

Privacy Impact Assessment

PIA Name:

The supply, installation and maintenance of cardio vascular equipment for LCC Leisure Centres for the period from 1/6/2018 to 31/1/2019

Ref No:

STAGE 1 Privacy impact assessment screening questions for proposed changes

Please read the PIA Guidance document before completing this form

	Screening questions	Yes	No
1	Will the project involve the processing of information about individuals?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2	Will the project compel individuals to provide information about themselves?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3	Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4	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"/>	<input checked="" type="checkbox"/>
5	Does the project involve you using new technology which might be perceived as being privacy intrusive? For example, the use of biometrics or facial recognition.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6	Will the project result in you making decisions or taking action against individuals in ways which can have a significant impact on them?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7	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 particularly private.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8	Will the project require you to contact individuals in ways which they may find intrusive?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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If the answer is “yes” to any of the questions above then a PIA must be carried out.

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Stage 2: Privacy Impact Assessment

Version Control

Version	Status	Revision Date	Summary of Changes	Author

Section A: New/Change of System/Project General Details

Name: (of the project or change to be delivered)	The supply, installation and maintenance of cardio vascular equipment for LCC Leisure Centres for the period from 1/6/2018 to 31/1/2019	
Background: (why is the new system / change required?)	The Current contract is due to expire. Failure to procure a new agreement would lead to a lack of working equipment in our gyms which would have a large negative impact on our business.	
Benefits: (explain what the project aims to achieve, what benefits to the organisation, to individuals and to other parties)	Well maintained and new equipment is essential for customer satisfaction and a failure to provide this will lead to a significant reduction in membership. With new and well maintained equipment customers will benefit and the service will remain competitive in the market	
Constraints:	None	
Relationships / Partnerships: (e.g. with NHS, or private organisation)	None	
Project Manager:	Name:	Caroline Semple
	Job Title:	Sports Programme Manager
	Service:	Sport and Active Lifestyles Service
	Telephone:	3780346
	Email:	Caroline.semple@leeds.gov.uk
Information Asset Owner All information assets must have an information asset owner (IAO). IAO's are usually Heads of Service or Chief Officers. further information	Name:	Mark Allman
	Job Title:	Head of Sport and Active
	Service:	Sport and Active Lifestyles Service
	Telephone:	3780289
	Email:	Mark.allman@leeds.gov.uk
System Administrator	Name:	

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(if applicable)	Job Title:	n/a
	Service:	
	Telephone:	
	Email:	

Section B: Privacy Impact Assessment (please complete all questions as fully as possible)

	Question	Response	Guidance document
1	Please state the purpose for the processing of the data / information: (for example, service provision, research, audit, employee administration)	Service provision	
1a	What is the legal basis you are replying on for the processing of the data/information	n/a	See Guidance Section 6 for references to Data Protection Principles.
2	Does the asset involve privacy invasive technologies?	<input type="checkbox"/> Yes (if yes, please give details) <input checked="" type="checkbox"/> No	Section 7: Glossary for definitions
3	Please tick the data items / information that will be held as part of this asset.		
a	Personal	<input type="checkbox"/> Name <input type="checkbox"/> Address/Postcode <input type="checkbox"/> Date of Birth <input type="checkbox"/> Telephone no/email <input type="checkbox"/> Next of Kin <input type="checkbox"/> National Insurance Number <input type="checkbox"/> NHS Number <input type="checkbox"/> Gender <input type="checkbox"/> GP / Consultant <input checked="" type="checkbox"/> Other (please give details) - None	Section 7: Glossary for definitions
b	Sensitive	<input type="checkbox"/> Sexual Orientation <input type="checkbox"/> Political opinions/trade union membership <input type="checkbox"/> Religion <input type="checkbox"/> Physical, mental health, medical history <input type="checkbox"/> Ethnic Origin <input type="checkbox"/> Sexual life	Section 7: Glossary for definitions

