

Data Protection Impact Assessment

DPIA Name: **DN405073 Initial Assessment and Diagnostic Tools**

Ref No: **DN405073**

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.

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Stage 2: Data Protection Impact Assessment

Version control

Version	Status	Revision Date	Summary of Changes	Author
1	Draft	29 Apr 2019	Created	Craig Skinner; Chris Towning
1.1	Draft	01 May 2019	IG Comments	Richard Brook

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

Name: (of the project or change to be delivered)	DN405073 Initial Assessment and Diagnostic Tools
Background/ Objectives: (why is the new system / change required?)	Initial Assessment Tools for Employability programmes supporting Service Users nearer to employment. The assessments will show whether a learner will need to complete basic skills qualifications and at what level they currently are. There will also be an employability assessment, which will gauge the learners job readiness. The third element will be to track previous learning to allow it to be included within the councils apprenticeship levy. There is no Council system/software that can provide any of the three assessments. These assessments underpin the effective delivery of externally funded programmes totalling £15m and improved outcomes for local residents.
Information flow diagram* (please see examples in guidance) see section on data mapping	See workflow table below. In summary, users will be provided with a login to the system which will match their Yeti/Maytas ID. They will then undertake training etc in the system. Employment and Skills staff can then access these records by entering the individual's Yeti ID into the system. These systems will not, however, directly interface with each other.

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Service User (SU)	IA System	Project Team	Other Systems or Providers
1 Attend Initial Interview with Key Worker Sign Information Statement		Key Worker arrange Initial Interview with each Service User	Input in to Yeti, name address etc.
2	Create Service User Unique ID's as login credentials	Generate Unique ID per Service User	Create Service User Unique IDs in Yeti
3	Suitable Initial Assessment tests per Service User	Configure Suitable Initial Assessment tests per Service User ID	
4 Receive Unique ID login credentials		Send SU UID login credentials	
5 Login and take Initial Assessment tests	Record each Unique ID Initial Assessment Test results		
6		Download Service User Initial Assessment test results reports	Record test results per Service User in Yeti
7		Key Worker Assess Initial Assessment test results and arrange and hold Information, Advice and Guidance meetings with each Service User. Identify training needs, support pathway(s) and/or employment options.	Update case notes in Yeti
	Reconfigure suitable Initial Assessment tests per Service User	Inform Support Pathways providers and/ or reconfigure suitable Initial Assessment test	
8 Attend support pathways			Appointments from support pathway providers
Either: still unemployed go to step 5 and take revised tests. If Employed. Inform Key Worker		Key Worker record employed status	Update Yeti

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State who is the Data Controller* see glossary	Leeds City Council	
Benefits: (explain what the project aims to achieve, what benefits to the organisation, to individuals and to other parties)	Increase the number of employed people in Leeds. Raise individuals functional skills levels	
Consultation: (If required detail here any consultation undertaken with the public, partners, internal or external stakeholders)	Externally Funded Programmes by ESF and DWP	
Implementation date: for example the timescales required for completion, implementation date	Immediate, with annual targets	
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)	European Union Funds ESF fund DWP to maximise the number of employed (data in this system is not shared directly with these parties, however).	
Project Manager:	Name:	Craig Skinner
	Job Title:	Senior Programme Manager
	Service:	Employment and Skills
	Telephone:	
	Email:	
Information Asset Owner(s) All information assets must have an information asset owner (IAO). IAO are usually Heads of Service or Chief Officers.	Name:	Martyn Long
	Job Title:	Head of Projects and Programmes
	Service:	Employment and Skills
	Telephone:	
	Email:	
System Administrator (if applicable)	Name:	TBC
	Job Title:	
	Service:	
	Telephone:	
	Email:	

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

	Question	Response	Guidance document
Processing			
1	<p>Please state the purpose for the processing of the data / information: (for example, service provision, research, audit, employee administration)</p>	<p>Service provision. Employment and Skills would like the software to run assessments of learners under 3 headings:</p> <ol style="list-style-type: none"> 1) Basic skills including ESOL <ol style="list-style-type: none"> a. The assessments usually include maths/English (layman's terms) questions, then provide eg tests that a learner would need to pass to achieve the level they are going for. b. Would then provide coursework on how to progress to the required level. c. This information of learners skills level would be keyed in to MAYTAS for adult learning or YETI for ESF 2) Employability readiness <ol style="list-style-type: none"> a. How good is your CV? How do you prepare for interviews etc. b. Provide examples of what to do c. How to tailor CV's etc d. This information of employability readiness would be keyed in to YETI notes to say, eg Bob did an employability assessment and 	

