

# Data Protection Impact Assessment

DPIA Name:

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**Stage 1: Data Protection Impact Assessment screening questions for proposed changes. Please read the DPIA guidance document before completing this form**

	Screening questions	Yes	No
1	Will the project involve the processing of information about individuals? Please note this does include pseudonymised data*	✓	<input type="checkbox"/>
2	Will information about individuals be disclosed or shared with organisations or people who have not previously had routine access to the information?	✓	✓
3	Are you using information about individuals for a purpose it is not currently used for, or in a way it is not currently used?	✓	✓
4	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.	<input type="checkbox"/>	✓
5	Does any phase of the project utilise automated decision making based on the information provided/ shared	<input type="checkbox"/>	✓
6	Will the project require you to contact individuals in ways which they may find intrusive? e.g marketing*	<input type="checkbox"/>	✓

**If the answer is “yes” to any of the questions above then a DPIA must be carried out.**

**Please ensure that this has been to the following :**

**Information Management & Governance, Subject matter experts including Business Partners, ICT, CYBER.**

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## Stage 2: Data Protection Impact Assessment

### Version control

Version	Status	Revision Date	Summary of Changes	Author

DPIA Approved by Information Asset Owner	Name: Caroline Semple	Date:
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### Section A: New/Change of System/Project General Details

<b>Name:</b> (of the project or change to be delivered)	Prescribe & Tanita
<b>Background/ Objectives:</b> (why is the new system / change required?)	To assist the service with increasing the retention of customers using the fitness services through communication routes. Improves customer service through programmes having images and instructions to assist their use of the gym/classes. Improves the customer service as it allows them to record their journey in one place/APP which links with their other wearable devices.
<b>Information flow diagram*</b> (please see examples in guidance) see section 3	<ol style="list-style-type: none"><li>1. A customer books in for an appointment to use the gym.</li><li>2. An individual programme is designed for them, this can include body measurements.</li><li>3. A customer can download the MyWellness APP to allow them to manage their programme in and out of Active Leeds.</li><li>4. If a customer does not wish to download the APP then the programme can be printed for them.</li><li>5. Staff will book the customer in for a review appointment. Staff are able to see when reviews are due and can contact customers to book a review through using the tools available within Prescribe.</li></ol>

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	6. Director level allows us to see who is due a review programme so enables us to communicate with them. 7. We can report on a range of KPI's relating to this.
<b>State who is the Data Controller*</b>	LCC
<b>Benefits:</b> (explain what the project aims to achieve, what benefits to the organisation, to individuals and to other parties)	Improve the customer journey for LCC and the customer. Customers are able to see progress on their goals and staff are able to better communicate and motivate customers. Meaning that customers will stay with the service for longer increasing income.
<b>Consultation:</b> (If required detail here any consultation undertaken with the public, partners, internal or external stakeholders)	Staff within the service and senior officers.
<b>Implementation date:</b> for example the timescales required for completion, implementation date	October/November 2018
<b>Relationships / Partnerships:</b> (e.g. with NHS, or private organisation, stakeholders, please also if possible state whether they are designated as data controllers or data processors)	Technogym
<b>Project Manager:</b>	Name: Caroline Semple
	Job Title: Sport Programme Manager
	Service: Active Leeds
	Telephone: 07891 270968
	Email: Caroline.semple@leeds.gov.uk
<b>Information Asset Owner(s)</b> All information assets must have an information asset owner (IAO). IAO are usually Heads of Service or Chief Officers.	Name: Mark Allman
	Job Title: Head of Service
	Service: Active Leeds
	Telephone:
	Email: Mark.allman @leeds.gov.uk
<b>System Administrator</b> (if applicable)	Name:
	Job Title:
	Service:
	Telephone:
	Email:

