

# Data Protection Impact Assessment Form

**RBC Citizens' Engagement Panel - Recruitment Phase**

**Reference: DPIA.107**

<b>Revision History</b>			
<b>Version</b>	<b>Date</b>	<b>Owner</b>	<b>Summary of Changes</b>
V1		KP	Original document – partially completed
V2		KP	NL advice in completing and updates to original
V3		KP	Update comments
V4		KP	NL/JM assist with completing remainder of form and update comments
V5		KP/JM	JM completion of form / NL advice and resolution of previous comments
V6		KP/JM	DW/KP resolution of comments

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## When must I complete a Data Protection Impact Assessment (DPIA)?

A DPIA is a process designed to help you systematically analyse, identify and minimise the data protection risks of a project or plan. We need to undertake one when we make a **significant change** to the way we handle **personal data** or if a **new technology** is considered or wherever **high risk data** is used for example data that is particularly sensitive or alternatively where a large volume of data is being processed.

### Identify the project

Name of the project or proposal	<b>RBC Citizen’s Engagement Panel</b>
Brief outline of project or proposal	<p>Runnymede Borough Council deems it important to gather evidence on residents’ views of the Council and potentially partner organisations’ services, to help inform understanding of progress and to be considered when gathering evidence for the future direction of council strategy.</p> <p>The aim is that the RBC Citizens Engagement Panel (CEP) will be formed of a minimum of 880 residents from across the borough who will be invited to give their views on various council led topics. It is intended that the panel membership will be broadly, proportionally representative of the borough’s population demographics to ensure that it represents the diversity of the borough.</p> <p>The delivery of an RBC Citizens’ Engagement Panel has been transferred to the Community Services Service Area Plan for 2024/2025.</p>
Name and Job Title of person responsible for project	Darren Williams, Corporate Head of Community Services

### Initial screening questions

Personal data is any data that either directly identifies someone such as their name, or indirectly identifies them i.e. where the data relates to an individual, but their identity is not given. In these circumstances where it is possible to identify that individual if other information were introduced, even if you do not hold that information at the time, then the information is personal data To determine whether you will need to complete a DPIA, complete the following 16 screening questions, if the answer to any of these is 'yes', then a DPIA is required.

If you are processing the data because you consider it a legitimate interest you are required to complete a [legitimate interest test](#) regardless of whether a DPIA is required.

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Please note if your project relates to CCTV you should undertake the DPIA by the Surveillance Camera Commissioner: <https://www.gov.uk/government/publications/data-protection-impact-assessments-for-surveillance-cameras>

Data element	Please tick
The project will involve the collection of a substantial amount of new personal data, not previously collected by the council	<input checked="" type="checkbox"/>
Information about individuals may be shared with third parties who have not previously had routine access to the information	<input type="checkbox"/>
The project will use information about individuals for a purpose it is not currently used for, or in a way it is not currently used	<input type="checkbox"/>
The project will involve using new technology that might be perceived as being privacy intrusive. For example, the use of biometrics or facial recognition.	<input type="checkbox"/>
The project may result in you making decisions or treating individuals in ways which can have a significant impact on them. E.g. profiling or using automated decision making	<input type="checkbox"/>
Information about individuals is likely to raise privacy concerns or expectations, for example, information that people would consider to be particularly private.	<input checked="" type="checkbox"/>
The project requires contact with individuals in ways they may find intrusive, for example, unexpected telephone calls	<input type="checkbox"/>
The project will access or transfer personal data outside the EU e.g. using a server in the USA	<input type="checkbox"/>
The project will involve processing special category* personal data or information relating to criminal convictions?	<input checked="" type="checkbox"/>
The project will involve systematically monitoring a publicly accessible place e.g. CCTV	<input type="checkbox"/>
The project will involve data matching from various sources	<input type="checkbox"/>
You will <b>not</b> be providing a privacy notice directly to the data subjects	<input type="checkbox"/>
The project will involve introducing and utilising Direct Marketing	<input type="checkbox"/>
The project will involve tracking an individual's location (either online or geographical) or behaviour	<input type="checkbox"/>
The project will involve childrens' data	<input type="checkbox"/>
The processing is considered 'high risk' i.e. inappropriate use or disclosure of this data would lead to serious consequences for the data subjects	<input type="checkbox"/>

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\*Please see the section 3.1.1 of the council's [Data Protection Policy](#) for details on special category data

If you have **not** answered 'Yes' to any of these questions, then you will not need to complete a full DPIA below.

Please return this part of the form to the Data Protection Officer who will keep this as a record of why a DPIA is not necessary.

