

## Data Protection Full Assessment Impact Assessment Id: #579

### 1.0 Screening Information

#### Project Name

Staying Healthy in Worcestershire

#### Name of Project Sponsor

Katie Deeley

#### Name of Project Manager

Katie Deeley

#### Name of Project Lead

Katie Deeley

#### Please give a brief description of the project

This will be an integrated community-based service responsive to the needs of residents. Where people can access programmes that support them to reduce their risk of falls, provide healthy lifestyle advice and opportunities to develop social connections.

#### 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

Will require a full impact assessment

### 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.

This will be an integrated community-based service that's responsive to the needs of residents, which results in empowering communities to improve health and wellbeing. The core programme will offer exercise interventions designed to reduce the risk of falls and maintain independence, as well providing a broad range of health and wellbeing advice to service users either face to face, via telephone or digital.

The 'Healthy Worcestershire Service' will address health issues that are seen across the county but are more prevalent in some districts. For example, residents in the district of Redditch suffer with higher rates of obesity and are more likely to be physically inactive. The service will contribute to addressing health inequalities, and show measurable improvements in levels of physical activity, strength, balance, and flexibility, maintaining a healthy weight, and social connectedness. The service will also help to increase awareness of community safety issues such as doorstep crime, scams, and fraud by directly educating participants on how they can keep themselves safe

#### Upload Business Case or Support documents

[□ Healthy Worcestershire Programme - report for the leader.docx](#)

#### Project Outputs

Briefly summarise the activities needed to achieve the project outcomes.

The Healthy Worcestershire programme will be operated out of a range of community venues and be delivered via structured, professionally led sessions. These sessions will be delivered on a weekly basis and include a range of supportive activities:

First, these sessions will incorporate an evidence-based physical activity programme targeted towards improving strength and balance. The focus will be on preventing falls and maintaining participants' mobility, health and confidence. This will be supplemented with lifestyle advice including support with weight management and other positive health behaviours.

Second, the sessions will also incorporate a strong focus on community safety, including advice and sessions on how to avoid fraud, doorstep crimes and internet-based scams. These sessions will be tailored to the local area based on up-to-date intelligence from the Police, Trading Standards and Community Safety Partnerships.

Third, the emphasis within both the health and community safety elements of the programme will be on building social connections. The sessions themselves will be enjoyable, incorporating activities that provide a positive experience for attendees that they will want to keep coming back to. In addition, social prescribing will be delivered that signposts participants to other community activities and projects, such as walking groups, arts and music projects or volunteering opportunities. Grants will be made available by the Public Health to build and enhance the local choice of community activities available in each area where sessions run.

The Healthy Worcestershire programme will blend the efficiency of a county-wide approach with significant tailoring and ownership at a local community level. This will be reflected in the branding and promotion of the programme as well as the content and focus of the sessions themselves. Care will be taken to work with the local community and compliment rather than compete with existing local activities and groups. The provision of grants in addition to the structured programme will support this aim.

### **Project Outcomes**

Briefly summarise what the project will achieve.

The 'Healthy Worcestershire Service' will address health issues that are seen across the county but are more prevalent in some districts. For example, residents in the district of Redditch suffer with higher rates of obesity and are more likely to be physically inactive. The service will contribute to addressing health inequalities, and show measurable improvements in levels of physical activity, strength, balance, and flexibility, healthy lifestyles, and social connectedness. The service will also help to increase awareness of community safety issues such as doorstep crime, scams, and fraud by directly educating participants on how they can keep themselves safe.

The purpose of the Service will be to provide accessible information and support services across the County, focusing on:

- Improving levels of physical activity (focusing on strength, balance and flexibility)
- Decreasing the risk of injurious/ non-injurious falls
- Decreasing loneliness and social isolation
- Increasing community safety
- Improving healthy lifestyles

This project will aim to contribute to improving the following public health outcomes:

E13- Hip fractures in people aged over 65 (Public Health Outcomes Framework, 2023).

C16 – Percentage of adults (18+) classified as overweight or obese (Public Health Outcomes Framework, 2023)

C17a- Percentage of physically active adults (Public Health Outcomes Framework, 2023).

C17b- Percentage of physically inactive adults (Public Health Outcomes Framework, 2023).

