

Information Management Team: **Data Protection Impact Assessment**
Version 2:0

Data Protection Impact Assessment (DPIA)

Project Name:	Equality Strategy
Project Manager or Sponsor (PM):	Yvonne Okiyo
Name of person completing the DPIA if different to (PM):	
Service Team and Department:	Policy and Partnerships, Resources Department
Relevant Director and Executive Director:	Gavin Handford, Jacqueline Harris-Baker
Information Management Champion(s) for service area:	
Date DPIA received by the IMT:	02.06.20
Date approved by DPO:	07.07.20
Date approved by IMT :	07.07.20

1 Project Scope

Include the projects aims, potential impact, all individuals involved in the project and those that may be affected by it. The stakeholders should be as broad as possible so that the list can be edited down after consultation)

Under the Equality Act 2010 (Specific Duties) Regulations 2011, councils employing more than 150 people will have to produce "equality objectives" at least once every four years. Our current equality objectives come to an end this year.

The Council is undertaking a process of developing an Equality Strategy and accompanying action plan for 2020-2024. The Strategy will set out the Councils vision to abolish inequality in Croydon and work towards a place where all have an equal opportunity to prosper as set out in its Corporate Plan 2018 - 2022.

Part of this process will also consist of developing refreshed equality objectives which will help the Council meet its requirements under the Equality Act 2010.

Part of this process will also consist of examining the health, socio-economic and new dimensions of inequalities amplified by the Coronavirus pandemic. This will looking at how different groups in the Borough have been affected by this period and work towards reducing these inequalities.

As part of this process, we would like to engage and consult with residents and local communities across the Borough to find out their views on our current equality objectives and use their feedback to develop the refreshed equality objectives that will form the basis of the strategy. We will want to make this process as inclusive as possible and as such will be consulting with a wide range of stakeholders and ensure they are representative of all communities. *A list of stakeholders has been sent separately.*

Information Management Team: **Data Protection Impact Assessment**
Version 2:0

2 Data Description

Answer the questions below so that there is a clear understanding about how the information will be used, who will use it etc. Remember that it's personal information (i.e. information about individuals) that you need to be concerned with. If you do not have answers to all the questions at this time, simply record what you do know.

<p>Whose information is being used?</p> <ul style="list-style-type: none"> - Are there additional concerns that need to be considered due to individuals sensitive/ complex circumstances? i.e. vulnerable person 	<p>The information that is being collected is through an online consultation and online focus groups. The consultation is open to all members of the public and we aim to ensure it is representative across groups that share a protected characteristic. The information that has been requested will not lead to the personal identification of any one person. However, the broad questions that have been asked, and the broad number of people that have been targeted for responses does mean that there is a strong possibility that a person(s) could identify themselves in an open text box should they wish to do so.</p>
<p>What information is being used?</p> <ul style="list-style-type: none"> - Consider the nature of this information E.g. Child's social care file 	<p>The questions that have been asked are centred around the current equality proposed outcomes and priorities for children and young people in Croydon. Therefore responses received should detail how important or unimportant people feel those priorities/ outcomes are.</p> <p>We have also requested information in relation to a participant's protected characteristics, in order to respond to the council's commitment to monitor equalities data. The nature of this information does not lead to the identification of any individual person, provided that respondents to not use the "other" text boxes to identify themselves.</p>
<p>Does it include special category or criminal offence data?</p>	<p>No</p>
<p>Can an individual be identified easily from the information?</p>	<p>No</p>

Information Management Team: **Data Protection Impact Assessment**
Version 2:0

<p>What is the potential impact on privacy of this information?</p> <ul style="list-style-type: none"> - <i>What are the risks/ impact to an individual if this information was lost, stolen or manipulated?</i> - <i>E.g. could it be sold?</i> 	<p>Providing that individuals do not choose to, for any reason, add personal information into the free text boxes, there would be no potential risk or impact on privacy should this data be lost, stolen or manipulated. It provides no personal information to be used in anyway.</p> <p>However, should an individual respondent choose to share their information in the consultation, there would be a risk that that person could be identified or contacted should something untoward happen to the raw data set.</p>
<p>Will this change the manner in which we handle, use or protect this information? <i>e.g. should it be encrypted?</i></p>	<p>In order to mitigate this risk that an individual shares their personal information in free text boxes, the raw data set that is gathered through the get involved website, will only be handled by the two members of the team who are responsible for analysing the raw data set after it is initially exported. The data set will then be cleansed of any potentially personal information, and saved as a workable data set. The raw data set will then be deleted, and only the workable data set will be used.</p> <p>High level findings of the consultation will be shared with internal agencies and partners where appropriate and relevant to the development of the equality strategy, no personal information will be shared as part of this, and the full data set will be held by the Policy Team. The data will be deleted after two years.</p>

