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Public Health  
Wales

# Privacy Impact Assessment

# 2018

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Protocol for nominating Public Health Wales staff for Honours

Privacy Impact Assessment

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## Privacy Impact Assessment

### *Introduction*

Privacy by design is an approach to projects that promotes privacy and data protection compliance from the start. Unfortunately, these issues are often bolted on as an after-thought or ignored altogether. Privacy Impact Assessments (PIA) will become a requirement of UK legislation in May 2018 and they do help organisations comply with their obligations, address privacy concerns, help ascertain whether the data are potentially identifiable and assess privacy risks. For this reason, Public Health Wales requires the completion of a PIA on the commencement of any new project or initiative which may have privacy implications for individuals.

### *Privacy Impact Assessments*

Privacy Impact Assessments (PIA) are an integral part of taking privacy by design approach. This template provides the method for PIA to be conducted within Public Health Wales.

The document is a tool that you can use to identify and reduce the privacy risks of your projects. The PIA can reduce the risks of harm to individuals through the misuse of their personal information and can also reduce the risks to Public Health Wales by failing to comply with the legal requirements of UK Data Protection legislation. If done properly, it will also help you to design more efficient and effective processes for handling personal data.

You can integrate the core principles of the PIA process with your existing project plans and divisional risk management. This will reduce the resources necessary to conduct the assessment and spreads awareness of privacy. The PIA cannot be regarded as completed until signed off by all interested parties in Section 7.

In most cases the project will only be integral to Public Health Wales even though it may be bringing in identifiable data from other organisations. However where a project has a wider NHS Wales remit, such as the Infection Control Network or Microbiology Laboratory Information System data, this may entail completing an All Wales Privacy Impact Assessment which will be scrutinised by the All Wales Information Governance Advisory Board for recommendation to Wales Information Governance Board.

Before completion, project managers should consult the following document which is available at ([link here](#))

*Conducting privacy impact assessments Code of Practice (Information Commissioner's Office, 2014)*

It is also strongly recommended that you engage with the Risk and Information Governance Team prior to conducting the PIA.

## Privacy Impact Assessment

### Screening Questions

#### To be completed by the project lead

Please complete the table below. Answering "Yes" to any of the screening questions below represents a potential IG risk factor that will have to be further analysed to ensure those risks are identified, assessed and mitigated wherever possible by working through sections 1-6.

Please provide a Project Initiation Document or other document that explains your Project.

Category	Screening question	Yes/No
Identity	Will the project involve the collection of new information about individuals?	Yes
Identity	Will the project compel/request individuals to provide information about themselves?	No
Multiple organisations	Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information?	Yes
Data	Are you using information about individuals for a purpose it is not currently used for, or in a way it is not currently used?	Yes
Data	Does the project involve using new technology which might be perceived as being privacy intruding for example biometrics or facial recognition?	No
Data	Will the project result in you making decisions or taking action around individuals in ways which could have a significant impact on them?	Yes
Data	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 are likely to consider as private?	No
Data	Will the project require you to contact individuals in ways which they may find intrusive?	No

## Privacy Impact Assessment

*Section 1 – Brief description of the project. Please provide Project Initiation Document or Business Case if available.*

This Protocol supports the Welsh Government call for honours nominations (Birthday and New Year).

Within the United Kingdom there is an honours system which recognises people:

- Who have made outstanding achievements in public life
- Whose work has brought distinction to British life or enhanced the UK's reputation in their area or activity

The Welsh Government issues a call for nominations twice a year and honours will be awarded either as part of the Queen's New Years honours in January or as part of the Queen's Birthday honours in June. The Welsh Government has advised that nominations can be made at any time during the year to allow for early consideration against the criteria and to help strengthen submissions. Nominations will therefore be welcomed at any point during the year.

It is important that Public Health Wales has arrangements in place to allow us to make nominations to ensure that our staff can be recognised if deserved.

Anyone can nominate a person for an honour, but the critical criterion is that candidates should have genuinely added value, either in their local communities, or in Wales/the UK as a whole, or helped to raise the profile of Wales internationally. For those individuals that are nominated for contributions they have made in their job, their contributions should significantly exceed what would have been expected of them in fully carrying out the requirements of their job. Citations based solely on an individual going over and above what was expected of them in their job would also benefit from evidence of some contribution in charitable work, community activities or other public services.

