

Appendix G - PIA Screening Questions



| What is the proposal? | |
|---|---|
| Name of proposal. | New Disabled Children's Home |
| Please outline the proposal. | <p>A three-bed disabled children's home will be built from BCC stock, with suitable adaptations that replicates the home environment for the children.</p> <p>With the proposed adaptations, this home will allow BCC to house 3 children with severe disabilities whom would otherwise be placed out of county as a result of the closure of Bristol's only home for Disabled Children that had been privately run. Of the three children previously housed at this home, two are temporarily placed at The Bush, a house designed for short-breaks, and one is placed out of county. This is disruptive to family life, their medical connections, and at an ongoing significant cost to the local authority in visiting and placement costs. In order for the identified site to be a suitable home for three children, the existing property would either need to be adapted and extended or replaced with a new build on the site.</p> |
| Who will answer any queries regarding the responses provided on this form? | Helen Haggi |

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: A relevance check has been completed and assessed by Data Protection team and advised that PIA screening questionnaire is required.

PIA was also completed for another project currently in delivery 'Re-profiling Children's Homes' to open 8 new homes over the next few years, which has similar requirements as this initiative.

| What personal data is being collected, shared or used? | | | | Justifications for collecting, sharing or using the data |
|--|--------------------------|--------------------------|--------------------------|--|
| <i>Please ✓ each category which applies</i> | Option 1 | Option 2 | Option n 3 | <i>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?</i> |
| Name | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

| | | | | |
|---|-------------------------------------|-------------------------------------|-------------------------------------|--|
| Date of birth | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | We know the age bracket of the 3 children as advised by the Service from records they already have to enable us to calculate lifetime cost of placement. |
| Email addresses | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Any ID number (e.g. Passport number, NI, NHS, internal ID) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Location data (e.g. Address) | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | Location address of the proposed new site will need to be shared during delivery with suppliers in order to enable the build and refurb of the home to happen. No other location information is being shared in regards to the children who will eventually be placed in the home. |
| Online identifiers (e.g. cookies, IP addresses, usernames) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Physical data | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | We know the 3 children who will move to the home will have complex health needs due to the nature of the home and as advised by the Service from records they already have |
| Information relating to the financial affairs of the individual | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | Average cost of x3 placements to BCC have been used to support OBC financials and provide accurate savings information to show difference between in-house and private/OOA placements. This is all existing information available from Finance Business Partner and records the service already has. |
| Employment and career history | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

| What sensitive personal / special category data is being collected, shared or used? | | | | Justifications for collecting, sharing or using the data |
|---|-------------------------------------|-------------------------------------|-------------------------------------|--|
| | Option 1 | Option 2 | Option n | |
| Information relating to the family of the individual and the individuals lifestyle and social circumstances | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Information relating to the individual's physical or mental health or condition | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | We know the 3 children who will move to the home will have complex health needs due to the nature of the home and as advised by the Service from records they already have |
| Racial origin | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Ethnic origin | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Political opinions | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Information relating to the individual's religion, | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

| | | | | |
|---|--------------------------|--------------------------|--------------------------|--|
| philosophical beliefs or other beliefs | | | | |
| Information relating to the individual's membership of a trade union | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| The processing of genetic data (e.g. DNA) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Biometric data identifiers (e.g. finger print, voice or facial recognition) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Information relating to the individual's sexual life or sexual orientation | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Information relating to any offences committed or alleged to be committed by the individual | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Information relating to criminal proceedings, outcomes and sentences regarding the individual | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

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 | Option3 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 – the project will not manage any personal data to determine anyone's access to a Service. This is led as standard by Children's Services who transfer any physical files and records pertaining to young people to their new home once they have moved in. | No | No | No |
| Use systematic profiling or automated decision-making to help make decisions on someone's access to a service, opportunity or benefit? | No | No | No |
| Process Personal/Sensitive Personal data or criminal offence data on a large scale? – No home placements for 3 children. 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. | No | No | No |
| Systematically monitor publicly accessible places on a large scale? 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. | No | No | No |

| | | | |
|---|-----|-----|-----|
| Use new technologies / software applications / line of business systems for council use? | No | No | No |
| Process biometric (e.g. finger print or facial recognition) or genetic (e.g. DNA sampling) data? | No | No | No |
| Combine, compare or match Personal/Sensitive Personal data from multiple sources? | No | No | No |
| Process Personal/Sensitive Personal data without providing a privacy notice directly to the individual? | No | No | No |
| Process Personal/Sensitive Personal data in a way which involves tracking individuals' online or offline location or behaviour? | No | No | No |
| Process children's Personal/Sensitive Personal data? – Yes to the extent outlined above | Yes | Yes | Yes |
| Process adult's Personal/Sensitive Personal data? | No | No | No |
| Process Personal/Sensitive Personal data for marketing purposes? | No | No | No |
| Process Personal/Sensitive Personal data in order to offer online services directly to them? | No | No | No |
| Process Personal/Sensitive Personal data which could result in a risk of physical harm in the event of a security breach? | No | No | No |

| Discretionary Grounds | | | |
|--|-----------------------|-----------------------|------------------------------|
| Please identify if your option plans to: | Option 1 Yes or No | Option 2 Yes or No | Option... cont. Yes or No |
| Evaluation or scoring that would produce a legal effect on an individual? – Yes in that we are creating more in-house placement provision so that the 3 children have more suitable placement that meets their needs fully. | No | Yes | Yes |
| Process more than 50% of the total number of data subjects recorded within the service Please state number of data subjects likely to be processed. X3 children have been identified by the Service to live in the home once built. | No | No | No |
| Processing of data concerning highly vulnerable data subjects? – Yes children | Yes | Yes | Yes |

| | | | |
|---|----|----|----|
| Processing involving preventing data subjects from exercising a right or using a service or contract? | No | No | No |
|---|----|----|----|

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

| Data Protection Officer Approval | | Outcome |
|----------------------------------|-----------------------------|---|
| Name: | Ben Hewkin | <ul style="list-style-type: none"> no PIA needed as is low risk and relates to some use of PD relating to 3 people. Previous project PIA Screening comments about transfer of paper records still stands. No mandatory/discretionary grounds are met. |
| Position: | Statutory DPO | |
| Organisation name: | The City Council of Bristol | |
| Date: | 31/07/2020 | |

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 |