

# SMBC Data Protection Impact Assessment (DPIA) Template

## Project Details

<b>Project / Process Name</b>	MMUH
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<b>Team Responsible for the project</b>	Joint Equipment Store – Project Team

There is a process document and guidance available to help you complete this DPIA, please refer to these when completing this template. The documents can be found via the following link: [DPIA Documents](#)

If you have any queries or need any advice in the completion of this DPIA then please contact the Governance Team at:

[info\\_management@sandwell.gov.uk](mailto:info_management@sandwell.gov.uk)



## Step 1: Identify the need for a DPIA

### 1a. Explain broadly what the project / process aims to achieve?

The project aims to replace the way in which equipment is procured for the Joint Equipment Store. The JES Team currently procure equipment from the Integrated Procurement Hub. The JES Team will look to bring the full end to end procurement service in-house.

### 1b. What Type of Processing is Involved?

They will access the information on LAS via the cloud and also information via ELMS which is also cloud based.

### 1c. If you are proposing the introduction of a new ICT system or a change to an existing ICT system, does the new /change enable the system to cope with the new Information Rights within DPA 2018 / UK-GDPR?

There will be no change in the way information is accessed and managed within the SMBC network infrastructure.

### 1d. Summarise why the need for a DPIA has been identified.

This is required as part of the change request process.

### 1e. Is there a project Proposal or other documents that can be attached below ?

Not at present.

## Step 2: Describe the Nature of the Processing

<b>2a. What is the source of the personal data?</b>
Only accessing data on LAS and ELMS.
<b>2b. How will the personal data be collected?</b>
This will be collected via the referrals on LAS and ELMS.
<b>2c. How will the personal data be used?</b>
The data will be used to access and update LAS and ELMS.
<b>2d. How will the personal data be stored and where?</b>
The information will be stored on ELMS and LAS.
<b>2e. What is the intended retention period for the personal data and how will it be deleted?</b>
As per LAS guidelines.
<b>2f. Will the personal data be shared with anyone? If so Who?</b>
No data will be shared with anyone who is not employed by SMBC.
<b>2g. What is the frequency of sharing (daily, weekly, monthly etc.)?</b>
N/A
<b>2h. Is there a Flow diagram or other document that describes the data flow? If so attach this below</b>
Not at present.
<b>2i. Has there been any types of processing identified as likely to be high risk?</b>
None

## Describe the Scope of Processing

<b>2j. What Personal data is being collected?</b>
Service user information for LAS and ELMS.
<b>2k. Does the personal data include special category or criminal offence data? If so what?</b>
No
<b>2l. Describe the Scope of the Processing</b>
The information will be processed in the same way as it currently is on LAS and ELMS. There is no change in data processing.
<b>2m. What is the estimated volume of personal data being collected and used?</b>
Unknown at present.
<b>2n. How often will the information be collected?</b>
On a daily basis.
<b>2o. How long will the personal data be retained for? What is the retention period?</b>
As per the Council protocols.
<b>2p. How many individuals are affected?</b>
This will be the Joint Equipment Team and social workers who will refer for equipment.
<b>2q. What geographical area does it cover?</b>
Within the Sandwell Borough and residents with a Sandwell postcode.

## Describe the Context of the Processing of Personal Data

<b>2r. What is the nature of the relationship with the individuals affected?</b>
They require low level equipment to aid the discharge from Hospital.
<b>2s. How much control will they have?</b>
As per LAS and ELMS current controls.
<b>2t. Would they expect their personal data to be used in this way?</b>
Yes
<b>2u. Does the collection include the personal data of children or other vulnerable groups?</b>
No
<b>2v. Are there any prior or current concerns over this type of processing or security flaws?</b>
No.
<b>2w. Is it novel in any way?</b>
No
<b>2x. What is the current state of technology in this area?</b>
All the information is uploaded onto systems which are cloud based. All access to the applications will be via a SMBC machine.

