

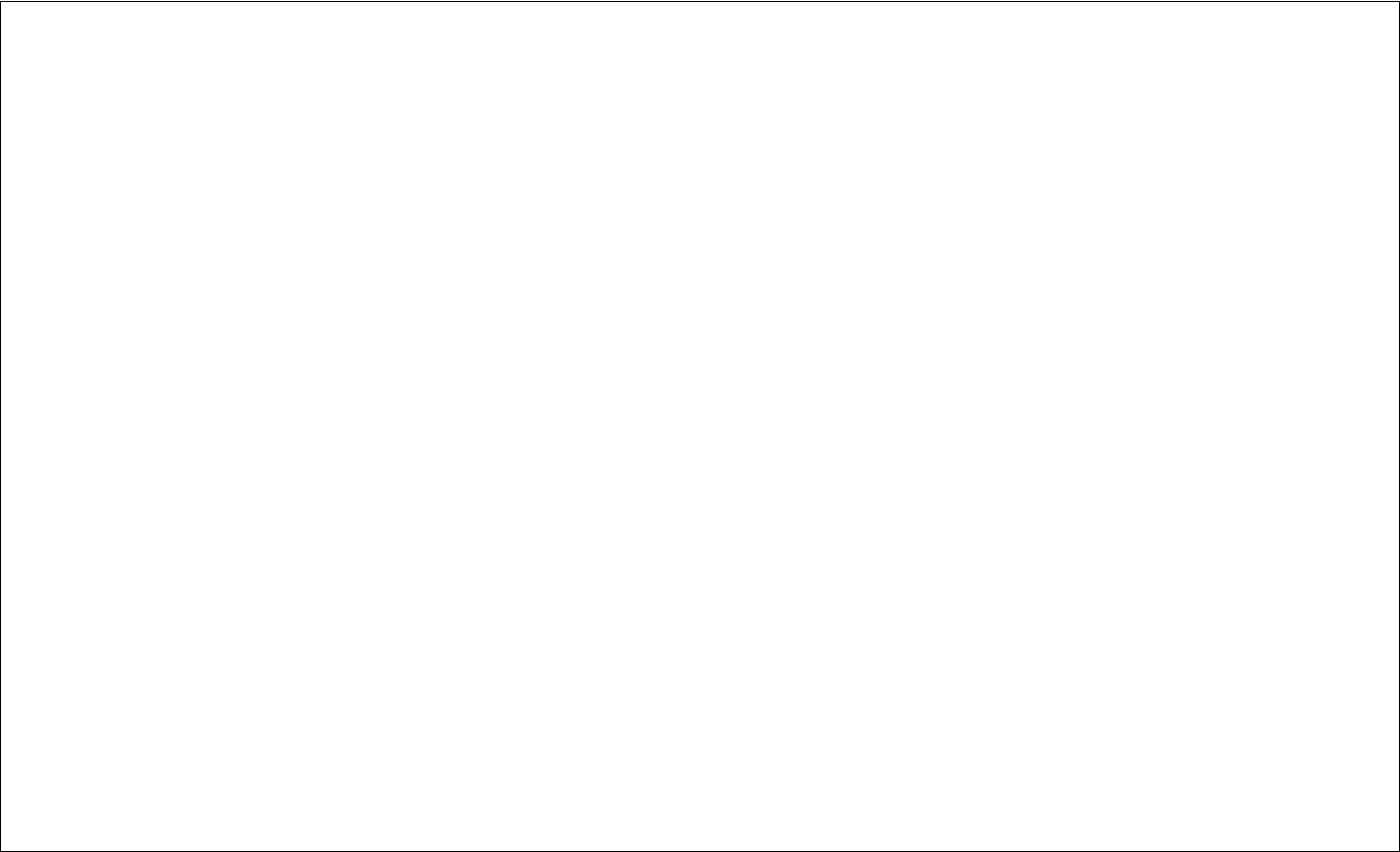
Privacy Impact Assessment – Project ICT-P3764 Pensions Administration System, DCCP