The purpose of this protocol is to explain the arrangements for making a nomination within the organisation. A Public Health Wales Honours Nominations Panel has been established to consider nominations prior to their onward submission to the Welsh Government.

It is important that there is a strong and diverse pool of candidates from across Wales and the organisation has an important role to play in ensuring this.

There is a requirement to ensure strict confidentiality when making nominations. When making a nomination the individual being nominated **MUST NOT** be informed.

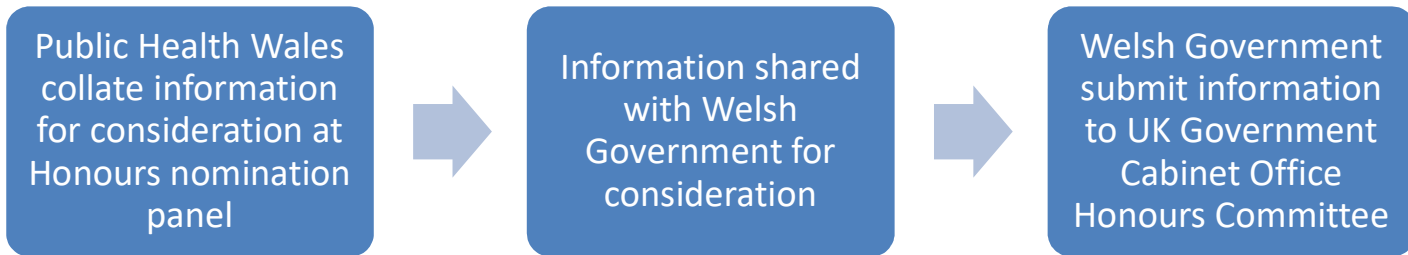
## Privacy Impact Assessment

In order to understand the potential risks to individual's privacy, it is important to know the types of data that will be held and/or shared. Even if exact detail is not known and initial indication will assist in the privacy impact assessment.

<b>Personal</b>	<b>Tick (All that Apply)</b>	<b>Sensitive</b>	<b>Tick (All that Apply)</b>
Name	<input checked="" type="checkbox"/>	Racial / ethnic origin	<input checked="" type="checkbox"/>
Address (home or business)	<input checked="" type="checkbox"/>	Gender	<input checked="" type="checkbox"/>
Postcode	<input checked="" type="checkbox"/>	Political opinions	<input type="checkbox"/>
NHS No.	<input type="checkbox"/>	Religious beliefs	<input type="checkbox"/>
Telephone number	<input checked="" type="checkbox"/>	Trade union membership	<input type="checkbox"/>
Email address	<input type="checkbox"/>	Physical or mental health	<input type="checkbox"/>
Date of birth	<input checked="" type="checkbox"/>	Sexual life	<input type="checkbox"/>
Payroll number	<input type="checkbox"/>	Criminal offences	<input type="checkbox"/>
Driving Licence [shows date of birth and first part of surname]	<input type="checkbox"/>	Biometrics; DNA profile, fingerprints	<input type="checkbox"/>
<b>Additional data types (if relevant):</b>		Bank, financial or credit card details	<input type="checkbox"/>
Length of service with NHS		Mother's maiden name	<input type="checkbox"/>
Length of service in current role		National Insurance number	<input type="checkbox"/>
Date of leaving current post (if applicable)		Tax, benefit or pension Records	<input type="checkbox"/>
Nationality		Health, adoption, employment, school, Social Services, housing records	<input type="checkbox"/>
		Child Protection	<input type="checkbox"/>
		Safeguarding Adults	<input type="checkbox"/>
<b>Comments</b>			

Section 2 – Data flows

*(Use this section to describe any dataflows. Ideally, attach a chart or diagram to show the flows. This should be described in simple terms (e.g. Data inputs – Data processing by PHW – Internal data sharing – External data sharing).*



*Section 3 – Consultation proposals*

*(Use this section to describe any consultation process that has been considered for the project Where appropriate this needs to be clearly linked to the signatories in Section 7)*

The external process is set out by Welsh Government. Public Health Wales has developed an internal process for nominations of Public Health Wales staff. The first iteration of the protocol underwent full consultation with staff and comments were fed into the final document. The protocol is now undergoing a review and the amendments have been issued for consultation to staff. .



