

Data Protection Full Assessment - Draft
Impact Assessment Id: #376**1.0 Screening Information****Project Name**

DfE Multiply

Name of Project Sponsor

Hannah Perrott

Name of Project Manager

Judy Gibbs

Name of Project Lead

Judy Gibbs

Please give a brief description of the project

Multiply , a strand of the UK Shared Prosperity Fund is designed as a core part of the Governments Levelling Up mission and investment in adult skills , designed to improve the levels of numeracy across Worcestershire. The scheme will support residents over 19 years old who have not previously attained a GCSE Grade 4/C or higher maths qualification to either work towards a GCSE or equivalent, develop specific numeracy skills for their work or progression or simply brush up on their skills to help them get on in life or work.

Data Protection screening result

Will require a full impact assessment

Equality and Public Health screening result

Will require a full impact assessment

Environmental Sustainability screening result

Does not need a full impact assessment

DRAFT

1.1 Background and Purpose

Background and Purpose of Project?

To support your answer to this question, you can upload a copy of the project's Business Case or similar document. Multiply, a strand of the UK Shared Prosperity Fund is designed as a core part of the Government's Levelling Up mission and investment in adult skills, designed to improve the levels of numeracy across Worcestershire. The scheme will support residents over 19 years old who have not previously attained a GCSE Grade 4/C or higher maths qualification to either work towards a GCSE or equivalent, develop specific numeracy skills for their work or progression or simply brush up on their skills to help them get on in life or work.

Upload Business Case or Support documents

No files uploaded

Project Outputs

Briefly summarise the activities needed to achieve the project outcomes.

4935

Project Outcomes

Briefly summarise what the project will achieve.

1. More adults achieving maths qualifications courses (up to, and including, Level 2 – with GCSEs and FSQs as the qualifications of choice in England – or equivalent) and an increase in participation in numeracy courses.
2. Improved labour market outcomes e.g. fewer numeracy skills gaps reported by employers, and an increase in the proportion of adults that progress into sustained employment and / or education.
3. Increased adult numeracy across the population – this overall impact, which goes beyond achieving certificates or qualifications, will track both the perceived and actual difference taking part in the programme makes in supporting learners to improve their understanding and use of maths in their daily lives, at home and at work - and to feel more confident when doing so

Is the project a new function/service or does it relate to an existing Council function/service?

Existing

Was consultation carried out on this project?

No

1.2 Responsibility

Directorate/Organisation

People

Service Area

Communities

1.4 Specifics

Project Reference (if known)

Not Recorded

Intended Project Close Date *

March 2025

1.5 Project Part of a Strategic Programme

Is this project part of a strategic programme?

No

2.0 Personal Data**Who are you processing data about?**

Customers, clients or service users

What personal data will be collected? *

The second stage is to list all of the types of personal data that you believe the project/works/additional processing will utilise. Please select yes for as many examples of types of data that are relevant and include any others in the free text at the bottom of the page.

Basic Identifiers:**Name**

Yes

Date of Birth

Yes

Age

No

Gender

Yes

Sex

Yes

Contact Details:**Address**

Yes

Email Address

Yes

Home Phone Number

No

Mobile Phone Number

Yes

Postcode

Yes

ID Number:**National Insurance Number**

Yes

Driving Licence/Number

No

NHS Number

No

Other General Identifier

No

Employment:**Work Related Training/Awards**

Yes

Financial:**Income/Financial/Tax Situation**

No

Appearance:**Photograph**

No

Physical Description

No

Lifestyle:**Living Habits**

No

Marital Status

No

Technology:**Login/Username**

No

Device MAC Address (Wireless Network Interface)

No

Device Mobile Phone/Device IMEI No

No

Location Data (Travel/GDPS/GSM Data)

No

Online Identifier e.g. IP Address

No

Website Cookies

No

Other Data Types Collected

Not Recorded

2.1 Legal basis for Personal Data**What is your lawful basis for processing the personal data? ***

Please choose one of the following

Data Subject's consent for the purpose

Yes

Necessary for a contract with the Data Subject

Yes

Necessary to comply with a legal obligation

No

Necessary to protect the vital interests of an individual(s)

No

Necessary for a task in the public interest or exercise of official authority of Controller

Yes

Necessary for legitimate interests of Controller unless interests are overridden by the interests or rights of the individual (only available in limited circumstances to public bodies)

No

2.2 Special Data

What special category personal data (if any) will be collected? *

This section will not apply to all projects and should only be completed if it applies to you.

