



Ref No: S/DPIA No. \_\_\_\_\_

## SUMMARY DATA PROTECTION IMPACT ASSESSMENT TEMPLATE

**IMPORTANT:** The Council has a duty to do a Data Protection Impact Assessment (DPIA) in order to comply with the General Data Protection Regulations 2016 and the Data Protection Act 2018 where it intends to process (i.e. (anything you do with data) an individual's personal data that is likely to result in a high risk to the rights and freedoms of individuals).

In order to decide whether it is necessary to do a full DPIA please complete this Summary DPIA template as accurately as possible.

A full DPIA is an assessment process which will assist in identifying and minimising data protection risks associated with your project / initiative.

To complete check the **Yes/No** questions in the form as appropriate.

Please save a new version of this document and return your completed form to: [mandy.byfield@bracknell-forest.gov.uk](mailto:mandy.byfield@bracknell-forest.gov.uk). Use the same email for any queries.

Author contact & submission details			
Name		Team	Audit and Risk Management
Email	<a href="mailto:Helen.rogers@bracknell-forest.gov.uk">Helen.rogers@bracknell-forest.gov.uk</a>	Department	Finance
Tel no	01344 352094	Date submitted	06/08/2019
What prompted you to submit a summary DPIA?			Retender of insurance provider
What is the legislation / authority under which you provide a service that gives rise to the need for the processing of personal data			Processing of insurance claims made against the Council

### \*Project / initiative details

\*Note: a project can be a new or review of: policy/strategy / function/procedure / project / service / organisation change / data sharing agreement/arrangement

<b>Title: Retender of casualty insurance and claims handling services</b>		
<b>Brief summary and description of the project / initiative:</b> Retender of insurance provider for employers liability, public liability, libel and slander, officials indemnity and professional negligence insurance and associated claims handling services		
<b>Proposed 'go live' / implementation date</b>	<b>01/04/2020</b>	
<b>Will the proposal / project involve a procurement exercise</b>	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>If YES, when will the tender be issued?</b>	<b>31/10/2019</b>	
<b>Consequences if the project / initiative was delayed/ unable to proceed:</b> <i>Factors may include: Consequences for the business, financial implications, consequences for service delivery and service users .</i> The Council would be left with no insurance in place. Employers liability is a compulsory insurance and with no insurance in force the Council would breach the Employers Liability (Compulsory Insurance) Act. This could result in the Council being subject to a fine of £2,500 per day that the insurance is not in force. In addition the Council would also be exposed to a financial loss for any claims that arised while these insurances were not in place		
<b>Has an Information Sharing Agreement for this proposal already been initiated with Legal Services?</b>	<b>Yes</b> <input type="checkbox"/>	<b>No</b> <input checked="" type="checkbox"/>
<b>Has a Privacy Impact Assessment / DPIA already been initiated/completed for a similar project/initiative?</b>	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>If YES, what was the name of the project/initiative?</b> Retender of Property and Motor insurance provider in 2017		

<b>Does the proposal involve :</b>	<b>Yes</b>	<b>No</b>
<b>1. Processing *high volumes of <a href="#">personal data</a> that affects a large number of individuals?</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>2. *Large scale processing of data of special category or criminal offence data including:</b> <ul style="list-style-type: none"> <li>• racial or ethnic origin</li> <li>• political opinions,</li> <li>• religious or philosophical beliefs,</li> <li>• trade union membership,</li> <li>• genetic data (e.g. DNA)</li> <li>• biometric data (where used for ID purposes) (e.g. fingerprints)</li> <li>• health (including provision of social care services)</li> </ul>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<ul style="list-style-type: none"> <li>Sex life or sexual orientation</li> <li>Data related to criminal allegations, convictions or offences related security measures</li> </ul> <p>*Large scale – Consider, a) the number of individuals concerned, either as a specific number or as a proportion of the relevant population, b) the volume of data and/or the range of different data items being processed, c) the duration or permanence of the data processing activity, d) the geographical extent of the processing activity.</p> <p>Health data only.</p> <p>Estimated 1,000 records over duration of 7 year contract</p>		
<b>3. Processing <u>any</u> biometric and/or genetic data?</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>4. Use systematic and extensive <u>profiling or automated decision-making</u> to make significant decisions about people?</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>5. Profiling individuals on a *large scale? See 2. above.</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>6. Profiling children or automated decision-making or for marketing purposes, or offering or targeting marketing or online services at children (aged under 13)?</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>7. Use profiling, automated decision-making or special category data to help make decisions on someone's access to a service, opportunity or benefit?</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>8. Matching data or combining datasets from different sources?</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>9. Tracking an individual's location or behaviour?</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>10. Processing data could result in a risk of physical harm in the event of a security breach.</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>11. Collecting personal data from a source other than the individual without providing them with a privacy notice ('this is termed invisible processing')</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
For example: The Council receives personal data from third parties without the individuals being aware, because issuing a privacy notice would prove impossible or involve disproportionate effort		
<b>12. Systemic monitoring of individuals / public areas using overt or covert methods e.g. CCTV?</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

13. Use of new technologies (inc. introducing new or amending existing technology, systems or software)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
14. Processing of data where the primary purpose is criminal law enforcement?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
15. Processing of data outside of the <a href="#">European Economic Area</a> ?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
16. Use of innovative technology in combination with any of the criteria in the European guidelines.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
17. There is a change to the nature, scope, context or purposes to our processing.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Where you have answered yes to the scale questions (1, 2 or 5 above) Indicate how many individuals will be affected	<input type="checkbox"/>	<input type="checkbox"/>

### Information Sharing

Does the proposal involve:	Yes	No
Sharing personal data or special category data on a regular basis with an external third party?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
If 'Yes' is there a valid Information Sharing Agreement (ISA) in place for the sharing you wish to undertake?	<input type="checkbox"/>	<input type="checkbox"/>
Changing the scope of an existing Information Sharing Agreement?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Please complete and return this form to: [mandy.byfield@bracknell-forest.gov.uk](mailto:mandy.byfield@bracknell-forest.gov.uk)

You will then be contacted with the outcome of the assessment of the summary DPIA and proposed next steps.

### Legal Services - Office Use

Data Protection Officer Review		
DPIA required?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
CCTV DPIA required?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Is Investigatory Power Act authorisation required?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Criminal Law Enforcement data processing?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Comments including rationale:		
Procurement involved?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Is a pre and post procurement DPIA likely to be required?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Comments including rationale:		
Information Sharing Agreement required?	Yes <input type="checkbox"/>	No <input type="checkbox"/>

<b>Comments including rationale:</b>			
<b>Next Steps / Recommendations for risk mitigation (including dates and any meetings arranged with business)</b>			
			Click here to enter a date.
			Click here to enter a date.
<b>Name</b>			
<b>Job Title</b>			
<b>Date of review</b>			
<b>Submitter informed of next steps</b>	<b>Yes</b> <input type="checkbox"/>	<b>No</b> <input type="checkbox"/>	<b>Date</b> Click here to enter a date.

When completed the above section may be sent as part of the Summary DPIA assessment response.