## 1. Data Processing activities and purposes of processing

Please identify the key privacy risks within the project.

### 1.1 Participants in this project

Role	Participant (name(s))
Project Manager	Kruti Pabari
Information Champion	Dom Prendergast
Business owner of the data (i.e. the Head of department)	Darren Williams, Corporate Head of Community Services
Third party software provider (if applicable)	Jadu
Digital Services representative (if applicable)	Stephen Bowen, Head of Digital Innovation

### 1.2 Aims of the project

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

In the table below, describe the purposes of the processing by clearly outlining the reason for data processing/sharing, including:

- The consequent benefit to service delivery
- The intended effect on individuals
- Benefits to stakeholders
- Benefits to the wider organisation
- Benefits to society

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

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The Council has a duty to ensure it communicates effectively with residents and communities. The development of a Citizens Panel in Runnymede will ensure that there is meaningful engagement around subjects that may be of interest and concern to our residents. The feedback received may be used in conjunction with other evidence and process to make decisions that will, over time, shape communities, towns and Runnymede as a borough.

The delivery of the Citizens Panel meets one of the key objectives within the Corporate plan and helps to deliver objectives within the Empowering Communities strategy.

It is intended, initially, as a one-year pilot to assess resource requirements and review success and value at the end of the first year. It is anticipated that in the first year there will be two main topics for engagement, these will look at how communities want us to engage with them and what residents' priorities are. It is anticipated that residents feedback will be considered as evidence when preparing the corporate business plan.

### 1.3 Consequences of not progressing with this project?

Please state the predicted impact of not progressing with this project.

If this project was not progressed, this key objective within the Corporate plan would not be met. The Council would also have to look at other methods to fulfil its duty to communicate and engage effectively with its residents to deliver objectives within the Empowering Communities strategy.

This project is based on research conducted by RHUL and Citizens Panels are already being used successfully by other councils therefore represents a credible and proven methodology.

### 1.4 Describe the nature of the processing

You should describe the collection, use and deletion of personal data here. You should also say how many individuals are likely to be affected by the project.

<p><b>How will data be collected?</b> i.e. directly from the data subject using a form, from a government department etc</p>	<p>Most sign-ups will be directly from the data subject using a webform. This can be completed either online, using a paper copy of the form or over the phone by customer services who will complete the form on behalf of the data subject. The form will be available on the RBC website, in-person events and we will also utilise existing consultation databases held at RBC and invite them to join the Citizens Panel (as opposed to just transferring the data).</p>
<p><b>How will the privacy notice be provided to the data subjects?</b> i.e. at what point in the process, and how will the data subject be</p>	<p>On the final page of the online application form and paper form there will be a project-specific privacy statement, with details on where to find or how to obtain a copy of the full CEP privacy notice (on the online form a link will be provided). It will also reiterate the right to withdraw consent. A final checkbox will</p>

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given the correct privacy notice	be included to confirm that applicants give their permission for the Council to process and handle their data in the way laid out in the privacy notice.
<b>How will their data be used?</b> i.e. once collected what will happen to the data	The submitted personal data may be used for some or all of the following purposes: <ul style="list-style-type: none"> <li>• to engage with panel members and seek their feedback/views on various topics of interest and/concern, priorities and preferences across all council departments</li> <li>• for demographic analysis and statistical monitoring , to ensure that membership of the panel is broadly representative of the population of Runnymede to use demographic information for targeted engagements</li> </ul>
<b>Where will their data be stored?</b> i.e. will it be kept on a specific data storage solution or on the council's hard drives etc	All data will be stored in the RBC CRM system, Jadu. The data obtained from paper questionnaires will be entered in to the CRM (Jadu) and destroyed.
<b>How long will their data be kept for?</b> i.e. how long is the data needed for and has a data retention period been established	As will be stated on the application form, the Council will retain personal data collected from the form for up to a maximum of 1 year from confirmation of membership details or engagement with CEP (which-ever is most recent), with an opportunity to update at every point of contact. Participants will be contacted to ask if they would like to update/confirm their details and remain on the panel or be removed. If no response is received, they will be removed automatically. If renewed, the annual notification will be reset, and the process will be on going.
<b>How will their data be deleted?</b> i.e. automated or manual deletion	Submitted webforms stored on Jadu cloud will be automatically deleted in accordance with Digital Services retention policy. Data stored in the Jadu database can be manually deleted or amended by the panel member or admin staff on their behalf.  Paper forms to be destroyed as soon as soon as the data has been entered into the webform and submitted.

