

PRIVACY IMPACT ASSESSMENT FORM

Section 1

Screening for a Privacy Impact Assessment

1a.	What is the name of the service/policy/procedure/project being assessed? Mental health acute care pathway review
1b.	<p>Briefly describe the service changes/new policy or procedure that is being Impact Assessed. What needs, or duties, is it designed to meet? Will it have an impact on the sharing of confidential data?</p> <ul style="list-style-type: none"> • A project to identify the needs and demand profile of the local population of people who have a serious mental illness, and to ascertain the levels of service that need to be commissioned for the Dorset population. • To carry out a system review starting with acute mental health care, including the community mental health teams and also including other services that interface, and impact on how acute care is delivered. • To develop a clinically led pan-Dorset pathway and care model based on recovery principles for people who are, or are at risk of becoming, acutely mentally unwell. • To involve clients, supporters, clinicians and other stakeholders on the development of the options. • Should there be substantial change to the service model, to consult with the Health Scrutiny Committees as required under S244 in addition to patients and the public. <p>Email and home addresses will be collected during consultation and engagement events to send the public information about events, updates on the review and opportunities for feeding in insight. The review will have minimal adverse effect on privacy.</p>
1c.	If this service/policy/procedure/CCG function has no relevance for privacy considerations, please give your reasoning below and sign Section 5 of this form.

Where there is no relevance for privacy considerations, then the screening section can be signed and countersigned and there is no need for a full assessment. Where there is relevance for privacy considerations, a full Privacy Impact Assessment must be undertaken and Section 2 completed

Section 2

Full Privacy Risk Screening Assessment

2a.	Does the project/service development involve any technologies that might have a privacy impact. For example, Smartcards, biometrics, digital imaging, video recording or logging of electric traffic? (Does the project use or suggest new or extra technologies that will have a greater impact on privacy?) No
2b.	Does the project/service development involve the use of new personal identifiers or an extension in the use of personal identifiers? (Are you setting up a new way to identify someone, or re-using an existing way? Is it intrusive?) No
2c.	Does the project/service development involve the handling of a significant amount of new personal data? (Are you going to be using new personal data that has not been previously

collected? Are you including a way to authenticate someone's identify or introducing an identity management process?)

Yes, this data has not previously been collected by the CCG for the purpose of informing the public about the review.

2d. Does the project/service development involve new or changed data management processes that might be intrusive, insecure, more permissive in terms of access to data, or unclear? (Are you suggesting using personal data in a new or significantly changed way? Is this the sort of data that people would have concerns about?)

No

Section 3

Information Sharing

3a. List other stakeholder(s)/organisations involved in the project:

Local Authorities: Bournemouth Borough Council, Dorset County Council, Borough of Poole, Dorset HealthCare, South West Ambulance Foundation Trust, Dorset Police, Dorset Mental Health Forum, Rethink Mental Illness.

3b. Will information be shared with these stakeholder(s)/organisations?

Yes information about the project and the review findings will be shared but personal information will not be shared.

3c. If information is to be shared, what is the legal basis for sharing this information?

The whole project is coproduced with the above organisations plus people who use services and carers. The information of the project is shared with all participants.

3d. How long will the information be held for?

No personal information with privacy impact will be held.

3e. What security measures will be in place to share this information securely?

As above

3f. What information sharing agreements will be in place?

As above

Section 4

Privacy Impact Action Plan

When completing the action plan set out below, you will need to set out the actions that you need to take in order to minimise the impact on privacy. If you are working with a third party, you should involve them in completing this PIA and action plan. You may also wish to consider:

- How will the individual be informed of any changes to the use of their information?
- How will information be transported / moved about securely?
- Will any staff be working remotely or from home, and has a risk assessment been completed?
- What IG controls do any participating third parties have in place?
- Who specifically will have access to the information?
- What access controls/policies will you have in place for accessing the information?
- How secure is your computer system, have you liaised with IT?
- How will the information be securely stored?

The following actions will be undertaken as a result of the Privacy Impact Assessment to address identified adverse impact:

Adverse impact identified	Actions to be taken	Timescale	Responsible Manager
The collection of email and home addresses to invite patients and the public to attend consultation events and to seek their views.	Email and home addresses were collected through the issue of a postcard inviting people to have their say on mental health services in Dorset. Unfortunately, the postcards were printed before a PIA was produced and signed off by the IG Group. This meant that the postcards, whilst mentioning Data Protection, did not state anything about using the addresses solely for the purpose of informing the public about the review and providing the opportunity to opt out at any point in the process.		
The secure storage of and access to personal data.	The addresses are stored on a secure database that is only accessible by the CCG project team.	June 2015 onwards	Jodie Whaley
The CCG will once again be seeking the views of the public who initially responded to this exercise, as the next stage of consultation begins. It is essential that when contacting the existing database of contacts is used for this purpose, they are fully informed	IG team to be contacted before further communication with public and before collecting any further personal data. Communications to include relevant IG information that has been approved by the IG team.	June 2016 onwards	Jodie Whaley
The CCG will be seeking the views of the public in December 2016 in a public consultation.	IG team to be contacted before further communication with public and before collecting any further personal data. Communications to include relevant IG information that has been approved by the IG team.	December 2016 Onwards	Jodie Whaley

Section 5

Signatures

To be signed by the Manager undertaking the full assessment:

Name:	Elaine Hurlll
Designation:	Senior Commissioning Manager Mental Health
Date:	September 2016

To be signed by the Senior Manager, i.e. Service Head, Line Manager, Director as appropriate:

Name:	Kath Florey Saunders
Designation:	Head of Mental Head of Review, Design and Delivery – Mental Health and Learning Disabilities
Date:	September 2016