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

Conservation Area Regeneration Schemes set out to deliver conservation-led regeneration by stimulating property investment in identified part of statutorily designated conservation areas.

The main stimulus is through the offer of grants for enveloping repair to property.

A successful CARS bid would lead to a scheme which would help deliver part of the Union Street improvements identified in the City Centre Masterplan. It will benefit property owners and those responsible for the repair of buildings within the designated with a knock-on benefit to contractors undertaking the work and the improved properties will contribute to place making and quality of life making Aberdeen a more attractive place to invest, live and visit.

Property owners will also be able to attend courses and events which are intended to highlight how best to look after historic buildings. Contractors will have opportunities to consolidate and improve their skills.

Need for a PIA is identified as ownership and potentially sensitive commercial information about leases may need to be submitted as part of any grant application process.

Step two: Describe the information flows

The application process for grant assistance requires collection of contact details of applicants and provision of evidence of their ownership of or responsibility for property within the CARS area including property title deeds, lease agreements and associated legal documentation. That information is then used to process and make awards of grants.

In some circumstances information may need to be stored for up to 15 years in order to provide context in relation to burdens on property titles.

Applicants sign a declaration agreeing the collection of this information as part of the grant application process.

Information will be stored and retained as required to comply with conditions of any grant offer and for the purposes of audit by the funders.

Consultation requirements

Should the grant scheme be successfully awarded, a risk management programme will be developed which will include managing privacy risks. All data storage will be reviewed, including review of best practice and any lessons learned from previous grant award schemes such as the Green Townscape Heritage Initiative. In addition, Aberdeen City Heritage Trust, who currently operate a grant scheme, will be working in partnership on the CARS, so there will be opportunities to share best practice

Consultation with building owners (potential grant recipients) will take place individually, initially by letter. There will also be direct consultation with Historic Environment Scotland as the grant issuer. Should the grant award be successful, a full communication and engagement plan will be developed.

It is intended to develop the remaining steps when the project develops

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
Initial identification of buildings for grant			Potential pre-determination of grant acceptance and raising expectation

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?
Initial identification of buildings for grant	Appendix identifying properties to be restricted circulation	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
Initial identification of buildings for grant	Appendix identifying properties to be restricted circulation	City Centre Programme Board, Council Pre-Agenda

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
To be developed as part of the project programme should the grant application be successful		

Contact point for future privacy concerns

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