## 2. Personal Data

### 2.1 Where does the personal data come from?

Please tick any that apply:

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Data Subject themselves*	<input checked="" type="checkbox"/>	Relevant Authorities**	<input type="checkbox"/>
Health Providers	<input type="checkbox"/>	Family members / Next of kin	<input checked="" type="checkbox"/>
Housing associations	<input type="checkbox"/>	Schools	<input type="checkbox"/>
Prisons / Detention Centres	<input type="checkbox"/>	Care Homes / Nursing Homes	<input type="checkbox"/>
External processors***	<input type="checkbox"/>	Charities	<input type="checkbox"/>
Councillors	<input type="checkbox"/>	Media	<input type="checkbox"/>
Members of Public	<input checked="" type="checkbox"/>	Trade Unions	<input type="checkbox"/>
Electoral Registers	<input type="checkbox"/>	Marketing Companies	<input type="checkbox"/>
Professional Bodies	<input type="checkbox"/>	Businesses (B2B)	<input type="checkbox"/>
Credit reference agencies	<input type="checkbox"/>	Other internal council department^	<input type="checkbox"/>
Council department involved in project ^^	<input checked="" type="checkbox"/>	Other (Please state)	<input type="checkbox"/>

\*Data Subjects themselves means the person who is providing the data. This could be a customer, complainant, witness etc.

\*\*Relevant authority means any government or similar department, commission, board, body, bureau, agency, authority or administration body.

\*\*\*External processors mean people/companies we employ to process data on our behalf such as photographers, consultants, experts etc.

^Other internal council department means the information has been shared by another council department that collected the data for their own purposes

^^Council department involved in the project means the information was previously collected for a specific purpose by the department carrying out the change or project. This purpose may or may not be linked to the new purpose.

## 2.2 Who is the data about?

Please tick the relevant categories of individuals

Customers / Service Users / Clients (including potential and previous)	<input checked="" type="checkbox"/>	Staff at partner / collaborating organisations	<input type="checkbox"/>
Employees / Ex-employees	<input checked="" type="checkbox"/>	Consultants / Contractors (including prospective)	<input type="checkbox"/>
Elected Officials	<input type="checkbox"/>	Job applicants	<input type="checkbox"/>
Members of Public / Residents	<input checked="" type="checkbox"/>	Tenants (both potential and ex-Tenants)	<input checked="" type="checkbox"/>
Agency Temps / Casual workers	<input type="checkbox"/>	Trade Union Representatives	<input type="checkbox"/>

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Family members of staff or service users;	<input checked="" type="checkbox"/>	Visitors to RBC premises	<input type="checkbox"/>
Journalists / press representatives	<input type="checkbox"/>	Children	<input type="checkbox"/>
Suppliers;	<input type="checkbox"/>	Visitors to RBC website;	<input checked="" type="checkbox"/>
Staff Emergency Contacts	<input type="checkbox"/>	Other (Please state)	<input type="checkbox"/>

## 2.3 What data is collected?

Please tick any that apply and insert any other data not listed. Please provide a justification as to why the information is necessary to meet your objective.

Personal data		Justification	Personal Data		Justification
Name	<input checked="" type="checkbox"/>	To be able to refer to an individual when contacting them regarding their membership on the panel and any subsequent engagements.	Title (Mr, Mrs, Ms, Master, Mx, Dr, Prof, Sir, Lord,);	<input type="checkbox"/>	
Home or work address	<input checked="" type="checkbox"/>	To be able to send correspondence by letter regarding membership on the panel and any subsequent engagements.  Also to indicate what ward a member lives in for demographic analysis.	Pronoun preference (he, his, she, her, they, etc.)	<input type="checkbox"/>	
Contact details (email address, telephone)	<input checked="" type="checkbox"/>	To be able to send	C.V.	<input type="checkbox"/>	

