

Small Scale Privacy Impact Assessment Template

This checklist aims to help departments proposing change to establish whether the personal information aspects comply with the Principles in Schedule 1 of the Data Protection Act (DPA) prior to full deployment or amendment to a project, procedure, policy or process involving the processing of personal data.

All employees are encouraged to seek guidance from the Information Governance Department on extension 2119 and 2816.

METHODOLOGY OF ASSESSMENT
<i>Preparation:</i>
Provide a summary of how you are going to assess this privacy impact.
Review of Operational Car Parking Policy to ascertain what processes use personal information and to ensure they comply with Data Protection Rules and Regulations.
PRIVACY IMPACT ASSESSMENT
<i>Consultation with Stakeholder:</i>
This should document the Privacy Impact in detail and reference concerns raised by the stakeholders in the Project Summary.
The policy and its processes have been reviewed by the Trust’s Transport Steering Group and annual audits take place by the DVLA and British Parking Association.
The enforcement of car parking requires the Trust to keep details of owners who use their private vehicles to park on site while working. This information is used for the allocation of relevant parking permits to allow employees to park in identified staff parking areas. This information is kept electronically and accessed by both the Car park Manager (Transport Manager and Facilities General Manager in his absence) and Facilities Reception staff that need this information to carry out their role.
Where there is a breach of the Trust’s parking terms and conditions and as a result of when Parking Charge Notices are not paid, the Trust will request registered keeper details from the DVLA in order to pursue payment for this debt.
<i>Risk Analysis of Identified Privacy Impact:</i>
Provide a Risk Assessment of the Identified Privacy Impact.
A risk assessment has been carried out and this resulted in a moderate risk scoring.
<i>Proposed Solution:</i>
Description of the measures proposed to counter (or justify) the Privacy Impact.
Information held by the Trust with regards to members of staff who park their vehicles on

site is held within a secure database and the relevant file containing this information has limited access only to those needing to use this information and the information itself is password protected.

Information obtained from the DVLA is immediately uploaded on to the Trust's enforcement system which is both password protected over a SSL encrypted HTTPS link. This data is then transferred to the Trust's Debt Recovery Agency using secure SFTP/SSH link.

REVIEW AND AUDIT PHASE

Implementation:

Provide details that demonstrate that the Proposed Solution was actually implemented, or refer to evidence that approved the privacy impact risk.

All information held by the Trust with regards to its car parking is audited annually by the British Parking Association to ensure the Trust is complying with the Approved Operators Codes of Practice of which the Trust is a member. This audit covers all processes associated with parking and its enforcement.

Additionally the DVLA also carry out an annual audit to ensure that all data which they provide to the Trust to assist in enforcement is handled, stored, and retained in accordance with the Data Protection Rules and Regulations.

A copy of the DVLA compliance report is submitted to the Information Governance Steering Group (IGSG) and is incorporated into the Trust's Information Governance Toolkit Assurance Statement of Compliance (IG Toolkit).

PIA Completed by:

Name:	Keith Loader	Details: Policy/ Procedure/ Project	Operational Car Parking Policy
Job Title:	LSMS & Car Park Manager		
Directorate:	Facilities		
Department:	Car Parks		
Email:	Keith.loader@salisbury.nhs.uk		
		Date:	10/07/18

Reviewed by:

Name:	Heidi Doubtfire-Lynn	Date Received:	10/07/18
Job Title:	IG Manager & Data protection Officer	Date Approved	10/07/18
Directorate:	Corporate Development	Date Declined	
Department:	Informatics		
Email:	Heidi.doubtfire@salisbury.nhs.uk		
Comments/Concerns:			
<div style="border: 1px solid black; height: 40px;"></div>			