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

New

### **Was consultation carried out on this project?**

Yes

## **1.2 Responsibility**

### **Directorate/Organisation**

Chief Executive Unit (inc Finance)

### **Service Area**

Public Health

## **1.4 Specifics**

### **Project Reference (if known)**

Not Recorded

### **Intended Project Close Date \***

March 2027

## 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**

No

**Age**

Yes

**Gender**

Yes

**Sex**

Yes

**Contact Details:**

**Address**

No

**Email Address**

Yes

**Home Phone Number**

Yes

**Mobile Phone Number**

Yes

**Postcode**

Yes

**ID Number:**

**National Insurance Number**

No

**Driving Licence/Number**

No

**NHS Number**

No

**Other General Identifier**

No

**Employment:**

**Work Related Training/Awards**

No

**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**

Ethnic group

Sexual orientation

Disability

Pregnant

Learning disability

Standard physical activity readiness questionnaire

Height

Weight

BMI

SWEMWBS score (Warwick Edinburgh wellbeing scale)

Physical activity levels

Register of attendance

Outcome measures - loneliness measure + physical improvement measure

Much more consideration and discussion of the data requirements and processing will need to be had with the Service Provider once identified.

## 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

No

#### Ethnic origin

Yes

#### Political opinions

No

#### Religion

No

#### Philosophical beliefs

No

#### Trade union membership

No

#### Genetic Data

No

#### Biometric Data

Yes

#### Sex life

No

#### Health or social care

Yes

## 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;

Yes

#### 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.

The data will be collected during a pre-registration process, either online, completion of hardcopy or by phone options.

**What will the data be used for? \***

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

1. To triage clients - particular in relation to the presence and degree of frailty and to determine whether medical clearance is needed for those that are self referred (Service Provider use only)
2. For day to day management of the service eg. To notified clients when a class has been unexpected cancelled or for welfare checks when an individual has failed to turn up for a period of time (Service Provider use only)
3. Summary data to provide information on the use and benefit of the service (Service Provider and Commissioner use)

**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 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.

Currently much of this information will be gathered, though not necessarily captured, as part of the triage process. All individuals are also currently assessed on 4 outcome measures at 0 12 and 24 weeks. Outcome monitoring will be kept but be less rigorous.

This service is a total redesign of the existing service, in terms of it still providing professionally led exercises which can recondition individuals but is more informal in terms of access because it has different goals.

New information that will be gathered will be sexual orientation, height and weight (which in turn will enable BMI to be calculated).

## 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. \*

<b>Organisation Name</b>	Subject to competitive tender
Data Controller or Data Processor	Data Processor
Organisation's Role	Service provider
Data Sharing Agreement or Contract	Yes
Contract Reference Number/DSA Name	There will be one in place once the service provider has been agreed
Organisation involved reason	The service provider will collect the data set out by the contract. The data falls into two groups - that needed for the Service Provider to manage the service and that which will monitor activity and who is accessing the service (summary not personal data).
Disclosure and Security	<p>There will be three groups that handle or receiving the data:</p> <ol style="list-style-type: none"> <li>1. Individual professional postural and stability trainers that gather the data and will use a subset of it to manage classes day to day.</li> <li>2. The Service Provider who will hold data from all the classes centrally.</li> <li>3. The Commissioner that will hold summary data.</li> </ol> <p>The means by which data is process and transferred is to be established before the contract is finalised.</p> <p>For example, ideally the Service Provider will be able to convert postcode into SES thereby avoiding the transfer of personal data to the Commissioner. Ideally this will be converted at the time of data capture which means the address can be removed.</p> <p>In addition, there needs to be a discussion about how central information is stored with the Service Provider. Ideally we need to keep records for individuals beyond the time they may have left the service but personal data will not need to be stored once they have left the service. There may, however be people who return to the service and this will need discussion as to how this is capture.</p> <p>We will need to assess the security measures in place for data storage as levels 1 and 2 as part of the contract agreement.</p>

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.

To be determined.

### For how long will the data be retained? \*

Summary data for the duration of the contract and beyond (date to be confirmed)

There needs to be discussion about the duration of personal details being kept as individuals may come and go from the service which presents challenges in terms of knowing when to remove personal data.

### What is the deletion process? \*

To be determined



## 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 \*

Currently we are undertaking a public survey of the health related priorities for adults in Worcestershire.

All consultation undertaken has been and will be anonymous.

Privacy is made available to respondents to surveys.

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

Wider stakeholder consultation has taken place.

Internally: Politicians, Adult Social Care,

Externally: Active Herefordshire and Worcestershire, the ICB

We have engaged with participants of existing exercise groups through partner organisations. All information is reported anonymously.

There will be a requirement, as part of the service, to co-produce aspects of the service with locally communities and so there will be continual engagement with residents. This will be developed the mobilisation period and is likely to be specific to each local community.

