

Privacy Impact Assessment Template

This template is used to fill in details from the beginning of the project, after the screening questions have identified the need for a PIA. For further guidance, please refer to the Information Commissioner's Privacy Impact Assessment Code of Practice



<https://ico.org.uk/media/for-organisations/documents/1595/pia-code-of-practice.pdf>

Step one: Identify the need for a PIA

Explain what the change/project aims to achieve, what the benefits will be to the organisation, to individuals and to other parties. Is it a one-off initiative or part of ongoing business development?

You may find it helpful to link to other relevant documents related to the change/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 in PIA Document 1).

Customer Communication Preference

There are a number of drivers prompting us to develop a corporate solution to the identification and recording of customer communication preferences.

These are:

- **Continuing budget pressures and opportunities for efficiency savings**

There are opportunities to reduce costs associated with the production and distribution of hard copy material for customers (preference to receive material electronically).

- **Welsh-language Standard Regulations**

Our Welsh-language Standards compliance notice requires that we adhere to the following standards by 30th September 2016. There are opportunities to improve customer service by aiming to ensure that customers receive communication from us in their preferred language. There also opportunities to considerably reduce costs associated with the sending out of hard copy material (which we are currently required to send fully bilingually).

Relevant Welsh Language Standards:

| Standard | Description |
|----------|---|
| 2 | When you correspond with an individual (A) for the first time, you must ask A whether A wishes to receive correspondence from you in Welsh, and if A responds to say that A wishes to receive correspondence in Welsh you must: |

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| | <ul style="list-style-type: none"> (a) Keep a record of A's wish (b) Correspond with A in Welsh when corresponding with A from then onwards (c) Send any forms you send to A from then onwards in Welsh |
| 3 | <p>When you send correspondence addressed to two individuals who are members of the same household (for example, the parents of a child) for the first time, you must ask them whether they wish to receive correspondence from you in Welsh; and if</p> <ul style="list-style-type: none"> (a) Both individuals respond to say that they wish to receive correspondence in Welsh, you must keep a record of that wish and correspond in Welsh from then onwards when sending correspondence addressed to both of those individuals; (b) One (but not both) of the individuals responds to say that he or she wishes to receive correspondence in Welsh, you must keep a record of that wish and provide a Welsh-language version of correspondence from then onwards when sending correspondence addressed to both of those individuals |
| 21 | <p>When you telephone an individual (A) for the first time you must ask A whether A wishes to receive telephone calls from you in Welsh, and if A responds to say that A wishes to receive telephone calls in Welsh you must keep a record of that wish, and conduct telephone calls made to A from then onwards in Welsh</p> |

Customer Communication Preference - Recommended Option

After considering a number of possible options, the Welsh Language Standards Communication and IT Sub Group agreed to recommend the following option to CMT for approval:

| | |
|----------------|--|
| Data source | <ul style="list-style-type: none"> ▪ The current Council Tax database was agreed as the most accessible comprehensive source of data on customers in Pembrokeshire |
| Data gathering | <ul style="list-style-type: none"> ▪ The estimated cost of gathering the data is £26,657. However, there are opportunities to reduce costs as the necessity of sending out all hard copy customer communication bilingually will be reduced. <p>Insentivise</p> <ul style="list-style-type: none"> ▪ Households on the Council Tax database would be contacted on a ward-by-ward basis. Proposed roll out plan is attached as Appendix A (<i>group to keep under review and revise arrangements if required</i>). Contact of households to be undertaken on a rolling basis in order that processing of responses could be absorbed within current capacity. ▪ Households in which all or any individuals (aged 16 and over) wished to receive future communication from the Council |

