

Data Protection Impact Assessment

DPIA Name: Appendix 3 Learner Destination Survey - 2019-24 Provider Contracts

Ref No: DN391369

STAGE 1 Data Protection Impact Assessment screening questions for proposed changes

Please read the DPIA Guidance document before completing this form

	Screening questions	Yes	No
1	Will the project involve the processing of information about individuals? Please note this does include pseudonymised data*	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2	Will information about individuals be disclosed or shared with organisations or people who have not previously had routine access to the information?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3	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"/>
4	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"/>
5	Does any phase of the project utilise automated decision making based on the information provided/ shared	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6	Will the project require you to contact individuals in ways which they may find intrusive? e.g marketing*	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Please ensure that this has been to the following :

Information Management & Governance, Subject matter experts including Business Partners, ICT, CYBER.

Data Protection Impact Assessment

DPIA Name: Appendix 3 Learner Destination Survey - 2019-24 Provider Contracts

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Stage 2: Data Protection Impact Assessment

Version Control

Version	Status	Revision Date	Summary of Changes	Author

DPIA Approved by Information Asset Owner	Name:	Date:
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Section A: New/Change of System/Project General Details

Name: (of the project or change to be delivered)	Learner destination telephone survey
Background/ Objectives: (why is the new system / change required?)	To undertake a destination survey conducted by telephoning learners who completed their courses in the academic year 2017/18. The survey will entail the following key elements: <ul style="list-style-type: none">• Contacting a 10% sample of academic year 2017-18 learners
Information flow diagram* (please see examples in guidance) see section 3	Learner name and telephone number are sent securely to J2Profits . J2 Profit staff will then ring the learner to find out their current destination.

Data Protection Impact Assessment

DPIA Name: Appendix 3 Learner Destination Survey - 2019-24 Provider Contracts

Ref No: DN391369

State who is the Data Controller*	
<p>Benefits: (explain what the project aims to achieve, what benefits to the organisation, to individuals and to other parties)</p>	<ul style="list-style-type: none"> Identifying <i>actual</i> destination of those learners and comparing this with their previously recorded <i>intended</i> destinations Provider engagement to address any identified unmet adult learning needs in relation to progression Provide an ambitious, yet realistic and sustainable, action plan to support planning and delivery of future provision, in line with Council priorities
<p>Consultation: (If required detail here any consultation undertaken with the public, partners, internal or external stakeholders)</p>	<p>The Executive Member for Learning, Skills and Employment has been consulted on the proposals.</p> <p>The views of local skills providers and the Council's Adult Learning Trust Board on the benefits of having a more informed understanding of current and planned adult learner destinations were used to inform these proposals, and will be integral to the completion of the survey.</p>
<p>Implementation date: for example the timescales required for completion, implementation date</p>	<p>March 2019 J2Profit to undertake the telephoning of 800 learners.</p> <p>May 19 Report on the finding from the survey sent to Leeds City Council.</p>
<p>Relationships / Partnerships: (e.g. with NHS, or private organisation, stakeholders, please also if possible state whether they are designated as data controllers or data processors)</p>	
Project Manager:	Name: Ann Eveleigh
	Job Title: Programme Manager
	Service: Employment and Skills
	Telephone: 07712215605
	Email: Ann.Eveleigh@Leeds.gov.uk
Information Asset Owner(s) All information assets must have an information asset owner (IAO). IAO are	Name: Martyn Long
	Job Title: Head of Projects and Programmes
	Service: Employment and Skills

Data Protection Impact Assessment

DPIA Name: Appendix 3 Learner Destination Survey - 2019-24 Provider Contracts

Ref No: DN391369

usually Heads of Service or Chief Officers.	Telephone:	
	Email:	Martyn.Long@leeds.gov.uk
System Administrator (if applicable)	Name:	
	Job Title:	
	Service:	
	Telephone:	
	Email:	

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

	Question	Response	Guidance document
Processing			
1	Please state the purpose for the processing of the data / information: (for example, service provision, research, audit, employee administration)	To enable through a follow up telephone call the actual destination of the learners who previously participated in the adult learning programme and to therefore use this information to better inform the provision going forward.	
2	Please tick the data items/ information that will be processed	<input checked="" type="checkbox"/> Name <input type="checkbox"/> Address/Postcode <input type="checkbox"/> Date of Birth <input checked="" 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 type="checkbox"/> Pseudonymised	
2b	Special categories and Criminal data	<input type="checkbox"/> Sexual Orientation <input type="checkbox"/> Political opinions/trade union membership <input type="checkbox"/> Religion <input type="checkbox"/> Physical health <input type="checkbox"/> Mental health <input type="checkbox"/> Medical history <input type="checkbox"/> Ethnic Origin	