Privacy Impact Assessment

*Section 4 – Risk Assessment*

Use this section to describe the risks. In this context you are describing the risks to an individual’s privacy, or the risks to Public Health Wales from non-compliance with the requirements of the Data Protection Act 1998 (or if applicable any other legislation).

No	Risk Description	Likelihood	Cause	Controls	Decision
1					
2					
3					
4					
5					
6					
7					

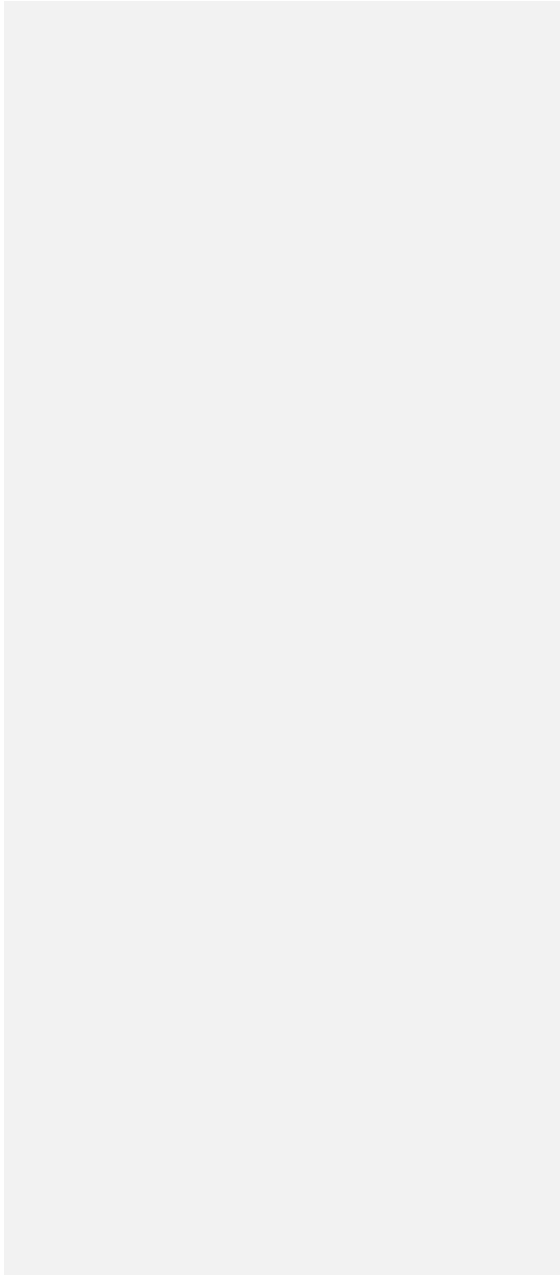
*Scoring guidelines*

Likelihood scoring					
	1 – Rare	2 – Unlikely	3 – Possible	4 – Likely	5 – Almost Certain
Frequency How often might it/does it happen	This will probably never happen/recur	Do not expect it to happen/recur but it is possible it may do so	Might happen or recur occasionally	Will probably happen/recur, but it is not a persisting issue/ circumstances	Will undoubtedly happen/recur, possibly frequently

Privacy Impact Assessment

*Section 5 – Risk Action plan*

No	Risk description	Action owner	Action	Target date
1				
2				
3				
4				
5				
6				
7				



## Privacy Impact Assessment

### *Section 6 - Linking the PIA to the data protection principles*

The General Data Protection Regulations (GDPR) 2018 contains 6 principles for Data Protection with which Public Health Wales is expected to demonstrate compliance. By answering these questions during the PIA process you will identify where there is a risk that the project will fail to comply with the DPA or other relevant legislation, for example the Human Rights Act.

*It is strongly recommended that you consult the Risk and Information Governance Team before you attempt to answer these questions.*

#### **Principle 1**

Personal data shall be processed lawfully, fairly and in a transparent manner in relation to individuals.