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| | <p>in Welsh would be invited to respond via My Account (also registered as a preference to receive correspondence electronically) or by returning the form in the pre-paid envelope. Households in which all individuals (aged 16 or over) wished to receive correspondence in English would be instructed to set up a My Account (if they wished to receive correspondence electronically) or not to respond. A copy of the letter/email is attached as Appendix B</p> <ul style="list-style-type: none"> ▪ Households wishing to respond would be encouraged to do so within three weeks ▪ Letters would include a code to allow scanning of responses into EDMS. IT and web team have developed a link to allow population of this data into CRM / My Account |
| Data storage | <ul style="list-style-type: none"> ▪ IT and web team have developed a Welsh-language database within CRM, with integration into My Account |
| Data access | <ul style="list-style-type: none"> ▪ IT and web team to develop an automated 'look up' facility for main systems in which customer contact details are held (e.g. Northgate, Care First etc). 'Look up' for other, smaller systems will be on a manual basis. <p>Access to the language and digital preference will be made available to all employees via a web based application linked from the Intranet. For audit purposes, a log table will store the username of the person searching the lookup table, along with the search criteria used.</p> |

Step two: Describe the information flows

Information flows are the path that data takes from its original setting to its end users. In this section, you should describe the current collection, use and deletion of personal data here and it may also be useful to refer to a flow diagram or another way of explaining data flows.

Consider how is this area currently managing privacy? Show where the change will fit into current systems. Then consider future information flows so the differences are visible at a glance.

Show for example:

- What personal information is collected and used, and how it flows through the system
- How the change/project will change the information flow
- All changes to personal information involved in the change/project – for instance:
 - Is new personal information being collected? Where is it coming

from?

- Will information that the Authority already holds be used for a new purpose? Why & how?
- What is the nature of the information collected and the source?
- What measures are in place to ensure the information is accurate and up to date?
- Will the organisation tell the individuals (staff or customers) what's happening to their information? How will you tell them?
- How is the information managed, handled or protected?
- Who will have access to the information (whether internal or external to the Authority)?
- How long will the information be retained and how will it be disposed of?

You should also say how many individuals are likely to be affected by the change/project.

We will contact approximately 62,000 thousand households, utilising the Council's Northgate system which holds Council Tax data.

We will ask individuals by writing to them in English & Welsh (aged 16 and over on 1st April 2017) to respond via My Account (preference to receive correspondence electronically (Eng or Welsh) or by hard copy return (any individuals within the household wishing to receive correspondence in Welsh).

It is difficult to predict how many individuals (over the age of 16) within the 62,000 households will express a preference to receive correspondence in Welsh. However, of the current 23,500 My Accounts, 130 are registered to receive information in Welsh. If this proportion is applied to the 62,000 households, the likelihood is that there may be a preference to receive correspondence in Welsh in approximately 310 households.

Responses via My Account will be held in the My Account database. At the point at which a My Account customer utilises an on-line service their details will be integrated with the CRM (Customer Record Management).

Letters to customers will include a code to allow scanning of responses into EDMS. IT and web team have developed a link to allow population of this data into a Welsh Language database held in the CRM.

Once the data-gathering phase of the project is complete, and data recorded in My Account / CRM, services wishing to undertake bulk and large scale mailings will be able to check which customers have requested to receive correspondence in Welsh, thus eliminating the need to send all material out fully bilingually.

As a second phase of this project, IT and Web teams will look at developing automated 'look up' facilities for main systems in which customer contact details are held (e.g. Northgate, Care First etc). 'Look up' for other, smaller systems will be on a manual basis.

Access to the language and digital preference will be made available to all employees via a web based application linked from the Intranet. For audit purposes, a log table will store the username of the person searching the lookup table, along with the search criteria used.

The Welsh Language preference will be held on the customer record as long as they are active customers of the Authority. They will be responsible for updating the Authority if their preference changes.

The Welsh Language preference results will be held within the Authority.

Consultation requirements

Explain what practical steps you will take to ensure that you identify and address privacy risks. Who should be consulted internally and externally? Consider your internal and external stakeholders. How will you carry out the consultation? You should link this to the relevant stages of your project management process. (You can use consultation at any stage of the PIA process)

A primary driver for the project is the need to meet a statutory requirement.

Step three: Identify the privacy and related risks

Identify the key privacy risks and the associated compliance and corporate risks. Larger-scale PIAs might record this information on a more formal risk register.