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number etc)		correspondence by email regarding membership on the panel and any subsequent engagements.			
Date of Birth	<input checked="" type="checkbox"/>	Panel is for 18 years plus only.  To ensure the panel make up is broadly representative of the Runnymede population and so members can be contacted for engagements relevant to them.	Age	<input type="checkbox"/>	
Marital Status	<input type="checkbox"/>		Job Title	<input type="checkbox"/>	
IP address	<input type="checkbox"/>		National Insurance Number	<input type="checkbox"/>	
Location data	<input type="checkbox"/>		Nationality or Place of birth	<input type="checkbox"/>	
Financial information such as credit check data, financial history, arrears, bankruptcy, CCJ, benefits	<input type="checkbox"/>		Payment information such as credit/debit card/direct debit/bank details	<input type="checkbox"/>	
Opinions / correspondence	<input checked="" type="checkbox"/>	Regarding themes/interests, to inform future contact decisions.	Languages spoken	<input checked="" type="checkbox"/>	Asked at sign up to inform for future contact requirements.
Gender	<input checked="" type="checkbox"/>	To ensure the panel make up is broadly representative of the Runnymede population and so members can be contacted for engagements that are relevant to them. This is not mandatory.	Next of Kin	<input type="checkbox"/>	
Voice data including voice recognition;	<input type="checkbox"/>		CCTV	<input type="checkbox"/>	
ANPR Data	<input type="checkbox"/>		Employment data (such as	<input type="checkbox"/>	

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			timesheets, appraisals etc)		
Free text inadvertently collected	<input type="checkbox"/>		Other: Household Tenure	<input checked="" type="checkbox"/>	To ensure the panel make-up is broadly representative of the Runnymede population and so that they can be contacted with engagements that are relevant to them.

The UK GDPR singles out some types of personal data as likely to be more sensitive and gives them extra protection. Please check whether any of these categories of data are relevant to your project.

Special category data/ Criminal offences		Justification
Mental Health	<input checked="" type="checkbox"/>	This is represented by a general question in the sign-up questionnaire around ill health/disability and how it affects the respondents day to day life. This mirrors the census information and is used to ensure the panel make up is broadly representative of the Runnymede population and so that they can be contacted about engagements that may be relevant to them. This is not mandatory.
Physical Health (including NHS/ Hospital number, allergies, dietary requirements, mobility aids, covid-19 risk/infection/vaccine etc)	<input checked="" type="checkbox"/>	This is represented by a general question in the sign up questionnaire around ill health/disability and how it affects the respondents day to day life. This mirrors the census information and is used to ensure the panel make up is broadly representative of the Runnymede population, and so that they can be contacted about engagements that may be relevant to them This is not mandatory.
Data revealing ethnicity or racial origin	<input checked="" type="checkbox"/>	To ensure the panel make up is broadly representative of the

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		Runnymede population and so that they can be contacted about engagements that may be relevant to them This is not mandatory.
Religion (including data revealing religious beliefs such as halal or kosher meals)	<input checked="" type="checkbox"/>	To ensure the panel make up is broadly representative of the Runnymede population and so that they can be contacted about engagements that may be relevant to them This is not mandatory.
Philosophical beliefs	<input type="checkbox"/>	
Political opinions	<input type="checkbox"/>	
Trade Union Membership	<input type="checkbox"/>	
Criminal offences	<input type="checkbox"/>	
Genetic or Biometric data	<input type="checkbox"/>	
Sexual orientation or Sex life	<input checked="" type="checkbox"/>	To ensure the panel make up is broadly representative of the Runnymede population. This is not mandatory.

## 2.4 How many individuals' data is involved? (please tick)

Where this is unknown please provide an estimate.

1-50	<input type="checkbox"/>	51-100	<input type="checkbox"/>	101-500	<input type="checkbox"/>
501-1000	<input checked="" type="checkbox"/>	1001-10000	<input type="checkbox"/>	10000+	<input type="checkbox"/>

## 2.5 Communication methods

How do you capture/receive/share the data?

Telephone/ Voicemail	<input checked="" type="checkbox"/>	MS Teams	<input type="checkbox"/>
System to System	<input type="checkbox"/>	Post	<input checked="" type="checkbox"/>
Weform including application forms	<input checked="" type="checkbox"/>	Email	<input type="checkbox"/>

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By hand (where physical forms are used)	<input checked="" type="checkbox"/>	Text	<input type="checkbox"/>
Egress	<input type="checkbox"/>	Face to face	<input checked="" type="checkbox"/>
Removable media (USB, CF/SD)	<input type="checkbox"/>	Social Media (Twitter, Instagram, Facebook)	<input type="checkbox"/>
CCTV	<input type="checkbox"/>	Other (Please state)	<input type="checkbox"/>

### 3. Data Protection Principles

#### 3.1.1 Lawful basis for processing the data- Article 5 (1) a

Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject

For any processing of personal data, complete Table 1 by ticking the relevant lawful basis. Where processing includes special category data (see Section 2 above) also complete Table 2.

