

Small Scale Privacy Impact Assessment Template

Corporate and Local Induction Policy and Procedure Medical Staff

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.
<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 how documentation is shared within the Trust and externally to new employees</p> <p>DPA impact</p> <p>Impact on any other Information Governance Policies</p>
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.
<ol style="list-style-type: none"> 1. Prior to Induction staff are sometimes emailed their new starter documents by the HR Administrators, often to an External email address 2. At Induction, paperwork is issued to all new starters by Directorate HR Managers (including contract and T&Cs) to be signed during Induction 3. New Starters have to bring proof of identity with them to Induction to be verified by the HR Department 4. HR Notify several internal departments of new starters each week. 5. Employees complete a checklist during Induction that is retained by the HR department on their personal files
<i>Risk Analysis of Identified Privacy Impact:</i>
Provide a Risk Assessment of the Identified Privacy Impact.
<ol style="list-style-type: none"> 1. The documents could potentially be sent to the incorrect email address 2. Paperwork could potentially become mixed up and issued to the wrong person, thus someone else seeing another new starters salary 3. Identity documents are taken from the new starters and photocopied and then given back on the day. The documents could be potentially lost or misplaced whilst photocopies are being made 4. The email sent by HR to other departments contains: name, department, start date, job role, directorate and date of birth (only given to the Education department) 5. The checklist that employees complete at Induction is given back to the Directorate HR Manager at the end of induction who then passes these to HR Administration for filing

Proposed Solution:
Description of the measures proposed to counter (or justify) the Privacy Impact.
<p>1. Emails that are sent are marked 'private and confidential' to ensure that the recipient is aware that the documents are of a confidential nature</p> <p>2. The Directorate HR Manager ensures that all documentation is given to the correct new starter so that no one is given the wrong information</p> <p>3. The HR Administrators ensure that all documentation is kept secure and returned to the correct new starter after this has been photocopied</p> <p>4. The email sent across to other departments is necessary so that the new starter can be properly inducted in to the Trust. The DOB is only passed to the education department as this forms part of the user name used to log in to MLE</p> <p>5. The Directorate HR Manager ensures that the completed form is passed to the HR administrators who ensure that the form is filed on the correct new starters personal file</p>
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.
<p>The Policy will be reviewed in line with the review date.</p> <p>A new Privacy Impact Assessment will also be completed at this time</p>

PIA Completed by:

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