PIA Document 3 “Linking the PIA to the Data Protection Principles” can be used to help you identify the DPA related compliance risks in this section.

| Privacy issue | Risk to individuals | Compliance risk | Associated organisation / corporate risk |
|-------------------------------------|--|-----------------|---|
| Council Tax personal data (name and | Personal data used for different purpose than it | Principle 1 | Availability of privacy statement to householders |

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| address) will be used for a bulk mailing relating to Welsh Language preference (62,000 Households will be contacted on a ward by ward basis) | was given. | | Identifying relevant conditions to share under the Data Protection Act 1998 |
| Return of the letters by post / migration of data from My Account needs to be managed securely. | Whether the information held is up to date. | Principle 2 Principle 4 | Reliance on current householder information in Northgate system |
| Welsh Language preference will be kept indefinitely | Possible data security incidents | Principle 7 | Availability of privacy statement on how data will be handled |
| Where there is no response, Authority will presume language preference is English | Reliance on customers to alert Authority on changes to their preference | Principle 1 Principle 3 Principle 4 | Availability of privacy notices to householders. Authority may need to undertake regular bulk mailing to ensure up to date Welsh Language preference |
| We are relying on individuals to inform us if they move house or if there are other changes to communication preferences | Individuals wishing to receive correspondence in Welsh may receive it in English. | Principle 1 Non-compliance of Welsh Language Standards 2,3 and 21 | Availability of privacy notices to householders Non-compliance of Welsh Language Standards 2,3 and 21 |
| | Individuals wishing to receive correspondence in Welsh may receive it in English or vice-versa. Individuals wishing to receive | Principle 1 Principle 4 This is an on-going risk to the organisation. Amplification | Availability of privacy notices to householders. This is an on-going risk to the organisation. Amplification of this risk. associated with |

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| <p>within their household.</p> | <p>correspondence electronically may receive it in hard copy or vice-versa.</p> | <p>of this risk, associated with this project, is marginal.</p> | <p>this project, is marginal.</p> |
| <p>PHASE 2 Developing automated look up facility for main systems</p> | <p>Secure transfer of data and accuracy of the data transfer</p> | <p>Principle 4 Principle 7</p> | <p>The systems involved may design functionality that is significantly less in scope than is required</p> |
| <p>Look up for smaller systems will be on a manual basis</p> | <p>Secure transfer of data and manual access for staff might be a potential data security weak point</p> | <p>Principle 4 Principle 7</p> | <p>The systems involved may design functionality that is significantly less in scope than is required.</p> |
| | | | <p>Training for staff (Information Governance & system specific)</p> |

Step four: Identify privacy solutions

Describe the actions you could take to reduce the risks, and any future steps which would be necessary (e.g. the production of new guidance or future security testing for systems).

| Risk | Solution(s) | Result: is the risk eliminated, reduced, or accepted? | Evaluation: is the final impact on individuals after implementing each solution a justified, compliant and proportionate response to the aims of the change/project? |
|--|---|--|--|
| Availability of privacy statement to householders so they are aware of the project and why Council Tax data is being accessed. | Short version on the letter in appendix B which will be sent to all householders. Long version to be placed on Authority's website. Contact details available for further information. | Eliminated | Individuals will be made aware of the Data protection issues and have various accessible sources for information. This satisfies the subject information provisions in line with Principle 1 of the DPA. This PIA will need review at Phase 2. |
| Identifying relevant conditions to share under the Data Protection Act 1998 | Council Tax data can be used for this purpose as it will assist with a statutory function of the Authority and also under section 111 of the Local Government Act 1972. Data Protection | Eliminated | Solution is compliant with legislation including principles 1 & 2 of the DPA and Welsh Language Standards, therefore justified. |

