



Appendix 4

Data Protection Impact Assessment Screening Checklist

(To be used by the officer planning to commission a service, only where a large volume of Personal Data is expected to be handled or high-risk projects will be undertaken in relation to Personal Data)

This form will allow you to establish whether your project or commissioned service is likely to need a DPIA as well as what you are sharing and why. It will also help with the procurement and contract because it gathers information we need to know what clauses we need to include to protect the authority and its customers. Once completed send to the DPO for record retention.

| Key Information | |
|---------------------------------------|--|
| Project Name: | |
| Project Manager: | |
| Responsible officer: | |
| This checklist has been completed by: | |

| Project Information |
|---|
| What does the project aim to achieve? <i>This needs to be in clear and simple language. Remember people reading this are not subject matter experts in the way you are.</i> |
| Who are the parties involved? <i>This could be the authority, service providers, health partners or internal colleagues.</i> |
| What the benefits will be to the organisation? <i>This could be a better service, streamlining the process, making savings or enabling our staff to work more effectively</i> |
| What are the benefits to service users? <i>This should carry out equal weight to the benefits to the authority. It could be a better service because it helps coordinate all the different people working with a client or making it easier to contact us.</i> |

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| Are there any risks to the service user and/or the authority? <i>This is about identifying any risks such as sharing too much information, storing information in the cloud, sharing with new partner. This is important because we need to say what we will put in place to prevent these impacting on service users or the authority.</i> |
| Is this a new project? If so, then what is the expected go live date |

The next questions are asked because we need to understand what information is being used and whether this is about people. Whether we are dictating exactly what someone does with the information or whether we are asking them to deliver a service on our behalf or whether they will just be sending us some performance data, someone is using data about a person.

| Data Protection | |
|--|--|
| Will anyone in this project collect, share or use information about people? Such as service users, employees, customers. NO - If the answer is no, you do not need to complete this form – a DPIA is not required. YES - If the answer is yes, please continue. | |
| Describe what kind of information will this project/service need? <i>You should also think about whether you do need full, minimised, pseudonymised or anonymised information. If you state that it needs to be anything other than anonymised then you need to list what it kinds of information it will use e.g. names, addresses, health, social care and so on.</i> | |
| Describe what if any information the authority will share with any party and why? <i>This could be referring a customer to a provider so we need to give the provider that information to deliver the service</i> | |
| Describe what if any information the provider/party will share with the authority and why? <i>This could be feeding back into a social care case, providing performance statistics or a report on progress of the service</i> | |
| Are we asking another party to do the work as if we were delivering it? <i>This is important for us to understand the way the service is going to be delivered</i> | |
| Do we specify exactly what they can do with any data they collect, or can they determine what they do? <i>This is helps us understand who is a controller and who is a processor.</i> | |

| Mandatory data protection impact assessments If one of the following situations apply then you must complete a DPIA | | | |
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| | Example | Yes | No |
| Are you going to be regularly using software to analyse and predict behaviour which helps to make significant decisions about people? | <i>This could be software which we use every week or month to look at personal data and analyse what people are doing so that we can tailor services to them</i> | | |
| Are you using sensitive personal data like health, sexuality or criminal offence data on a large scale? | <i>This could be using introducing a new system to use lots of information about social care service users</i> | | |
| Are you regularly monitoring a public space on a large scale? | <i>This will most likely be CCTV or other such monitoring systems</i> | | |

| High Risk Processing It is also mandatory to complete a DPIA where what we are doing could be considered <i>high risk</i> . If one of the following situations applies then we will also need to complete a DPIA | | | |
|---|---|-----|----|
| Question | Example | Yes | No |
| Are you using new technology like artificial intelligence or “internet of things” devices like smart meters? | <i>This may be information that we already hold but we are going to use new technology to do something different with it</i> | | |
| Are you using software to profile and make automated decisions as a one off to make decisions on whether someone can access a service? | <i>This means that we use software to analyse data we hold and automatically decide whether someone should get a service from the authority</i> | | |
| Are you using sensitive personal data like health, sexuality or criminal offence data to make decisions on whether someone can access a service? | <i>This means that we use sensitive information about people to decide whether they should receive our support. This could be social care, SEN or youth offending data. It could be the most private data about them.</i> | | |
| Are you going to be analysing or predicting behaviour of lots of people? | <i>This may be a one off piece of work but we may use software to look at hundreds of people and try to analyse their actions</i> | | |
| Are you going to be using biometric or genetic data? | <i>This could be DNA we collect or using fingerprints as a means of authenticating access to a system</i> | | |
| Are you going to be data matching from a number of sources? | <i>This could be combining different data sets to create a single one such as identifying people who have not registered for something</i> | | |

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| Are you going to use personal data without informing the people whose data it is? | <i>We should explain to people what we are doing with a privacy notice however there are some situations such as fraud investigations when we will not tell people.</i> | | |
| Are you going to track someone's online or offline locations or behaviour? | <i>We could be taking IP addresses, access to apps or social media for example to track where service users are and understand their activities</i> | | |
| Are you going to be using the personal information of vulnerable children and/or adults? | <i>We have to take greater care when we are using data about those who are most vulnerable</i> | | |
| Are you making decisions about people who we have power over and would not ask them for the consent? | <i>We have power over our employees or others because of the contract we have with them which means we can make decisions without their consent</i> | | |
| Are you going to be using children's personal data to analyse behaviour, make any automated decisions, offer marketing or services directly to them? | <i>Anything that involves gathering information directly from children means that we need to take greater care</i> | | |
| Are you processing the kind of personal information which could put someone at risk of harm if it was misused or lost? | <i>This means that if this information was lost, could it cause someone distress or damage? Could they be at risk of identity fraud?</i> | | |

| People focussed DPIA | | | |
|---|---|-------------|----|
| Whilst it is not mandatory, it can be helpful if we are doing something new to think about it | | | |
| | Notes | Yes | No |
| Are you going to be obtaining new information from people? | <i>This could mean we are starting a new service and need to obtain information from people for the first time</i> | | |
| Are you going to take information we already have and use it for something new? | <i>We may hold a list of people who have been consulted about a property development and want to use it in transport planning project</i> | | |
| Are we obtaining information about people from new organisations? | <i>We may be entering a new partnership and be sharing information with a new provider, as well as getting it back</i> | | |
| Are we sharing information about people with new organisations? | | | |
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