Data Protection Impact Assessment

DPIA Name: Appendix 3 Learner Destination Survey - 2019-24 Provider Contracts

Ref No: DN391369

		<input type="checkbox"/> Sexual life <input type="checkbox"/> Criminal convictions	
2c	Other (please specify)	Name of the course they attended	
3a	What is the legal basis you are relying on for the processing of the data/information. (please see guidance section 4 for all of question 3)	Compliance with Ofsted and ESFA funding rules.	
3b	If you are relying only on consent, did you consider any other legal basis?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
3c	If using consent, how will that consent be obtained and recorded and withdrawn if requested? (please state)		
4	Will personal data items be collected 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?	<input type="checkbox"/> 1-10 <input type="checkbox"/> 10-100 <input checked="" type="checkbox"/> 100-1000 <input type="checkbox"/> 1000-10,000 <input type="checkbox"/> 10,000+	
6	How is the personal data obtained?	<input checked="" type="checkbox"/> From Client/Service User <input type="checkbox"/> From partner agencies <input type="checkbox"/> From 3 rd Party/ Another Individuals <input type="checkbox"/> For employment purposes <input type="checkbox"/> Internal services <input type="checkbox"/> Other	

Data Protection Impact Assessment

DPIA Name: Appendix 3 Learner Destination Survey - 2019-24 Provider Contracts

Ref No: DN391369

7	Have the individuals been informed of this processing?	<input checked="" type="checkbox"/> Yes (explicit) <input type="checkbox"/> Yes (implicit i.e. through Privacy notice, website, leaflet etc) <input type="checkbox"/> No	If no please record as risk in section C
8	Does the information 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
9	Does this project involve utilising data for the purposes of automated decision making/profiling. If so add details (please see guidance section 4)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Please see guidance
Records Management			
10	Does this project create a new Information Asset?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
10a	How will the information be kept up to date and checked for accuracy and completeness?	Number of learners contacted	If there are no documented procedures to evidence this answer, please record as a risk in section c
10b	What processes are in place for data quality checking?	Data sharing agreement in place with the provider and contractual arrangements.	
11	If this project involves a new system, does it have the ability to quarantine information/restrict processing? (See guidance for details)	No	Please see guidance
11a	Does the system have the ability to amend or add notes to data/information at a single data field level?	No	Please see guidance

Data Protection Impact Assessment

DPIA Name: **Appendix 3 Learner Destination Survey - 2019-24 Provider Contracts**

Ref No: **DN391369**

12	What checks have been made regarding the adequacy, relevance and necessity for the collection of data?	Data already collected as part of the learners enrolment process	If no checks have been made please record this as a risk in section C
13	Where will the information be stored / accessed? (please see guidance section 4 for further information about cloud storage)	<input type="checkbox"/> LCC System/ Application <input type="checkbox"/> Sharepoint <input type="checkbox"/> LCC email system <input type="checkbox"/> Paper filing system <input checked="" type="checkbox"/> LCC File-Shares (e.g Network Drives) <input type="checkbox"/> Removable media <input type="checkbox"/> External to LCC (cloud, web hosted) <input type="checkbox"/> other	
14	What are the retention periods?	Three years following end of academic year	If there are no documented retention periods please record as a risk in section C
15	How will the information be destroyed when it is no longer required?	Removed from the computer.	
15a	If held electronically, can the destruction be certified?	Yes	
15b	Can the information be deleted at a singular data field level?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Please see guidance
Security			
16	Who will access the information? (i.e. Services, roles, organisations)	Projects and Programmes staff to enable the forward planning of the curriculum	

Data Protection Impact Assessment

DPIA Name: Appendix 3 Learner Destination Survey - 2019-24 Provider Contracts

Ref No: DN391369

17	Is there an Access Control Policy in place? (Please see guidance section 6 for further information)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
18	Is there an ability to audit access to the information? (Please see guidance section 6 for further information)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If no please record as a risk in section C .
19	Detail what security measures have been implemented to secure access and limit the use of personal information?	Contractual DC-DP commitment Secure transfer via ME	
20	Does this project involve privacy invasive technologies? (Please see the guidance)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes please detail	
21	Is there a business continuity and a disaster recovery plan in place?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If no please record as a risk in section C
22	Where external parties are accessing LCC information has it been identified that they require IG training?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	IG training undertaken
Sharing			
23	Will any of the information 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
23a	Please list all organisations/LCC services involved with sharing	N/A	
23b	What is the legal basis for sharing?	N/A	Please note that your legal basis for processing may be different from your legal basis for Sharing. Please refer to guidance
24	Will there be signed information sharing agreements in place	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If no please record as a risk in section C
25	Which method will be used to transport information if it is going off site?	<input type="checkbox"/> Standard email <input checked="" type="checkbox"/> Secure email (e.g. GCSx) <input type="checkbox"/> Website	If no please record as a risk in section C

Data Protection Impact Assessment

DPIA Name: Appendix 3 Learner Destination Survey - 2019-24 Provider Contracts

Ref No: DN391369

		<input type="checkbox"/> Via courier <input type="checkbox"/> By hand <input type="checkbox"/> Via external post <input type="checkbox"/> Via telephone <input type="checkbox"/> Removable Media <input type="checkbox"/> Secure file transfer protocol (eg. mail express) <input type="checkbox"/> Other file transferring applications (dropbox) <input type="checkbox"/> Social Media <input type="checkbox"/> Providing access via LCC systems <input type="checkbox"/> Other (please give details)	
26	Are you transferring any personal identifiable data/information to a country outside the United Kingdom	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes please record as a risk in section C

Data Protection Impact Assessment

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Ref No: DN391369

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).

Please note if your project has a large number of risks there is an alternative spreadsheet you can use, (please ask your IG officer) or simply continue onto a separate sheet.

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?
Individual request their data be deleted or modified on the data set	Remove individual data from the survey		