

Imperial College London

HR Probation Dashboard Data Protection Impact Assessment

Document Information	
Document Status and Version	<i>Draft</i>
Author(s)	
Information Asset Owner	
Name of department and faculty or Support Services	<i>Human Resources Division</i>

Version History	Version Date	Requestor of Change	Summary of Changes
<i>V1.0</i>	<i>25/09/19</i>		<i>Initial Draft</i>
<i>V2.0</i>	<i>03/10/19</i>		<i>Review / finalisation</i>

Proposed date for the activity/project/process/initiative commencement	7 th October 2019
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Proposed date for the activity/project/process/initiative completion	Ongoing
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Please note that the College may disclose completed DPIAs where it is required to do so by law (including the Freedom of Information Act), by any applicable governmental or other regulatory authority, or by order of a court. For further information as to what to disclose if required under FOIA please contact the Legal Services Officers at foi@imperial.ac.uk.

Completed DPIAs may also be published internally for organisational learning and awareness so please advise the Data Protection Officer of any concerns to ensure these are duly considered/mitigated. The Data Protection Officer can be contacted at data-protection@imperial.ac.uk

Before completing this document, please read the Data Protection Impact Assessments Guidance available via <https://www.imperial.ac.uk/admin-services/secretariat/information-governance/data-protection/processing-personal-data/data-assessments/>

All entries listed in blue are examples and for guidance only

Part 1 - DPIA Summary

Name, job title and contact details of the nominated Information Asset Owner*	
Information Asset Owner name and job title	
Information Asset Owner contact details	

*Information Asset Owners

Any activity, project, process or initiative proposed to involve the processing of personal data¹ should have a designated Information Asset Owner. Information Asset Owners are responsible for assessing information security and privacy risks annually for their information assets and implementing appropriate measures accordingly. Accordingly, the Information Asset Owners are responsible for completing a DPIA in respect of the relevant activity/project/process or initiative (as is applicable).

Information Asset Owners are also responsible for recording the existence and details of their information assets in the College's Information Asset Register (which is in the process of being rolled out in College).

What scenario best describes the purpose for the DPIA?		
Activity/Non-research project: Yes	Supplier: No	Research: No

Outline the project / supplier requirements / research and its objectives (if processing is due to a statutory requirement please explain)?
<p>The College is committed to developing and supporting staff to work effectively to meet the objectives of their roles. Line managers are best placed to offer one-to-one support and guidance to new staff in meeting these objectives and developing new skills. The probation period is used to support and evaluate a new member of staff's performance with a view to confirming them in post.</p> <p>Probation periods are automatically confirmed as successful at the end of the period unless Human Resources are advised to the contrary via the returned Probation Review form. There is currently a lack of probation reviews being recorded and bringing together operational activity in HR has confirmed that practice across the College regarding probations has varied drastically – in many cases a significant amount of manual effort in HR was dedicated to checking and chasing managers to complete their probation.</p> <p>HR have reviewed the approach to Probation management and stated that it is a department's responsibility to ensure that managers are completing these probation discussions. This project "HR Probation Dashboard" supports HR senior managers and partners by analysing how many managers are undertaking a final probation review prior to confirmation in post. It supports managers by highlighting that status and identifying a list of their staff due to be confirmed in post. This list is broken down by organisation (section) and individual line manager and the list is refreshed on a monthly basis.</p> <p>Data will be provided via a Power BI report which is a business analytics tool to visualise and analyse data. Access will be given to departments leads nominated by the HR Strategic Support Team and will be given row level security access which means they will only be able to see their own departments data.</p>

¹ For the definition of personal data please see as follows;

<https://www.imperial.ac.uk/admin-services/secretariat/information-governance/data-protection/processing-personal-data/>

Before this project, probation dates were extracted from ICIS and provided to HR and Department Managers in a protected Excel spreadsheet via SharePoint.