Public Health Wales will ensure compliance with this principle by: ensuring the use of the information provided is stored and used in a secure manner. Submitted citations will be stored in a restricted folder on the shared drive and will only be shared using password protection.

#### **Principle 2**

Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes..

Public Health Wales will ensure compliance with this principle by: Ensuring citations submitted are stored in accordance with the Public Health Wales retention and destruction schedule.

**Commented [EH1]:** Do I need to be more specific?

## Privacy Impact Assessment

### Principle 3

Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

Public Health Wales will ensure compliance with this principle by: Personal data must be provided using the proforma included in the protocol. The data is limited to that which is required for a successful citation. No further information will be collected or stored.

### Principle 4

Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.

Public Health Wales will ensure compliance with this principle by: Data will be provided on the citation proforma and will be held in accordance with Public Health Wales retention and destruction schedule.

Commented [EH2]: Do I need to be more specific

### Principle 5

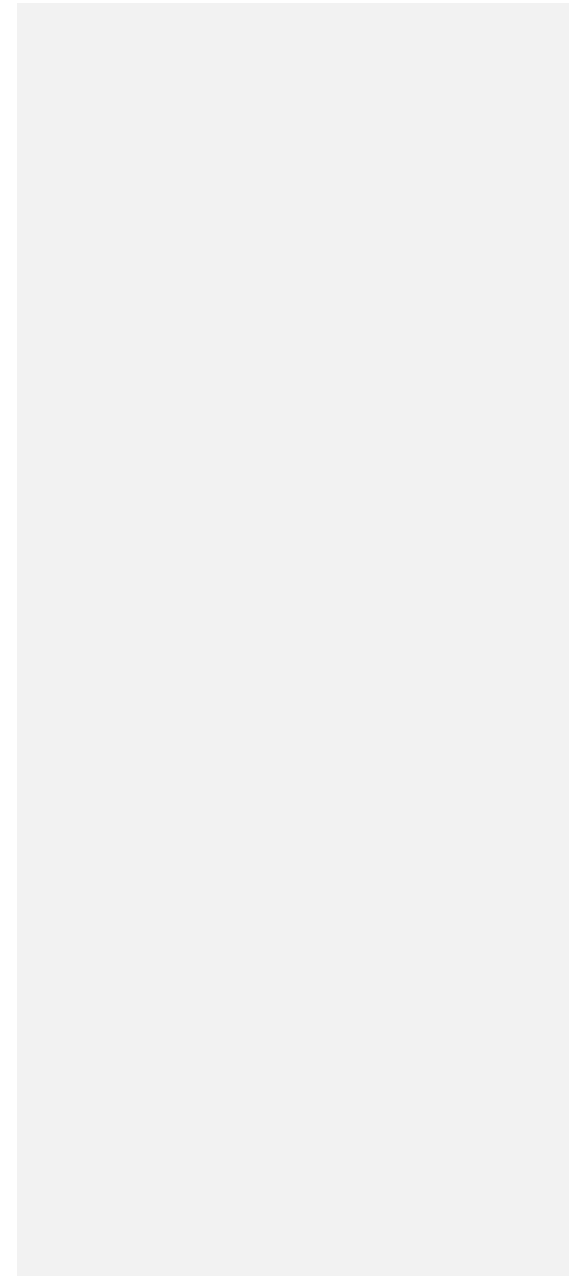
Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals.

Public Health Wales will ensure compliance with this principle by: Information will only be held on the citation proforma that is submitted to the Honours nomination panel. This information will be passed onto Welsh Government and UK Government. Information will be held in accordance with the Public Health Wales retention and destruction schedule.

**Principle 6**

Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Public Health Wales will ensure compliance with this principle by: Information will only be held on restricted access shared drive. Information will be shared outside of Public Health Wales using password protection. Information will not be used for any other purpose. Should there be a breach in use of the information, this will be dealt with under the relevant Public Health Wales policies.



Privacy Impact Assessment

*Section 7 – Sign off*

To be signed off when completed. All key stakeholders to be included as signatories.

<b>Position</b>	<b>Name</b>	<b>Signature</b>	<b>Date</b>
Project Manager	Eleanor Higgins		
Head of Information Governance			