<b>Table 1- Personal Data</b>	
Consent has been (will be) obtained and maintained Article 6 (1)(a)	<input type="checkbox"/>
A contract <u>with the data subject</u> is (will be) in place covering the processing of specified personal data Article 6 (1)(b)	<input type="checkbox"/>
The Council has a legal <u>obligation</u> to process the data Article 6 (1)(c)	<input type="checkbox"/>
Data will be shared/processed in the vital interests of the data subject (or another individual) where there is threat to life Article 6 (1)(d)	<input type="checkbox"/>
It is in the public interest or the Council has statutory authority to process the data Article 6 (1)(e)	<input checked="" type="checkbox"/>
Necessary for the purposes of legitimate interests pursued by the Council, except where such interests are overridden by the interests, rights or freedoms of the data subject. * Article 6(1)(f)	<input type="checkbox"/>

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\*Consult with the Information Management Team to see if this will apply – this legal basis can't be used where the Council is carrying out local government activity. A legitimate interest test will be required.

<b>Table 2- Special Category Data (if applicable)</b>	
Consent has been (or will be) obtained and maintained Article 9 (2)(a)	<input type="checkbox"/>
Processing is necessary to carry out obligations in the field of employment and social security Article 9 (2)(b)	<input type="checkbox"/>
Data will be shared/processed in the vital interests of the data subject where there is threat to life and the data subject is physically or legally incapable of giving consent Article 9 (2)(c)	<input type="checkbox"/>
The data subject has already manifestly made the information public Article 9 (2)(e)	<input type="checkbox"/>
Processing is necessary for defence of a legal claim Article 9 (2)(f)	<input type="checkbox"/>
Processing is necessary for reasons of substantial public interest Article 9 (2)(g)	<input checked="" type="checkbox"/>
Processing is necessary for delivery of health or social care services including preventative measures and employee health Article 9 (2)(h)	<input type="checkbox"/>
Processing is necessary for protecting against serious public health implications Article 9 (2)(i)	<input type="checkbox"/>
Storage is necessary for archiving purposes Article 9 (2)(j)	<input type="checkbox"/>

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### 3.1.2 Fairness- Article 5 (1) a

<p>Would the data subject reasonably expect their information to be used in this way?</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<p><i>Application and sign up to the citizens' panel is voluntary. The purpose of the citizens' panel and use of data collected will be explained at the time of collection. Applicants are also given the option to "prefer not to say" instead of giving special category data.</i></p>
<p>Is any individual likely to be damaged by processing the information? - <i>Is there any likelihood of data subjects suffering financial loss, physical harm, significant emotional or mental pain as a result of data processing?</i></p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	<p><i>The data will be used for the sole purpose of the Citizens' Panel and to ensure that the demographics of the borough are broadly represented by the panel (using statistical analysis)</i></p>
<p>Will the proposed use of personal data infringe the right to privacy under Article 8 of the Human Rights Act? - <i>Article 8 of the Human Rights Act includes reference to: respect for private and confidential information, respect for privacy when one has a reasonable expectation of privacy and the right to control the dissemination of information about one's private life, including photographs taken covertly</i></p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	<p>N/A</p>

### 3.1.3 Transparency- Article 5 (1) a

<p>How will individuals be notified about the use of their personal data?</p>	<p>At the end of the application form, there will be a privacy statement and link (or directions) to access the privacy notice.</p>
<p>Is processing (including sharing) transparent?</p>	<p>The webpage and application form will give clear information and details about the purpose of the panel. They will also be directed to the privacy notice.</p>

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### 3.1.4 Consent- Article 5 (1) a

If consent is required to process personal data, how will this be collected and what happens if consent is withheld or withdrawn?	Consent is not used as lawful basis, but individuals will be able to actively opt in and be given the option to opt out during the account management process. The panel member has control over their own account and the information held in it.
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### 3.2 Purpose limitation- Article 5 (1) b

Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;

Are all the purposes for processing personal data covered here?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<i>The project may evolve but currently all expected use of data is compatible with original purpose.</i>
Has any personal data been obtained for one purpose and then will be used for a new or different purpose in this project?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	<i>We may use existing databases, but we would contact those on these databases to ask if they would like to join the CEP, so they can complete the CEP registration form, if they choose to join, rather than transfer their data automatically across. We deem this a compatible purpose as it gives those already participating in Council activity the opportunity to engage with the CEP should they wish to.</i>