Part A - PIA Screening Questions

| Question | Y/N | Additional Comments (optional) |
|--|-----|---|
| Will the project involve the collection of new information about individuals? | N | |
| Will the project compel individuals to provide information about themselves? | N | |
| Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information? | Y | |
| Are you using information about individuals for a purpose it is not currently used for, or in a way it is not currently used? | N | |
| 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 | |
| Will the project result in you making decisions or taking action against individuals in ways that can have a significant impact on them? | N | |
| 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. | Y | Records include pay and employment information, as well as home addresses, in relation to administering the LGPS. |
| Will the project require you to contact individuals in ways that they may find intrusive? | N | |

Part B Step 1 – Outline Requirement for PIA

- Project Aim and Objectives
The aim of the project is to migrate the data pertaining to the members of Derbyshire Pension Fund from the current pensions administration system (Civica UPM) to a replacement system (Heywood Altair)
- Benefits to the organisation, to individuals and to other parties
The benefits were identified in a review of the pension system provision and the recommendation to move to a replacement system was approved by Pensions Committee. The benefits include more accurate and more efficient processing of pension benefits for Fund members.
- Links to any relevant project documentation
None
- Summary of Identified Need for PIA (can draw on answers to the screening questions).
The data is being migrated to a new system which is to be hosted by the new supplier, thereby giving that supplier access to the data.



