

Privacy Impact Assessment

This assessment should be completed as part of the business case for all new information systems and processes which involve the use of personal sensitive data or will significantly change the way in which personal data is handled.

Once the assessment has been completed, please forward to the Information Governance Team for approval – sue.stone@lancashirecare.nhs.uk or michelle.brammah@lancashirecare.nhs.uk

If you require additional information on how to undertake a Privacy Impact Assessment, the Information Commissioner's Office has developed a PIA Handbook

GENERAL OVERVIEW

1.	Name of the new system or process:	WRaPT v2.0
2.	Responsible Lead (name & email address):	Fiona Lord, Fiona.Lord@lancashirecare.nhs.uk
3.	What are the main aims?	To securely store workforce and activity data from a range of organisations in the Health and Social Care arena and to align these in a meaningful way to produce robust workforce modelling.
4.	List the main activities of the project:	<ul style="list-style-type: none">• Design and delivery of WRaPT, a secure workforce repository and workforce modelling tool.• Data collection and analysis.• Facilitated meetings and workshops.• Workforce and activity modelling.• Training delivery to new users.
5.	What are the intended outcomes?	<ul style="list-style-type: none">• Increased knowledge and capability of workforce planning using WRaPT around the North West (NW).• Robust workforce modelling for select supported transformation programmes in the NW.




INFORMATION ASSET REGISTER

6.	Who is the Information Asset Owner - IAO(Name & email address)?	Fiona Lord, Fiona.Lord@lancashirecare.nhs.uk
7.	Who is the Information Asset Administrator - IAA (name & email address)?	Amina Khursiwala, Amina.Khursiwala@lancashirecare.nhs.uk

DATA

8.	Who are the Data Subjects? (e.g. the people whose data will be held in this new system)	. Staff including volunteers, temporary and casual workers
9.	What Data Classes will be held on this system?	<p>Organisation Hierarchy Staff Group Role Occupation Code Position Title Payscale Spinal Value Salary Value Salary including On Costs FTE Contracted hours Assignment Category Employee Category Fixed Term End Date Fixed Term Reason centre code Position Subjective Code Organisation Entry Date Unique Identifier= assignment number Ethnic Origin Year of Birth Gender Sexual Orientation Religious Belief Disabled Area of work 1 Area of work 2 Area of work 3</p>
10.	Will this system include data which was not previously collected?	No, the system will utilise data collected at the time of employment and through any changes in ESR thereafter.
11.	Have you assessed the likelihood of data causing any unwarranted distress or damage to individuals concerned?	Risks have been identified and evaluated in Appendix 1
12.	Is there a legal basis for holding and processing this data?	The data is collected and processed to perform reasonable functions of a public nature in supporting organisational redesign and transformation.
13.	Does the system include new or amended identity authentication requirements that may be intrusive?	No
14.	What checks have been made regarding the adequacy, relevance and necessity of data used?	All data fields have been reviewed to assess the relevancy, where data was deemed to be relevant in only some circumstances these fields have been classed as optional. All mandatory data fields are both adequate and necessary to perform the major functions of the software.

15.	Can the system use pseudonyms or work on anonymous data?	Data is pseudonymised upon upload to the software tool, this is to ensure the key is consistent for all organisations using WRaPT and enable swift recovery of records in the event of objection, correction or subject access requests.
16.	Can patients opt-out of their data being added to the system, and if so is this publicised?	Yes, please see privacy notice: www.wrappt.org.uk/privacy
17.	Who are the partners for the data sharing?	Providing organisation, Lancashire Care NHS FT (LCFT), Mando Group Ltd, Rackspace inc, GE Healthcare Finnamore (GEHCF).
DATA SECURITY		
18.	Who will use the system and have access to the data?	Lancashire Care NHS FT staff employed by the WRaPT Team. GEHCF staff assigned to the WRaPT Project. Mando Group staff assigned to maintaining the WRaPT system. Selected Rackspace staff with appropriate clearance.
19.	What training have users had in patient confidentiality?	All users complete the relevant IG training mandated by their employing organisation. GEHCF staff also complete the mandatory IG training required by LCFT.
20.	Will the data be shared with any other organisations?	Data can be shared with other organisations where appropriate data sharing agreements are in place.
21.	Where will data be held?	Data may be held in one or more of the following places as and when appropriate: LCFT Server Health Education England North West Server Encrypted Laptops Rackspace Server All data will be held in the UK, including back up arrangements
22.	What format will data be stored in?	Excel File
23.	Does the system change the way data is stored?	The WRaPT system enables cloud storage of workforce and aggregated activity data to allow access to registered users regardless of location.
24.	How will staff access and amend data?	Access to data is restricted to appropriate team members by limited access to the LCFT server. Access to the data in the tool is limited to only that which the user needs
25.	How will data be shared?	<input type="checkbox"/> Fax <input type="checkbox"/> By hand

