

Privacy Impact Assessment

All IT systems, data processes, LBC projects and Governance Boards which collect and/or process personal data, whether staff or citizen related, must be subject to a privacy impact assessment (PIA). All PIA's will be approved by the Information Governance (IG) Steering Group to ensure that they comply with current technical and information governance requirements.

All data processing activity **MUST** comply with the General Data Protection Regulations (GDPR) 2018. The Privacy Impact Assessment process helps managers identify how the collection and use of people's personal data may affect their privacy and work out way to protect citizen's privacy at all times.

The form should be completed* by the service but support can be provided by the Information Governance Team (6398). Please return the completed form to feedback@luton.gov.uk for approval.

*One assessment should be completed for each system/process

Project type	Luton Access Referral	Project name	ReferNet
Department	C&C	System/Asset name	ReferNet
Lead officer	Michael-Francis Higgins	Service/Directorate	Cust Comm
Telephone	01582 510409 (internal 2409)	IG lead officer	Yvonne Salvin
Email	Michael-Francis.Higgins@Luton.gcsx.gov.uk	Telephone	7062
Data subject type	Citizen	Email	yvonne.salvin@luton.gov.uk

Planned start date

1: List all personal and sensitive data that you will be collecting as part of this project?

Personal Data: information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier
Sensitive Data: consisting of racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation

1. Personal Data: Name, Address, Date Of Birth, Employment Status, Telephone Number, Marital status, Number of Children, Financial/benefit welfare information, Ethnicity
2. Special Category Data: Physical or mental health, Accessibility issues

2: Why are you collecting this data and how do you intend to use it?
 - List each purpose.

1. The data is used to identify each individual and provide a service.
2. Disability/ Accesibility issues are needed to make sure we can provide the appropriate services without any barriers.
3. Address may be needed to send correspondance.
4. Postcodes won't be used to identify an individual but to plot on a map what areas of Luton access services the most.
5. Date of birth is required to make sure age relevant services can be provided, e.g referral to Age concern requires the client be 50+ years old.
6. Ethnic origin is required as some services target people from specific backgrounds, e.g. Luton Irish forum requires a certain percentage of their services to be provided to people of Irish origin.

3a: Do you have a lawful basis for collecting/processing this data?
 - List all relevant acts

No	<input type="checkbox"/>	
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Yes	<input checked="" type="checkbox"/>	Please list lawful basis for each processing activity	1. Public Task
3b: If you do not have a lawful basis will you be getting explicit consent for each processing activity?			
No	<input type="checkbox"/>	Why not?	
Yes	<input type="checkbox"/>		
Will you obtain consent at the point of collection?			Yes <input type="checkbox"/> No <input type="checkbox"/>
4: Have individuals been given the opportunity to refuse us permission to use their data for this project?			
No	<input type="checkbox"/>	Why not?	
Yes	<input checked="" type="checkbox"/>	How will this impact their ability to access the service?	They would not be able to have the full holistic service provided by the Luton Access Partnership.
Will you inform individuals of the consequences of refusing permission?			Yes <input type="checkbox"/> No <input type="checkbox"/>
5: Is automated decision-making and profiling included?			
No	<input checked="" type="checkbox"/>		
Yes	<input type="checkbox"/>	How?	
6: Do you have a process for deleting data if an individual requests to be forgotten or restrict processing?			
No	<input type="checkbox"/>	Why not?	
Yes	<input checked="" type="checkbox"/>	How?	A written request can be sent to LutonAccess@Luton.gov.uk for a person's data to be deleted or anonymised within a 28 day period starting the day after the request.
7: Are you planning to share this personal data with any other internal service?			
- List each internal service and the reason for access.			
Only the referrer-in, the data processor and the referred to will see the data from each individual referral.			
8a: Are you planning to share this personal data with any other external service?			
- List each external service and the reason for access			
Any organisation that refers into Luton Access will be provided with updates on the progress of a referral. Only the referrer-in, the data processor and the referred to will see the data from each individual referral. Outside organisations include: Advice Central, Building Blocks Children's Centre, Citizens Advice Luton, Disability Resource Centre, Embrace Life LGBT Links Luton, Flying Start - LBC, Flying Start South, Headway Luton Ltd, Healthwatch, Kennedy Scott, Level Trust, Live Well - Community Navigator, Luton Access Referral Intake, Luton All Women's Centre, Luton Irish Forum, Luton Law Centre, Luton Rights, Luton Youth Offending Service, Mind BLMK, Oasis Centre, Penrose Synergy, POhWER, Stepping Stones Luton, Stroke Association, The Salvation Army Debt Advice Service, Training pretend agency, University of Bedfordshire SU Welfare & Advice Service, ResoLUTIONs. This list is continually expanding. Some of these are part of the partnership and some will only be using ReferNet to refer it, please contact myself to explain further. They all provide services related to welfare benefits and health.			
8b: If you are planning to share this data with external services do you have an approved Information Sharing Agreement (ISA) in place?			
- You will need to send a copy with this form			

