

Small Scale Privacy Impact Assessment Template

Data Quality Policy

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
Preparation:
Provide a summary of how you are going to assess this privacy impact.
<p>Consider whether the reviewed policy will directly or indirectly affect the privacy of any individuals</p> <p>Review of current process and what happens at the moment</p> <p>Review of what documentation linked to the policy is completed and kept by the Trust</p> <p>DPA impact</p> <p>Impact on any other Information Governance Policies</p>
PRIVACY IMPACT ASSESSMENT
Consultation with Stakeholder:
This should document the Privacy Impact in detail and reference concerns raised by the stakeholders in the Project Summary.
<p>The Data Quality Policy is supported through two main strands:</p> <ul style="list-style-type: none"> • Staff are trained and assessed in their use of clinical and admin systems and records are kept of their performance. • Staff will have Data Quality Notifications where they have made errors in their data input into clinical and admin systems and are given guidance on how to correct these errors. <p>Staff are informed as part of their initial training, that they will be assessed as part of their training. Staff are informed that assessment should be seen as an opportunity to fill in any gaps in their learning or to raise queries about differences between their classroom training and operational practice. Staff are also informed that the process of DQNs is to support them in identifying and correcting data which is inaccurate.</p>
Risk Analysis of Identified Privacy Impact:
Provide a Risk Assessment of the Identified Privacy Impact.
<p>DQNs are sent directly to the individual by their Trust email address and if outstanding after 10 days are also sent to their line manager. Control of circulation is managed within the DQN system itself</p>

and is updated when staff change role.

Training and Assessment records are managed by the Trust Managed Learning Environment (MLE) and via the IT Training Team secure folder which is accessible only by the Training Team and Data Quality Manager.

A series of web reports are available via the Trust Hospital Application Login. Access to these reports is managed by user access, and they are available to the IT Training Team and Data Quality Manager to enable them to assess the performance of staff.

Regular meetings take place to discuss the results of training and assessments between the IT Training Team and the Data Quality Manager. If any concerns exist about an individual, these are raised directly with individuals and their managers via phone or email. No further written evidence is kept at this point.

Proposed Solution:

Description of the measures proposed to counter (or justify) the Privacy Impact.

The Data Quality Policy uses systems which are electronic rather than paper based and are controlled via user access. Minimal detail is collected to support the DQN process (eg user name, department, line manager, patient id and description of error).

All staff working in IT Training and Data Quality understand the importance of confidentiality and Data Protection, so in having access to the electronic systems and files that exist, provides minimal risk

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.

The Policy will be reviewed in line with the review date. Ad-hoc reviews will also be carried out as and when necessary.

A new Privacy Impact Assessment will also be completed at this time.

PIA Completed by:

Name:	Susan Lees	Details: Policy/ Procedure/ Project	Data Quality Policy
Job Title:	EPR Support Manager		
Directorate:	Informatics	Date:	10 th October 2017
Department:	Informatics		
Email:	Susan Lees.@salisbury. nhs.uk		

Reviewed by:

Name:	<input type="text"/>	Date Received:	<input type="text"/>
Job Title:	<input type="text"/>	Date Approved	<input type="text"/>
Directorate:	<input type="text"/>	Date Declined	<input type="text"/>
Department:	<input type="text"/>		
Email:	<input type="text"/>		

Comments/Concerns:

Referral Form: