

APPENDIX D – PREVENT Policy

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.
<p>The PREVENT policy was initially introduced in December 2017 following the revision of NHS England Framework of PREVENT (revised October 2017), the policy details the Trusts responsibilities and actions around the Government’s Counter Terrorism Strategy CONTEST of which PREVENT is an element.</p> <p>The Prevent policy requires a PIA as the process involves for referral within the policy and onward referral to the Channel Panel (Multi Agency partners) the release of information.</p> <p>The Policy has been reviewed and the PIA reviewed and updated in accordance.</p> <p>The information shared will be monitored through a gateway process with the trust and the process is detailed in the policy whereby only the Head of EPRR and Accountable Executive Officer can instigate the process.</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.
The policy has been consulted through the integrated safeguarding group, and has been reviewed by the Information Governance Manager, who has provided guidance around the GDPR and updates.
<i>Risk Analysis of Identified Privacy Impact:</i>
Provide a Risk Assessment of the Identified Privacy Impact.
The risks around confidential sensitive information has been mitigated through the gateway control of the Head of EPRR/Prevent Lead and Executive Accountable Officer being able to make referrals, and following the guidance around GDPR in addition the UK Government’s Counter Terrorism Strategy will subject to sharing appropriate information as detailed as a responsible organisation under the Civil Contingencies Act (2004). See also explicit information from NHS England: Practical Guidance on the sharing of information and information governance for all NHS organisations specifically for Prevent and the Channel process.
<i>Proposed Solution:</i>

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

The policy states we will adhere to the General Data Protection Regulations (GDPR) – details below: The General Data Protection Regulations (GDPR) requires organisations processing personal data to ensure a legal basis exists for the collection, storage, retention and sharing of data.

Legal Basis for Sharing of Information

- As a healthcare provider we are legally in accordance with [Articles 6](#) and [9](#) of the EU General Data Protection Regulations.
- General Data Protection Regulations Gateway;
- Article: Lawfulness of processing
- Article 6: Processing of personal data shall be lawful only if (c) processing is necessary for compliance with a legal obligation to which the controller is subject;
- Article 9: Processing of special categories of data (g) processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

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 solution and documentation is available to staff in the Policy and to the Head of EPRR/ prevent Lead and Executive Accountable Officer through the documentation in forms of the policy, iRespond PREVENT action cards and the NHS England PREVENT guidance see link to website for full details: <https://www.england.nhs.uk/ourwork/safeguarding/our-work/prevent/> & <https://www.gov.uk/government/publications/nhs-prevent-training-and-competencies-framework/nhs-prevent-training-and-competencies-framework>

PIA Completed by:

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Comments/Concern

s: