



Privacy Impact Assessment – **Action Grants**

Version 0.2

Version History			
Version	Date	Detail	Author
0.1	17.04.18	First Draft	
0.2	23.04.18	Amended after consultation	

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LINKING THE PIA TO THE DATA PROTECTION PRINCIPLES	ERROR! BOOKMARK NOT DEFINED.

Introduction

The Council has undertaken a Privacy Impact Assessment (PIA) of its Action Grants scheme to be.

This document is based on the template produced by Simon Hobbs DPO for the Information Governance Group (IGG).

Annex A

Privacy impact assessment screening questions

These questions are intended to help you decide whether a PIA is necessary. Answering 'yes' to any of these questions is an indication that a PIA would be a useful exercise. You can expand on your answers as the project develops if you need to.

Question	Y/N	Additional Comments (please give reasons for either a 'yes' or 'no' answer here)
Is there a requirement under GDPR to carry out a PIA? See section 7 above. NB if there is a legal requirement to carry out a PIA there is no requirement to complete the remaining questions.	Y	Collecting information on individuals for the purpose of administering grants
Will the project involve the collection of new information about individuals?	Y	Technically this would be individual's information who are submitting applications on behalf of the community and voluntary sector group they represent.
Will the project compel individuals to provide information about themselves?	Y	Yes. The Local Authority has a duty to consider community groups for grant aid and as such have the legal obligation to collect the data in order to process and pay the applicant where appropriate.
Will information about individuals be disclosed to third party organisations or people?	Y	Again, individual's information may be used because they are often given on behalf of the group. In order to ensure oversight of the grant funding, for Youth Grants, panels will help decide which grants to take forward. To help those panels make the best decision about the application, information about the community group will be provided, which may include personal information about the applicant.
Are you using information about individuals for a purpose it is not currently used for, or in a way it is not currently used?	Y	This is a new grant programme and therefore although many of those applying may have already applied for a grant before, that was used for a different purpose under a different programme.

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Does the project involve you using new technology that might be perceived as being privacy intrusive? For example, the use of biometrics or facial recognition.	N	No. There is no new technology used in the awarding of the grants and monitoring of the awards.
Will the project result in you making decisions or taking action against individuals in ways that can have a significant impact on them?	N	Individuals may apply on behalf of groups, but individuals cannot be paid the award. The award will be paid into the bank account of a constituted community group. Action would only be taken against the group if the funds were not spent or misappropriated. Unsuccessful bids will not result in any adverse effects on the individual or group applying.
Is the information about individuals of a kind particularly likely to raise privacy concerns or expectations? For example, health records, criminal records, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union information, biometric data, health or information concerning an individual's sex life or sexual orientation or other information that people would consider to be private.	N	No personal information except a telephone number, email address and address will be asked for and is anticipated to be given.
Will the project require you to contact individuals in ways that they may find intrusive?	N	No. Contact will only be made to individuals in relation to the application and to ensure the application follows the approval process in a timely and effective manner. Successful applicants will be contacted as part of the process of monitoring the award, but will be done so in a proportionate way, and in-keeping with the 'community grant conditions' signed by groups receiving a grant.
Will the data be held in relation to children or vulnerable adults?	N	No.

Annex B

Privacy Impact Assessment

Step one: Identify the need for a PIA

Explain what the project aims to achieve, what the benefits will be to the organisation, to individuals and to other parties.

You may find it helpful to link to other relevant documents related to the project, for example a project proposal.

Also summarise why the need for a PIA was identified (this can draw on your answers to the screening questions).

The Action Grants scheme is a small grants scheme designed to pay out small amounts of money to voluntary and community groups for local activities.

In order to obtain this money from the Council, groups have to fill in an application form with information pertaining to the project/activities which they would like to obtain funding to deliver, the benefit to the local community and how the work aligns to the Council corporate objectives. Applicants have to detail what they propose spending the money on and appropriate costings.

