

Information **Matters**

Information Management Team: **Data Protection Impact Assessment**
Version 2:0

Data Protection Impact Assessment (DPIA)

Project Name:	School Streets
Project Manager or Sponsor (PM):	Tabrez Hussain / Jayne Rusbatch
Name of person completing the DPIA if different to (PM):	
Service Team and Department:	Highways and Parking Service Sustainable Communities
Relevant Director and Executive Director:	Steve Iles Nick Hibberd
Information Management Champion(s) for service area:	
Date DPIA received by the IMT:	
Date approved by DPO:	4 October 2022
Date approved by IMT :	

1 Project Scope

You should describe here the nature, scope, context and purpose of the processed processing. (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. You should summarise why you identified the need for a DPIA).

The council's School Streets programme is necessary to ensure we secure a healthy and safe environment near to schools and to help children and parents use cars less and to walk, cycle and use public transport more. The school run presents a particularly harmful combination of air pollution and inactivity for our children and parents.

The need for a DPIA has been identified as the project will involve public statutory consultation and the collection of their responses to the statutory consultation. Responses to the consultation will be sought from not only the school community but the wider community as the proposed changes could impact on traffic on the surrounding road network. This requires the below DPIA.

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>We will be processing information provided by those people responding to the statutory consultation. The statutory consultation is voluntary and where participants take part they will be required to provide some personal information.</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>Information being used for statutory consultation includes:</p> <ul style="list-style-type: none"> Address Name Email address
<p>Does it include special category or criminal offence data?</p>	<p>No</p>
<p>Can an individual be identified easily from the information?</p>	<p>Yes</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>Personal data collected for the purpose of commenting or objecting to the proposals includes names, addresses and e-mail addresses. The risk to an individual, if this data were lost would include ID fraud.</p>
<p>Will this change the manner in which we handle, use or protect this information? e.g. should it be encrypted?</p>	<p>Personal data with respect to commenting or objecting to public notices is treated carefully to ensure that this is unlikely to leak outside the project team (6 members). Data is retained in an electronic folder only accessible by the project team and retained for sufficient time to enable analyses of the comments.</p>

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3 Consultation process

Consider how to consult with relevant stakeholders.

When did you consult individuals?	The statutory consultation for the Experimental Traffic Management Order (ETMO) will start on 30 September 2022 and will last 6 months.
How did you consult individuals?	As part of the statutory consultation process addresses within the School streets and within an area approximately 200m surrounding the streets will be written to explaining the process and inviting objections to the public notice within a 6 month period. Public notices are also fixed to lamp columns within the School Streets and these will be advertised in the Croydon Guardian and London Gazette. There will also be a link on the Croydon Council's website.
If not explain why it is not appropriate.	N/A
Who else within the organisation have you consulted with?	This project is largely contained within the Highways and Parking Service. However, other teams within the Sustainable Communities, Regeneration & Economic Recovery directorate have also been made aware of the changes including Strategic Transport which works closely with the Highway Improvement Team.
Do you need to speak with your processor to assist?	N/A
Do you plan to consult information security experts or any other experts?	Processing personal data as part of the consultation process is not deemed to require security experts as there are standard methods available to ensure data is secure – letters secured in lockable cabinets and e-mails only viewable by certain officers dealing with similar consultation on a daily basis including the project team (6 members).

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4 Assessment of necessity and proportionality of data usage

<p>What is your lawful basis for processing?</p>	<p>The lawful basis for processing is the consultation being a task carried out in the public interest or in the exercise of official authority, principally it being an activity that supports or promotes democratic engagement, in accordance to GDPR Article 6(1)(e). Members of the public that comment or object to the public notice are informed, by return, that their personal data will only be used for the purpose of the formal consultation and retained for as long as necessary to enable this process to take place in accordance with GDPR.</p>
<p>Is consent being relied upon to share the information? Has explicit consent been obtained? Are data subjects able to opt out from giving consent?</p>	<p>No. This is a statutory consultation and voluntary for the public to take part. However whilst it is voluntary the council will process any personal information in accordance with GDPR (those making comments or objecting are informed that their personal data will only be used for the purpose of the consultation and retained for as long as necessary to complete this process).</p>
<p>Does the processing actually achieve your purpose?</p>	<p>Yes, it enables us to refine the analysis of the consultation responses and assists with validation.</p>
<p>How will the information be collected? Verbally, forms, intranet, interview, 3rd party, anonymous)</p>	<p>The information will be collected via an online form, e-mails and letters. Acknowledgements will include a comment that personal data will only be used for the consultation process and retained fo as long as necessary to complete this process.</p>
<p>Is there another way to achieve the same outcome?</p>	<p>Statutory consultations must be carried out in line with regulations.</p>
<p>How will the information be used? <i>e.g. to write a report</i></p>	<p>The information will be used to produce a report on the results of the consultation.</p>

