

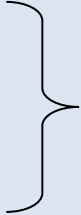
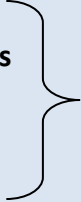
Data Protection Impact Assessment (DPIA)

Please complete all questions with as much detail as possible (liaising with partners/third parties) and then contact the IG Team prior to seeking approval.

Section 1: System/Project General Details

| | | |
|--|---|---|
| System/project/process (referred to thereafter as 'project') title: | Shred-it – Confidential data collection | |
| Objective: | The nature and purpose of the processing is destruction/shredding of confidential by Shred-it as the data processor and described in the DPA. | |
| Detail: Why is the new system/change in system required? Is there an approved business case? | The Shred-it contract has been extended to include CHC who are located at a different premises to the CCG HQ. | |
| Stakeholders/Relationships /Partners: Please outline the nature of such relationships and the corresponding roles of other organisations. | None | |
| Other related projects: | None | |
| Project lead: | Title: | Planning Manager |
| | Department: | Strategic Planning |
| Information Asset Owner: All information systems/assets must have an Information Asset Owner (IAO) . IAO's should normally be a Head of Department/Service. | Title: | Planning Manager |
| | Department: | Strategic Planning |
| Information Asset Administrator: Information systems/assets may have an Information Asset Administrator (IAA) who reports the IAO. IAA's are normally System Managers/Project Leads. | Name: | N/A |
| | Title: | Click here to enter text. |
| | Department: | Click here to enter text. |
| | Telephone: | Click here to enter text. |
| | Email | Click here to enter text. |

Section 2: Data Protection Impact Assessment Key Questions

| | Question | Response |
|------------------------|---|---|
| Data Items | | |
| 1. | <p>Will the project use identifiable or potentially identifiable data in any way? If answered 'No' then a DPIA is not normally suggested.</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, who will this data relate to: <input checked="" type="checkbox"/> Patient <input checked="" type="checkbox"/> Staff <input type="checkbox"/> Other: Click here to enter text.</p> |
| 2. | <p>Please state purpose for the processing of the data: For example, patient care, commissioning, research, audit, evaluation.</p> | Destruction/shredding of confidential waste |
| 3. | <p>Please tick the data items that are held in the system</p> <p>Personal </p> <p>Special categories of personal data (sensitive data) </p> | <p><input type="checkbox"/> Name <input type="checkbox"/> Address <input type="checkbox"/> Post Code <input type="checkbox"/> Date of Birth <input type="checkbox"/> GP Practice <input type="checkbox"/> Date of Death <input type="checkbox"/> NHS Number <input type="checkbox"/> NI Number <input type="checkbox"/> Passport Number <input type="checkbox"/> Pseudonymised Data <input type="checkbox"/> Online Identifiers (e.g. IP Number, Mobile Device ID)</p> <p><input type="checkbox"/> Health Data <input type="checkbox"/> Trade Union membership <input type="checkbox"/> Political opinions <input type="checkbox"/> Religion <input type="checkbox"/> Racial or Ethnic Origin <input type="checkbox"/> Sex life and sexual orientation <input type="checkbox"/> Biometric Data <input type="checkbox"/> Genetic Data</p> <p><input checked="" type="checkbox"/> Other: The confidential waste could contain either of the above</p> |
| 4. | <p>What consultation/checks have been made regarding the adequacy, relevance and necessity for the processing of the data for this project?</p> | Following an IG Spot check. It has been identified that the current system used at additional CCG premises is not compliant, therefore the Shred-it contract has been extended to include this premises and supply the relevant material (shred-it bins etc) |
| 5. | <p>How will the data be kept up to date and checked for accuracy and completeness?</p> | N/A |
| Data processing | | |
| 6. | <p>Will a third party be processing data on the CCG or one of its contractors?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If no, please go to the Confidentiality section.</p> |