Included on the application form is the requirement for applicants to provide the Council (as the funder) with appropriate and relevant contact details of the individual applying for the funding and the group who the individual is applying on behalf of.

The Council cannot grant groups any money without obtaining the information described above and therefore there is a need to process potential private information and share this with appropriate departments for the grants to be awarded.

Is the information about individuals of a kind particularly likely to raise privacy concerns or expectations? For example, health records, criminal records or other information that people would consider to be private.

No.

Step two: Describe the information flows

- Description of collection, use, retention and deletion of personal data- is any sharing of data involved?
- Explanation of data flows – diagram or description detailing: controllers and processors, storage location and storage method, personal data fields collected, individual/team/organisational access to personal data(audit trail), security measures for storage and transfer of data
- Number of individuals likely to be affected by the project-do they include children or other vulnerable groups?
- A flow diagram is likely to be helpful here.
- Does the data include special category or criminal offence data?

The collection of data will be done via applicants filling in a generic Actions Grants application form available to download from the County Council website or obtain a physical copy. They will then fill the application form out electronically or by hand, and email it to the assigned 'actiongrants@derbyshire.gov.uk' Inbox or post it to the Policy and Research division via the business centre.

The application form will ask for details regarding the community and voluntary group asking for the funding. In many cases this information will be publicly available as all applicants are required to operate as a community or voluntary group however in supplying this information it is common that applicants use home addresses and personal details in order to be contacted.

Collecting this information is essential for four reasons:

1. So decision makers know who they are awarding the money to.
2. So applicants can be informed of whether or not their application has been successful.
3. So applicants can be physically granted the money.
4. So the Council can monitor how the money has been spent in accordance with the original application.

In order for the money to be granted, the applicant/group have to also sign a 'conditions of grant' form outlining their responsibility with the money and provide us with Bank Details (on headed paper) in order to be set up as a vendor on our system. For Grants to be given to projects that work with children or vulnerable groups, additional information will be sought, ensuring the group has appropriate policies in place to receive the grant.

The Actions Grants scheme is designed to award 2,000 grants across four areas:

Youth Grants
Physical Activity and Sports Grants
Community Safety Grants

Community Action Grants

It is anticipated that in order for there to be 2000 successful grants, around 3,000 applications may be made to the council – therefore there is the potential that the Council will be provided with the names and details of 3,000 groups and/or individuals.

In order to process this amount of applications the administrative resource will be spread across the Council, with relevant departments processing their relative grants (Childrens Services administering Youth Grants for example), which for simplification will be sent by applicants to one central, generic inbox/office.

The workflow below outlines, once the application form has been received by the Council, how the application form will be shared with departments.

The data processor (Policy) will record the reception of the applications and will assign a number to the application in order to track the applications if needed. The information recorded at this stage will be simply the applicant or group, the date received, the date sent on to the data owner and the amount of money requested (in order to log where the application needs sending).

The data owner who then receives the application from this point, will record the personal data necessary to fully process the application. The five data owner for different grants is detailed in the workflow below.

All information will be kept for the necessary retention period (6 years) and will then be deleted by the relevant data owner.

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Consultation requirements

Identify whether internal and/or external consultation is required to address privacy risks

