

Appendix B

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 Security Policy to ascertain what processes use personal information and to ensure they comply with the Data Protection Act.
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.
<p>The policy and its processes have been reviewed by the Trust’s Security Management Committee and Health and Safety Committee.</p> <p>With regards to the security of the site the CCTV system holds personal information of both staff and the public. The information is held for a maximum of 30 days and then automatically deleted from the system. (CCTV Policy refers)</p> <p>The Trusts ID Cards access control system holds photographs and personal information of all staff including, agency and bank. This information is kept digitally and in paper records. This information is retained for 6 years in accordance with the NHS Records Management Codes of Practice.</p> <p>Lorenzo Smart cards: information is held by I.G. department on a secure server with access by I.G. staff only. NHS Digital also holds Lorenzo details on a secure national server.</p> <p>Information can be held longer for the purposes of the legal proceedings and for this purpose information may be provided to third parties (e.g. Police) on request subject of Data Protection exemptions (Sec 28 & 29 DPA)</p>
<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 see

attached.

Proposed Solution:

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

All information is contained on secure servers that are password protected. Paper records are stored in secure cabinets and retained only for the periods mentioned above.

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.

Annual review of CCTV and ID system. Records over 6 years are removed/deleted and destroyed by shredding.

PIA Completed by:

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Comments/Concerns:

None