

Public



Privacy Impact Assessment

**Made in Derbyshire Externally Hosted
Website Solution**

**Version 1.0
17 July 2018**

Version History			
Version	Date	Detail	Author
0.1	23/04/18	First draft	
0.2	26/04/18	Amendment to document template	
0.3	01/05/18	Second draft	
0.4	15/5/18	Third draft	
0.5	19/6/18	Fourth draft	
0.6	4/7/18	Fifth draft	
1.0	17/7/18	First final version	

Part A – PIA Screening Questions

Question	Y/N	Additional Comments (optional)
Will the project involve the collection of new information about individuals?	Y	
Will the project compel individuals to provide information about themselves?	Y	Membership of the website is voluntary
Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information?	N	
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.	N	
Will the project require you to contact individuals in ways that they may find intrusive?	N	

Part B – Outline Requirement for PIA

Project Aim

To develop a new website to incorporate both the current artsderbyshire and Made in Derbyshire websites, which actively promotes Derbyshire producers, artists and creative practitioners by supplying them with free digital marketing tools for a public audience

Project Objectives

- To support the growth of business and the economy in Derbyshire, particularly creative industries and small businesses
- To provide a free marketing and information tool for Derbyshire makers, producers, artists and creative practitioners
- To promote arts activities and events in Derbyshire
- To provide news and information to website members and the public
- To develop the visitor economy through the promotion of Derbyshire businesses, visitor attractions and community-led events
- To maximise Council efficiencies by consolidating all efforts into one externally created, managed, supported and maintained website

Benefits to the organisation, to individuals and to other parties

Benefits of keeping this personal data:

- Enables the County Council and its partners in Arts Derbyshire to communicate with Derbyshire makers, producers, artists and creative practitioners and with the public
- Enables Derbyshire makers, producers, artists and creative practitioners (members) to promote their products, services and events
- Enables members of the public (subscribers) to sign up to receive tailored information about their areas of interest

Links to any relevant project documentation

Relevant project documentation:

- Business Case
- Departmental Risk Register
- Council Requirements – Tender Specification

Summary of Identified Need for PIA

We will be collecting limited personal contact information from subscribers (individual members of the public using the website to sign up for newsletters).

The project will collect, collate and publicly display limited contact information about members (businesses, sole traders and voluntary organisations). This will include some limited personal contact information that is not publicly displayed on the website, where individuals or businesses have asked for this to be kept confidential.

Part B – Information Flows

Description of collection, use, retention and deletion of personal data:

Public

- Data will be transferred from two current websites, with permission of the existing members and subscribers;
- In future, data will be collected via web forms;
- Data collected will include name, organisation name, postal address, email address, organisation's website address, telephone numbers and short description;
- All the data is voluntarily given by businesses, artists, third sector organisations and members of the public;
- Members and subscribers will be able to access, update and delete their own information, via a webform, and will be reminded annually to do so;
- Data will be anonymised and used to provide statistics about website use for Council reporting;
- Deleted data will only be retained to prevent the Council from inadvertently re-joining deleted members;
- Deleted data will be anonymised for use in statistical reporting, so that numbers of members can be tracked over time;
- Personal data will not be shared with any other party, including other members and subscribers;
- Member information is collected to be displayed publicly on the website, as a marketing tool and for us to be able to communicate with them;
- Subscriber information is collected to enable us to send out newsletters;
- We also collect postal addresses to allow geolocation of listings in search results; and
- Data will be retained according to the Arts Service retention schedule (6 years, plus the current year).