		<input checked="" type="checkbox"/> Email <input type="checkbox"/> Via NHS Mail <input checked="" type="checkbox"/> Website (Secure connection) <input type="checkbox"/> Via Courier	<input type="checkbox"/> Via post – internal <input type="checkbox"/> Via post - external <input type="checkbox"/> Via telephone <input type="checkbox"/> Other – please state
26.	Are you transferring any personal and / or sensitive data to a country outside the European Economic Area (EEA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <i>If yes, please outline the data types, country, transfer methods and any measures in place to ensure adequate levels of security when transferred to this country.</i>	
27.	What security measures have been taken to protect the data?	<p>Access to physical data storage sites is strictly limited and requires a key card.</p> <p>Data stored on the LCFT server is in a limited access folder restricted only to WRaPT team members.</p> <p>Data in WRaPT is accessed with a username/password and is limited to only the data that a user requires to perform his or her duties.</p> <p>All laptops are encrypted to the NHS standard as a minimum.</p>	
28.	Is there a useable audit trail in place for the asset? <i>For example, to identify who has accessed a record</i>	Audit logs are available for each user interaction in the tool.	
29.	How often will the system be audited?	Annually	
30.	Who supplies the system?	Mando Group Ltd	
31.	Is the supplier of the system registered with the ICO? (please give registration number)	Z7802069	
32.	Has the organisation completed the HSCIC IG Toolkit to a satisfactory level? Include IG Toolkit registration no.	8JN27 March 17 submission was 66% satisfactory	
33.	Does the contract include necessary IG clauses?	   Signed version (DG, CL, Mando).pdf HEE signed copy.pdf Tier 1 between WRaPT parties final v2	
34.	What business continuity plans are in place in the case of data loss / damage as a result of human error / computer virus /	https://www.rackspace.com/en-gb/legal/intensive-hosting-terms-uk	

	network failure / theft / fire / flood / other disaster?	
DATA QUALITY		
35.	Who provides the information for the asset?	Various health and social care providers
36.	Who inputs the data into the system?	WRaPT Team members
37.	How will the information be kept up to date and checked for accuracy and completeness?	The data is validated before any modelling takes place by triangulating with finance and first hand validation. Data is refreshed every 12 months as a minimum.
38.	Can an individual (or a court) request amendments or deletion of data from the system?	Yes, all access requests will be reviewed and actioned appropriately.
ONGOING USE OF DATA		
39.	Will the data be used to send direct marketing messages?	No
40.	If yes, are consent and opt-out procedures in place?	-
41.	Does the system change the medium for disclosure of publicly available information?	No
42.	Will the system make data more readily accessible than before?	Yes, only to appropriate individuals
43.	What is the data retention period for this data? <i>(please refer to the Records Management: NHS Code of Practice)</i>	12 months
44.	How will the data be destroyed when it is no longer required?	In line with the LCFT deletion policy
PIA SIGN OFF		
45.	<p>Your PIA should be sent to the Information Governance Team for approval Michelle.brammah@lancashirecare.nhs.uk And Sue.stone@lancashirecare.nhs.uk</p>	
	Approval by SIAO / IAO:	Fiona Lord – 5/12/17
	Date of PIA Approval:	5/12/17
	Name of Approver:	Sue Stone

	Title of Approver:	IG Specialist
46.	Recommendations & required further actions following PIA approval.	<ul style="list-style-type: none">• LCFT Information Asset Register and Data Flow Mapping entries need to be reviewed and updated as required