



Privacy Impact Assessment

DERBYSHIRE VIDEO INTERACTION GUIDANCE (VIG) PROJECT

Privacy Impact Assessment – Screening Questions

Question	Y/N
Is there a requirement under GDPR to carry out a PIA?	YES
Will the project involve the collection of new information about individuals?	YES
Will the project compel individuals to provide information about themselves?	YES
Will information about individuals be disclosed to third party organisations or people?	YES
Are you using information about individuals for a purpose it is not currently used for, or in a way it is not currently used?	YES
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.	NO
Will the project result in you making decisions or taking action against individuals in ways that can have a significant impact on them?	NO
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.	YES
Will the project require you to contact individuals in ways that they may find intrusive?	YES
Will the data be held in relation to children or vulnerable adults?	YES

Privacy Impact Assessment

Step 1 – Requirement for PIA – issues to be addressed

To Include:

- Project Aim and Objectives
- Benefits to the organisation, to individuals and to other parties of personal data
- Links to any relevant project documentation
- Summary of Identified Need for PIA (can draw on answers to the screening questions).

The aim of the service shall be to deliver VIG (a therapeutic intervention) to parents and carers where attachment issues are identified as a primary source of difficulty, by using short pieces of video clips of interactions between adult and child to improve relationships and communication. It is a recognised approach used only by accredited practitioners or those in training through AVIGuk.

There are huge benefits to Derbyshire CC in using this approach with parents/carers to counter the negative effects of some parenting styles, neglect and abuse. It is a positive, evidence based and preventative approach to improve parenting skills that is renowned as having significant impact nationally and internationally. Studies show that parents/carers benefit as they gain insight into the impact of their behaviours on their child, gain in confidence and self-esteem and develop new parenting skills. Children's well-being and behaviour improves. We anticipate that this project has the potential to reduce costs to the LA as the families/children involved will be less likely to experience placement breakdown (adopted or fostered children), less likely to need to undergo safeguarding procedures or experience school exclusion.

This project has an associated confidentiality agreement for practitioners using the approach (see attached).

The project will involve collecting baseline assessments (questionnaire data), making short videos of parents with their children, usually in the home environment. Video clips will be kept for a time limited period and will only be shared with third parties for training purposes.

Step 2 – Information Flows/Nature of processing

To Include:

- 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?

See confidentiality agreement attached which details: data collection, use, retention, sharing and deletion. This document includes forms for gaining parent/carers consent to hold video data. This agreement is based on agreements typically used in LAs and health authorities across the UK who use VIG and complies with guidance from AVIGuk.

All practitioners involved in the project, DCC Educational Psychologists and NHS nurse specialists (health visitors) will use an encrypted DCC laptop protected with anti-virus software. All practitioners will have access to a VIG network folder, restricted only to professionals working directly with the project clients (parents/carers) plus the Senior Business Services Officer (BSO) in the Educational Psychology Service. Any emails sent by professionals to the project lead relating to advice about working with project clients will use initials to maintain anonymity. If any documents need to be sent from the health visitors to project clients (eg a letter to summarise the outcomes of the intervention), these will be sent via GCSX to the BSO and/or saved directly in the network folder.

Approximately 50 families (parents/carers and their children) are likely to access VIG interventions through this project. The majority of families and children involved will relate to vulnerable groups.

The project does not include any special category or criminal offence data.

Step 2 – Consultation Requirements

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

- Stakeholders to be consulted
- Method of consultation

The project lead has consulted with colleagues in AVIGuk and in other LAs where VIG projects exist (eg Northants) on the format of confidentiality agreements that are robust and fit for purpose. These have been used as a basis for the confidentiality agreement attached. The agreement includes information regarding gaining informed consent from clients for the use of video material.

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 (after applying actions)	Risk Control Plan	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
Data is accessed by unauthorised persons and used or shared inappropriately	<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</p>	12	<p>Data will be held on encrypted DCC laptops and secure DCC network folder</p> <p>Written Data sharing Agreement agreed</p> <p>Individual confidentiality agreements in place for non DCC staff</p>	8	<p>Treat/ Control</p> <p>Treat/Control</p> <p>Transfer</p>	<p>Yes</p> <p>Yes</p> <p>Yes</p>	

	against the LA and possible substantial fine						
Retention schedule is not adhered to.	Data is kept longer than agreed	2	A dedicated retention process has been developed. Any data that has met the retention expiry date will be deleted. Written Data Sharing Agreement in place.	0	Eliminated	Yes Yes	

Step four: 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
Inform key stakeholders of PIA outcomes	04/09/18	
Update CS Information Audit	31/07/18	
Update CS Retention Schedule	31/07/18	

Contact point for future privacy concerns

Date of consideration by IGG