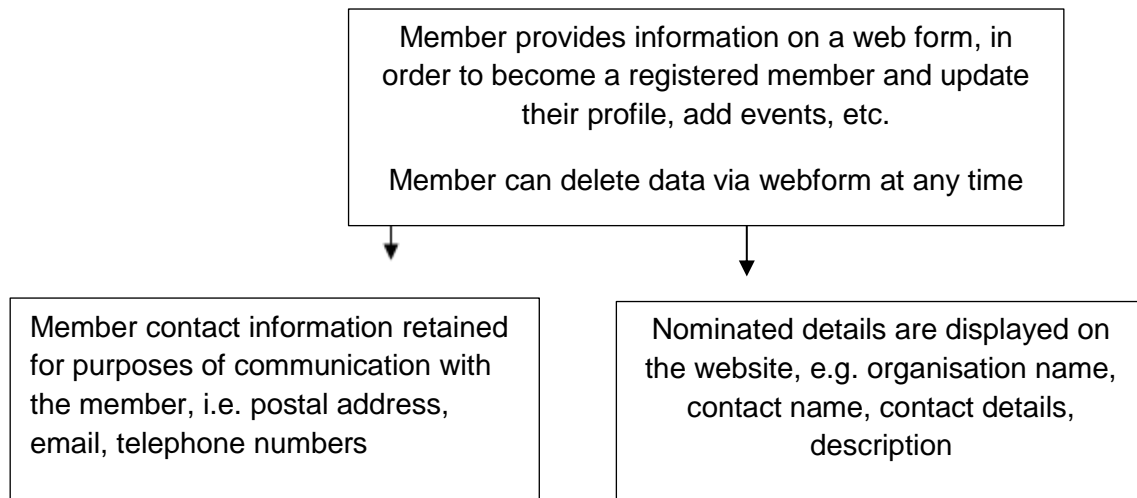
Explanation of data flows:

- The data will be controlled and processed by an external website developer;
- The data will be stored on an external server;
- Personal data fields collected will be: name, postal address, email address, landline and mobile telephone numbers;
- Security measures will be detailed by the contractor in their tender, but will comply with Council policy:
 - The council has ISO27001:2013 certification and has established an information security management system (ISMS) in accordance with the requirements of ISO27001 and ISO27002 code of practice for information security controls.
 - The council requires the supplier to provide a level of information security assurance for Council and personal data which is compliant with current Data Protection Legislation and Information security best practice. The requirements document provided for this tender sets out the security, audit and technical requirements which will be validated as part of the due diligence process.
 - As part of the Council's ISMS, the Council has a Supplier Information Security Policy, (Appendix A), which contracted suppliers will need to comply

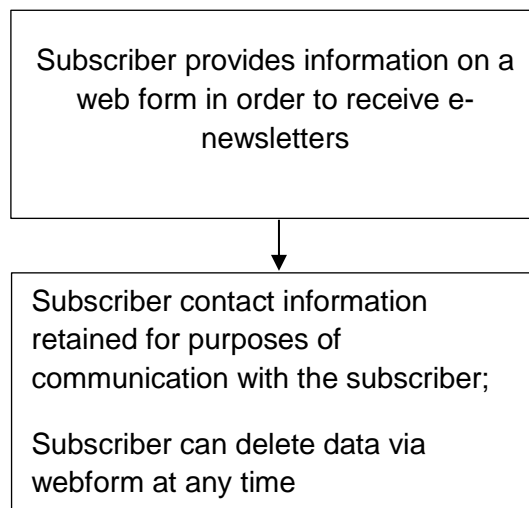
with. The data for this project is likely to be categorised as Restricted in accordance with Appendix A of the policy.

- The data will not include any special or sensitive data; and
- The number of individuals affected will be between 5,000 and 50,000 people.

Member data



Subscriber data



Part B – Identify Privacy Risks, Solutions and Approval

Privacy Issue	Risk to Individuals & organisation	Risk initial score	Action Identified	Target Score (after applying actions)	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
Transfer of data from current websites to new one without permission would constitute a breach of privacy	Individual's data processed without permission	3	Seek permission from all members and subscribers before information is transferred	1	Treat	Yes	
Personal data held by the Contractor about users is breached	Individual loss of privacy and reputational damage to DCC	3	Appropriate security measures employed by contractor to protect website (e.g. ISO 27001 compliance)	2	Treat	Yes	

Public

Personal data held by the Contractor is deleted or corrupted	Reputational damage to DCC	3	Appropriate security measures adopted by contractor to protect data from accidental deletion/corruption	1	Treat	Yes	
Solution unable to isolate out-of-date personal information and delete it	Legal GDPR obligations unable to be fulfilled	2	Appropriate provisions written in the tender documents, to ensure the solution meets GDPR requirements	1	Treat	Yes	

Approval Signatory:

Part B – Integrate PIA Outcomes into Project Plan

Actions to be taken	Date for completion	Responsibility for action
Seek permission from all members and subscribers before information is transferred	On implementation	
Appropriate security measures employed by contractor to protect website (e.g. ISO 27001 compliance)	On implementation	

Public

Contact for future privacy concerns		