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		<p>needs to work on interview skills.</p> <p>3) Evidence previous experience to count towards apprenticeship learning</p> <p>a. A series of questions linked to an individual apprenticeship framework/standard to then evidence the learner has sufficient skills/experience</p> <p>b. This assessment is the least known as ESFA are yet to truly clarify what evidence is needed. However, the assumption is still based on the assessment only showing skills/aptitudes with the ID being the MAYTAS one only.</p>	
2	Please tick the data items/ information that will be processed	<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"/> 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	

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		<input type="checkbox"/> Medical history <input type="checkbox"/> Ethnic Origin <input type="checkbox"/> Sexual life <input type="checkbox"/> Criminal convictions	
2c	Other (please specify)	The data in question will be assessment information regarding the individual. This will be pseudonymised using the individual's Yeti/Maytas ID.	
3a	What is the legal basis you are relying on for the processing of the data/information. (please see guidance section on processing for all of question 3)	Consent.	
3b	If you are relying only on consent, did you consider any other legal basis?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
3c	If using consent, how will that consent be obtained and recorded and withdrawn if requested? (please state)	Privacy notice at the point the individual agrees to the service.	
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 type="checkbox"/> 100-1000 <input checked="" 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	
7	Have the individuals been informed of this processing?	<input checked="" type="checkbox"/> Yes (explicit)	If no please record as a risk in section C

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		<input type="checkbox"/> Yes (implicit i.e. through Privacy notice, website, leaflet etc) <input type="checkbox"/> No	
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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No User ID matches the Yeti/Maytas ID so records can be linked (but there is no direct system integration).	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 on processing)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Records Management			
10	Does this project create a new Information Asset?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
10a	How will the information be kept up to date and checked for accuracy and completeness?	Key Worker IAG reviews with Service Users	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?	Key Worker IAG reviews with Service Users	
11	If this project involves a new system, does it have the ability to quarantine information/restrict processing? (See guidance for details)	TBC once tender submissions reviewed.	Please see guidance
11a	Does the system have the ability to amend or add notes to data/information at a single data field level?	TBC once tender submissions reviewed.	Please see guidance
12	What checks have been made regarding the adequacy, relevance and necessity for the collection of data?	ESIF contract through DWP requires Employment and Skills to assess the learner and ensure suitability for programme. No additional information is being collected.	If no checks have been made please record this as a risk in section C

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13	Where will the information be stored / accessed? (please see guidance section on Record Management for further information about cloud storage)	<input checked="" type="checkbox"/> LCC System/ Application (Information collected from the system may be transferred to Yeti/Maytas) <input type="checkbox"/> Sharepoint <input type="checkbox"/> LCC email system <input type="checkbox"/> Paper filing system <input type="checkbox"/> LCC File-Shares (e.g Network Drives) <input type="checkbox"/> Removable media <input checked="" type="checkbox"/> External to LCC (cloud, web hosted) (Suppliers system) <input type="checkbox"/> other	
14	What are the retention periods?	European Funding ESF contractual regulations currently retain for EU audits until 2032 as of 2019, although individual has the right to withdraw consent.	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?	Information will be securely destroyed. Exact process TBC once tender submissions reviewed.	
15a	If held electronically, can the destruction be certified?	TBC once tender submissions reviewed.	
15b	Can the information be deleted at a singular data field level?	<input type="checkbox"/> Yes <input type="checkbox"/> No TBC once tender submissions reviewed.	Please see guidance
Security			
16	Who will access the information? (i.e. Services, roles, organisations)	Programme Staff & Key Workers	

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17	Is there an Access Control Policy in place? (Please see guidance section on Security 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 on Security for further information)	<input type="checkbox"/> Yes <input type="checkbox"/> No TBC once tender submissions reviewed.	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?	The system will use pseudonymisation to protect personal data.	
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 type="checkbox"/> Yes <input type="checkbox"/> No TBC once tender submissions reviewed.	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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Sharing			
23	Will any of the information be shared with other organisations or LCC services?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes please record as a risk in section C
23a	Please list all organisations/LCC services involved with sharing	Contracted Employability and Skills Support Organisations (Potentially 2 – 3 but this is TBC and they will not access the system directly).	
23b	What is the legal basis for sharing?	Consent of the service user.	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

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		These are to be written (subject to the above)	
25	Which method will be used to transport information if it is going off site?	<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"/> Removable Media <input checked="" 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)	If no please record as a risk in section C
26	Are you transferring any personal identifiable data/information to a country outside the United Kingdom	<input type="checkbox"/> Yes <input type="checkbox"/> No TBC. Subject to tender bids, EU ESF and DWP Funding Contractual requirement is, generally, to retain data within EU.	If yes please record as a risk in section C

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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?
Potential for data loss/theft from cloud system.	Ensure appropriate security arrangements are in place through DIS	Reduced	
Customers are unaware of how their data will be processed	Ensure privacy notices are fully up-to-date.		