- **Stakeholders to be consulted**
- **Method of consultation**

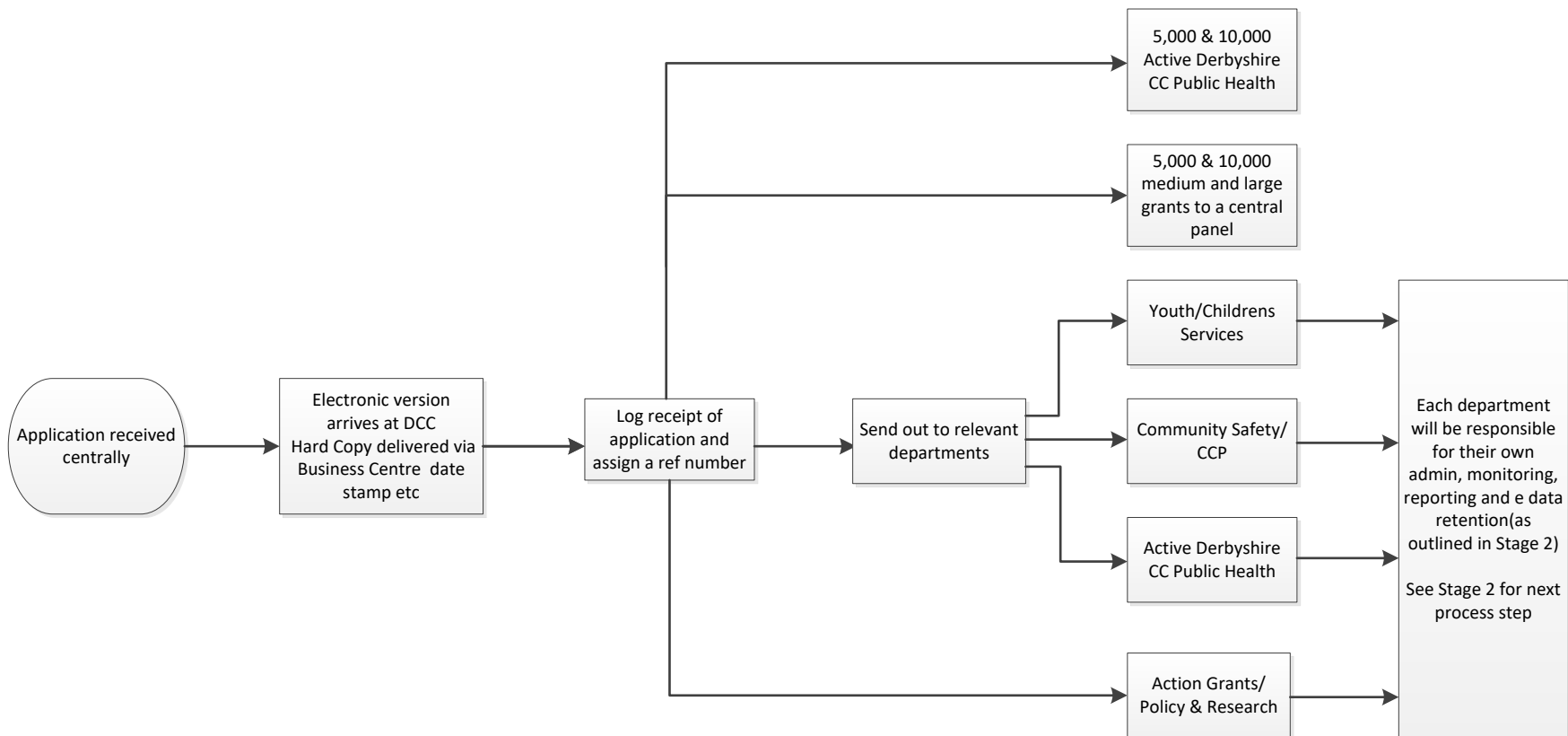
Since the projects inception, a working group, Chaired by the Director of Finance and ICT, has met periodically to discuss and design the Action Grant proposals, its resource implications and workflow arrangements.

GDPR group rep has been consulted and involved in the design of the workflow, ensuring privacy risks have been identified and addressed and that the workflow is most suitable to collecting only as much information on an individual as is required.