### How will you carry out the consultation? \*

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

Consultant with the public has been through a web based survey and events and attendance at groups in the local communities.

## 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 - Minimal Impact

Score - Low

#### Mitigation/Solution

Some individuals will give information over the phone initially, and so there is a risk concerning individual's not understanding or remembering to consent to the information and how it will be used. We will ensure that the Service Provider has a process in place of providing written information and consent.

#### Mitigated Risk

Likelihood - Reasonably Unlikely

Severity - Some Impact

Score - Medium

#### Result

Reduced

**Risk that information is being processed unlawfully****Unmitigated Risk**

Likelihood - Unlikely  
 Severity - Some Impact  
 Score - Low

**Mitigation/Solution**

Potential for instructors to market their other services to clients. This needs to be addressed in the contract or employment relationship between the Service Provider and the Instructor.

**Mitigated Risk**

Likelihood - Unlikely  
 Severity - Minimal Impact  
 Score - Low

**Result**

Eliminated

**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**

Potential risks

The Instructor using the information to promote private work. The Service Provider would need to make explicit in their employment / contracting relationship that such activity is not allowed (and would be unlawful). Sanctions would need to be clear. Service Provider will also need to create the correct organisational culture to reduce the risk of this happening.

A key question that needs to be resolved as part of the commissioning process is whether or not the data processing will be done by the Service Provider or an anonymised data set be handed to the WCC for processing. Agreeing the routine analysis and reporting in advance reduced one data processor in the system and also require all parties at the outset to agree which data will be important to understand activity, performance and access issues.

**Mitigated Risk**

Likelihood - Unlikely  
 Severity - Minimal 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**

No Risk

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

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

Likelihood - Unlikely

Severity - Minimal Impact

Score - Low

**Mitigation/Solution**

We will check the IT systems the Service Provider will be using as part of the contract process. It is likely that the Provider already provides similar services and so has an established software where data can be amended or, on request, a file deleted.

The other risks mentioned are not relevant.

**Mitigated Risk**

No Risk

**Result**

Eliminated

**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 - Some Impact

Score - Low

**Mitigation/Solution**

This is an issue that needs more discussion. The service redesign will allow individuals to come and go (previously they were part of a 6 month cohort that left the course at the end of the period). This presents some challenges with respect to data retention. These are meant to be local and informal sessions and so excessive information processing is undesirable. It is perhaps at the point where the Instructor and the individual agree that it is time to move onto another exercise group that the individual's information is removed.

Additional issues that needs more discussion are:

- Retention of the postcode - the WCC will need to understand access not just at a single point of time but over time, both geographically and also from a SES point of view. The postcode can be used to generate an SES grouping linked to the ED but the first part of the postcode is too large a grouping to understand geographical access. However, with retention of the full postcode, an individual could always be potentially identifiable.
- Other demographic and health information. Again we need both point in time and over time information on who is accessing the service. The Instructor will need to know the specifics of an individuals health problem, but for the reporting it might be possible to categorise it and then remove the specific detail.

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It is expected that the Service Provider will have their own retention policy. We need advice from Information Governance Team as to what is reasonable.

**Mitigated Risk**

Likelihood - Unlikely  
Severity - Some Impact  
Score - Low

**Result**

Reduced

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

**Unmitigated Risk**

Likelihood - Unlikely  
Severity - Minimal Impact  
Score - Low

**Mitigation/Solution**

This is an issue to be discussed with the Service Provider once identified.

**Mitigated Risk**

Likelihood - Unlikely  
Severity - Minimal Impact  
Score - Low

**Result**

Reduced

## 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 - Some Impact  
Score - Low

**Mitigation/Solution**

The main risk is loss of hardcopy registration forms as some individuals will register when they turn up for an exercise session. The Service Provider will need to have policies in place about safe handling of hardcopies until the data can be uploaded and the hardcopies securely destroyed.

**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**

The Service Provider will be expected to have cybersecurity measures in place and these will be checked during the contracting process.

**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**

The Service Provider will need to have measure in place to train their staff in their data protection duties.

**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****Unmitigated Risk**

Likelihood - Unlikely  
 Severity - Serious Impact  
 Score - Medium

**Mitigation/Solution**

We will need to check with the Service Provider where their data.

**Mitigated Risk**

No Risk

**Result**

Eliminated

**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)****Unmitigated Risk**

Likelihood - Unlikely  
 Severity - Some Impact  
 Score - Low

**Mitigation/Solution**

The contract with the Service Provider will set out the legal obligations of the provider and we will review their data management during the contracting process.

