

## Small Scale Privacy Impact Assessment Template

### The Relocation Expenses 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
<b>Preparation:</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 how Relocation agreement/other documents are sent and received by the Trust</p> <p>DPA impact</p> <p>Impact on any other Information Governance Policies</p>
PRIVACY IMPACT ASSESSMENT
<b>Consultation with Stakeholder:</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. Current employees (employed by another Trust) have documents sent via nhs to nhs email addresses</li> <li>2. New employees would have the relocation documents either sent hard copy in external mail or sent via external email</li> <li>3. Information accessed only by Trust employees on a need to know basis</li> <li>4. Once relocation documents are received by employee, they need to sign them and then get them back to the Trust for action.</li> </ol>
<b>Risk Analysis of Identified Privacy Impact:</b>
<b>Provide a Risk Assessment of the Identified Privacy Impact.</b>
<ol style="list-style-type: none"> <li>1. Risk here is very low as NHS.net to NHS.net email is the safest and quickest way to transfer documentation securely</li> <li>2. If emailed externally or in external mail there is a higher chance of either getting lost in the post or going to an incorrect email address</li> <li>3. Low Risk - Information will continue to be accessed on a need to know basis</li> <li>4. If sent back to Trust in external mail they could get lost in the post</li> </ol>
<b>Proposed Solution:</b>
<b>Description of the measures proposed to counter (or justify) the Privacy Impact.</b>
<ol style="list-style-type: none"> <li>1. Low Risk area – would only be impact if internal systems went down</li> <li>2. Emails sent externally to the Trust should be marked as 'NHS Confidential' and any attached</li> </ol>

documents will be password protected. A delivery acknowledgement and read receipt will also be generated at the same time to confirm the information sent has been received and read by the recipient. In addition to this, employees will be given the option to collect all correspondence in person from the HR department.

3. Low Risk – information will continue to be accessed on a need to know basis

4. As above, employees can hand deliver signed documents to the Trust if they wish to

## 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 and ad-hoc reviews will be carried out as Relocation documents are received in HR.

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

### **PIA Completed by:**

<b>Name:</b>	Vicki Horrill	<b>Details: Policy/ Procedure/ Project</b>	
<b>Job Title:</b>	HR Advisor		The Relocation Expenses Policy
<b>Directorate:</b>	Human Resources	<b>Date:</b>	1 <sup>st</sup> December 2014
<b>Department:</b>	HR		
<b>Email:</b>	<a href="mailto:Vicki.horrill@salisbury.nhs.uk">Vicki.horrill@salisbury.nhs.uk</a>		

### **Reviewed by:**

<b>Name:</b>	Heidi Doubtfire-Lynn	<b>Date Received:</b>	18.02.2015
<b>Job Title:</b>	IG Manager & Data Protection Officer	<b>Date Approved</b>	18.02.2015
<b>Directorate:</b>	Corporate Development	<b>Date Declined</b>	
<b>Department:</b>	Informatics		
<b>Email:</b>	<a href="mailto:Heidi.doubtfire@salisbury.nhs.uk">Heidi.doubtfire@salisbury.nhs.uk</a>		
<b>Comments/Concerns:</b>			
<div style="border: 1px solid black; height: 40px;"></div>			