| | Question | Response |
|------------------------|--|---|
| 7. | <p>Is the third party contract/supplier of the project registered with the Information Commissioner?</p> <p>This was required until 25 May 2018.</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Organisation: Shred-it Ltd Data Protection Registration Number: Z8335339</p> |
| 8. | <p>Has the third party supplier completed and published a satisfactory Data Security and Protection Toolkit submission?</p> <p>Please note that the Data Security and Protection Toolkit replaced the IG Toolkit from 1 April 2018.</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please give organisation code and percentage score: 66%</p> <p><i>IG Toolkit Score:</i></p> <p><input checked="" type="checkbox"/> Satisfactory <input type="checkbox"/> Not satisfactory</p> <p><input type="checkbox"/> Satisfactory with Improvement Plan</p> <p>If satisfactory with an improvement plan, please request a copy of the plan and enclose it with this assessment.</p> <p>If not satisfactory, please explain how the service has been procured:</p> <p>Click here to enter text.</p> |
| 9. | <p>Does the third party/supplier contract(s) include all the necessary Information Governance clauses regarding Data Protection and Freedom of Information?</p> <p>See Contract and Commissioning Information Governance Assurance checklist.</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Is the contract based on or utilise the NHS standard contract?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> |
| 10. | <p>Will other third parties (not already identified) have access to the data?</p> <p>Include any external organisations.</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If so, for what purpose?</p> <p>Click here to enter text.</p> <p>Please list organisations and by what means of transfer:</p> <p>Click here to enter text.</p> |
| Confidentiality | | |
| 11. | <p>Please outline how individuals will be informed and kept informed about how their data will be processed.</p> <p>A copy of the privacy notice and/or leaflets must be provided.</p> | <p>http://www.northeastlincolnshireccg.nhs.uk/how-we-use-your-information/Privacy-Notice/</p> |

| | Question | Response |
|-----|---|--|
| 12. | <p>Does the project involve the collection of data that may be unclear or intrusive?</p> <p>Are all data items clearly defined? Is the data collected limited to a specific set of predefined categories?</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If yes, please explain: Click here to enter text.</p> |
| 13. | <p>Are you relying on individuals (patients/staff) to explicit consent to the processing of personal identifiable or sensitive data?</p> <p>Please provide copies of any consent documentation that will be used, including patient information leaflets</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (Go to next question)</p> <p>How will consent be obtained and by whom? Click here to enter text.</p> <p>Will the consent cover all proposed processing and sharing/disclosures? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If no, please detail: Click here to enter text.</p> |
| 14. | <p>If explicit consent is not being sought, what legal basis enables this data processing?</p> <p>For more information about conditions for processing, please see the ICO's GDPR website.</p> | <p>Personal data (identifiers and potentially identifiable data):</p> <p><input checked="" type="checkbox"/> Relating to a contract: Click here to enter text. <input type="checkbox"/> Legal obligation: Click here to enter text. <input type="checkbox"/> Vital interests: Click here to enter text. <input type="checkbox"/> Public task: Click here to enter text. <input type="checkbox"/> Other: Click here to enter text.</p> <p>Special categories of personal data (sensitive data), <i>if applicable</i>:</p> <p><input checked="" type="checkbox"/> Medical related: Click here to enter text. <input type="checkbox"/> Public Health: Click here to enter text. <input checked="" type="checkbox"/> Employment related: Click here to enter text. <input type="checkbox"/> Vital interests: Click here to enter text. <input type="checkbox"/> Already public: Click here to enter text. <input type="checkbox"/> Legal claim related: Click here to enter text. <input type="checkbox"/> Substantial public interest: Click here to enter text. <input type="checkbox"/> Other: Click here to enter text.</p> |
| 15. | <p>Will identifiable data only be handled within the patients' direct care team (in accordance with the Common Law Duty of Confidentiality)?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If no, please detail: Click here to enter text.</p> |
| 16. | <p>How will consent, non-consent, objections or opt-outs be recorded and respected?</p> | <p>N/A – This would be obtained by service prior to the data being received in the first instance.</p> |