**Mitigated Risk**

Likelihood - Unlikely  
 Severity - Some Impact  
 Score - Low

**Result**  
Reduced

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

##### Unmitigated Risk

Likelihood - Unlikely  
Severity - Some Impact  
Score - Low

##### Mitigation/Solution

Data breach of commissioned services by the public sector will always have some reputational damage for the commissioner. The key mitigation will be ensure that the Service Providers processes and culture is as robust as possible.

##### Mitigated Risk

Likelihood - Unlikely  
Severity - Some Impact  
Score - Low

##### Result

Reduced

### Health, safety and wellbeing

#### Risk of physical harm to individuals

##### Unmitigated Risk

Likelihood - Unlikely  
Severity - Serious Impact  
Score - Medium

##### Mitigation/Solution

Because individuals will be part of a group led by an individual instructor, the risk of unhealthy professional relationship can never be eradicated, but the likelihood of that risk is very low, particularly as individuals will be attending group sessions. Nevertheless, the PSI will have contact details of the individual.

The proposed governance processes of the Service Provider will be reviewed as part of the initial contract discussions - regarding employment checks, supervision etc.

##### Mitigated Risk

Likelihood - Unlikely  
Severity - Serious Impact  
Score - Medium

##### Result

Reduced

#### Risk of physical harm to staff and workers

##### Unmitigated Risk

Likelihood - Unlikely  
Severity - Some Impact  
Score - Low

##### Mitigation/Solution

The risk to instructors is low but cannot be minimum when working with clients and particularly with respect to physical exercise but as the classes are being led by professionally trained instructors. Some classes be developed for individuals with dementia where the risks are slightly raised, but generally a member of the family also attends such sessions.

##### Mitigated Risk

Likelihood - Unlikely  
Severity - Some Impact  
Score - Low

##### Result

Reduced

#### Risk of discrimination

No Risk

#### Risk of other significant economic or social disadvantage

No Risk

### Individuals Rights

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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

##### Unmitigated Risk

Likelihood - Reasonably Unlikely

Severity - Some Impact

Score - Medium

##### Mitigation/Solution

As indicated previously, initially data collected is to be over the phone. The issue how the patient has written information and consent is properly captured will need to be discussed with the Service Provider.

##### Mitigated Risk

Likelihood - Reasonably Unlikely

Severity - Some Impact

Score - Medium

##### Result

Reduced

#### 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

##### Unmitigated Risk

Likelihood - Unlikely

Severity - Minimal Impact

Score - Low

##### Mitigation/Solution

We will need to have a discussion with the Service Provider concerning this.

The key is to avoid this by individuals being given good information about how their data will be processed and for what purpose in the first place. However if an individual still wishes to not have their data contribute to summary data reports, a mechanism will need to be agreed to exclude that individuals data from the analysis.

##### Mitigated Risk

No Risk

##### Result

Eliminated

#### 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

22/09/2023 13:28:38

### Screening Submitted Date Time

11/08/2023 14:05:49

### Last Reopened Date Time

No Date Recorded

### Full Impact Submitted Date Time

22/09/2023 12:28:38

### Approved/Rejected Date Time

27/09/2023 17:02:31

### Current User Dashboard Request Status

Complete

## 8.0 People with access to the original screening

[Daphne Austin \(DAustin3@worcestershire.gov.uk\)](mailto:DAustin3@worcestershire.gov.uk)

[Katie Deeley \(KDeeley@worcestershire.gov.uk\)](mailto:KDeeley@worcestershire.gov.uk)

[Maddy Cameron \(MCameron@worcestershire.gov.uk\)](mailto:MCameron@worcestershire.gov.uk)

[Olivia Toye \(OToye@worcestershire.gov.uk\)](mailto:OToye@worcestershire.gov.uk)

[Sophie Pryce \(SPryce@worcestershire.gov.uk\)](mailto:SPryce@worcestershire.gov.uk)

## 8.1 People with access to this data protection assessment

[Daphne Austin \(DAustin3@worcestershire.gov.uk\)](mailto:DAustin3@worcestershire.gov.uk)

[Katie Deeley \(KDeeley@worcestershire.gov.uk\)](mailto:KDeeley@worcestershire.gov.uk)

[Olivia Toye \(OToye@worcestershire.gov.uk\)](mailto:OToye@worcestershire.gov.uk)

[Sophie Pryce \(SPryce@worcestershire.gov.uk\)](mailto:SPryce@worcestershire.gov.uk)

## 9 Direct Questions

No Questions Asked