## ico_master_blue_rgb_CityWellnessLink DPIA

# Step 1: Identify the need for a DPIA

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| Explain broadly what project aims to achieve and what type of processing it involves. You may find it helpful to refer or link to other documents, such as a project proposal. Summarise why you identified the need for a DPIA. |
| **Broad Project Aims:**  The project aims to produce and undertake two questionnaires posed to employees and employers over the age of 50 in the London area: specifically, the London boroughs, City of London, Tower Hamlets and Newham. CitywellnessLink envisions a future where it is easy and enjoyable for employees to take responsibility for their health, getting access to the right resources at the right time to enable an increasing proportion of the older workforce to remain in productive employment until retirement The CitywellnessLink study will determine the feasibility, acceptability and conceptual architecture of a novel personal health and wellness eco-system for the older worker.  **Summarise why you identified the need for a DPIA:**  There is a need for a DPIA, as the study will involve the processing of health and well-being data and hence the need to ensure that this data is protected. |

# Step 2: Describe the processing

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| **Describe the nature of the processing:** how will you collect, use, store and delete data? What is the source of the data? Will you be sharing data with anyone? You might find it useful to refer to a flow diagram or other way of describing data flows. What types of processing identified as likely high risk are involved? |
| The research assistants will collect the information on an encrypted platform that only they will have access to. The data will be stored on an encrypted online platform that removes the risk of accidental deletion. As a safety precaution the data will be stored in two places online. The data for the two questionnaires will be stored on encrypted platforms separately to each other. In the case of both of the research assistants being unable to continue with the study, then access to the raw data will be passed on to Margaret Ellis.  All data will be collected with the permission of the participants, only information about health and well-being will be collected or stored for the acknowledged time. The research assistants will only use the information for the purpose of the study. Participants reserve the right to stop participation in the study at any point. Research assistants are there to process and analyse data, if any participant has a complaint this should be directed to the CWLG Group. |

Flow Diagram of Data Flows

Email addresses and contact details collected by CWLG Partners

Contact details passed on to Research Assistants

Research Assistants collect anonymous questionnaire 2 responses

Research Assistants collect anonymous questionnaire 1 responses

Responses are stored on online encrypted platform

Responses are stored on online encrypted platform

Responses are stored on online encrypted platform for three years, access going to Margaret Ellis

Research Assistants create a summary report of responses, without specific data being given

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| **Describe the scope of the processing:** what is the nature of the data, and does it include special category or criminal offence data? How much data will you be collecting and using? How often? How long will you keep it? How many individuals are affected? What geographical area does it cover? |
| The data is basic background information including age, ethnicity, employment and lifestyle. They will then be asked simple questions on their health and wellness as well as a quality-of-life questionnaire. The questionnaire comprises roughly 30 questions and requires short or multiple-choice answers.  All data will remain anonymous throughout the data collection period. The data will be kept for a length of three years after the study has concluded. A period of three years has been identified so that further research can be carried out in relation to the results of the 8-month feasibility study. The geographical area is the London boroughs, City of London, Tower Hamlets and Newham. Data will be kept for the duration of the study and the subsequent development of the technological architecture this study hopes to influence. The study will collect the data of employers and employees in the catchment area. |

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| **Describe the context of the processing:** what is the nature of your relationship with the individuals? How much control will they have? Would they expect you to use their data in this way? Do they include children or other vulnerable groups? Are there prior concerns over this type of processing or security flaws? Is it novel in any way? What is the current state of technology in this area? Are there any current issues of public concern that you should factor in? Are you signed up to any approved code of conduct or certification scheme (once any have been approved)? |
| The data processors have never met the participants of the study. The participants’ role will be to answer the questionnaire, participate in a series of health and wellness activities/ advice offered to them and then answer another questionnaire on their experiences. Data protection is important but the participants in the study are not identified as a vulnerable group. This contact will be online, through email and online questionnaire sites. |