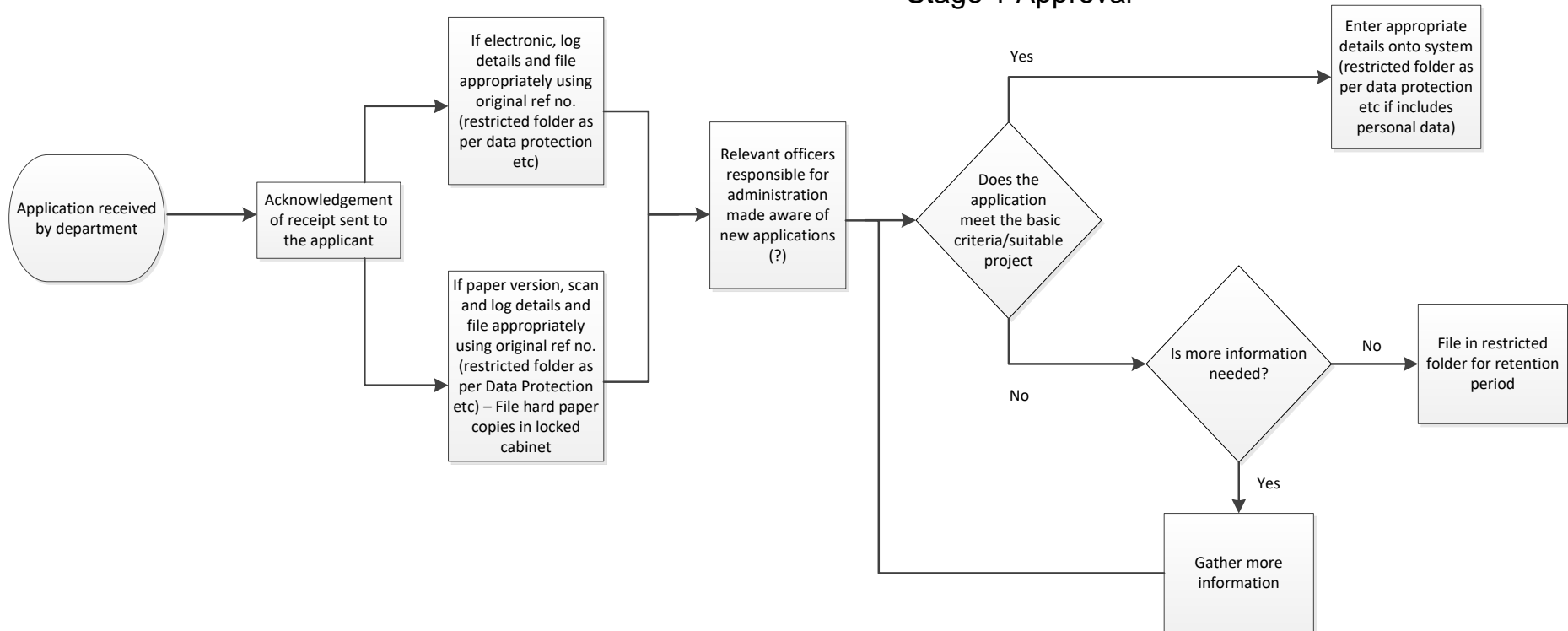
Legal have been consulted on the privacy notice to be included in the application documentation for applicants and the specific wording needed due to the necessity of the Council to collect information to process grant applications.

Grant Scheme - Workflow

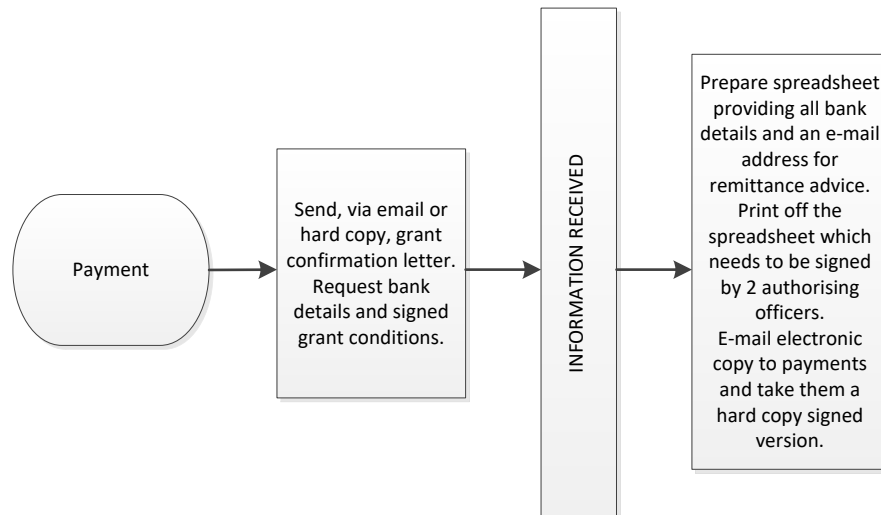
Application Received Centrally – Stage 1



