Privacy Impact Assessment

Step one: Identify the need for a PIA

Explain what the project aims to achieve, what the benefits will be to the organisation, to individuals and to other parties.

You may find it helpful to link to other relevant documents related to the project, for example, a project proposal.

Also summarise why the need for a PIA was identified (this can draw on your answers to the screening questions).

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Will the programme involve the collection of new information about individuals?
No, this programme will not involve the collection of new information on individuals. The information in scope for the Master Data Management programme of works is information that is already held by Aberdeen City and Aberdeenshire Councils.

Will the programme compel individuals to provide information about themselves?
No, this programme will not compel individuals to provide personal information about themselves. However, the implementation of Master Data Management using existing personal information held about individuals (customers and employees) and appropriate consents will provide the mechanisms for changes made by individuals about their personal details to be updated across all systems.

Will the information about individuals be disclosed to organisations or people who have not previously had routine access to the information?
No, information about individuals will not be disclosed to organisations or people who have not previously had routine access to the information.
However, in the longer term, the potential to share personal information about individuals across our Councils and with our partner organisations such as NHS Grampian is part of the longer term Master Data Management programme and will require the appropriate security, access and consents to be in place prior to implementation.

Are you using information about individuals for a purpose it is not currently used for, or in a way it is not currently used?
No, we will not be using information about individuals for a purpose it is not currently used for, or in a way it is not currently used?
However, in the longer term the implementation of Master Data Management will involve working with master data, providing our Councils with control options over our master data values to enable consistent, shared, contextual use across systems of the most accurate, timely, and relevant version of the truth about essential business entities (e.g. customer, employee,).

Does the programme involve you using new technology which might be perceived as being privacy intrusive? For example, the biometrics or facial recognition?
No, the programme will not involve using new technology which might be perceived as being privacy intrusive?
However, in the longer term the potential to share personal information about individuals across our Councils and with our partner organisations such as NHS is part of the longer term Master Data Management programme and will require the appropriate security, access and consents to be in place prior to implementation. The

sharing of personal information will be addressed using a tiered hierarchy that goes from name and address levels to more in depth service specific. This aspect is recognised, will be monitored through appropriate business function representation throughout the programme and the PIA will be updated accordingly.

Will the programme result in you making decisions or taking action against individuals in ways which can have a significant impact on them?

No, This programme is aimed at providing more efficient and targeted customer service delivery. However, benchmarking with other local authorities indicates there may be instances where the sharing of customer data could result in decisions being taken against individuals where fraud is detected e.g. false claims for council tax benefit.

Is the information about individuals of a kind particularly likely to raise privacy concerns or expectations? For example health records, criminal records or information that people would consider to be particularly private.

No, the information about individuals of a kind are not likely to raise privacy concerns or expectations? For example health records, criminal records or information that people would consider to be particularly private.

However, it is acknowledged that in the longer term, the potential to share personal information about individuals across our Councils and with our partner organisations such as NHS is part of the longer term Master Data Management programme and will require the appropriate security, access and consents to be in place prior to implementation. A tiered hierarchy of controls will be put in place to manage levels of access to records that relate to a particular service (business function), for example social care, health etc.

Will the programme require you to contact individuals in ways which they may find intrusive?

No, the programme will not require our Councils to contact individuals in ways which they may find intrusive.

In the longer term, Master Data Management will allow our Councils to contact customers, (with appropriate consents in place) about anticipated services available, e.g. ranging from provision of early years (baby yoga) services following the registering a birth to waste management following the registering of council tax.

Step two: Describe the information flows

The collection, use and deletion of personal data should be described here and it may also be useful to refer to a flow diagram or another way of explaining data flows. You should also say how many individuals are likely to be affected by the process.

This section will be updated during the next phase of this programme.

Consultation requirements

Explain what practical steps you will take to ensure that you identify and address privacy risks. Who should be consulted, internally and externally? How will you carry out the consultation? You should link this to the relevant stages of your project management process.

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

At this point of the Master Data Management programme conceptual phase, consultation has and is taking place with senior management, assigned officers, as well as the formal Committee consultation process with elected members and Unions across both Councils.

This section will be updated as the programme progresses.

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
Ability to comply with Data Protection Act requirements	Likelihood: Impact:	Processing and using out of date personal information and application of appropriate retention periods	Monetary penalties, customer harms and reputational damage

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?

Ability to comply with Data Protection Act requirements	Appropriate information and security architecture for personal (and sensitive) information	Reduced significantly	Yes

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

Caroline Anderson, Information Manager, Aberdeen City Council
01224 522521canderson@aberdeencity.gov.uk