**Section B: Data Protection Impact Assessment** (please complete all questions as fully as possible)

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	Question	Response	Guidance document
<b>Processing</b>			
<b>1</b>	Please state the purpose for the processing of the data / information: (for example, service provision, research, audit, employee administration)	To understand the member journey of our customers using the gym, frequency of use, review appointments being booked. Track their activity levels.	
<b>2</b>	Please tick the data items/ information that will be processed	<input checked="" type="checkbox"/> Name <input type="checkbox"/> Address/Postcode <input type="checkbox"/> Date of Birth <input checked="" type="checkbox"/> Telephone no/email <input type="checkbox"/> Next of Kin <input type="checkbox"/> National Insurance Number <input type="checkbox"/> NHS Number <input type="checkbox"/> Gender <input type="checkbox"/> GP / Consultant <input type="checkbox"/> Pseudonymised	
<b>2b</b>	Special categories and Criminal data	<input type="checkbox"/> Sexual Orientation <input type="checkbox"/> Political opinions/trade union membership <input type="checkbox"/> Religion <input checked="" type="checkbox"/> Physical health <input type="checkbox"/> Mental health <input type="checkbox"/> Medical history <input type="checkbox"/> Ethnic Origin <input type="checkbox"/> Sexual life <input type="checkbox"/> Criminal convictions	
<b>2c</b>	Other (please specify)		
<b>3a</b>	What is the legal basis you are relying on for the processing of the data/information. (please see guidance section 4 for all of question 3)	Consent	
<b>3b</b>	If you are relying <b>only</b> on consent, did you consider any other legal basis?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

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<b>3c</b>	If using consent, how will that consent be obtained and recorded and withdrawn if requested? (please state)	Will be recorded when signing up to the service (privacy statement will need to be generated) and they can be removed if they no longer want to be part of the programme.	
<b>4</b>	Will personal data items be collected which have not been collected before?	<input type="checkbox"/> Yes We already hold data on items in XN or on our boditrax system. <input checked="" type="checkbox"/> No	
<b>5</b>	The data of approximately how many individuals will be affected?	<input type="checkbox"/> 1-10 <input type="checkbox"/> 10-100 <input type="checkbox"/> 100-1000 <input type="checkbox"/> 1000-10,000 <input checked="" type="checkbox"/> 10,000+	
<b>6</b>	How is the personal data obtained?	<input checked="" type="checkbox"/> From Client/Service User <input type="checkbox"/> From partner agencies <input type="checkbox"/> From 3 <sup>rd</sup> Party/ Another Individuals <input type="checkbox"/> For employment purposes <input type="checkbox"/> Internal services <input type="checkbox"/> Other	
<b>7</b>	Have the individuals been informed of this processing?	<input checked="" type="checkbox"/> Yes (explicit) <input type="checkbox"/> Yes (implicit i.e. through Privacy notice, website, leaflet etc) <input type="checkbox"/> No	If no please record as risk in section C Do we need a privacy notice for this?
<b>8</b>	Does the information involve new linkage / matching of personal data with data in other collections, or is there significant changes in data linkages / matching?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes please record as a risk in section C
<b>9</b>	Does this project involve utilising data for the purposes of automated decision making/profiling. If so add details (please see guidance section 4)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Please see guidance
<b>Records Management</b>			

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<b>10</b>	Does this project create a new Information Asset?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
<b>10a</b>	How will the information be kept up to date and checked for accuracy and completeness?	Customers can manage their own account and change it themselves.	If there are no documented procedures to evidence this answer, please record as a risk in <a href="#">section c</a>
<b>10b</b>	What processes are in place for data quality checking?	Email verification to access account.	
<b>11</b>	If this project involves a new system, does it have the ability to quarantine information/restrict processing? (See guidance for details)	No	Please see guidance
<b>11a</b>	Does the system have the ability to amend or add notes to data/information at a single data field level?	Yes	Please see guidance
<b>12</b>	What checks have been made regarding the adequacy, relevance and necessity for the collection of data?	Only basic personal information is required to sign up and these are the same as our XN system which they join up to as part of the membership. This data is not excessive and has been checked by Information Governance in the past in this regard.	If no checks have been made please record this as a risk in <a href="#">section C</a>
<b>13</b>	Where will the information be stored / accessed? (please see guidance section 4 for further information about cloud storage)	<input type="checkbox"/> LCC System/ Application <input type="checkbox"/> Sharepoint <input type="checkbox"/> LCC email system <input type="checkbox"/> Paper filing system <input type="checkbox"/> LCC File-Shares (e.g Network Drives) <input type="checkbox"/> Removable media <input checked="" type="checkbox"/> External to LCC (cloud, web hosted) <input type="checkbox"/> other	