Application Received by Department – Stage 2



Departmental Payment



Part B Steps 3 to 4 – Identify Privacy Risks, Solutions and Approval

Privacy Risk	Risk to Individuals & organisation	Risk initial score	Action Identified	Target Score	Risk Control Plan (Treat/Control/Tolerate/Accept/Terminate/Transfer)	Evaluation: is the final impact on individuals and the organisation after implementing each solution a justified, compliant and proportionate response to the aims of the project?	Approved By
<p>Breach of Principle 7 of the Data Protection Act</p> <p>Applicant data is accessed by unauthorised persons and used or shared inappropriately</p> <p>.</p>	<p>Risks to the individual as a result of contravention of their rights in relation to privacy, or loss, damage, misuse or abuse of their personal information.</p> <p>Financial and reputational damage. Legal action could be taken against the LA and possible substantial fine</p>	4	Applications and monitoring data will be stored in a restricted folder with permissions only granted to those working on the Action Grants Programme	2			

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<p>Breach of Data Protection Principles 4 and 5</p> <p>If data is inaccurate recorded.</p> <p>If a retention period is not established, information might be held for longer than necessary.</p>	<p>Data becomes out of date and could be inaccurate.</p> <p>Financial and reputational damage to the organisation.</p>	4	<p>Personal data primarily entered by the individuals themselves. Spreadsheets designed to be as user friendly to reduce inaccuracies. Effective 'training' for administrators to ensure the system is used in accordance with protocols and processes.</p> <p>Archiving to delete applications and associated data e.g. monitoring work. Retention schedule of 6 years identified as per financial regulations.</p>	2			
<p>Breach of Principle 6 of the Data Protection Act.</p>	<p>Individual's privacy is compromised by breaching rights</p>	6	<p>Personal data used by the Local Authority will be compliant with the</p>	3			

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Ensuring data subjects, i.e. Applicants, are aware of rights under data protection legislation relating to processing of data for these requirements.	of a data subject in relation to their personal data, including right to withdraw consent. Reputational damage and potential fines		new GDPR regulations. Applicants will be provided with a privacy notice outlining their rights. Consent is not needed as Grants have been categorised as Public Task (as the legal means with which to process data). Localism Act 2011 and Local Government Act 1972 – help the authority to achieve strategic outcomes.				
Unnecessary or irrelevant data held.		2	As part of system configuration and development it is ensured that data is only collected at the point it is needed, for at each stage of the application	1			

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			workflow is collected and held.				

Step five: Sign off and record the PIA outcomes

Who has approved the privacy risks involved in the project? What solutions need to be implemented?

Risk	Approved solution	Approved by
All the risks above have been identified through consultation with programme stakeholders as part of the development of the Action Grants proposals, and reflected workflow plan.	The approved solutions above have been identified by consultation with stakeholders as part of the development of workflow design. Once it is agreed who is in charge of which stage of the process a meeting will be held with data controllers explaining the workflow in detail and outlining their obligations to the PIA.	Action Grants working group

Step six: Integrate the PIA outcomes back into the project plan

Who is responsible for integrating the PIA outcomes back into the project plan and updating any project management paperwork? Who is responsible for implementing the solutions that have been approved? Who is the contact for any privacy concerns that may arise in the future?

Action to be taken	Date for completion of actions	Responsibility for action
Action Grants group to review PIA outcomes and ensure workflow reflects the approved solutions.	Expected to be by implementation of the process.	Project Board

Contact point for future privacy concerns