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| | <p>Officer advice on schedule 2 & 3 of DPA: Schedule 2 of the DPA, paragraph 3 – necessary for compliance with a legal obligation; and Schedule 3 of the DPA, paragraph 9 – necessary for the purpose of identifying or keeping under review the existence or absence of equality of opportunity...with a view to enabling such equality to be promoted or maintained.</p> | | |
| <p>Reliance on current householder information in Northgate system</p> | <p>This has been identified as the most up to date and comprehensive system within the Authority to minimise the risk of sending letters to inaccurate or out of date addresses.</p> | <p>Reduced risk after surveying all other Authority systems.</p> | <p>Solution is compliant with legislation and justified.</p> |
| <p>Authority may need to undertake regular bulk</p> | <p>Northgate system has been identified as the most up to</p> | <p>Reduced risk after surveying all other Authority</p> | <p>Solution is compliant with legislation and justified.</p> |

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| <p>mailing to ensure up to date Welsh Language preference</p> <p>The systems involved may design functionality that is significantly less in scope than is required</p> | <p>date and comprehensive system within the Authority to minimise the risk of sending letters to inaccurate or out of date addresses.</p> <p>Regular reviews of the PIA in line with reviews of the project. It may be necessary to design a system that can track access to the system for security purposes.</p> | <p>systems.</p> <p>This will ensure that privacy issues are revisited regularly to reduce any risks with the data</p> | <p>Given the size of the project and the possible need to undertake this exercise again in the future, it is Information Commissioner's recommended best practice to review PIA's regularly, in the code of practice. This will ensure compliance with all principles of the DPA.</p> |
| <p>Training for staff (Information Governance & system specific)</p> | <p>All staff are required to undertake mandatory Information Governance training. It may be necessary for additional advice and guidance be provided to staff if they are able to access a Pembrokeshire-wide database with name, address and Welsh Language preference.</p> | <p>This will ensure compliance with principle 7</p> | <p>The Welsh Language Standards has a training sub-committee and it could be highlighted to them to consider this when phase 2 is activated.</p> |

Step five: Sign off and record the PIA outcomes

Who has approved the privacy risks involved in the change/project? You need to have authorisation from the relevant Information Asset Owner. What solutions need to be implemented?

| Risk | Approved solution | Approved by |
|--|---|---|
| Availability of privacy statement to householders so they are aware of the project and why Council Tax data is being accessed. | Short privacy statement on letter in annex b | Kerry Macdermott, Head of Revenue Services. |
| Identifying relevant conditions to share under the Data Protection Act 1998 | Advice from Data Protection Officer – complies with section 111 Local Government Act 1972; DPA schedule 2 para 3 and schedule 3 para 9 | N/A |
| Reliance on current householder information in Northgate system | Agreed by Welsh Language Standards Communication and IT Sub Group as most appropriate system to minimise risks | Kerry Macdermott, head of Revenue Services |
| Authority may need to undertake regular bulk mailing to ensure up to date Welsh Language preference | Decision to be taken in the future as project is reviewed by Welsh Language Standards Communication and IT Sub Group | Ceri Davies, Head of HR |
| The systems involved may design functionality that is significantly less in scope than is required | The project is reviewed regularly and the PIA will need to be reviewed at the same time. | Lee McSparron, Interim Head of IT |
| Training for staff (Information Governance & system specific) | Regular reviews of the PIA as the project progresses will ensure that the need for training for staff is considered at phase 2. These will be | Ceri Davies, Head of HR |

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| | considered by the Welsh Language Standards Training sub-committee prior to sign off by | |
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Step six: Integrate the PIA outcomes back into the project plan

Who is responsible for integrating the PIA outcomes back into the change/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 |
|---|---|---|
| Integrating the PIA outcomes back into the change/project plan and updating any project management paperwork. | Complete - September 2016 | Sarah Worby, Corporate Communications Officer |
| Taking responsibility for implementing the solutions that have been approved. | Upon approval by CMT – estimated September 16 | Ceri Davies, Head of HR |