### 3.3 Data minimisation- Article 5 (1) c

Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed

Is the data being processed limited to the minimum required to fulfil the purpose?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	<i>The demographic information that is being collated mirrors the census data and will be used to evaluate the panel</i>
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		<i>membership and to attempt to ensure that the panel is broadly representative of the Runnymede population. Census results are not published in their entirety therefore we can only base the evaluation on the results that are published, and as such some of the demographic data collected may not be used immediately, but as categories of the published results can change over time we collate all relevant demographic information and use whatever is relevant to the census results we have at the time.</i>
Is the data being processed of adequate quality to fulfil the purpose?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<i>Notes</i>
Is more data than is required being shared with any 3rd party?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	<i>Notes</i>

### 3.4 Accuracy of data- Article 5 (1) d

Personal data shall be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay

Do you or will you verify/check the data with anyone? If so, who?	CEP members will have their own online account and will have the ability to check, update, amend their data at any time. They can also cancel their own membership if the wish to do so.
How often do you/will you check that the personal data you hold for this processing activity is correct and up to date? What processes do you/ will you have in place to cleanse the data; are these written down, e.g. in a handbook or in electronic format?	There will be an automated reminder sent to all panel members after 1 year from their membership start or the from their last engagement with the panel, to ask if they wish to remain on the panel. They then have the option to respond to either stay on the panel or cancel their membership. If they do not reply they will automatically be removed from the panel.

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Do systems (where relevant) allow data to be amended when required?	Yes
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### 3.5 Storage limitation- Article 5 (1) e

Personal data shall be kept in a form which permits identification of the data subjects for no longer than is necessary for the purposes for which the personal data are processed.

How long do you keep the personal data for this processing activity? (In some instances, legislation may dictate how long you hold personal data. It may help looking at your service's Record of Processing Activities (RoPA) or retention schedule or the LGA website to determine your retention policy.)	There will be an automated reminder sent to all panel members after 1 year from their membership start or the from their last engagement with the panel, to ask if they wish to remain on the panel. They then have the option to respond to either stay on the panel or cancel their membership. If they do not reply they will automatically be removed from the panel. If membership is renewed or the annual reminder is re-set.
How will information be deleted (or anonymised) when retention periods are reached?	Either manually by the panel member or by the panel admin if they do not reply or if they require assistance to do so. Reminders will be set to members at this point so they can decide whether to remain on the panel or not. This is an ongoing process.
Do you or will you keep any of your data beyond your stated retention period, e.g. in archive or due to technical issues with the software?	No

### 3.6 Security and confidentiality- Article 5 (1) f

Personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical and organisational measures.

What controls are in place to manage and maintain secure access to data?		Notes
Access control – only appropriate individuals can access the data.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	Only relevant officers will have access to the data stored in Jadu.
Password control – complex passwords are used, and the requirement to update	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Passwords are used to access Jadu. Only appropriate officers

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passwords at regular intervals has been considered	N/A <input type="checkbox"/>	who require access for the purposes of managing the CEP will be given password access.
Encryption- data is encrypted in transit	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	No intention to move the data
Secure server- if data is not stored on a council server, appropriate level of security has been considered.	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	Stored on council server
Removable media- data stored on 'removable media' only in line with council's policy	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
Two-factor authentication- where data is accessed from outside the council's network, two-factor authentication is used.	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
Physical security measures have been identified i.e. access control to the building, locked cabinets etc	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	This will apply to paper copies if stored e.g. locked cabinets
<b>What organisational measures are in place to keep data secure?</b>		Notes
Appropriate written guidance is in place for the project	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	Guidance around use of CRM system in line with Digital services policy. This includes password protection and access only to relevant project officers.
Relevant staff have been or will be trained and are familiar with the written guidance	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
Where a third party is engaged, a written, signed contractor or data sharing agreement is in place	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
The third party has provided assurance of staff training, technical security, data retention, appropriate assistance with Subject Access Requests, and secure data deletion.	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
Will you audit the policies, procedures and technical security to ensure it is working as envisioned?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	Digital services will manage this in accordance with their current policies.

*[DPIA Reference- Information Management Team to complete] [Data Classification e.g. Restricted]*

### 3.7 Accountability

The controller shall be responsible for, and be able to demonstrate compliance with the above principles

Record of Processing Activities (RoPA)		Notes
Is the processing in this project already listed in a RoPA?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Will the RoPA require updating or changing because of this project?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Have added action to update ROPA to reflect this

## 4. Data relationships and transfers

### 4.1 Who will access the data?

Categories of users	How users access the system and their intended use of the system
Council staff	To administrate the CEP. To review demographics of panel members. To send communications relating to the activities of the CEP.
Third party staff	Where the council contracts a third party to undertake monitoring/evaluation, or to lead processes of engagement with residents, they will be provided with access to the data.
Members of the public	Panel members and their data cannot be viewed by members of the public. But Panel members can view and amend their own information.
Other	

