Privacy impact assessment screening

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

Will the project involve the collection of new information about individuals?

"No"

Will the project compel individuals to provide information about themselves?

"No"

Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information?

"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?

"No"

Does the project involve you using new technology that might be perceived as being privacy intrusive? For example, the use of biometrics or facial recognition.

"No"

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

"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 private.

"No"

Will the project require you to contact individuals in ways that they may find intrusive?

"No"

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 that is used in this code of practice. You can adapt the process and this template to produce something that allows your organisation to conduct effective PIAs integrated with your project management processes.

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.

To provide a safe and secure environment for the benefit of those who might visit, work or live in the area. The system will not be used to invade the privacy of any individual, except when carried out in accordance with the law.

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

Due to numerous complaints from residences, about the standard of driving in the car park, and being verbally abused in the early hours, complaints from users of being verbally abused as well as complaints of tyres being let down, or damaged to cars (not reported to police though lack of evidence).

Step two: Describe the information flows

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 explaining data flows. You should also say how many individuals are likely to be affected by the project.

RECORDED IMAGES

All CCTV recordings are retained for a minimum period of 31 days. If no legitimate request for retention of the recording has been made, it is then erased or overwritten. All requests for retention of recordings are considered against the provision of the Data Protection Act and the CCTV Code of Practice.

Recorded data will only be used for the purposes defined in the Code of Practice.

Access to recorded data shall only take place in the circumstances defined in the Code of Practice and the provisions of relevant legislation.

Recorded data will not be sold or used for commercial purposes or the provision of entertainment. However, in exceptional circumstances images may be released but subject to strict controls and with the approval of senior management

All data released shall remain the property of Seascale Parish Council.

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.

Privacy issue	Risk to individuals	Compliance risk	Associated organisation / corporate risk
1. View of front of residence	Possible	Yes	Yes
2. View of Children's Play Area	Possible	Yes	Yes
3. Request to view footage or Photo Print out	Possible	Yes	Yes

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?
1. View of front of residence	Blanking out view using privacy software. Allow local Police to view set up to confirm Privacy at any time.	Eliminated	Compliant,
2. View of Children's Play Area	Positioning cameras to restrict view and corrected by blanking out view using privacy software.	Eliminated	Compliant,
3. Request to view footage or Photo Print out	The showing of recorded data to the public will only be permitted in accordance with the CCTV Code of Practice and the provision of the Data Protection Act 1998. In every case, a written application in an approved format	Eliminated	Compliant

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
1. View of front of residence	Blanking out view using privacy software.	**Brian Goulding Data Controller**
2. View of Children's Play Area	Positioning cameras to restrict view and corrected by blanking out view using privacy software.	" "
3. Request to view footage or Photo Print out	The showing of recorded data to the public will only be permitted in accordance with the CCTV Code of Practice and the provision of the Data Protection Act 1998. In every case, a written application in an approved format	" "

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 that may arise in the future?

Action to be taken	Date for completion of actions	Responsibility for action
Areas of residence and shops seen on CCTV blanked out	15/04/2017	Brian Goulding Data Controller

Contact point for future privacy concerns
Brian Goulding - 01946729377

Principle 1

Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless:

a) at least one of the conditions in Schedule 2 is met, and

b) in the case of sensitive personal data, at least one of the conditions in Schedule 3 is also met.

Principle 2

Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.

Principle 3

Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.

Principle 4

Personal data shall be accurate and, where necessary, kept up to date.

Principle 5

Personal data processed for any purpose or purposes shall not be kept for longer than necessary for that purpose or those purposes.

Principle 6

Personal data shall be processed in accordance with the rights of data subjects under this Act.

Principle 7

Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.

Principle 8

Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country of territory ensures and adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.