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		<input type="checkbox"/> Criminal convictions	
c	Other (please specify)	n/a	
4	Will the asset collect new personal data items which have not been collected before?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5	The data of approximately how many individuals will be affected by this asset?	None	
6	What checks have been made regarding the adequacy, relevance and necessity for the collection of personal and / or personal sensitive data for this asset? See Guidance Section 6 for references to Data Protection Principles.	n/a	If no checks have been made please record this as a risk in section C
7	Who provides the information for the asset?	<input type="checkbox"/> Citizen / service user <input type="checkbox"/> Employee <input checked="" type="checkbox"/> Other (please specify e.g. integration with another system)	N/a
8a	Are you relying on individuals to provide consent for the processing of this personal and / or personal sensitive data	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
8b	If yes, are you relying on consent only	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
8c	If yes, how will that consent be obtained and recorded? (please state)	n/a	
8d	If no, what is the legal basis for collecting/processing the information	n/a	
9	Have the individuals been informed of this processing?	<input type="checkbox"/> Yes (explicit) Declaration on form <input type="checkbox"/> Yes (implicit i.e. through fair processing notice, website, leaflet etc)	If no please record as a risk in section C

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		<input checked="" type="checkbox"/> No – n/a	
10	How will the information be kept up to date and checked for accuracy and completeness?	Information will not be kept	If there are no documented procedures to evidence this answer, please record as a risk in section c
11	Who will access the information? (Services, roles, organisations?)	n/a	
12	Is there an Access Control Policy in place?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Section 7: Glossary for definitions
13	Is there a usable audit trail in place for the asset? E.g. to identify who has accessed a record	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If no please record as a risk in section C . Section 7: Glossary for definitions
14	What are the retention periods for this asset?		If there are no documented retention periods please record as a risk in section C
15	How will the asset be destroyed when it is no longer required?	n/a	
16	Will the asset or part of the asset be shared with other organisations or LCC services?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes please record as a risk in section C
17	If yes, are there appropriate information sharing agreements in place	<input type="checkbox"/> Yes <input type="checkbox"/> No	If no please record as a risk in section C
18	Please list all organisations involved or LCC services.	LCC Sport and Active Lifestyles Service and LCC PPPU teams.	
19	Does the asset involve new linkage / matching of personal data with data in other collections, or is there significant changes in data linkages / matching?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes please record as a risk in section C . Section 7: Glossary for definitions
20	Where will the asset be stored / accessed?	<input type="checkbox"/> On paper <input type="checkbox"/> On a network folder / drive –	

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		<input type="checkbox"/> Website <input type="checkbox"/> Dedicated system <input checked="" type="checkbox"/> Other (please give details) – N/A	
21	Will any information be sent off site? (i.e. a building or network not under the direct control of LCC)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes please record as a risk in section C
22	If yes, please state by which method the information will be transported	<input type="checkbox"/> Fax <input type="checkbox"/> Standard email <input type="checkbox"/> Secure email (e.g. GCSx) <input type="checkbox"/> Website <input type="checkbox"/> Via courier <input type="checkbox"/> By hand <input type="checkbox"/> Via external post <input type="checkbox"/> Via telephone <input type="checkbox"/> Other (please give details)	
23	Are you transferring any personal and / or personal sensitive information to a country outside the European Economic Area (EEA)	<input type="checkbox"/> Yes If yes, where? <input checked="" type="checkbox"/> No	If yes please record as a risk in section C
24	Is there a contingency plan / back up policy in place to manage the effect of an unforeseen event?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If no please record as a risk in section C
25	Describe or draw the information flows (you can attach your flowchart diagram)	LCC will draw from an ESPO framework and then the Sport and Active Lifestyles team will deal direct with successful supplier	

Section C: Identify the Information, Privacy and related risks

Identify the key risks. All risks identified from the questionnaire in section B should be included, plus any others of relevance. Describe the actions you could take to reduce the risks and any future steps which would be necessary (e.g. the production of new procedures or future security elements for systems).

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Risk	Solution	Result: is the risk eliminated, reduced, or accepted?	Evaluation: is the final impact on individuals after implementing each solution justified, compliant and proportionate response to the aims of the project?
None	n/a	n/a	n/a