### 4.2 Who controls the data?

Where another organisation is involved with the data processing please confirm the data relationship

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<b>Relationship</b>	<b>Name of the third party</b>	<b>Reasoning</b>
<b>Data Controller/ Data Processor</b> <i>i.e. one party determines the purpose of processing and the other party carries out their instructions. This will most likely be the case where a contract is in place.</i>	N/A	N/A
<b>Data Controller/ Data Controller</b> <i>i.e. Controller A shares information with Controller B but they both have a separate defined purpose for using the data. They decide independently how the data is used, stored or deleted within their organisations although they may agree to a set of principles to ensure data sharing is in line with data protection rules.</i>	N/A	N/A
<b>Joint Data Controllers</b> <i>i.e. both parties are processing the information for the same purpose and have joint responsibility for how that information is used.</i>	N/A	N/A

### 4.3 Data sharing

Please list the other organisations the data will be shared with.

<b>Organisation or individual</b>	<b>Reason for sharing</b>	<b>Method for sharing/ access controls</b>	<b>Frequency</b>
<i>Organisation/individual</i>	<i>Reason</i>	<i>Method</i>	<i>Frequency</i>
N/A	N/A	N/A	N/A

### 4.4 Data subject rights

Individuals have a number of rights which need to be considered when processing their data.

<b>Are individuals informed about this new processing of their data / information?</b>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<b>How are the individuals informed?</b>
		Registration is optional to the citizens' panel. A description of the panel purpose etc will be available on sign up and there will be a privacy statement and link to the CEP privacy notice on registration form and associated citizen panel webpages

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		<b>If they are not informed, why not?</b>
		N/A
<b>Is the processing of this data in the Council's Privacy Notice?</b>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	It is not specifically mentioned in the councils PN, there will be a specific PN for CEP
<b>Is there an option for the individual to opt out of their information being shared or accessed?</b>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
<i>If so, how?</i>		
<i>All registered members of the panel have control of their own account and can manage their details online. This includes the ability to cancel or amend membership/registration details. There is a question that asks them if they wish to do this. Customer services/admin can also assist with this if the member needs assistance</i>		
<b>Does the project ensure and meet the individual's rights?</b>	Right to access their data	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	Right to rectify incorrect data	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	Right to erasure data	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	Right to object to processing	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	Right to restrict processing	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	Right to portability	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <input checked="" type="checkbox"/>
<b>If you answered no to any of the above please explain why?</b>		

## 4.5 International transfers

Personal data shall not be transferred to a country or territory outside the European Union unless that country or territory ensures and adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data

Will the activity require processing, transfer, storage and/or access to personal data outside of the UK.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	If yes, provide details
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Will the activity require processing, transfer, storage and/or access to personal data outside of the EU?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	If yes, provide details
Where are the servers used to host or transfer data located?	UK	

## 5. Data Protection Risks identified

### 5.1 Identify the privacy issues within the project and related risks

Consider the potential impact on individuals you have identified and any harm or damage your processing may cause – whether physical, emotional or material.

In particular, consider whether the processing could contribute to:

- inability to exercise rights (including but not limited to privacy rights);
- inability to access services or opportunities;
- loss of control over the use of personal data;
- discrimination;
- identity theft or fraud;
- financial loss;
- reputational damage;
- physical harm;
- loss of confidentiality;
- re-identification of pseudonymised data; or
- any other significant economic or social disadvantage

You should include an assessment of the **security risks**, including sources of risk and the potential impact of each type of breach including the illegitimate access to, modification of, and loss of personal data

Then calculate the level of risk based on the severity of the impact and the likelihood of harm using the table below.

Probability of harm		
Remote (1)	Reasonable possibility (2)	More likely than not (3)

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Severity of impact	Serious harm (3)	Medium risk (3)	High risk (6)	High risk (9)
	Some impact (2)	Low risk (2)	Medium risk (4)	High risk (6)
	Minimal impact (1)	Low risk (1)	Low risk (2)	Medium (3)

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## 5.2 Risk Assessment Table