Contact point for future privacy concerns

Sarah Worby, Corporate Communications Officer, Pembrokeshire County Council, 2D County Hall, Haverfordwest, SA61 1TP
 01437 775263 sarah.worby@pembrokeshire.gov.uk

| Contact Date | Wards | Estimated number of households | Estimated percentage of Welsh speakers (Census 2011) | % of My Accounts by Household |
|-----------------|--|--------------------------------|--|-------------------------------|
| w/c 10/10/16 | CLYDAU MAENCLOCHOG | 667 1,407 | 55.88% 47.93% | 31.75% 30.23% |
| w/c 17/10/16 | ST DOGMAELS RUDBAXTON | 1,231 504 | 46.05% 18.16% | 25.98% 40.82% |
| w/c 24/10/16 | HALF TERM | | | |
| w/c 31/10/16 | CRYMYCH CAREW | 1,195 679 | 60.33% 12.08% | 30.13% 33.00% |
| w/c 07/11/16 | LETTERSTON NARBERTH RURAL | 1,099 704 | 37.82% 17.20% | 30.65% 33.70% |
| w/c 14/11/16 | CILGERRAN LAMPETER VELFREY | 980 705 | 51.66% 22.77% | 29.53% 26.18% |
| w/c 21/11/16 | DINAS CROSS PEMBROKE MONKTON | 868 746 | 49.67% 10.24% | 26.76% 27.15% |
| w/c 28/11/16 | LLANRHIAN PEMBROKE ST MARY SOUTH | 805 792 | 42.12% 10.55% | 30.55% 32.28% |
| w/c 05/12/16 | NEWPORT SCLEDDAU | 760 721 | 42.78% 36.42% | 25.04% 26.82% |
| w/c 12/12/16 | FISHGUARD NORTH EAST ST ISHMAELS | 1,011 760 | 34.27% 8.71% | 23.34% 37.09% |
| w/c 26/12/16 | CHRISTMAS WEEK | | | |
| w/c 09/01/17 | FISHGUARD NORTH WEST BURTON | 766 800 | 35.03% 12.03% | 21.73% 38.96% |
| w/c 16/01/17 | ST DAVIDS PENALLY | 1,061 818 | 29.04% 12.41% | 32.43% 25.69% |
| w/c 23/01/17 | GOODWICK HUNDLETON | 990 893 | 28.54% 11.16% | 28.63% 35.14% |
| w/c 30/01/17 | SOLVA WISTON | 830 848 | 24.44% 23.95% | 35.75% 32.42% |
| w/c 06/02/17 | NARBERTH URBAN MARTLETWY | 1,112 902 | 21.8% 18.2% | 34.25% 33.88% |
| w/c 13/02/17 | HVERFORDWEST,PRENDERGAST PEMBROKE DOCK MARKET | 1,034 920 | 16.82% 9.48% | 36.88% 35.42% |
| w/c 20/02/17 | HALF TERM | | | |
| w/c 27/02/17 | CAMROSE | 1,336 | 16.36% | 17.64% |
| w/c 06/03/17 | HVERFORDWEST CASTLE | 1,316 | 15.57% | 33.86% |
| w/c 13/03/17 | MERLIN'S BRIDGE THE HAVENS | 969 910 | 14.44% 13.45% | 33.55% 40.03% |
| w/c 20/03/17 | HVERFORDWEST GARTH AMROTH | 1,233 719 | 13.74% 11.62% | 16.46% 35.53% |
| w/c 27/03/17 | HVERFORDWEST PRIORY PEMBROKE DOCK CENTRAL | 1,182 925 | 13.52% 9.23% | 33.78% 32.06% |
| w/c | EASTER HOLIDAYS | | | |

