed consolidation, inter-linking, cross-referencing or matching of personal data from multiple sources?

NB: *This is an especially important factor. Issues arise in relation to data quality, the*

diverse meanings of superficially similar data-items, and the retention of data beyond the very short term.	
No	**This project allows the same information to be processed and stored in different ways but does not change linking or cross-referencing of data from multiple sources.**

(10) Does the project relate to data processing which is in any way exempt from legislative privacy protections? *NB: Examples include law enforcement and national security information systems*	
No	**No there is no known exemption from Legislative privacy protections**

(11) Does the project's justification include significant contributions to public security measures? *NB: Measures to address concerns about critical infrastructure and the physical safety of the population usually have a substantial impact on privacy. Yet there have been tendencies in recent years not to give privacy its due weight. This has resulted in tensions with privacy interests, and creates the risk of public opposition and non-adoption of the programme or scheme.*	
No	**There is no contribution to public security from this project.**

(12) Does the project involve systematic disclosure of personal data to, or access by, third parties that are not subject to comparable privacy regulation? *NB: Disclosure may arise through various mechanisms such as sale, exchange, unprotected publication in hard-copy or electronically-accessible form, or outsourcing of aspects of the data-handling to sub-contractors.*	
Y/N	

Definitions

Anonymous service user: The information collected about and from the citizen makes it impossible to identify the individual.

Pseudonymous service user: The citizen is not directly identifiable as an individual e.g. they use an alias to consume the service. However the information collected about and from the citizen may still contain identifiers which could be linked to identify the individual.