# Appendix K1 Mandate Information Governance Relevance Check

This tool will identify the Information Governance (IG) impacts of a new change proposal. Complete part 1 of this form and it along with the project mandate, if you have one, to <a href="mailto:Information.management@bristol.gov.uk">Information.management@bristol.gov.uk</a> so that the Information Governance Service can provide professional advice and guidance.

Part 1: project / change proposal details

	What is the proposal?
Name of proposal.	<ul> <li>SEND Sufficiency &amp; Capital proposals:</li> <li>Elmfield &amp; Claremont Special Schools</li> <li>City of Bristol College (CoBC) – Independent Living Accommodation.</li> </ul>
Please outline the proposal.	The principle needs for the project are:  1. To increase the offer of pupil places for children and young adults with SEND.  2. To address the suitability and condition issues of the current buildings used for providing education to SEND pupils.
	The needs may be addressed via a proposed Masterplan project involving demolition, refurbishment and new build. In summary, in broad order of chronology:
	<ul> <li>Project A: Minor refurbishment of Redland Green School to enable Elmfield School for Deaf Children Secondary pupils to move from Fairfield School to Redland Green School.</li> </ul>
	<ul> <li>Project B: Full refurbishment, demolition and new build at the Bristol Education Centre to meet the needs of Elmfield School for Deaf Children Early &amp; Primary years.</li> </ul>
	<ul> <li>Project C: Construction and installation of temporary accommodation for Claremont Special School, to enable decant of pupils from Claremont Special School during construction works. Location of temporary accommodation TBA.</li> </ul>
	<ul> <li>Project D: Refurbishment, demolition and new build at Claremont Special School.</li> </ul>
	<ul> <li>Project E: Construction of a new Independent Living facility at the City of Bristol College,</li> </ul>

	Ashley Down Campus.
Who will answer any queries regarding the responses provided on this form?	Phil Lawrence MRICS Senior Project Manager For and on behalf of the Education Capital Team Phil.Lawrence@bristol.gov.uk

#### Does the change/project involve processing personally identifiable or special category information?

Please outline what Personal or Special Category data will be processed (see definitions below)?

As a project delivery team, Bristol City Council Education Capital Team will not be processing any Special Category date (BCC Education Capital Team will be managing the project with consultants and contractors teams, taking the Brief from the Head Teachers at the schools).

As part of the wider consultation, we anticipate the individual schools who are custodians of their pupil's data, will directly manage consultation with parents and pupils regarding proposals.

In connection with wider community consultation and the Planning and Statutory applications, we will need to undertake Public Consultations. Also, during the construction works, the appointed Contractor will need to communicate with the adjacent neighbours and community (to communicate potential disruptive activities at particular times during the build etc.).

For both community consultation, including Public Consultation, and assistance with the Contractors communication, BCC may need to collect and use Personal Date, such as names, addresses and contact details (phone/e-mail) only.

### Will the change/project involve other organisations? Is this likely to involve exchanging information with them?

Please outline which type of organisations e.g. internal BCC departments, voluntary sector, NHS etc. might receive our data and information as part of this project or to support the changes it proposes.

The principle stakeholders are the schools:

- Elmfield School for Deaf Children
- Claremont Special School
- City of Bristol College
- Upper Horfield Community School
- Redland Green School
- Fairfield High School

Other stakeholders / organisations who will be involved with the project will include, but are not limited to:

- Ward Councillors and Cabinet members
- Local Community Groups
- Lead BCC Officers and Head of Service (SLT)
- BCC Officers in various internal services (SEND, Legal Services, Property, Procurement etc.)
- Housing Delivery
- Appointed consultant supply chain
- Appointed Local Education Partnership (& Contractor, anticipated to be Skanska).

As above, it is envisaged that consultation with parents/ carers and pupils will be via the schools opposed to the BCC Education Capital Team.

## Is the change/project likely to provide/create or require new information? Or information analysis to support performance management, planning or decision making?

Please outline any new data or information the project/change will create.

The project will generate significant technical information (building design, construction related information, legal contracts etc.), plus vast and ongoing project management documents and correspondence.

# Will the change/project produce any publishable Open Data? (non-personal and non-commercially sensitive data)

Please see <a href="http://intranet.bcc.lan/ccm/content/articles/transformation/information-management-prog/information-we-publish.en">http://intranet.bcc.lan/ccm/content/articles/transformation/information-management-prog/information-we-publish.en</a> and detail what data might be 'Open' below

The Statutory applications (Planning, Land Use and Listed Building Consent) may be relevant to the Open Data.

We understand the project will be open to receiving Fol's.

### Is the change/project likely to change the acquisition, processing, storage or disposal of information?

Please outline the changes the project is likely to make (see definitions below)?

The project will generate a significant amount of data acquisition from our appointed supply chain; predominantly, but not limited to, forms of technical design and construction information.

There is potential for this information to be transmitted to other members of the supply chain and/or schools.

There will be a requirement for storage of data for a minimum 15-year period (Contract period plus latent defects and long stop).

#### Have you considered what security measures need to be in place?

Please outline the security testing which will be needed e.g. the ability to audit third party suppliers and their systems, penetration testing.

For forward discussion – we would very much welcome advice from ICT.

Due to the anticipated file size and frequency of data exchange, it would be very beneficial to be able to upload and download files to be able to share with the Schools, Consultants and Contractors.

Ар	provals
Person completing the Information	
Governance Relevance Check (e.g. project	
manager, manager)	
Person owning the change project / proposal	
(e.g. Service Manager, Director)	

#### Part 2: comments from Information Governance Service

Advice and guidance	
Data Protection Officer	

Information Security Manager	
Records Manager	
Information Management Advisor	
Freedom of Information Officer	
Head of Information Governance / Statutory	
Data Protection Officer	

If you are working on a formal business case (mandate, outline or full business case) then the comments above should be incorporated into the 'professional views' section of the business case.

### **Definitions**

disposal	'Acquisition' includes the collecting, buying, generating and obtaining from other bodies; 'Processing' includes the disclosing, viewing, amending, transmission, and combining; 'Storage' including archiving (in any format including paper), hosting, cloud storage; and 'Disposal' includes the retention, deletion, destroying or not disposing of information.
Personal Data	any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person
	Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.
Penetration testing	The practice of testing a computer system, network or Web application to find vulnerabilities that an attacker could exploit