It is important that you read this section carefully, as these data types require additional care and protection.

If you do pick anything from this list, you will be required to give more details in Section 4 of this form.

You can read more about Special Category Data through this link;

<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/special-category-data/>

Race

Yes

Ethnic origin

Yes

Political opinions

No

Religion

No

Philosophical beliefs

No

Trade union membership

No

Genetic Data

No

Biometric Data

No

Sex life

No

Health or social care

No

2.3 Legal basis for Special Data

What is the relevant condition for processing the special category personal data? *

You must qualify under one of the below exemptions as well as having a legal basis from the previous question.

Explicit Consent

The data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject;

Yes

Employment and Social Security

Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject;

No

Vital Interests

Processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent;

No

Legitimate Interests of:

"a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim".

Processing is carried out in the course of its legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim and on condition that the processing relates solely to the members or to former members of the body or to persons who have regular contact with it in connection with its purposes and that the personal data are not disclosed outside that body without the consent of the data subjects;

Note – this is not often applicable to local authorities.

No

Publicly Available Data

Processing relates to personal data which are manifestly made public by the data subject;

No

Legal or Court Proceedings

Processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity;

No

Public Interest - Statutory Necessity

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;

No

Medical, Health and Social Care Provision

Processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional and subject to the conditions and safeguards referred to in paragraph 3;

No

Public Health

Processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject, in particular professional secrecy;

No

Archiving or Scientific, Historical or Statistical Research Purposes

Processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on 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.

No

2.4

Information Involved

Understanding the information flows involved in a project is essential to a proper assessment of privacy risks.

How will the data be collected? *

This section should be filled in for every project, not just those collecting Special Category data.

Data will be collected by interview and Individual registering consent to enter programme

What will the data be used for? *

This section should be filled in for every project, not just those collecting Special Category data.

Submission to funding body to provide diversity data and ensure those accessing service are both unique individuals and meet the entry requirements.

Has data already been collected?

No

Are the purposes for which you are collecting the data different? *

If the data you are hoping to use was not collected specifically for this project, please explain in the box below why it was collected. This will

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include data that you have collected from other teams within WCC.

Not Recorded

Explain why existing and/or less intrusive processes or measures would be inadequate *

In this section, you should explain why your new method/project is absolutely necessary and show that you have thought about all other options.

This is the requirements of the DfE not WCC to collate this data as part of a national contract

3.0 Other organisations

Are other organisations involved in processing the data?

Yes

Please provide details of each organisation that is involved in the processing of Data. Do this by adding to the below list. *

Organisation Name	Department for Education
Data Controller or Data Processor	Data Controller
Organisation's Role	Funds and Manages Education Provision as part of HM Government
Data Sharing Agreement or Contract	No
Contract Reference Number/DSA Name	Multiply
Organisation involved reason	Contract owner on behalf of HM Government
Disclosure and Security	Privacy Clause in place and data sharing agreement with DfE

1 record

3.1 Storage detail

How will the information be stored? *

Please include details of whether data will be stored outside of the European Economic Area (EEA).

Please remember that cloud storage and back up servers maybe outside the EEA.

Stored in locked cabinets and processed into a secure online system designed to report to the DfE data on the programme participants

For how long will the data be retained? *

To be defined by the DfE but normally 7 years

What is the deletion process? *

Destroyed securely paperwork document as per CIMU processes

4 Consultation details

Consultation can be used at any stage of the DPIA process and is important to allow people to highlight privacy risks and solutions based on their own area of interest or expertise.

For further assistance and information please visit the [consultation toolkit section on Ourspace](#).

Explain what practical steps you are going to take to ensure that you identify and address privacy risks *

Consultation with the DfE and working with both the internal Data controller Becki State and the CIMU department to understand and limit risks

Who should be consulted, internally and externally? Do you need to seek the views of members of the public? *

Internally - WCC teams, Externally DfE regulates data

How will you carry out the consultation? *

(You should link this to the relevant stages of your project management process)

As part of QA processes and early stage set up

5 Risk register

At this stage you should identify the possible privacy risks together with their likelihood, severity and overall level, and for high risks the measures taken to reduce the risk.
Add any risk to the relevant sections below.

Fair and Lawful Processing

Data must be processed lawfully, fairly and in a transparent manner.

Please also consider

- Have you identified at least one lawful basis for the personal data processed as part of the project?
- Does at least one Controller involved have a lawful power to act?
- Do you need to create or amend a privacy notice?
- How is your processing going to be transparent?

