

**Worcestershire County Council – Privacy Impact Assessment  
template**

**Privacy Impact Assessment**

<b>Ref</b>	<b>Questions</b>	<b>Assessment responses</b>
	<b>TITLE</b>	<b>SEND Improvement Plan</b>
<b>A</b>	<b>Basic Information</b>	
1	Information Asset Owner / Head of Service	Nick Wilson AD Education and Skills
2	Service Manager	SEND Group Manager
3	Contact name	Penny Richardson
4	Contact telephone	
5	Target date required for completion of PIA	26 <sup>th</sup> July 2018
6	Target implementation date of project/change	Ongoing
7	Information Asset Register Reference (if known)	





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	<p>If consent how will that consent be obtained, recorded and kept up to date? What will happen if they withdraw consent?</p> <p>If Legal Gateway please detail what legislation/Act you're relying on</p>	<p>records updated accordingly.</p>
C2	<p>Will the individuals whose information will be in the system be informed of the processing and disclosures that will take place? For example, are they aware of the collection and how their information will be used.</p> <p>Please provide a link to the service specific privacy notice</p>	<p><i>Privacy notices are available on the public website.</i></p> <p><i>Children's Specific Notices:</i>  <a href="http://www.worcestershire.gov.uk/info/20097/children_families_and_communities/473/children_families_and_communities_policy_and_guidance">http://www.worcestershire.gov.uk/info/20097/children_families_and_communities/473/children_families_and_communities_policy_and_guidance</a></p> <p><i>Council's Privacy Notice:</i>  <a href="http://www.worcestershire.gov.uk/fullprivacynotice">http://www.worcestershire.gov.uk/fullprivacynotice</a></p>

C3

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D2	Data Controller(s) <i>Determine if Joint or Common data controllers and rationale.</i>	<i>Capita One – Catherine Driscoll Framework – Catherine Driscoll</i>
D3	Data Processor(s) <i>If applicable</i>	All CFC and contracted partner agencies
D4	Format of data.  <i>Require a list of all types - delete those that do not apply or add new.</i>	All data is electronic and captured on FWI and Capita ONE, Tribal (EYS)

D5 Location of all data.  
*Is data being stored and accessed off-site from Council premises?*

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E5	Describe how all staff are adequately training in data protection and confidentiality.	Staff are required to complete e-learning modules around data protection and confidentiality before access to Frameworki, ONE and Tribal are granted
<b>F</b>	<b>ACCURACY, RETENTION AND DISPOSAL</b>	
F1	Will the information be kept up to date and how will the personal data be checked for accuracy? This applies to electronic and paper formats.	All workers are responsible for checking the accuracy on active cases. Data cleansing activities are carried out on a regular basis.
F2	Are measures in place to routinely remove redundant information and for it to be disposed of securely? This applies to electronic and paper formats.	The information is subject to regulations and the Councils disposal schedule
F3	Retention of data How long will data be kept for? <i>Link to retention schedule if known.</i>	<i>The</i> information will be retained according to the retention schedule <a href="https://worcestershirecc.sharepoint.com/:x:/r/information-governance/Documents/Disposal%20Schedule.xlsx?d=wacd46750af034f59b65a2c530bb8b2aa&amp;csf=1">https://worcestershirecc.sharepoint.com/:x:/r/information-governance/Documents/Disposal%20Schedule.xlsx?d=wacd46750af034f59b65a2c530bb8b2aa&amp;csf=1</a>
<b>G</b>	<b>COMMISSIONING</b>	

G1 If the data is being commissioned externally does the contract or

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	<p>Worcestershire</p> <p>See <a href="#">commissioning/ decommissioning IM checklists</a></p>	
G2	<p>Is it clear who is responsible for responding to subject access requests. i.e. will it be Worcestershire or the commissioned service provider?</p>	<p>The details of responsibility will be clarified in any contract – and is Worcestershire County Council</p>
G3	<p>Is there a process for when a customer asks for their personal data to be removed from the system?</p>	<p>Any request will follow the responsible organisation's processes</p>
<b>H</b>	<b>DIRECT MARKETING</b>	
H1	<p>Does the system send messages by electronic means? <i>This includes both live and pre recorded telephone calls, fax, e mail, text messages or via social networking sites.</i></p>	No
H2	<p>Will you be involved in direct marketing? <i>This may be classed as direct marketing and the PECR regulations would apply. Consent and opt-out is required. Seek advice.</i></p>	No

<b>I</b>	<b>RISKS</b>	<i>To be agreed by service contact and IM</i>
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<b>J</b>	<b>ACTIONS</b>	
	List planned actions to address risks identified above.	1. Any actions will be recorded on the Frameworki, ONE and Tribal risk logs
	<b>Assessment Completed by: (name &amp; contact number)</b>	
	<b>Assessment completion date</b>	
	<b>APPROVALS REQUIRED</b>	
	<b>Information Management Date:</b>	
	<b>Service Manager Date:</b>	
	<b>Copied to:</b> <i>Insert names as relevant (SIRO/CG/IAO)</i>	



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