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14	What are the retention periods?	Whilst participants are active in the app this will remain live. And we can delete when they leave our services. The Council's retention period for our programmes are 3 years.	If there are no documented retention periods please record as a risk in <a href="#">section C</a>
15	How will the information be destroyed when it is no longer required?	Customers can close their APP account at anytime. We can delete if a member and leave, non members	
15a	If held electronically, can the destruction be certified?	No	
15b	Can the information be deleted at a singular data field level?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Please see guidance
<b>Security</b>			
16	Who will access the information? (i.e. Services, roles, organisations)	Active Leeds Team Gym team Programme team Business team	
17	Is there an Access Control Policy in place? (Please see guidance section 6 for further information)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Our Fitness Manager will control access, staff have to be added by her and then she determines the level of access each person requires, for example, Caroline Semple would have access at director level but gym staff will only have access at fitness level. Levels of access at each level are pre-determined in Prescribe and then we select the appropriate level for each designation.	
18	Is there an ability to audit access to the information? (Please see guidance section 6 for further information)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Only the Fitness Manager can set access this is controlled but Caroline Semple will be able to	If no please record as a risk in <a href="#">section C</a> .

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		look at access levels if she needs to review	
19	Detail what security measures have been implemented to secure access and limit the use of personal information?	A above, access is determined by job designation.	
20	Does this project involve privacy invasive technologies? (Please see the guidance)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes please detail	
21	Is there a business continuity and a disaster recovery plan in place?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  Not required, as this is essentially an optional service which could be provided directly by the Council if required.	If no please record as a risk in <a href="#">section C</a>
22	Where external parties are accessing LCC information has it been identified that they require IG training?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No All processors are GDPR compliance and IG have reviewed their contracts etc.	
<b>Sharing</b>			
23	Will any of the information be shared with other organisations or LCC services?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes please record as a risk in <a href="#">section C</a>
23a	Please list all organisations/LCC services involved with sharing	Technogym and its subprocessors Amazon Web Services, Sendgrid, Google and TomWare S.c.a.r.l.	
23b	What is the legal basis for sharing?	Contract	Please note that your legal basis for processing may be different from your legal basis for Sharing. Please refer to guidance
24	Will there be signed information sharing agreements in place	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If no please record as a risk in <a href="#">section C</a>
25	Which method will be used to transport information if it is going off site?	<input type="checkbox"/> Standard email <input type="checkbox"/> Secure email (e.g. GCSx) <input type="checkbox"/> Website	If no please record as a risk in section C



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		<input type="checkbox"/> Via courier <input type="checkbox"/> By hand <input type="checkbox"/> Via external post <input type="checkbox"/> Via telephone <input type="checkbox"/> Removable Media <input type="checkbox"/> Secure file transfer protocol (eg. mail express) <input type="checkbox"/> Other file transferring applications (dropbox) <input type="checkbox"/> Social Media <input type="checkbox"/> Providing access via LCC systems <input checked="" type="checkbox"/> Other (please give details)  Entry input via app.	
26	Are you transferring any personal identifiable data/information to a country outside the United Kingdom	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Sendgrid are based in the US. Technogym have standard GDPR compliant contract clauses with them, however.	If yes please record as a risk in <a href="#">section C</a>

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## Section C: Identify the Information, Privacy and related risks

Identify the key risks. All risks identified from the questionnaire in section B should be included, plus any others of relevance. Describe the actions you could take to reduce the risks and any future steps which would be necessary (e.g. the production of new procedures or future security elements for systems).

Please note if your project has a large number of risks there is an alternative spreadsheet you can use, (please ask your IG officer) or simply continue onto a separate sheet.

<u>Risk</u>	<u>Solution</u>	<u>Result:</u> is the risk eliminated, reduced, or accepted?	<u>Evaluation:</u> is the final impact on individuals after implementing each solution justified, compliant and proportionate response to the aims of the project?
Consent	Privacy statement required		