

Data Protection Impact Assessment (DPIA)

Appendix 4

Project Name:	South London Waste Plan
Project Manager or Sponsor (PM):	Duncan Clarke (Sutton Council)
Name of person completing the DPIA if different to (PM):	Dominick Mennie
Service Team and Department:	Spatial Planning, Place
Relevant Director and Executive Director:	Heather Cheesbrough Shifa Mustafa
Information Management Champion(s) for service area:	
Date DPIA received by the IMT:	
Date approved by DPO:	
Date approved by IMT :	

1 Project Scope

Include the projects aims, potential impact, all individuals involved in the project and those that may be affected by it. The stakeholders should be as broad as possible so that the list can be edited down after consultation)

The South London Waste Plan is part of the statutory development plan for Croydon under the Planning and Compulsory Purchase Act 2004. It is being prepared by Sutton Council on behalf of Croydon Council, Kingston Council and Merton Council.

Croydon Council will not manage or maintain any data. All data will be processed by Sutton Council on behalf of the four boroughs.

2 Data Description

Answer the questions below so that there is a clear understanding about how the information will be used, who will use it etc. Remember that it's personal information (i.e. information about individuals) that you need to be concerned with. If you do not have answers to all the questions at this time, simply record what you do know.

<p>Whose information is being used?</p> <ul style="list-style-type: none"> - Are there additional concerns that need to be considered due to individuals sensitive/ complex circumstances? i.e. vulnerable person 	<p>Anyone who comments in writing to the South London Waste Plan at the Proposed Submission publication of the plan stage (regulation 19 of the Town and Country Planning (Local Planning)(England) Regulations 2012.</p> <p>All data will be managed and maintained by Sutton Council. Croydon Council will forward all information to Sutton Council.</p>
<p>What information is being used?</p> <ul style="list-style-type: none"> - Consider the nature of this information E.g. Child's social care file 	<p>n/a – Sutton Council are the data managers</p>
<p>Does it include special category or criminal offence data?</p>	<p>If any representations made to the Council contains 'sensitive data' (which includes racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; or health, sex life and/or sexual orientation) then these will be forwarded directly to Sutton Council as the data managers.</p>
<p>Can an individual be identified easily from the information?</p>	<p>Yes they will give their name, and their postal and/or e-mail address, all of which will be forwarded to Sutton Council.</p>
<p>What is the potential impact on privacy of this information?</p> <ul style="list-style-type: none"> - What are the risks/ impact to an individual if this information was lost, stolen or manipulated? - E.g. could it be sold? 	<p>n/a – Sutton Council are the data managers</p>
<p>Will this change the manner in which we handle, use or protect this information? e.g. should it be encrypted?</p>	<p>n/a – Sutton Council are the data managers</p>

3 Consultation process

Consider how to consult with relevant stakeholders.

When did you consult individuals?	The South London Waste Plan will be published in order for interested persons to make comment on it. All comments are considered by the Planning Inspector appointed by the Secretary of State, and not Croydon Council. As such it is not a consultation.
How did you consult individuals?	They will be able to submit comments in a number of ways including email and letter.
If not explain why it is not appropriate.	
Who else within the organisation have you consulted with?	None
Do you need to speak with your processor to assist?	No
Do you plan to consult information security experts or any other experts?	No

4 Assessment of necessity and proportionality of data usage

What is your lawful basis for processing?	It is a requirement of Regulation 19 of the Town and Country Planning (Local Planning)(England) Regulations 2012
Is consent being relied upon to share the information? Has explicit consent been obtained? Are data subjects able to opt out from giving consent?	n/a – Sutton Council are the data managers
Does the processing actually achieve your purpose?	n/a – Sutton Council are the data managers
How will the information be collected? Verbally, forms, intranet, interview, 3 rd party, anonymous)	n/a – Sutton Council are the data managers
Is there another way to achieve the same outcome?	n/a – Sutton Council are the data managers
How will the information be used? <i>e.g. to write a report</i>	Data may be used to contact persons about the Examination in Public to enable them to participate and submit further representations if requested to so by the Planning Inspector appointed by the Secretary of State.
Do the individuals know and understand how their information will be used? If there are changes to their information does the privacy notice need to be amended?	n/a – Sutton Council are the data managers
How will it be stored, kept up to date and disposed of when no longer required? <i>e.g. stored in locked cabinet/securely shredded</i>	n/a – Sutton Council are the data managers
How will you ensure data quality and data minimisation?	n/a – Sutton Council are the data managers
Who will have access to the information within LBC? - <i>Include approximate number of users</i>	n/a – Sutton Council are the data managers
Are there new or significant changes to the way we manage, use, handle or collect this information? - <i>Include any identified concerns for the individuals, would these changes heighten risks involved</i>	n/a – Sutton Council are the data managers
Will individuals within an existing database be subject to new or changed handling? - <i>If yes amendments need to be made to the privacy notice and these individuals need to be informed.</i>	n/a – Sutton Council are the data managers
What are the internal arrangements for processing this information? <i>e.g. number of staff who will have access</i>	n/a – Sutton Council are the data managers