| | Question | Response |
|---------------------|---|---|
| 17. | What arrangements are in place to process Subject Access Requests? What would happen if such a request were made? | N/A |
| 18. | Will the processing of data be automated? Will the proposed processing of data involved automated means of processing to determine an outcome for the individual? | <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable If yes, please outline what arrangements are available to enable the individual access and to extract data (in a standard file format). Please also detail any profiling that may take place as part through automated processing: Click here to enter text. |
| 19. | What process is in place for rectifying/blocking data? What would happen if such a request were made? | N/A |
| Engagement | | |
| 20. | Has stakeholder engagement taken place? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, how have any issues identified by stakeholders been considered? Click here to enter text. If no, please outline any plans in the near future to seek stakeholder feedback: Click here to enter text. |
| Data Sharing | | |
| 21. | Does the project involve any new data sharing between stakeholder organisations? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please describe: Click here to enter text. Please provide a high level data flow diagram showing how identifiable information would flow. |
| Data Linkage | | |

| | Question | Response |
|-----------------------------|---|---|
| 22. | <p>Does the project involve linkage of personal data with data in other collections, or significant change in data linkages?</p> <p>The degree of concern is higher where data is transferred out of its original context (e.g. the sharing and merging of datasets can allow for a collection of a much wider set of information than needed and identifiers might be collected/linked which prevents personal data being kept anonymously)</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If yes, please provide a data flow diagram showing how identifiable information would flow and ensure this is added to the CCG Information Asset and Data Flow Register (see Information Assets and Data Flows section).</p> |
| Information Security | | |
| 23. | <p>Who will have access to the data within the project?</p> <p>Please refer to roles/job titles/organisations.</p> | Shred –it |
| 24. | <p>Is there a useable audit trail in place for the project?</p> <p>For example, to identify who has accessed a record?</p> | <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Not applicable</p> <p>If yes, please outline the audit plan: The CCG receives certificate of destruction after each scheduled visit.</p> |
| 25. | <p>Where will the data be kept/stored/accessed?</p> <p>Where applicable, please refer to data flow diagram.</p> | Information for destruction is placed in a secure/lockable confidential bin. Bins are emptied on a four weekly basis |
| 26. | <p>Please indicate all methods in which data will be transferred</p> | <p><input type="checkbox"/> Fax <input type="checkbox"/> Email (Unsecure/Personal)</p> <p><input type="checkbox"/> Email (Secure/nhs.net) <input type="checkbox"/> Internet (unsecure – e.g. http)</p> <p><input type="checkbox"/> Telephone <input type="checkbox"/> Internet (secure – e.g. https)</p> <p><input type="checkbox"/> By hand <input type="checkbox"/> Courier</p> <p><input type="checkbox"/> Post – track/traceable <input type="checkbox"/> Post – normal</p> <p><input type="checkbox"/> Software <input type="checkbox"/> Mobile app</p> <p><input checked="" type="checkbox"/> Other: No data transferred – data is shredded/destroyed on site</p> |
| 27. | <p>Does the project involve privacy enhancing technologies?</p> <p><i>New forms of encryption, two factor authentication and/or pseudonymisation.</i></p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If yes, please give details: Click here to enter text.</p> |

