PIA Screening Questions/Outline Business Case Options



The answers on this form will allow the Information Governance Advisors (IGAs) to determine whether you will need to complete a Privacy Impact Assessment (PIA) for your change proposal or project. Please send completed forms to Data Protection data.protection@bristol.gov.uk for review

What is the proposal?	
Name of proposal.	 SEND Sufficiency & Capital proposals. Elmfield & Claremont Special Schools. City of Bristol College – Independent Living building (Hawking House). Small works (various schools)
Please outline the proposal.	 Masterplan project involving demolition, refurbishment and new build. In summary, in broad order of chronology: Project A: Minor refurbishment of Redland Green School to enable Elmfield School for Deaf Children Secondary pupils to move from Fairfield School Redland Green School. Project B: Refurbishment, demolition and new build at the Bristol Education Centre to meet the needs of Elmfield School for Deaf Children Early Years. Project C: Construction and installation of temporary accommodation, location to be confirmed, internally specialist fitted to enable decant of pupils from Claremont Special School. Project D: Refurbishment, demolition and new build at Claremont Special School. Project E: Construction of a new Independent Living facility at the City of Bristol College, Ashley Down Campus. Project F: Demolition of Elmfield School and development of the site for residential purposes (by Housing Delivery).
Who will answer any queries regarding the	Phil Lawrence MRICS
responses provided on this form?	Education Capital Team

Provide details of any previous Privacy Impact Assessment or other form of personal data compliance assessment done on this initiative. If this is a change to an existing system, a PIA may have been undertaken during the project implementation

Please provide your answers here: This is a new project. No Privacy Impact Assessment has been completed.

A Mandate Information Governance Relevance Check has been completed and the advice from BCC Information Governance Service is that it would be prudent to complete the PIA Screening questionnaire.

What personal data is being collected, shared or used?			Justifications for collecting, sharing or using the data	
Please ✓ each category which applies	Option 1	Option 2	Option n	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 or change? NOTE: BCC Education Capital Team will manage the construction project and will only be liaising with interested parties using work (non-personal) contact details. Communications will be with internal staff, consultants & contractors, plus principle school end users (Head teachers and any delegated staff).
				The schools will manage all communications with parents and pupils (the BCC Education Capital Team will not have any communications with pupils or students). Public consultation will be undertaken during the statutory Planning stages. Some personal data (names, addresses, e-mails and phone numbers only) may be collected at the public consultations by consultants commissioned by the BCC Education Capital Team. (In liaison with Data Protection Officer 20/07/2020 - TBC)
Name	\boxtimes			Yes, as above Note.
Date of birth				N/A
Email addresses	\boxtimes			Yes, as above Note.
Any ID number (e.g. Passport number, NI, NHS, internal ID)				N/A
Location data (e.g. Address)	\boxtimes			Yes, as above Note.
Online identifiers (e.g. cookies, IP addresses, usernames)				N/A
Physical data				N/A
Information relating to the financial affairs of the individual				N/A
Employment and career history				N/A

What sensitive personal / special category data is being collected, shared or used?			Justifications for collecting, sharing or using the data	
	Option	Option	Option	
	1	2	n	
Information relating to the family of the individual and				N/A
the individuals lifestyle and social circumstances				
Information relating to the individual's physical or				N/A
mental health or condition				
Racial origin				N/A
Ethnic origin				N/A
Political opinions				N/A
Information relating to the individual's religion,				N/A
philosophical beliefs or other beliefs				
Information relating to the individual's membership of				N/A
a trade union				
The processing of genetic data (e.g. DNA)				N/A
Biometric data identifiers (e.g. finger print, voice or				N/A
facial recognition)				
Information relating to the individual's sexual life or				N/A
sexual orientation				
Information relating to any offences committed or				N/A
alleged to be committed by the individual				
Information relating to criminal proceedings, outcomes				N/A
and sentences regarding the individual				

The GDPR (General Data Protection Regulation) sets out the situations where the organisation will need to carry out a data protection impact assessment where the processing is considered high risk.

Mandatory Grounds			
Please identify if your option plans to:	Option 1 Yes or No	Option 2 Yes or No	Option cont. Yes or No
Process Personal/Sensitive Personal data or criminal offence data to help make decisions on someone's access to a service, opportunity or benefit?	No		
Use systematic profiling or automated decision-making to help make decisions on someone's access to a service, opportunity or benefit?	No		

Process Personal/Sensitive Personal data or criminal offence data on a large scale?	No
Define large scale by stating the total number of data subjects processed by the service and the percentage likely to be processed by the new change.	
Systematically monitor publicly accessible places on a large scale?	No
Define large scale by stating the total number of data subjects processed by the service and the percentage likely to be processed by the new change.	
Use new technologies / software applications / line of business systems for council use?	No
Process biometric (e.g. finger print or facial recognition) or genetic (e.g. DNA sampling) data?	No
Combine, compare or match Personal/Sensitive Personal data from multiple sources?	No
Process Personal/Sensitive Personal data without providing a privacy notice directly to the individual?	No*
(In liaison with Data Protection Officer 20/07/2020 - TBC)	
Process Personal/Sensitive Personal data in a way which involves tracking individuals' online or offline location or behaviour?	No
Process children's Personal/Sensitive Personal data?	No
Process adult's Personal/Sensitive Personal data?	No
Process Personal/Sensitive Personal data for marketing purposes?	No
Process Personal/Sensitive Personal data in order to offer online services directly to them?	No
Process Personal/Sensitive Personal data which could result in a risk of physical harm in the event of a security breach?	No

Discretionary Grounds			
Please identify if your option plans to:	Option 1	Option 2	Option cont.
	Yes or No	Yes or No	Yes or No
Evaluation or scoring that would produce a legal effect on an individual?	No		
Process more than 50% of the total number of data subjects recorded within the service	No		
Please state number of data subjects likely to be processed.			
Processing of data concerning highly vulnerable data subjects?	No		
Processing involving preventing data subjects from exercising a right or using a service or contract?	No		

PIA Screening Questions/Outline Business Case Options Outcome: To be completed by the DP Team

Data Protection Officer Approval		Outcome		
Name:	Clive Mackintosh.	•	PIA not needed	
Position:	Interim Statutory DPO	•	Full PIA needed	
Organisation name:	The City Council of Bristol	•	Light Touch Risk Assessment needed	
Date:				

Definitions

Personal data
Name
Date of Birth
Any ID number e.g. Passport number, NI, NHS, internal ID.
Location data (e.g. Address)
Online identifiers - cookies, IP addresses, radio frequency ID tags, applications etc.
Physical data
Information relating to the financial affairs of the individual
Employment and career history

Sensitive Personal / Special Category

Information relating to the family of the individual and the individuals lifestyle and social circumstances

Information relating to the individual's physical or mental health or condition
Racial origin
Ethnic origin
Political opinions
Information relating to the individual's religion, philosophical beliefs or other 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 sexual life or Sexual orientation
Information relating to any offences committed or alleged to be committed by the individual
Information relating to criminal proceedings, outcomes and sentences regarding the individual

EDUCATION CAPITAL TEAM 23/07/2020