How will the information be updated? <i>e.g. monthly check</i>	n/a – Sutton Council are the data managers
Does the project involve the exchange of information outside of the UK and are there set standards for how the information will be treated? How will you safeguard international transfers?	No
How will you prevent function creep?	n/a – Sutton Council are the data managers

5 Assessment of the risks to the rights and freedoms of data subjects

You must describe the source of risk and the nature of potential impact upon individuals and identify any additional measures to mitigate those risks.

5a Security

Who will be responsible for the control for this information?	Duncan Clarke, Sutton Council
How will the access to this information be controlled?	n/a – Sutton Council are the data managers
Is the data correctly managed to reduce the risk of collateral intrusion to the data subject?	n/a – Sutton Council are the data managers
Are there adequate provisions in place to protect the information? If so what are they? <i>e.g. Process, security</i>	n/a – Sutton Council are the data managers

5b Sharing

Who is the information shared with, why are we sharing the information with this organisation?	n/a – Sutton Council are the data managers.
What purpose does the information we are sharing have to the third party? - <i>Ensure that we only share relevant information and not excessively</i>	n/a – Sutton Council are the data managers
Who will have access to the information, externally? - <i>Include approximate number of users</i> - <i>Describe any sharing arrangements and what the level of access is. It may help to produce a diagram to show the data flows.</i>	n/a – Sutton Council are the data managers
How will it be transmitted to third parties and when? How often?	n/a – Sutton Council are the data managers
Is there a data sharing agreement in place?	n/a – Sutton Council are the data managers

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At what stage will the information be transferred?	n/a – Sutton Council are the data managers
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5c Identified Risks and assessment:

You should take into account the sensitivity of the information and potential harm that inappropriate disclosure or use of the information could cause to any individuals concerned. You should also consider the reputational loss to the Council and the potential for financial penalties being imposed by the ICO.

To assess the level of risk you must consider both the **likelihood** and the **severity** of any impact on individuals. A high risk could result from either a high probability of some harm or a lower possibility of serious harm.

The severity impact level and likelihood should be scored on a scale of 1 to 10 with 1 being low severity and 10 high. The two scores should be **added** together. The RAG status is derived from the following scale:

Score:

- 15 to 20 = Red (High)
- 8 to 14 = Amber (Medium)
- Below 8 = Green (Low)

To be completed by Project Sponsor

Risk Identified	Severity of Impact	Likelihood of harm	Overall RAG rating

6 Identify measures put in place to reduce risk.

You must now identify additional measures you could take to reduce or eliminate any risk identified as medium or high risk in step 5.

To be completed by the Project Sponsor

Risk Identified	Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved
		Eliminated / reduced / accepted	Low / medium / high	Yes / No

Sign off and Record sheet

Item	Name/date	Notes
Measures approved by: Residual risks approved by:		Integrate actions back into project plan, with date and responsibility for completion. If accepting any residual high risk must consult ICO before going ahead.
DPO advice provided:		Summary of DPO advice: <i>(DPO should advise on compliance, measures to mitigate risk and whether processing should proceed)</i>
Consultation responses reviewed by:		If your decision departs from individuals views you must explain your reasons.
DPIA to be keep under review by:		

If you require further guidance to complete this DPIA please contact:

Information Management Team (IMT)

Ext: 47777

Email: information.management@croydon.gov.uk

Data Protection Officer

Email: DPO@croydon.gov.uk