

## Small Scale Privacy Impact Assessment Template

### Performance Appraisal and Pay Progression 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 documents relating to Performance management are handled 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>
<p>Appraisal records are kept electronically and hold only the name, assignment number and department relating to each individual. Managers have access to appraisal records relating to their own staff only. The process is as follows:</p> <p>9.1 Recording of all performance appraisals will be completed online using SpIda (Salisbury Performance Individual Development Appraisal).</p> <p>9.2 Once the performance appraisal has been completed fully (performance appraisal, personal development plan and objectives) the Appraiser must electronically sign off the performance appraisal before notification is sent to the Appraisee. At this stage the Appraisee must also sign off the appraisal.</p> <p>9.3 Once both the Line Manager and Employee have signed off the performance appraisal it is sent electronically to the 2nd Reporting Manager (Line Manager's Line Manager) for validation and sign off.</p> <p>9.4 Once the performance appraisal has been signed off by the 2nd Reporting Manager no changes can be made.</p> <p>9.5 Should the performance appraisal be rejected by the Appraisee, Appraiser or 2nd Reporting Manager electronic notification is sent to the parties. At this stage, a discussion should take place as to why the performance appraisal has been rejected and a resolution sought. Once a resolution has been found the performance appraisal would need to go back through the sign off process.</p>
<b>Risk Analysis of Identified Privacy Impact:</b>

AUTHOR: DIRECTORATE HR MANAGER

PERFORMANCE  
APPRAISAL AND PAY PROGRESSION

VERSION 2.0  
HR POLICIES

MAY 2017

**Provide a Risk Assessment of the Identified Privacy Impact.**

Managers may retain access to appraisal records for staff previously managed in their area if staff are not immediately transferred.  
The privacy impact is low, given the restricted amount of personal data available.

**Proposed Solution:**

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

Managers are reminded at point of transfer to amend the records to ensure staff are moved on at the appropriate time. Increments are not awarded if an appraisal does not take place so staff are also responsible for ensuring their record is up to date and in the right place. SPiDA links to ESR so as soon as someone leaves the record is removed.

**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:**

<b>Name:</b>	Lucy Coombes	<b>Details:</b> <b>Policy/ Procedure/ Project</b>	Performance appraisal and pay progression policy
<b>Job Title:</b>	HR Advisor		
<b>Directorate:</b>	Human Resources		
<b>Department:</b>	HR		
<b>Email:</b>			
		<b>Date:</b>	8 June 2017

**Reviewed by:**

<b>Name:</b>		<b>Date Received:</b>	
<b>Job Title:</b>		<b>Date Approved</b>	
<b>Directorate:</b>		<b>Date Declined</b>	
<b>Department:</b>			
<b>Email:</b>			
<b>Comments/Concerns:</b>			
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