No	<input type="checkbox"/>	Why not?	
Yes	<input checked="" type="checkbox"/>	ISA Reference?	ISA.10062/ also a MOU - ISA/10040

9: What are the benefits to the individual of their personal data being used for this project?

They will get a holistic approach to their problems/issues. For example they may come in regarding rent arrears using the partnership we would want to understand if there are any other debts the cause of those debts and if there is any welfare benefit entitlement etc. rather than just dealing with a single issue presented.

10: What are the organisational benefits of the individual's personal data being used for this project?

1. Early recognition by the holistic approach is seeking to prevent greater secondary need and therefore greater cost to the organisation. An example of this would be if we could identify the reasons behind rent arrears and resolve accordingly at an earlier stage, this would prevent later homelessness and the costs associated.

11: What are the potential negative impacts to the individual of their personal data being used?

1. This is a non commercial venture therefore there are no negative impacts

12: How will you make sure that the personal data you are using is kept accurate and up to date?

Who will have access to the system and how will that access be controlled? Give description of potential users and authorisation process. Include process used when users leave employment and how the account will be disabled

Each individual referral would be treated individually. While a referral is open it is down to who received it to keep the information up to date

Referral partners will make referrals using ReferNet, the online, secure, web-based referral system during the lifetime of the project. Each Referral partner will need to agree to and adhere to the Referral protocol. All referrals sent through ReferNet can only be seen by; the sender, receiver and the Referral Co-ordinator

13: How will you ensure that all users have attended mandatory/follow up data protection training

LBC complete follow-up data protection training. In advance sending to all partners a letter to ensure they are GDPR compliant.

14: How long will you need to hold the personal data for?

Data will be kept for 12 months, this is so that we can provide accurate outcome reporting and so that we can identify returning service users.

15: Is the corporate retention schedule up to date?			
- Make sure you copy a link to the schedule here			
No	<input type="checkbox"/>	Why not?	
Yes	<input type="checkbox"/>	Link to retention schedule:	
16: Does the process/system enable timely location and retrieval of personal data to meet Subject Access request requirements?			
Describe retrieval process. If the process refers to another paper or electronic system then this process is also required, e.g. tracing of paper case notes by an electronic system:			
No	<input checked="" type="checkbox"/>	Why not?	It currently requires manually going through every referral to find specific data. Feature due to be added to system by May.
Yes	<input type="checkbox"/>	Retrieval process description:	

Information Governance Team's risk assessment of this project's overall compliance with GDPR and likelihood of non compliance

Risk score	Medium special category data being collected and shared. MOU and ISA in place
Likelihood score	Medium

Information Governance Team's conclusions regarding this project's overall compliance with GDPR

Assessment

Looking at this PIA the risk score is medium because of the health data being collected and likelihood is medium as you are sharing quite a lot of data eternally. However, you have an MOU and ISA in place. I would provide this with an amber score overall. So a medium priority for the council

The biggest risk is deletion of data.

Information Governance Team's recommendations for changes / refinements to the project which are required to ensure compliance.

Action: Ensure software is upgraded to enable auto search for completion of Subject Access Requests

Action: Get MOU and ISA signed by partners

Action: make sure retention schedule is up to date

PIA reference number

Approval

As lead officer, I confirm that the information recorded on this form is, to the best of my knowledge, an accurate and complete assessment of the potential privacy impacts of this project.

Name	Signature	Date
Yvonne Salvin		April 2018

Please return your signed and dated form to:

Information Governance Team
Luton Council
feedback@luton.gov.uk

If you have any questions about the Privacy Impact Assessment process, or if you need any help completing this form, please contact us using the email address, above, or by telephoning the Information Governance on 018582 546398

Privacy Impact Assessment reviewed and approved by Luton's Data Protection Officer:

Name	Signature	Date