

Privacy Impact Assessment - Step one

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	Customer Services General contact	Project name	General Contact
Department	Customer Service	System/Asset name	Workflow 360,
Lead officer	Hazel Lunn	Service/Directorate	Cust Comm
Telephone	01582 548460	IG lead officer	Yvonne Salvin
Email	hazel.lunn@luton.gov.uk	Telephone	7062
Data subject type	Citizen,	Email	yvonne.salvin@luton.gov.uk
Planned start date	Already in use		
1: List all personal and sensitive data that you will be collecting as part of this project?			
<p><i>Personal Data: information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier</i> <i>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</i></p>			
<ol style="list-style-type: none"> Title, First name, surname, address, person type, password, gender. These are routinely collected in certain circumstances we can also collect NI number, DOB, potentially violent status Special Category Data: Health information such as hard of hearing or blind. Person type is if they are a member of the public, councillor, landlord, solicitor, police etc. so basically the capacity in which they are contacting us most are public. 			
2: Why are you collecting this data and how do you intend to use it?			
- List each purpose.			
<ol style="list-style-type: none"> A contact record is created on W360 for each individual who contacts us. This contact is then linked to the relevant services ie; council tax, benefits, housing or ASC. The contact record is searchable and so any subsequent contact should be logged under the contact record. The contact records are a database of people who may contact us for multiple services. 			
3a: Do you have a lawful basis for collecting/processing this data?			
- List all relevant acts			
No	<input type="checkbox"/>		
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 checked="" type="checkbox"/>	Customer is advised of data protection statement when their contact record is created (flag on system is evidence)	
Will you obtain consent at the point of collection?			Yes <input checked="" 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 checked="" type="checkbox"/>	Why not?	We are collecting this data under public task
Yes	<input type="checkbox"/>	How will this impact their ability to access the service?	
Will you inform individuals of the consequences of refusing permission?			Yes <input type="checkbox"/> No <input checked="" 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?	Online request form for customers. Civica to delete data if approved
7: Are you planning to share this personal data with any other internal service?			
- List each internal service and the reason for access.			
Contact details are shared with the services who receive an item of work from that contact.			
8a: Are you planning to share this personal data with any other external service?			
- List each external service and the reason for access			
No			
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?	N/A
Yes	<input type="checkbox"/>	ISA Reference?	
9: What are the benefits to the individual of their personal data being used for this project?			

Detailed Information is captured at the first point of contact and passed to the correct service for action
 Customer services have access to a wealth of knowledge and can action simple requests easily and quickly at the first point of contact
 Complex cases will be passed to an expert right first time. This ensures that customer requests are dealt with quickly and right first time
 Customer Services are also able to identify and prioritise emergency or urgent cases and get them addressed quickly where appropriate

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

1. When a customer approaches the organisation or services we can search their record on a single field and find their details without having to re-ask or re-enter the information onto the system. This can save upto 3 minutes on a phone call
2. Provides the organisation with the ability to respond to simple requests at the first point of contact saving time and resources and improving customer satisfaction
3. Skilled customer services are experts at gathering the right information to enable a task to be completed right first time by the back office
4. The ability to prioritise emergency cases saves time and money and improves reputation. Also results in less failure demand such as complaints.

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

1. None

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

Users are created on W360 by Civica and role profiles given based on their job role which will restrict what records they can have access to.
 Advisors search for contacts each time a customer comes in or calls and validates their contact information.

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

All new starters are required to complete an elearning DPA module
 All staff are required to complete an annual refresher of the above
 Dedicated training time given for staff to undertake the above
 Policies and procedures available for all staff on the intranet
 Regular updates provided to staff through news letters and articles on the staff intranet

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

7 years - The contact record created in W360 is just the person record. This will then be linked to benefit, council tax, housing and adult social care records according to the service request they have contacted about. The advisor will be dealing with the complex enquiry. The contact record is the route into that enquiry and so advice records will be stored against that contact. 7 years is in relation to the time period for possible legal action against advice given. Simple service requests would be logged in APP and so would be picked up by whoever is doing the PIA for that system.

W360 is the document management and workflow system for many services and not the actual database. As such we only have

limited linked fields. We will be testing the document disposal module on W360 in the next few weeks which will highlight where we will have issues.

15: Is the corporate retention schedule up to date?

- Make sure you copy a link to the schedule here

No	<input checked="" type="checkbox"/>	Why not?	Contact data has not been cleansed for some-time. Awaiting module to be implemented on W360 to archive contact details.
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 type="checkbox"/>	Why not?	
Yes	<input checked="" type="checkbox"/>	Retrieval process description:	Search for contact. All records associated to that customer that have been linked and have access to view will be pulled up. Data can be exported.

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
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Likelihood score	Low no sharing
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Information Governance Team’s conclusions regarding this project’s overall compliance with GDPR

Assessment

Looking at this PIA the risk score is medium to high because of the types of data you are collecting but likelihood is low. I would provide this with an amber score overall. So not an immediate priority for the council

The biggest risk is retention. I don’t think a blanket 7 years is adequate. The long term goal would be for these cases to integrate into the relevant IT system and follow service led retention schedules.

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

Actions:

- Retention period agreed
- Retention schedule update
- Purge old data from the system

PIA reference number	
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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
Hazel Lunn	Hazel Lunn	

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
Yvonne Salvin	Yvonne Salvin	11 th May 2018