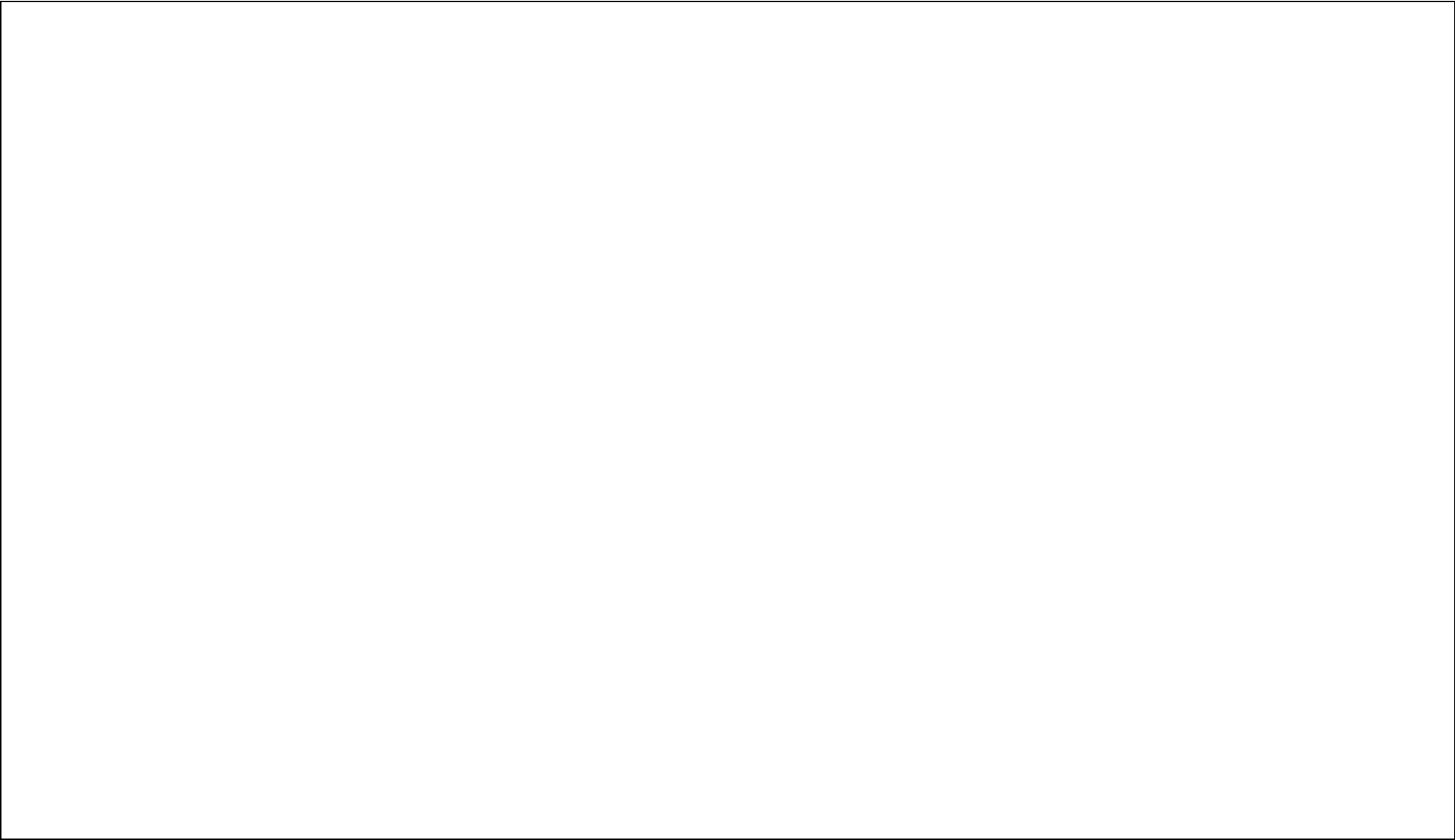
Part B Step 2 – Information Flows

To Include:

- Description of collection, use, retention and deletion of personal data
The data is continually received into the system from employing authorities, other LG Pension Funds, other pension schemes, and from the Fund members themselves. Pensions is a long term business, so most of the data is held for the life of the member, and beyond in cases where contingent benefits, based on the deceased member's entitlement, are in payment. Data is deleted 6 years from when the Fund holds no further liability for the member. This is shortly to be confirmed as compliant with the new GDPR.
- 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
The existing data will flow from the data controller (DCC) to the system host and data processor (Heywood) who are located in Altrincham, where it will be held and regularly accessed by DCC. A dedicated project team will take a data cut from the DCC server, develop a data dictionary, map the data fields to the new locations on Heywood's server, and oversee the migration ensuring a comprehensive audit trail is maintained
- Number of individuals likely to be affected by the project
Records relating to 100,000 Fund members will be migrated, but no individuals will be involved

Part B Step 2 – Consultation Requirements

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| <p>Identify whether internal and/or external consultation is required to address privacy risks</p> <ul style="list-style-type: none">• Stakeholders to be consulted Not required• Method of consultation Not applicable |
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Part B Steps 3 to 5 – Identify Privacy Risks, Solutions and Approval

| Privacy Issue | Risk to Individuals | Compliance Risk | Organisation Risk (DCC = Derbyshire County Council, GP = General Practice) | Solution | Is Risk Eliminated, reduced, Accepted | Evaluation: is the final impact on individuals after implementing each solution a justified, compliant and proportionate response to the aims of the project? | Approved By |
|--|---|--|--|--|---------------------------------------|---|-------------|
| Transfer of pensions records from DCC server to Heywood server in Altrincham | Any exposure of data could lead to the personal info identified above being accessed inappropriately. | Compliance with secure data transfer protocols | Impact = 3 Likelihood = 1 Total = 3 | DCC Audit due diligence visit to Altrincham site. Transfer of data carried out via secure methods by experienced staff, and in compliance with secure data transfer protocols. Consent is not required for pensions data under GDPR. All parties will sign a contract that includes a comprehensive section on data protection responsibilities. | Reduced | Yes | |
| Storage of pensions records on Heywood server at Altrincham | Any exposure of data could lead to the personal info identified above being accessed inappropriately. | Compliance with secure data storage protocols | Impact = 3 Likelihood = 1 Total = 3 | DCC Audit due diligence visit to Altrincham site. Storage of data carried out on protected systems by experienced staff, and in compliance with secure data storage protocols. All parties will sign a contract that includes a comprehensive section on data protection responsibilities. | Reduced | Yes | |
| Accessing and processing of records on server in Altrincham | Any exposure of data could lead to the personal info identified above being accessed inappropriately. | Compliance with secure data access protocols | Impact = 3 Likelihood = 1 Total = 3 | DCC Audit due diligence visit to Altrincham site. Access and processing of data by appropriately authorised DCC staff in line with agreed access protocols. Data to be deleted in line with Pension Fund GDPR arrangements. All parties will | Reduced | Yes | |

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|--|--|--|--|--|--|--|--|
| | | | | sign a contract that includes a comprehensive section on data protection responsibilities. | | | |
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Approval Signatory: Nigel Dowey

Part B Step 6 – Integrate PIA Outcomes into Project Plan

| Actions to be taken | Date for completion | Responsibility for action |
|-------------------------------------|--------------------------------|---------------------------|
| Audit site visit and system testing | 28 th February 2018 | |

| Contact for future privacy concerns |
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