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<p>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?</p>	<p>No. This is a statutory consultation and voluntary for public to take part. However whilst it is voluntary the council will process any personal information in accordance with GDPR. However, as this statutory consultation is published on the council's website there will be a Privacy Notice provided explaining that those that comment or object give information voluntarily, consent to it being processed and are aware of the GDPR rights. Personal data will be removed once the analysis is completed.</p>
<p>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></p>	<p>The data will be stored on the Council's servers within a folder that can only be accessed by the project team only.</p>
<p>How will you ensure data quality and data minimisation?</p>	<p>The participation in the scheme consultation is voluntary and the extent to which a participant provides data is voluntary. For valid comments or objections to be received and processed a name and address is the minimum data required and an e-mail address if the responder uses this as a means to communicate and requires an e-mail response.</p>
<p>Who will have access to the information within LBC? <ul style="list-style-type: none"> • <i>Include approximate number of users</i> </p>	<p>The project team (6 members)</p>
<p>Are there new or significant changes to the way we manage, use, handle or collect this information? <ul style="list-style-type: none"> • <i>Include any identified concerns for the individuals, would these changes heighten risks involved</i> </p>	<p>No. There is a standard approach to the processing of comments or objections to a public notice. This includes collating comments and objections, analysing and responding to these to determine whether the experimental scheme should be retained as implemented, amended or withdrawn depending on the level of objections and affects on the School Streets and surrounding area. Once this data is used and included in a report (not including personal data) then personal information such as names, addresses and e-mail addresses will be destroyed.</p>

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<p>Will individuals within an existing database be subject to new or changed handling?</p> <ul style="list-style-type: none"> If yes amendments need to be made to the privacy notice and these individuals need to be informed. 	No.
<p>What are the internal arrangements for processing this information? e.g. number of staff who will have access</p>	The project team (6 members – same as listed in 5a below) will process this consultation data.
<p>How will the information be updated? e.g. monthly check</p>	There is one planned analysis of the data at the end of the consultation period. No further updates will be required. Once the comments and objections are analysed then personal data will be destroyed.
<p>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?</p>	No
<p>How will you prevent function creep?</p>	By keeping access to the data to the project team and ensuring that they are aware of the content of this DPIA and of the need to prevent function creep. Personal data is only retained for sufficient time to enable analyses to take place.

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

<p>Who will be responsible for the control for this information?</p>	Jayne Rusbatch/Tabrez Hussain/Waheed Alam/Claire McWatt/Claire Harris/Diana Salmon
<p>How will the access to this information be controlled?</p>	Only the named officers making up the project team (6 members) will have access to the data entered into the online consultation on the Council website.
<p>Is the data correctly managed to reduce the risk of collateral intrusion to the data subject?</p>	Once downloaded from the online consultation platform, the data will be held on the council’s servers in a folder that can

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	only be accessed by the project team. The folder can only be accessed from a council laptop which is Bitlocker and password protected or via Office 365 requiring a password and access code.
Are there adequate provisions in place to protect the information? If so what are they? <i>e.g. Process, security</i>	See above

5b Sharing

Who is the information shared with, why are we sharing the information with this organisation?	The information on objections and comments to the public notice is not to be shared with any third party.
What purpose does the information we are sharing have to the third party? <ul style="list-style-type: none"> • <i>Ensure that we only share relevant information and not excessively</i> 	N/A for the statutory consultation
Who will have access to the information, externally? <ul style="list-style-type: none"> • <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> 	No external party will have access to the statutory consultation data and access is limited to the project team identified above
How will it be transmitted to third parties and when? How often?	N/A for the statutory consultation
Is there a data sharing agreement in place?	N/A for the statutory consultation
At what stage will the information be transferred?	N/A for the statutory consultation

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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
Statutory Consultation: Information being lost or stolen which leads to views expressed from an individual household becoming public. This carries risk to members of the individual household, reputational risk to the Council potential financial penalty	3	1	4 (Low)
Information being lost or stolen which leads to special category data from an individual household becoming public. For example ID fraud carries risk to members of the individual household, reputational risk to the Council potential financial penalty.	9	1	10 (Medium)
Process personal data without providing a privacy notice directly to the individual leading to reputational risk and potential financial penalty. Please note that respondents objecting and commenting on the experimental School Street schemes will be informed that their	9	1	10 (Medium)

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personal data will only be used for the purpose of the statutory consultation process and information destroyed once this exercise is completed.			
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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
Process personal data without providing a privacy notice directly to the individual leading to reputational risk and potential financial penalty	Linked provide in the online survey to the privacy notice when/where respondents are asked to consent to us holding their information	Eliminates	Removed	Yes
Risk of personal data being lost or stolen which could lead to ID fraud	Personal information retained electronically only for sufficient time needed to respond to comments or objections	Reduces	Minimal	Yes

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		<p>project sponsor has expressed a concern that if the data collected were to be lost or stolen there is a risk of special category data from an individual household falling into the public domain. The DPO has requested clarification of this comment but is still to receive the same. The DPO reiterates the request for clarification, to properly understand the sponsor's comments and to comment on any measure to mitigate against the same. Meanwhile, given the urgency attaching to the project (the sponsor has indicated that it is working to a 4 October 2022 timeline) and considering the limited nature of the data the sponsor confirms is to be collected/processed (address, name, email), and the measures in place to keep the data secure, the DPO's view is that the processing may proceed; albeit, subject to the clarification requested above regarding any special category data (i.e., whether such data is at risk in connection with this project or not). The fact that access to the personal data collected is stated to be</p>
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		<p>restricted to the project team members only (six individuals altogether) is also noted. In addition to the above, the DPO advises that the DPIA is reviewed periodically (monthly), to assess its performance and to take a view of how any new information (especially how any special category data) may impact these conclusions. The sponsor is also advised to keep a Record of Processing Activity (RoPA) to record the data processed (and shared, if applicable), and to state retention periods.</p> <p><i>(DPO should advise on compliance, measures to mitigate risk and whether processing should proceed)</i></p>
<p>Consultation responses reviewed by:</p>		<p>If your decision departs from individuals views you must explain your reasons.</p>
<p>DPIA to be keep under review by:</p>		

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