| | | | | |
|-----------------------------|--|----------------|------------------|------------------|
| 10/04/17 and 17/04/17 | | | | |
| w/c 24/04/17 | HVERFORDWEST PORTFIELD PEMBROKE ST MARY NORTH | 1,112 957 | 13.71% 10.26% | 29.41% 40.80% |
| w/c 08/05/17 | LLANGWM NEYLAND WEST | 1,048 960 | 12.81% 10.9% | 33.71% 34.89% |
| w/c 15/05/17 | EAST WILLIAMSTON MANORBIER | 1,156 991 | 12.2% 11.35% | 27.72% 36.98% |
| w/c 22/05/17 | TENBY NORTH KILGETTY / BEGELLY | 1,181 1,031 | 11.56% 10.9% | 28.89% 26.91% |
| w/c 29/05/17 | HALF TERM | | | |
| w/c 05/06/17 | PEMBROKE ST MICHAEL JOHNSTON | 1,199 1,124 | 11.18% 11.36% | 36.60% 39.79% |
| w/c 12/06/17 | NEYLAND EAST NEYLAND WEST | 1,138 960 | 10.69% 10.9% | 38.51% 34.89% |
| w/c 19/06/17 | SAUNDERSFOOT | 1,600 | 10.48% | 13.62% |
| w/c 26/06/17 | LAMPHEY MILFORD CENTRAL | 1,125 1,129 | 10.16% 7.5% | 42.16% 30.40% |
| w/c 03/07/17 | MILFORD EAST MILFORD WEST | 1,053 1,052 | 9.91% 9.08% | 34.90% 29.01% |
| w/c 10/07/17 | MILFORD HUBBERSTON MILFORD HAKIN | 1,197 1,162 | 9.65% 8.01% | 38.33% 29.57% |
| w/c 24/07/17 | PEMBROKE DOCK PENNAR | 1,470 | 9.4% | 36.70% |
| w/c 31/07/17 | TENBY SOUTH | 1,661 | 9.34% | 32.16% |
| w/c 07/08/17 | MILFORD NORTH | 1,238 | 9.27% | 33.53% |
| w/c 14/08/17 | PEMBROKE DOCK LLANION | 1,297 | 8.94% | 32.05% |

Customer Preference Household Contact Schedule

Dear Householder

Recent legislation says that we have to ask you if you would prefer to receive communication from us in English or Welsh.

BY COMMUNICATION WE MEAN LETTERS, EMAILS AND TELEPHONE CALLS

We will record the information you give us in a central database and use it to help inform the language in which we communicate with you in future. If you would like further details please see www.pembrokeshire.gov.uk/wls

How to register your preference:

Online: The quickest, easiest and most cost effective way for you to let us know is via 'My Account - Your Online Council Account'. We will then correspond in whichever of the two languages your account is set up in.

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| ▪ To register an English preference visit www.pembrokeshire.gov.uk/myaccount |
| ▪ To register a Welsh preference visit www.sir-benfro.gov.uk/fynghyfrif |

Please note each member of your household (aged 16 or over on 01/04/17) will need to set up their own account for us to record their preference.

If you already have a 'My Account' we will automatically have recorded your language preference as that in which you registered your account. You can change your language preference by clicking on the 'Edit' option by your name at the top of the home screen.

If you chose to register online – that's it! You do not need to return this form to us.

By post: If **EVERY** member of your household (aged 16 or over on 01/04/16) would prefer to be communicated with in English - **you do not need to return this form.** If we do not hear back we will default your language preference to English.

However if **EVERY** member of your household (aged 16 or over on 01/04/16) would prefer to be communicated with in Welsh, or there are mix of preferences, please provide preference details for every person (aged 16 or over on 01/04/16) in the household below:

| | Title | First Name | Surname | Age on 1 st April 2017 | Language Preference Welsh | Language Preference English |
|----|-------|------------|---------|-----------------------------------|---------------------------|-----------------------------|
| 1. | | | | | | |
| 2. | | | | | | |
| 3. | | | | | | |
| 4. | | | | | | |
| 5. | | | | | | |
| 6. | | | | | | |
| 7. | | | | | | |
| 8. | | | | | | |

Once complete, please return in the reply paid envelope enclosed.

Please note: if you do not return this form, or respond via 'My Account' on www.pembrokeshire.gov.uk we will register a preference for English language. Sometimes we may also have to send information out bilingually.

Please don't forget to let us know if you move house or if the communication preferences of those within your household changes for any other reason.

Pembrokeshire County Council enquiries@pembrokeshire.gov.uk

01437 764551