Risk	Associated compliance risk	Probability Score	Severity Score	Overall risk	Existing controls in place	Additional controls required	Residual probability Score	Residual impact Score	Residual risk	Is the Risk eliminated, reduced or accepted?
what is the identified risk to individuals?	what is the risk to data protection compliance?				what controls are already in place to mitigate against the risk (e.g. technical, operational/procedural, etc.)?	what can be put in place to mitigate the risk further?				
<i>Form not completed by the person it concerns</i>	<i>The data subject may not have been directed to or seen the information provided about the use of their data, where to find the privacy notice and how to opt out</i>	2	2	4	<i>Webforms and paper forms are intended to be completed by the person it concerns.  Customer services staff will offer a service to complete the online form on behalf of residents if required and therefore training will be in place to ensure the privacy information is given. As customer services are already trained in this area of DP they will already be competent in this area.</i>	<i>If paper forms are provided for events or outreach by staff or Members they will be informed that they should be completed by the resident unless specifically asked for help.  Include text on the form where the privacy information is, to explain that if you are completing on behalf of someone else to make them aware</i>	1	2	2	<i>Reduced risk. Risk accepted because we have provided the information clearly and covered situations that we predict may occur. Also all residents can contact the council for the privacy notice/look up online. Furthermore if they manage</i>

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						<i>of this (stress importance)</i>				<i>their account online there will be a link to the privacy notice on the homepage.</i>
<i>Collecting demographic information that might not be needed/used.</i>	<i>We should only be collecting the information that is reasonably required for the project and is justifiable</i>	2	2	4	<p><i>The data required has been based on census information, which is being used as our baseline data, therefore is a main predictor of what is required.</i></p> <p><i>Further to this, research has taken place into best practice as demonstrated by a study conducted by RHUL on behalf of RBC and existing practice at other councils.</i></p> <p><i>There has also been extensive discussion between the project team across a range of roles.</i></p>	<i>All questions regarding collection of data will be presented to CLT/SLT for final approval and opinions and concerns sought prior to the final decision.</i>	1	2	2	<p><i>Risk reduced. Risk accepted. There is a low risk of harm if data isn't used. Sign up and the completion of sensitive data is optional and if the data is not required we can delete it so it will no longer be included.</i></p> <p><i>As this is a pilot study, initially for 1 year, there may be unforeseen</i></p>

*[DPIA Reference- Information Management Team to complete] [Data Classification e.g. Restricted]*

											<i>amendments/ change. This allows for a review of process at the end of the year.</i>

*[DPIA Reference- Information Management Team to complete] [Data Classification e.g. Restricted]*

## 6. Actions arising from DPIA

It is important that the steps recommended within this Data Protection Impact Assessment are implemented and that it is used throughout the project lifecycle when appropriate.

This DPIA should be referred to if the project is reviewed or expanded in the future.

Action to be taken	Priority	Date for completion of actions	Responsibility for action
Include statement on the form to draw attention to Privacy notice if completing on behalf of someone else. (RA section)	Medium	Prior to questionnaire going live	KP
Add Date of Birth into questionnaires	Medium	Prior to questionnaire going live	KP
DW to confirm if third party being used for demographic analysis / or any other aspect	Medium	Prior to sign off	JM/KP/DW
Add to ROPA	Medium		JM
Manage the process for using existing databases for recruitment– ensuring it is clear the purpose for each and if one negates the other or not etc.	Medium	Prior to sign off	KP (see JM)
Complete Privacy Notice and add link to the Privacy notice section of the questionnaire (Privacy statement to include – how to obtain PN, right to withdraw and tick box to agree)	Medium	Prior to sign off	KP (JM can support)

*[DPIA Reference- Information Management Team to complete] [Data Classification e.g. Restricted]*

## 7. RISK ASSESSMENT: Authorisation

### 7.1 Data Protection Officer

Name	Natalie Lacey
Job Title	Data Protection Officer
Telephone	01932 425617
Signature	<i>Natalie Lacey</i>
Date	11/11/2024

#### Any comments/recommendations

Clear understanding of what the purpose of the engagement panel prior to recruitment.

The application form should only ask for information that is required and necessary for participation in the panel. Any special category data collected should have a clear purpose in terms of reporting.

Understanding of other forums and communication channels already established and how the CEP will work alongside these or replace them.

### 7.2 Service Area Data and Risk Owner – Corporate Head of Service

Name	
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Job title	
Telephone	
Signature	
Date	

On behalf of my service area, I agree with this risk assessment and accept the risks as described in this document. I confirm that I have read the Digital Services policies and assert that nothing in this risk assessment is in conflict with these policies. I am also fully aware that the council needs to adhere to the UK General Data Protection Regulation and Article 5 (f) of the Regulation that all organisations commit to: "Data must be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures." I confirm that while accepting the risks stated in this risk assessment, that I have not breached this requirement.

*[DPIA Reference- Information Management Team to complete] [Data Classification e.g. Restricted]*