

Data Privacy Impact Assessment (DPIA)



What is a DPIA?

DPIA is a new obligation under the GDPR which requires us to set out and have recorded all our processing activities across the council. It will also help us to identify and tackle problems at an early stage and ultimately help to reduce associated costs and damage to Reading Borough Council's reputation.

When do I need to conduct a DPIA?

You must carry out a DPIA :

- If you are currently processing data and have not completed a DPIA
- When using new technologies and the processing is likely to result in a high risk to the rights and freedoms of individuals.

What information should the DPIA contain?

- A description of the processing operations and the purposes, including, where applicable, the legitimate interests pursued by the controller.
- An assessment of the necessity and proportionality of the processing in relation to the purpose.
- An assessment of the risks to individuals.
- The measures in place to address risk, including security and to demonstrate that you comply

Directorate:	Reading UK (Chief Exec)	Lead Officer	Nigel Horton-Baker
Brief Description or Title of activity requiring a DPIA	Economic Development	Date:	8.5.18

Please leave this blank
DPO Reference Number:

Version	Reason	Author	Date
1	To clarify the role of Reading UK in connection with Reading Borough Council	Nigel Horton Baker	8.5.18

Approvals- This document requires the following approvals:

Please ensure that approval is sought from your Head of Service and the Data Protection Officer

Name	Title	Signature	Date
Nigel Horton-Baker	Executive Director		8.5.18
Ricky Gill	Data Protection Officer		

Distribution - This document has been distributed to:

Please ensure that a copy once approved is sent to the Data Protection Officer for record-keeping

Name	Title	Company	Date
	Board Members	Reading UK CIC	
Ricky Gill	Data Protection Officer	RBC	

--	--	--	--

1. Screening Questions

Description of process or activity

Give a detailed explanation of the process or activity and attach relevant reports or papers

Reading UK is an outsourced and externally funded economic development and place marketing company set up between the Council and the private sector since 2007. RUK undertakes business growth, promotion of the town, cultural events, support for unemployed people in the town. It also operates the Business Improvement District. RUK has its own bank account. Its e filing system is stored on the RBC mainframe computer on the H Drive. There is also a section on the T drive RUK undertakes services for RBC when requested with relevance to the economic development and promotion of the town

Detail what personal data you will be processing

List the personal data you will be collecting that can identify an individual/individuals

We keep lists of business contacts associated with our economic development projects including the Business improvement District. We have audited our filing systems and cleared out all old data bases including our business newsletter and started it again getting consent to send the newsletter to named individuals
Our list primarily contain a named person the company and an email address and are used for invitations to events or for their participation on our working groups. All are consented for these purposes. We have no services to individuals currently and no lists. To invite people to events we work through third parties or by public advertising RUK carries information on its non-executive Board Directors for registering and updating at Companies House as required by Company Law
We outsource some activities and by agreement keep contact information of our suppliers in our files and on our Lloyds Bank Account

Explain why the processing is necessary & proportionate to the activity

Explain why each item of personal data listed above is needed in relation to the activity

Our role is to engage with eh business community for the benefit of the economy and people living in Reading and we need to find and maintain business contacts to communicate with them in order to deliver our activities.

Is there a lawful basis for processing ?

- With consent of DS
- Necessary for a contractual obligation with DS
- Necessary for compliance with a “clear and precise” legal obligation
- Necessary to protect vital interests of DS
- Necessary for performance of public interest task in exercise of official legal duty
- Necessary for your legitimate interests or the legitimate interests of a third party (When not performing tasks as a public authority)

<p>Our lawful basis is with regard to duties under Companies Law and the legislation surrounding Business Improvement Districts. Otherwise our services and activities are discretionary and we have set up a policy/ process for seeking agreement to keep personal contact information for specific purposes, Also a system to deal with enquiries about data held and removal if requested</p>	
<p>Impact on individuals Explain whether there will be any negative impact on or risks to the affected individuals</p>	
<p>Information collected is primarily a name and email contact so minimising any negative impact or risk to the person</p>	
<p>Measures Explain what measures will be put in place to mitigate the impact (eg. security, deletion, redaction, encryption, restricting access, staff training)</p>	
<p>We keep a central file of contact lists managed by the Communications Manager. The files are password protected. All new lists for projects are logged with the Comms Manager. The BID CRM is cloud based but pass word protected and restricted to two users , the BID Manager and the BID Operations Co-ordinator Staff have had training in procedures regarding setting up new data bases , seeking consent and responding to requests for info kept and deletion</p>	
<p>How many individuals' personal data will be affected? Enter the number of individuals or an approximate number if exact number is unknown</p>	<p>1000 business contacts</p>

	Yes (x)	No (x)
Will the personal data collected include sensitive personal data? These include medical/health, religious, political, racial/ethnic or trade union data		X
Will the data be used for profiling purposes? Profiling means making automated decisions (typically involving algorithms or IT systems) that would have an impact on a person's life		X
Will the activity compel individuals to provide information about themselves?		X
If Yes, has consent been sought?		
Will the information about individuals be disclosed to organisations outside of RBC? If so, who and why? Please include a copy of the contract or agreement governing the sharing of information		X
Does the activity involve you using new technology which might be perceived as being privacy intrusive? For example, the use of biometrics or facial recognition.		X
Will the activity require you to contact individuals in ways which they may find intrusive?		X
Please submit completed form to the IG team at the following e-mail address: GDPR@reading.gov.uk		