



GLASTONBURY TOWN COUNCIL

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DATA PRIVACY IMPACT ASSESSMENT DOCUMENT

Screening Questions

These questions are intended to help you decide whether a DPIA is necessary. Answering 'yes' to any of these questions is an indication that a DPIA would be necessary. You can expand on your answers as the project develops if you need to.

Question	Response
Will the project involve the collection of new information about individuals?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Will the project compel individuals to provide information about themselves?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are you using information about individuals for a purpose it is not currently used for, or in a way it is not currently used?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Does the project involve you using new technology that might be perceived as being privacy intrusive? For example, the use of biometrics, or CCTV.	<input type="checkbox"/> Yes <input type="checkbox"/> No

Will the project result in you making decisions or taking action against individuals in ways that can have a significant impact on them?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Is the information about individuals of a kind particularly likely to raise privacy concerns or expectations? For example, health records, criminal records or other information that people would consider to be very private.	<input type="checkbox"/> Yes <input type="checkbox"/> No
Will the project require you to contact individuals in ways that they may find intrusive?	<input type="checkbox"/> Yes <input type="checkbox"/> No

Data Privacy Impact Assessment

Step One – Why you are conducting a DPIA

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).

Step Two – Describe the information involved

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

Step Three – Identify the privacy and related risks

Principle 1 – Lawfulness, fairness and transparency

Privacy Issue	Comment
Have you identified the purpose of the project?	
How will you tell individuals about the use of their personal data?	
Do you have a Privacy Notice in place to cover the processing of this data? If so does it need to be updated?	
Please tick the data items collected.	

Personal	<input type="checkbox"/> Name <input type="checkbox"/> Next of Kin <input type="checkbox"/> Date of Birth <input type="checkbox"/> Sex <input type="checkbox"/> Address <input type="checkbox"/> Post Code <input type="checkbox"/> National Insurance Number
Sensitive	<input type="checkbox"/> Sexual Orientation <input type="checkbox"/> Political Opinions <input type="checkbox"/> Religion <input type="checkbox"/> Physical or Mental Health <input type="checkbox"/> Ethnic Origin <input type="checkbox"/> Union Membership <input type="checkbox"/> Genetic / Biometric Other (please state):
Who provides the information?	
Have you established the legal basis for processing? If so, what is it?	
If you are relying on consent to process personal data, how will this be collected and recorded?	
Do you need to validate the age of the data subject and if so how will this be done?	
Have you checked and confirmed that the data subject has capacity to give consent?	

Principle 2 – Purpose limitation

Privacy Issue	Comment
Please state the purpose for the processing of the data: (<i>e.g. research, audit, service provision</i>)	
Which personal data will you not need to use without compromising the needs of the service/project?	

Principle 3 – Data minimisation

Privacy Issue	Comment
Will you only collect personal data actually needed for the specified purposes of the service/project?	
Are you procuring software that will allow you to delete information in line with your retention periods?	
How will the data be destroyed when it is no longer required?	

Principle 4 – Accuracy

Privacy Issue	Comment
How are you ensuring that the personal data obtained from individuals or other organisations is accurate?	
How will the information be kept up to date and checked for accuracy and completeness?	
If the data subject withdraws their consent how will this be actioned and recorded?	
Is there a documented process to amend and/or delete data when necessary?	

Principle 5 – Storage limitation

Privacy Issue	Comment
What personal data will be held and why are you holding it?	
What is the retention period to hold personal data?	
Is there a policy with standard retention periods in place?	
Will the personal data information to be held be regularly reviewed and erased or anonymise when no longer needed?	
Is there an appropriate processes in place to comply with individuals' requests for erasure under 'the right to be forgotten'.	
Will personal data be clearly identified that you will need to keep for public interest archiving, scientific or historical research, or statistical purposes?	

Principle 6 – Integrity and confidentiality (security)

Privacy Issue	Comment
Do the systems provide protection against the security risks identified?	
What training and /or guidance is in place to ensure that staff know how to operate the system securely?	
Is there an audit trail in place for the system/asset?	
Where will the information be kept/stored/accessed?	
Will any information be sent off site? If yes where will it be sent and how will it be transferred?	
Is there an access policy in place which covers the data referred to in the DPIA?	
Is there a contingency plan/back up policy in place to manage the effect of an unforeseen event?	
Are there procedures in place to recover data (both electronic and paper) which may be damaged through human error, computer virus, network failure, theft, fire or flood?	

Principle 7 – Accountability

Privacy Issue	Comment
Will you have appropriate measures and records in place to be able to demonstrate your compliance with the principles of the Data Protection Act 2018?	

Step 4 – Completion of Risk Assessment and Mitigation

Describe source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary.	Likelihood of harm Remote, possible or probable	Severity of harm Minimal, significant or severe	Overall risk Low, medium or high

Step 5 – Sign off and record of DPIA outcomes

<u>Risks</u>	<u>Approved Solution</u>	<u>Approved by</u>	<u>Date Approved</u>