Risk that processing is not transparent, and individuals are unaware that data is being collected or why it is processed

Unmitigated Risk

Likelihood - Reasonably Unlikely

Severity - Some Impact

Score - Medium

Mitigation/Solution

Individuals will sign consent to share Data and to process data , privacy notice will be in place with individuals . Data Sharing agreement in place with DfE

Mitigated Risk

Likelihood - Unlikely

Severity - Minimal Impact

Score - Low

Result

Accepted

Risk that information is being processed unlawfully

No Risk

Specific, explicit and legitimate purposes

The purpose for which you process personal data must be specified, explicit and legitimate. Personal data collected must not be processed in a manner that is incompatible with the purpose for which it was originally collected.

Please also consider

- Does your project plan cover all of the purposes for processing personal data? If not your plan needs amending accordingly.

- Are all elements of the processing compatible with the original reason and justification for the processing?
- What are these specific, explicit and legitimate purposes?

Risk of 'mission creep' and information is used for different, or incompatible purposes to that identified when originally collected

Unmitigated Risk

Likelihood - Unlikely
Severity - Some Impact
Score - Low

Mitigation/Solution

Data processed can not be accessed by individuals within wider teams, only by those directly working on programme and not for purposes other than those known to participants

Mitigated Risk

Likelihood - Unlikely
Severity - Some Impact
Score - Low

Result

Reduced

Adequate, relevant and not excessive

Personal data processed must be adequate, relevant and not excessive in relation to the purpose for which it is processed. Please also consider

- Is the quality of the information adequate for the purposes it is used?
- If not, how is this to be addressed?
- Are measures in place to ensure that data is limited to that which is needed to fulfill the aim of the processing?
- Which personal data elements do not need to be included without compromising the needs of the project?

Risk of loss of control over the use of personal data

Unmitigated Risk

Likelihood - Unlikely
Severity - Some Impact
Score - Low

Mitigation/Solution

Systems are secure and collated data is kept in locked and secure cupboards, Data is not kept physically where possible and mitigated through online processing.

Mitigated Risk

Likelihood - Unlikely
Severity - Some Impact
Score - Low

Result

Accepted

Risk that inadequate data quality means the information is not fit for the identified purpose(s) potentially leading to inaccurate decision making

No Risk

Risk that any new surveillance methods may be an unjustified intrusion on individuals' privacy

No Risk

Accurate and timely

Personal data processed must be accurate and, where necessary, kept up to date, and every reasonable step must be taken to ensure that personal data that is inaccurate is erased or rectified without delay.

Please also consider

- If you are procuring new software does it allow you to amend data when necessary?
- How are you ensuring that personal data obtained from individuals or other organisations is accurate?
- Do you have processes in place to keep data up to date?
- If any data sets are to be merged, what checks are carried out to ensure that the right data records are matched/merged together?

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Any data matching or linking, including whole data sets may link wrong records together

No Risk

Storage limitation

Personal data must be kept for no longer than is necessary for the purpose for which it is processed. Appropriate time limits must be established for the periodic review of the need for the continued storage of personal data.

Please also consider

- What are the risks associated with how long data is retained and how they might be mitigated?
- Has a review, retention and disposal (RRD) policy been established?
- How does the software enable you to easily act on retention criteria – does it enable bulk review/destruction; set review periods; extract for long-term preservation/retention of the corporate memory?

Risk information is retained for the wrong length of time (both too long and too short)**Unmitigated Risk**

Likelihood - Unlikely

Severity - Minimal Impact

Score - Low

Mitigation/Solution

Contracts will be considered to assess records keeping timescales

Mitigated Risk

No Risk

Result

Eliminated

Risk information is not securely destroyed when its retention period has been reached

No Risk

Security

Personal data must be processed in a manner that ensures appropriate security of the personal data, using appropriate technical or organisational measures (and, in this principle, “appropriate security” includes protection against unauthorised or unlawful processing and against accidental loss, destruction or damage).

Please also consider

- What technical and organisational measures are in place to ensure that the data is protected to an adequate level?
- What training on data protection and/or information sharing has been undertaken by relevant staff?
- What access controls are in place to enforce the ‘need to know’ principle?
- What assurance frameworks are utilised to assess adequacy of security measures in place e.g. NHS DSPT; Cyber Essentials Plus; PSN Certification?

