

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 aim of the Excess Waste Policy is to ensure that only waste and recyclables presented in the correct and authorised containers is collected. The policy sets out the standard service that will be provided to householders in Aberdeen and also defines the circumstances where additional capacity will be allowed. The policy also sets out the process to be followed when it has been identified that there are unauthorised containers being used.

This policy ensures that there is harmonisation of service provision across service users in Aberdeen. The policy takes account of the needs of those who may have difficulty complying with the Council's standard service through their individual circumstances such as large families or medical needs.

The policy states that additional bin capacity can be provided where the household meets any of the following criteria (and provided they can demonstrate that they are making full use of recycling services where waste containers are being requested):

- Five or more permanent resident(s) in the household
- One or more resident(s) in the household that has a medical condition which results in additional production of non-clinical waste
- Two or more residents in the household in nappies under the age of 3 years old

The need for a PIA was identified because the collection of data relating to individuals will be required as part of the application process for additional bin capacity.

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.

Householders requesting additional bin capacity will be sent a form to complete and return to the Service. The form will be assessed by an Officer and a telephone assessment will be made to verify the information and satisfy the service that the applicant has all of the information and equipment required to ensure that they can recycle as much as possible.

The form is filed and kept for a period of 3 years at which time a review of the requirement will be conducted. If the householder no longer requires the additional capacity the form will be destroyed. If the service is still required it will be kept on file for a further 2 years. The data is not used for any other purpose.

To date, approximately 2000 people have completed this application process.

Consultation requirements

No formal consultation has been conducted. This process is in line with the existing practice and is in keeping with similar processes used by local authorities across Scotland.

The data in the application form is not shared with the wider waste team, e.g. the bin delivery crews are not told the reasons why an individual has been granted an additional bin.

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
Release of personal information	Their information is shared without consent	Non-compliance with Data Protection Act	Reputation.

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?
Release of personal information	Formal procedure and filing processes established in line with Data Protection requirements.	Reduced.	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
Release of personal information	Process and filing procedures in place and training provided to staff.	Pam Walker

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
Ensure procedures are compliant with Data Protection Act and that all staff concerned are appropriately trained in the process.	31/08/16	Pam Walker

Contact point for future privacy concerns

--