Information Management Team: **Data Protection Impact Assessment**
Version 2:0

3 Consultation process

Consider how to consult with relevant stakeholders.

When did you consult individuals?	Engagement to take place June 2020
How did you consult individuals?	Consultation to take place via online focus groups - retro workshops via Retrium as well as online survey using the 'Get Involved' platform
If not explain why it is not appropriate.	
Who else within the organisation have you consulted with?	We will consult with staff diversity networks, Executive Leadership Team (ELT), Departmental Leadership Team (DLT)
Do you need to speak with your processor to assist?	No
Do you plan to consult information security experts or any other experts?	Yes

Information Management Team: **Data Protection Impact Assessment**
Version 2:0

4 Assessment of necessity and proportionality of data usage

What is your lawful basis for processing?	We will not be processing personal data
Is consent being relied upon to share the information? Has explicit consent been obtained? Are data subjects able to opt out from giving consent?	Consent is not required as no personal data is being requested.
Does the processing actually achieve your purpose?	N/A
How will the information be collected? (Verbally, forms, intranet, interview, 3 rd party, anonymous)	Information is being collected via an online server and online focus groups, however as previously mentioned, personal data is not being requested.
Is there another way to achieve the same outcome?	No. We need to ensure that residents and partner organisations have had the opportunity to comment on joint strategic vision and priorities, in addition to ensuring that their feedback is used to develop the refreshed equality objectives that will form the basis of the strategy and they feel that we are working towards the right priorities to reducing inequalities in the Borough.
How will the information be used? <i>e.g. to write a report</i>	To develop the refreshed equality objectives that will form the basis of the Equality Strategy
Do the individuals know and understand how their information will be used? If there are changes to their information does the privacy notice need to be amended?	We will inform individuals how their information will be used as part of the consultation process
How will it be stored, kept up to date and disposed of when no longer required? <i>e.g. stored in locked cabinet/securely shredded</i>	<p>The data will only be gathered once and therefore will not be updated.</p> <p>The raw data set that is gathered through the get involved website, will only be handled by the two members of the team who are responsible for analysing the raw data set after it is initially exported. The data set will then be cleansed of any potentially personal information, and saved as a workable data set. The raw data set will then be deleted, and only the workable data set will be used.</p> <p>High level findings of the consultation will</p>

Information Management Team: **Data Protection Impact Assessment**
Version 2:0

	be shared with internal agencies and partners where appropriate and relevant to the development of equality strategy, no personal information will be shared as part of this, and the full data set will be held by the Policy Team. The data will be deleted after two years.
How will you ensure data quality and data minimisation?	N/A
Who will have access to the information within LBC? - <i>Include approximate number of users</i>	3 members of the policy team, 1 member of the communications and engagement team.
Are there new or significant changes to the way we manage, use, handle or collect this information? - <i>Include any identified concerns for the individuals, would these changes heighten risks involved</i>	No
Will individuals within an existing database be subject to new or changed handling? - <i>If yes amendments need to be made to the privacy notice and these individuals need to be informed.</i>	No
What are the internal arrangements for processing this information? <i>e.g. number of staff who will have access</i>	N/A – one time only data set
How will the information be updated? <i>e.g. monthly check</i>	N/A – one time only data set
Does the project involve the exchange of information outside of the UK and are there set standards for how the information will be treated? How will you safeguard international transfers?	No
How will you prevent function creep?	N/A – high level findings only will be shared which will be anonymous.

5 Assessment of the risks to the rights and freedoms of data subjects

You must describe the source of risk and the nature of potential impact upon individuals and identify any additional measures to mitigate those risks.

5a Security

Who will be responsible for the control for this information?	Policy Team
How will the access to this information be controlled?	The raw data set will be deleted after a workable data set is created. Therefore no risk of access to personal data.