| | Question | Response |
|--|---|---|
| 28. | <p>Is there a documented System Level Security Policy (SLSP) or process for this project?</p> <p>A SLSP is required for new <i>systems</i> – this is likely to need to be completed by the supplier.</p> | <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Not applicable</p> <p>If yes, please provide a copy.</p> |
| Privacy and Electronic Communications Regulations | | |
| 29. | <p>Will the project involve the sending of unsolicited marketing messages electronically such as telephone, fax, email and text?</p> <p>Please note that seeking to influence an individual is considered to be marketing.</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If yes, what communications will be sent? Click here to enter text.</p> <p>Will consent be sought prior to this? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If no, please explain why consent is not being sought first: Click here to enter text.</p> |
| Records Management | | |
| 30. | <p>What are the specific retention periods for this data?</p> <p>Please refer to the Records Management Code of Practice for Health and Social Care 2016 and list the retention period for identifiable project datasets.</p> | N/A |
| 31. | <p>Will the data be securely destroyed when it is no longer required?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If no, please detail: Click here to enter text.</p> |
| Information Assets and Data Flows | | |
| 32. | <p>Has an Information Asset Owner been identified and does the Information Asset and Data Flow Register require updating?</p> <p>Please see the Information Asset Register and Data Flow Mapping Form.</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, include the completed Information Asset Register New Entry Form.</p> <p>Not included on IAR – DPA in place Does this project constitute a change to existing Information Asset(s) or is this a new Information Asset? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If yes, include the completed Information Asset Register and Data Flow Mapping Form for risk review.</p> |
| Business Continuity | | |

| | Question | Response |
|--|--|--|
| 33. | Have the business continuity requirements been considered? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Business Continuity is not applicable Please explain and either reference how such plans link with the organisational plan or why there are no business continuity considerations that are applicable for this project: Click here to enter text. |
| Open Data | | |
| 34. | Will identifiable/potentially identifiable from the project be released as Open Data (placed in to the public domain)? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please describe: Click here to enter text. |
| Data Processing Outside of the UK and European Union (EU) | | |
| 35. | Will any personal and/or sensitive data be transferred to a country outside the UK? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, which data and to which country? Click here to enter text. |

Section 3: Data Protection Impact Assessment Information Governance Review

| Information Governance Review (for completion by IG) | | | Response (for completion by project lead) | |
|--|----------------------|----------------|---|--------------------------------|
| Issue | Potential Risk | Recommendation | Agreed Action | Completion (Date and Initials) |
| 1 | No issues identified | | | |
| 2 | | | | |
| 3 | | | | |
| 4 | | | | |
| 5 | | | | |

For completion by IG:

| Residual Risk | Main Risk Sources | Main Threats | Main Potential Impacts | Main Controls Reducing the Severity and Likelihood | Severity | Likelihood |
|---------------|-------------------|--------------|------------------------|--|----------|------------|
| 1 | | | | | | |
| 2 | | | | | | |
| 3 | | | | | | |

IG review completed by: Information Governance Team Manager
 Date complete and risk assessed: 07.02.19

Review date: 07.02.19
 Consultation with ICO required? /NO (delete as appropriate)

Section 4: Review and Approval

Assessment completed by

| | |
|---------------|-------------------------------------|
| Title: | Information Governance Team Manager |
| Date: | 07/02/2019 |

Data Protection Officer Approval

| | |
|--|--|
| Name: | Paul Ellis |
| Title: | Data Protection Officer |
| DPO advice: DPO should advise on compliance, risks identified and whether processing can proceed. If accepting any residual high risk, consult the ICO before going ahead | The confidential waste collection service complies with the requirements of data protection legislation ensuring measures are in place to keep data protected and secure at all times. Information / documents identified for destruction are placed by authorised officers in secure lockable bins, preventing unauthorised access. These bins are emptied on a four weekly basis by Shred-it who undertake the destruction/shredding of the contents of the bin on site mitigating the risk of unauthorised access or accidental loss. |
| Approved | <input checked="" type="checkbox"/> |
| Date: | 7/2/2019 |

The DPO should also review ongoing compliance with DPIA

SIRO/Caldicott Guardian Approval

| | |
|---|--|
| Name: | Jan Haxby |
| Title: | (SIRO) - Director of Quality & Nursing |
| DPO advice accepted or overruled: If overruled, you must explain your reasons | Accepted. |
| Approved: | <input checked="" type="checkbox"/> |
| Date: | 27.02.2019 |

| | |
|---|------------------|
| This DPIA will be kept under review by: | Planning Manager |
|---|------------------|