



Privacy Impact Assessment - Checklist

Key Information – please be as comprehensive as possible.

Project Name:	
Description of project:	<p><i>Explain what the project aims to achieve, what the benefits will be to the organisation, to individuals and to other parties.</i></p> <p><i>You may find it helpful to link to other relevant documents related to the project, for example a project proposal</i></p>

Will the project involve any data from which individuals could be identified (including pseudonymised data)? (Yes/No)	
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IF NO THEN YOU DO NOT NEED TO ANSWER ANY FURTHER QUESTIONS AND A PIA IS NOT REQUIRED.

Key Contacts

Project Manager Name & Job Title:	
Project Manager Email:	
Project Manager Phone:	
Key Stakeholder Names & Roles:	



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Screening Questions	YES or NO
Will the project involve the collection of new information about individuals?	
Will the project compel individuals to provide information about themselves?	
Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information?	
Are you using information about individuals for a new purpose or in a new way that is different from any existing use?	
Does the project involve you using new technology which might be perceived as being privacy intrusive? For example, the use of biometrics or facial recognition.	
Will the project result in you making decisions about individuals in ways which may have a significant impact on them? e.g. service planning, commissioning of new services	
Is the information to be used about individuals' health and/or social wellbeing?	
Will the project require you to contact individuals in ways which they may find intrusive?	

If any of the screening questions have been answered "YES", then please continue with the Privacy Impact Assessment Questionnaire (below).

If all questions are "NO", please return the document to the Information Governance Team and **do not** complete a Privacy Impact Assessment. Please email the completed screening to the M&L CSU IG Team mlcsu.ig@nhs.net and notify the IG Support Officer.



Privacy Impact Assessment – Questionnaire

Use of personal information	
Description of data:	
What is the justification for the inclusion of identifiable data rather than using de-identified/anonymised data?	
Will the information be new information as opposed to using existing information in different ways?	
What is the legal basis for the processing of identifiable data? If consent, when and how will this be obtained and recorded?	
Who will be able to access identifiable data?	



Will the data be linked with any other data collections?	
How will this linkage be achieved?	
Is there a legal basis for these linkages?	
What security measures will be used to transfer the data?	
What confidentiality and security measures will be used to store the data?	



<p>How long will the data be retained in identifiable form? And how will it be de-identified? Or destroyed?</p>	
<p>What governance measures are in place to oversee the confidentiality, security and appropriate use of the data and manage disclosures of data extracts to third parties to ensure identifiable data is not disclosed or is only disclosed with consent or another legal basis?</p>	
<p>If holding personal i.e. identifiable data, are procedures in place to provide access to records under the subject access provisions of the DPA?</p> <p>Is there functionality to respect objections/ withdrawals of consent?</p>	
<p>Are there any plans to allow the information to be used elsewhere either in the CCG, wider NHS or by a third party?</p>	
<p>Describe the information flows</p> <p>The collection, use and deletion of personal data should be described here and it may also be useful to refer to a flow diagram or another way of explaining data flows.</p>	
<p>Does any data flow in identifiable form? If so, from where, and to</p>	



<p>where?</p>			
<p>Media used for data flow? (e.g. email, fax, post, courier, other – please specify all that will be used)</p>			
<p>Consultation requirements</p> <p>Part of any project is consultation with stakeholders and other parties. In addition to those indicated “Key information, above”, please list other groups or individuals with whom consultation should take place in relation to the use of person identifiable information.</p> <p>It is the project’s responsibility to ensure consultations take place, but IG will advise and guide on any outcomes from such consultations.</p>			
<p>Privacy Risks</p> <p>List any identified risks to privacy and personal information of which the project is currently aware. Risks should also be included on the project risk register.</p>			
<p>Risk Description (to individuals, to the CCG or to wider compliance)</p>	<p>Proposed Risk solution (Mitigation)</p>	<p>Is the risk reduced, transferred, or accepted? Please specify.</p>	<p>Further detail if required</p>



Further information

Please provide any further information that will help in determining privacy impact.

Following acceptance of this PIA by Information Governance, a determination will be made regarding the privacy impact and how the impact will be handled. This will fall into three categories:

1. No action is required by IG excepting the logging of the Screening Questions for recording purposes.
2. The questionnaire shows use of personal information but in ways that do not need direct IG involvement – IG may ask to be kept updated at key project milestones.
3. The questionnaire shows significant use of personal information requiring IG involvement via a report and/or involvement in the project to ensure compliance.

It is the intention that IG will advise and guide those projects that require it but at all time will endeavour to ensure that the project moves forward and that IG is not a barrier unless significant risks come to light which cannot be addressed as part of the project development.

Please email entire completed document to M&L CSU IG Team mlcsu.ig@nhs.net and notify the IG Support Officer.