<b>2y. Are there any current issues of public concern that need to be factored in?</b>
No
<b>2z. Are you signed up to any approved code of conduct or certification scheme (once any have been approved)? If so what are they?</b>
As per LAS.

## Describe the Purpose(s) of Processing

<b>2aa. Describe the purpose(s) of the processing</b>
We will access the information the same way we do at present.
<b>2bb. What is the processing aiming to achieve?</b>
Update service user information on equipment provided.
<b>2cc. What is the intended effect on individuals?</b>
Access to services within ASC.
<b>2dd. What are the benefits of the processing - for us, and more broadly?</b>
Recording what information has been provided to service users by the Joint Equipment Service.

## Step 3: Consultation Process

<b>3a. Have relevant stakeholders been consulted?</b>
Not required.
<b>3b. When and how have individuals views been sought?</b>
Not required.
<b>3c. If this is not appropriate, why is it not appropriate?</b>
Not required.
<b>3d. Has anyone within SMBC been consulted i.e. ICT, HR etc If so who and why?</b>
This is happening at present.
<b>3e. Is there a need to consult any data processors?</b>
Not required.
<b>3f. Is there a need to consult information security experts or any other experts? If so who and why?</b>
No.



## Step 4: Assess Necessity and Proportionality

### 4a. What is the lawful basis of processing?

As required under Article 6 of the UK-GDPR the lawful basis for processing personal data is that of:

(a) CONSENT: the individual has given us clear consent for to process their data for a specific purpose

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### 4b. What is the Lawful basis for processing the special category data

As required under Article 9 of the UK-GDPR the lawful basis for processing Special Category Data is that of:

(h) HEALTH or SOCIAL CARE: the processing is necessary for preventive or occupational medicine, assessment of the working capacity of employees, medical diagnosis, provision of health or social care or treatment or the management of health care systems

Choose an item.

Choose an item.

### 4c. Does the processing actually achieve the purpose? How?

n/a

### 4d. Is there another way to achieve the same outcome?

n/a

<b>4e. How will you prevent function creep?</b>
n/a
<b>4f. How will you ensure personal data quality and data minimisation?</b>
n/a
<b>4g. What information will you give individuals?</b>
n/a
<b>4h. How will you help to support their rights?</b>
n/a
<b>4i. What measures do you take to ensure processors comply?</b>
n/a
<b>4j. Will the personal data be transferred outside of the EU? If so how will the personal data be safeguarded?</b>
No

## Step 5: Identify and Assess Risks

<b>Describe source of risk and nature of potential impact on individuals.</b> Include associated compliance and corporate risks as necessary.	<b>Likelihood of harm</b> <b>(Remote, possible or probable)</b>	<b>Severity of harm</b> <b>(Minimal, significant or severe)</b>	<b>Overall risk</b> <b>(Low, medium or high)</b>

## Step 6: Identify Measures to Reduce Risk

**This section should only be completed if there have been risks identified as medium or high in Step 5 above.**

Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 5

**NOTE:** If the residual risk remains as high we have to contact the Information Commissioners Office before we can commence the process/change. Please contact the Council's Data Protection Officer if this is the case. Do **NOT** contact the ICO yourself.

Risk	Options to reduce or eliminate risk	Effect on risk (Eliminated, Reduced or Accepted)	Residual risk (Low, Medium, High)	Measure approved (Yes or No)

## Step 7: Sign Off and Record Outcomes

Item	Name, Signature & Date	Notes
<b>DPIA Sponsor Signature:</b>		
<b>Name</b>		
<b>Date</b>		
<b>Residual risks to be managed by:</b>		If accepting any residual high risk, consult the DPO, follow their recommendation and keep them updated.
<b>Name</b>		
<b>Date</b>		
<b>Member of Governance Team Reviewed by:</b>		
<b>Name</b>		
<b>Date</b>		
<b>DPO Sign Off:</b>		It will be assumed that the DPO's signature signals approval to progress
<b>Name</b>		
<b>Date</b>		
DPO comments:		