Risk of loss of confidentiality**Unmitigated Risk**

Likelihood - Unlikely

Severity - Minimal Impact

Score - Low

Mitigation/Solution

Staff are trained in DPA as part of mandatory training

Mitigated Risk

Likelihood - Unlikely

Severity - Some Impact

Score - Low

Result

Reduced

Risk of inadequate security controls in place to protect and secure personal data, including inappropriate access**Unmitigated Risk**

Likelihood - Unlikely

Severity - Some Impact

Score - Low

Mitigation/Solution

Minimal Data will be handled in paper based copies , therefore data will be secure

Mitigated Risk

Likelihood - Unlikely

Severity - Some Impact

Score - Low

Result

Reduced

Risk that workers processing the data are not aware of their data responsibilities**Unmitigated Risk**

Likelihood - Unlikely

Severity - Some Impact

Score - Low

Mitigation/Solution

Staff are trained

Mitigated Risk

Likelihood - Unlikely

Severity - Some Impact

Score - Low

Result

Reduced

Risk that information is distributed using inappropriate methods

No Risk

Risk of re-identification of pseudonymized or anonymised data (e.g. collecting matching and linking identifiers and information may result in information that is no longer safely anonymised)

No Risk

Risk that information is transferred to a 'third country' without adequate safeguards

No Risk

Financial and reputational**Risk of identity theft or fraud**

No Risk

Risk of financial loss for individuals or other third parties

No Risk

Risk of financial loss for the Council (including ICO fines)

No Risk

Risk of reputational damage to the Council, partners, and processors

No Risk

Health, safety and wellbeing**Risk of physical harm to individuals**

No Risk

Risk of physical harm to staff and workers

No Risk

Risk of discrimination

No Risk

Risk of other significant economic or social disadvantage

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No Risk

Individuals Rights

Data protection legislation gives data subjects' various rights (listed below). Limiting or restricting any of these rights is likely to be a significant impact so the justification for any restriction, as well as mitigations, must be fully outlined.

Inability to meet individuals' right to be informed

No Risk

Inability to meet individuals' right of access

No Risk

Inability to meet individuals' right to rectify inaccurate data

No Risk

Inability to meet individuals' right to erase data

No Risk

Inability to meet individuals' right to restrict processing

No Risk

Inability to meet individuals' right to data portability

No Risk

Inability to meet individuals' right to object

No Risk

Inability to meet individuals' rights relating to automated decision making and profiling

No Risk

Additional project specific risks

No additional risks recorded

6 Declaration

I confirm to the best of my knowledge that the information I have provided is true, complete and accurate *

Selected

I confirm that I will make sure that data protection has been and continues to be considered throughout the project life cycle and should circumstances change in the project to include any processing of personal data a further Data Protection Impact Assessment Screening will be carried out *

Selected

7 Application Details

Last Updated Date Time

01/08/2022 14:37:50

Screening Submitted Date Time

19/07/2022 17:36:56

Last Reopened Date Time

No Date Recorded

Full Impact Submitted Date Time

28/07/2022 20:20:36

Approved/Rejected Date Time

No Date Recorded

Current User Dashboard Request Status

In progress

8.0 People with access to the original screening

[Judith Gibbs \(JGibbs@worcestershire.gov.uk\)](mailto:JGibbs@worcestershire.gov.uk)

8.1 People with access to this data protection assessment

[Judith Gibbs \(JGibbs@worcestershire.gov.uk\)](mailto:JGibbs@worcestershire.gov.uk)

9 Direct Questions

Question:

Hi,

I have a few questions;

2.1, I would suggest you should only use the legal basis of public task. consent has a lot of limitations and is not advisable for a public authority. Legitimate interests isnt really relevant.

2.3 Why have you selected 'employment'? I think for this type of information consent is your only real option. You need to consider what happens if consent is not given or is withdrawn at any time. Would it be possible to collect this data and not associate it with an individual?

3.0 Are you sharing the personal data with the DfE? If so you would need to include them here and have a sharing agreement in place.

5 You state you are asking people to sign consent form which may not be appropriate if you go with a public task legal basis. You would need a privacy notice in place.

Thanks,

Charlotte

Asked by Charlotte Shepard (CShepard@worcestershire.gov.uk) at 29/07/2022 10:25:55

Judith Gibbs (JGibbs@worcestershire.gov.uk) has been asked this question.

Response:

2.1 I will change to as per your request

2.3 The individuals within the programme are potentially employed but I will change as I didnt get the context of the ask

3.0 I will amend

5 There will be a privacy notice in place

Judith Gibbs (JGibbs@worcestershire.gov.uk) at 01/08/2022 14:27:08

Add Response