

Privacy Impact Assessment Template

This template is an example of how you can record the PIA process and results. You can start to fill in details from the beginning of the project, after the screening questions have identified the need for a PIA. The template follows the process which is used in the code of practice. You can adapt the process and this template to produce something which allows your organisation to conduct effective PIAs integrated with your project management processes.

Step one: Identify the need for a PIA

The report outlines the current approach of Aberdeen City Council towards waste enforcement, identifies gaps with the current approach and provides a proposal for the way forward.

There are over 4000 reported cases of fly tipping each year within Aberdeen City which includes anything from a bin bag next to a street bin, a piece of furniture or larger scale dumping from a vehicle. This figure could be potentially doubled by the unreported fly tipping that is proactively collected by the Waste and Street Cleansing teams. The 4000 reported cases cost an estimated £100,000 to collect and even more to dispose of. In addition to this the Waste team have regular complaints from the general public about businesses putting their waste into the domestic waste stream. This problem is not currently investigated by any team within the Council. As result of this a review of waste enforcement within Aberdeen City Council was carried out

Significant gaps have been identified by this review in the way that Aberdeen City Council manages its responsibilities to carry out waste enforcement, particularly in regards to the enforcement of fly tipping and businesses putting their waste into the domestic waste stream. An options appraisal detailing potential solutions to the identified gaps has been put together and full details can be found in the report.

It is recommended that option 2 is taken forward – the mid level enforcement approach. This would involve implementing a pilot project in the city centre for one year and seconding 2 officers into a dedicated waste enforcement role. Part of the role of these Enforcement Officers would be to issue Fixed Penalty Notices to individuals who are found to be breaching the law. It is for this reason that a PIA is required.

Step two: Describe the information flows

The same data collation and storage processes would be used by the Waste Enforcement Officers as is currently used by the City Wardens who have secure and well established processes in place. Information on an individual who is issued a FPN would be collated by the Enforcement Officer at the scene of the offence. This information is stored in a confidential database. A hard copy of the FPN is also stored along with the covering letter which is sent to the individual. This is stored for evidential purposes in case the case is referred to the Procurator Fiscal for a period of years. The hard copies are stored in a locked cabinet. It is estimated that an average of 3-5 FPNs will be issued each week to individuals.

Consultation requirements

Consultation can be used at any state of the PIA process.

There are a number of internal stakeholders who have been and will be further consulted during the implementation of this pilot project including:

- Environmental Services
- Environmental Health
- City Wardens
- Trade Waste
- Roads
- Waste and Recycling

All of the above services will have input into the PIA process can help to identify privacy risks and can advise on steps to take to address them.

Step three: identify the privacy and related risks

Identify the key privacy risks and the associated compliance and corporate risks. Larger scale PIAs might record this information on a more formal risk register.

Annex three can be used to help identify the DPA related compliance risks.

Privacy issue	Risk to individuals	Compliance risk	Associated organisation / corporate risk
Collation and storage of names and addresses of individuals	Loss of personal data		

Step four: Identify privacy solutions

Describe the actions you could take to reduce the risks, and any future steps which would be necessary (eg the production of new guidance or future security testing for systems).

Risk	Solution(s)	Result: is the risk eliminated, reduced or accepted?	Evaluation: is the final impact on individuals after implementing each solution a justified, compliant and proportionate response to the aims of the project?
Collation and storage of names and addresses of individuals	Systems must be put in place to ensure that the individual data data is stored securely and managed properly		

Step five: Sign off and record the PIA outcomes

Who has approved the privacy risks involved in the project? What solutions need to be implemented?

Risk	Approved solution	Approved by

Step six: Integrate the PIA outcomes back into the project plan

Who is responsible for integrating the PIA outcomes back into the project plan and updating any project management paperwork? Who is responsible for implementing the solutions that have been approved? Who is the contact for any privacy concerns which may arise in the future?

Action to be taken	Date for completion of actions	Responsibility for action

Contact point for future privacy concerns

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