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| **Describe the purposes of the processing:** what do you want to achieve? What is the intended effect on individuals? What are the benefits of the processing – for you, and more broadly? |
| CityWellnessLinkGroup brings together a senior eclectic group dedicated to  working towards increased benefit to the older workforce using digital services  linking health and wellbeing in the community. Only a limited number of  employers currently encourage such engagement. Our plan is to encourage  more employers to do so and for employees to adopt the opportunity.  CitywellnessLink seeks to enable a future where employees take responsibility  for their health and wellbeing by accessing the right resources at the right time  and through direct channels. This will result in an increasing proportion of the  ageing employed remaining in productive employment, whilst also being able to  care for family members. |

# Step 3: Consultation process

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| **Consider how to consult with relevant stakeholders:** describe when and how you will seek individuals’ views – or justify why it’s not appropriate to do so. Who else do you need to involve within your organisation? Do you need to ask your processors to assist? Do you plan to consult information security experts, or any other experts? |
| Fortnightly meetings are held with the partners to delegate tasks and bring any concerns to the team’s attention. The CitywellnessLink Team has strength in depth, led by Fujitsu, and coordinated by European Knowledge Tree Group, with Docobo, Business Healthy, Barts Health NHS Trust, East London NHS Foundation Trust and Morrisons as major employer and healthy-eating advocate, supported by a Special Advisory Board. All of the above provide advice on certain involvement in the study, however have no access to the raw data of the survey. |

# Step 4: Assess necessity and proportionality

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| **Describe compliance and proportionality measures, in particular:** what is your lawful basis for processing? Does the processing actually achieve your purpose? Is there another way to achieve the same outcome? How will you prevent function creep? How will you ensure data quality and data minimisation? What information will you give individuals? How will you help to support their rights? What measures do you take to ensure processors comply? How do you safeguard any international transfers? |
| This is a feasibility study that requires the analysis of feedback from participants to highlight a need for further development. The output from the project will be a report on the feasibility of a CWLG approach with identification and quantification of stakeholders and some resources necessary to list developments needed. Our intention is to clearly outline all data that will be collected and for what purpose. This ensures that we are transparent. The research assistants have carried out an analysis of the nine principles of data protection and have made sure to adhere to each point individually. |

# Step 5: Identify and assess risks

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| **Describe source of risk and nature of potential impact on individuals.** Include associated compliance and corporate risksas necessary. | **Likelihood of harm** | **Severity of harm** | **Overall risk** |
| Data leak – possible leak of data that was meant to be kept private  Offence to employer by employee | Low  Low | Low  Medium | Low  Low |

# Step 6: Identify measures to reduce risk

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| **Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 5** | | | | |
| **Risk** | **Options to reduce or eliminate risk** | **Effect on risk** | **Residual risk** | **Measure approved** |
| Data Leak  Employer offence | The research assistants will collect the information on an encrypted platform that only they will have access to. The data will be stored on an encrypted online platform that removes the risk of accidental deletion. As a safety precaution the data will be stored in two places online. In the case of both of the research assistants being unable at continue with the study, then access to the raw data will be passed on to Margaret Ellis.  All data will be collected with the permission of the participants, no sensitive information will be collected or stored. The data is basic information and will not ask anything too sensitive. | Reduced  Reduced | Low  Low |  |

# Step 7: Sign off and record outcomes

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| **Item** | **Name/position/date** | **Notes** |
| Measures approved by: |  | Integrate actions back into project plan, with date and responsibility for completion |
| Residual risks approved by: |  | If accepting any residual high risk, consult the ICO before going ahead |
| DPO advice provided: |  | DPO should advise on compliance, step 6 measures and whether processing can proceed |
| Summary of DPO advice: | | |
| DPO advice accepted or overruled by: |  | If overruled, you must explain your reasons |
| Comments: | | |
| Consultation responses reviewed by: |  | If your decision departs from individuals’ views, you must explain your reasons |
| Comments: | | |
| This DPIA will kept under review by: |  | The DPO should also review ongoing compliance with DPIA |