

## Small Scale Privacy Impact Assessment Template

### Annual Leave Policy For Consultant and SAS Doctors

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
<b><i>Preparation:</i></b>
<b>Provide a summary of how you are going to assess this privacy impact.</b>
<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
<b><i>Consultation with Stakeholder:</i></b>
<b>This should document the Privacy Impact in detail and reference concerns raised by the stakeholders in the Project Summary.</b>
<ol style="list-style-type: none"> <li>1. The policy provide a uniform and equitable approach to calculating annual leave and bank holiday entitlement for senior medical staff The amount of leave is calculated against contract and in accordance with terms and conditions for the relevant grade</li> <li>2. Leave is requested, agreed (or declined) and recorded as currently and this information is retained by the clinical director (or nominated deputy) within each speciality area.</li> <li>3. The doctor themselves should also retain a copy of their leave approval Leave requests are made by the individual</li> <li>4. A copy of approved leave must be sent to Medical HR to keep a central record.</li> <li>5. During the next review of this Policy, a selection of Medical Personnel who will be asked to provide feedback on the effectiveness of this leave request process and asked to suggest ways of improving this administrative process.</li> </ol>
<b><i>Risk Analysis of Identified Privacy Impact:</i></b>
<b>Provide a Risk Assessment of the Identified Privacy Impact.</b>
<ol style="list-style-type: none"> <li>1. Without the policy and records being kept there is the possibility of insufficient or too much leave allocation for these grades of doctors and individuals discussing and querying their own and others entitlement.</li> </ol>

2. Using a leave request form all requests will be uniform in application and retained in a secure location within the speciality.
3. By using the leave form it may encourage the doctors to keep a record of their leave and thereby reducing the risk of taking too much leave to which they are not entitled
4. Information transferred to would be by email or photocopy of approval form Medical HR retain the information in a secure shared drive. Emails transferring leave requests will be marked NHS Confidential: Lave Request. This will ensure that recipients of the email know how to processes the information on receipt in line with the Trust's acceptable Use of Email Policy.
5. The Medical HR Department have ensured that the form to be used to process leave requests has been reviewed to ensure that adequate, relevant and not excessive data is collected during this process.
6. The Leave request form will include the protective Marking in the Header in line with the Trust's Document Storage, Retrieval and Classification Policy. NHS CONFIDENTIAL: PERSONAL
7. Staff will be instructed to ensure that correspondence relating to personal leave requests are appropriately secured and addressed when sent via the internal postal system.

**Proposed Solution:**

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

1. By adding the full time leave entitlement by grade and seniority it will provide everyone with an overview of maximum leave entitlement in accordance with terms and conditions for the relevant grade
2. The retention of an overview of each person annual leave entitlement and approved leave will ensure a fair and equitable process and will bring the senior medical staff into line with all other staff and their leave records
3. The individual doctor should take responsibility for their leave record
4. Information sent to Medical HR will be retained on a shared drive which is accessed only by HR staff using their system password.

**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:**

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**Reviewed by:**

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<b>Comments/Concerns:</b>	<input type="text"/>		