Information Management Team: **Data Protection Impact Assessment**
Version 2:0

Is the data correctly managed to reduce the risk of collateral intrusion to the data subject?	N/A
Are there adequate provisions in place to protect the information? If so what are they? <i>e.g. Process, security</i>	N/A - as outlined above

5b Sharing

Who is the information shared with, why are we sharing the information with this organisation?	High level findings will be shared only, no personal data.
What purpose does the information we are sharing have to the third party? - <i>Ensure that we only share relevant information and not excessively</i>	Partners will only receive high level findings of the consultation. No personal data will be shared.
Who will have access to the information, externally? - <i>Include approximate number of users</i> - <i>Describe any sharing arrangements and what the level of access is. It may help to produce a diagram to show the data flows.</i>	As above.
How will it be transmitted to third parties and when? How often?	N/A
Is there a data sharing agreement in place?	N/A – as above
At what stage will the information be transferred?	N/A

5c Identified Risks and assessment:

You should take into account the sensitivity of the information and potential harm that inappropriate disclosure or use of the information could cause to any individuals concerned. You should also consider the reputational loss to the Council and the potential for financial penalties being imposed by the ICO.

To assess the level of risk you must consider both the **likelihood** and the **severity** of any impact on individuals. A high risk could result from either a high probability of some harm or a lower possibility of serious harm.

The severity impact level and likelihood should be scored on a scale of 1 to 10 with 1 being low severity and 10 high. The two scores should be **added** together. The RAG status is derived from the following scale:

Score:

- 15 to 20 = Red (High)
- 8 to 14 = Amber (Medium)
- Below 8 = Green (Low)

To be completed by Project Sponsor

Risk Identified	Severity of Impact	Likelihood of harm	Overall RAG rating
To focus on info that is shared before consent – is dob/ anon details of the family/ sw/mgr/lawyer/ reasons for eligibility	1	1	2 – Green= Low
A member(s) of the public may use the free text boxes in the consultation to identify themselves as an individual or provide personal data where it is not requested.	1	1	2 – Green= Low

Information Management Team: **Data Protection Impact Assessment**
Version 2:0

6 Identify measures put in place to reduce risk.

You must now identify additional measures you could take to reduce or eliminate any risk identified as medium or high risk in step 5.

To be completed by the Project Sponsor

Risk Identified	Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved
A member(s) of the public may use the free text boxes in the consultation to identify themselves as an individual or provide personal data where it is not requested.	<ol style="list-style-type: none"> 1. Do not use free text boxes – this is not an option, as it does not allow us to gather the information that we require for an effective consultation. 2. One member of the policy team to review the raw data set and remove any indications of personal data, and save the new set as the workable data to be used for consultation analysis. The raw data set will then be permanently deleted. 	Eliminated	Low	Yes / No

<p>(in no particular order):</p> <p>1 Individuals contact details</p> <p><i>The Council should give further consideration to the individuals contact details (personal data). For example, are they retaining these in order to keep the individuals updated with the Policy's progress? If so;</i></p> <ul style="list-style-type: none"> • <i>the individuals would need to give their freely given consent,</i> • <i>the information should be kept secure,</i> • <i>the list should not used for other purposes and</i> • <i>the information should be deleted when no longer needed.</i> <p>2 Collecting information</p> <p><i>The form for collecting information must only request information needed for the drafting of the Policy (and not excessive information). It must also include a clear description of how the information will be handled (an appropriate Privacy Notice) and give their consent for their information to be used by the Council. I am happy to help with this drafting if you wish.</i></p> <p>3 Processors</p> <p><i>The DPIA mentions that the information will be collected via an external website. There should be the appropriate</i></p>		
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Information Management Team: **Data Protection Impact Assessment**
Version 2:0

<i>contract clauses in place to ensure the website handles information properly (such as information security and deleting information).</i>		
Consultation responses reviewed by:		If your decision departs from individuals views you must explain your reasons.
DPIA to be keep under review by:		

If you require further guidance to complete this DPIA please contact:

Information Management Team (IMT)

Ext: 47777

Email: information.management@croydon.gov.uk

Data Protection Officer

Email: DPO@croydon.gov.uk