List of stakeholders consulted during the DPIA Process (if pertinent, include names / roles for any persons involved thus far and include their feedback within the DPIA)

Internal Suggestions include:

Data Protection Officer

External suggestions include:

HR Strategic Partners

HR Deputy Director

Part 2 - Identifying the need for a DPIA

The following screening questions are intended to help you decide whether a full Data Privacy Impact Assessment (DPIA) is necessary. Answering yes to any of the below listed questions means that a full DPIA is necessary and therefore, you must complete all of Parts 3 through 9 (inclusive) of this document. If a full DPIA is **not** required please progress to Part 9.

Activity	Yes or No
Will you be processing / collecting special categories of personal data ² or data which is likely to raise privacy concerns e.g. health records?	No
Will you be evaluating, scoring, profiling or predicting individuals' behavior?	No
Will there be automated decision making about individuals with legal or similar effects? ³	No
Will the project result in you making decisions or taking action against individuals in ways which can have a significant impact on them?	Yes – action will be taken in the form of HR having conversations with managers about completing the probation procedure, however this is not a significant impact.
Will the project include systematic monitoring, observing or controlling personal data?	No

² For the definition of sensitive personal data or special categories of data please see this website: <https://www.imperial.ac.uk/admin-services/secretariat/information-governance/data-protection/processing-personal-data/>

³ For guidance on what automated decision making is please see as follows: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/rights-related-to-automated-decision-making-including-profiling/>

Will you be carrying out large scale processing of personal data? (This could include large volumes of data, large population of data subjects, length of processing or geographical extent of data)	Yes – this analyses data of employees with a probation end date in their record. There are circa 8,500 employees in the organisation with around 1,300 records being reported.
Will you be combining or matching datasets or collecting and creating new information about individuals?	No
Will you be collecting the personal data of vulnerable individuals?	No
Will you be deploying a new or innovative use of technology to process personal data?	Yes – The data is displayed using Power BI a visualisation tool.
Does the project involve you using new technology which might be perceived as being privacy intrusive? For example, the use of biometrics, facial recognition or tracking.	No
Is data likely to be transferred outside of the European Union?	No
Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information? For example, UCAS, NHS, other Universities	No
Are you using information about individuals for a purpose it is not currently used for, or in a way it is not currently used?	No
Will the project involve the processing of personal data by third parties (third parties would include all cloud based services, webinar platform providers etc.)?	No
Will the project expose personal data to elevated levels of security risks? Could the processing result in physical harm to individuals if a breach were to occur?	No

Once these questions have been completed please contact the College's Data Protection Officer at data-protection@imperial.ac.uk for review and guidance.

Part 3- Data Protection Officer Comments

Having reviewed the answers to Part 1 & 2 plus speaking with the author directly I am satisfied the activity can continue based on the proposal stipulated and is deemed compliant with the regulations. I also do not feel the activity poses a high risk to data subjects or their personal data so a full DPIA is not necessary.

The activity will in fact make the data more secure by making the process digital only and will benefit the College and its staff by ensuring an important activity is adhered too re the PDRP's

However, for clarity and for the authors guidance. The proposal must have suitable access permissions in place and all users must be aware that access is always on a case by case basis and must align to data protection regulations which are supported by the data protection policy and associated policies / Codes of Practice with any breach of aforementioned documentation potentially leading to misconduct proceedings.

The author should also be aware that this document remains a live document so as the process continues and / or further information / learning comes to light then it must be filtered back into the DPIA to ensure the parameters of the original discussion and associated risk have not changed, see Part 5 for more information.

03/10/19

Part 4 - Sign off / Approvals

At the end of the assessment, the DPIA with the proposed solutions should be signed off as follows:

Sign off by the Information Asset Owner / Data Protection Officer:

1. where only the screening questions in Part 2 have been completed; or
2. where the full DPIA has been completed and satisfactory solutions are found to any identified risks;

and, in each case, (i) no sensitive personal data is proposed to be processed as part of the activity/project/process or initiative (as applicable) and (ii) the activity/project/process or initiative will not involve the processing of personal data about 250 or more individuals, the Information Asset Owner is authorised to sign off the completed DPIA in consultation with the local Data Protection Co-Ordinator (if one has been nominated).

Where the Information Asset Owner is uncertain as to whether he/she is able to sign off on a given DPIA or uncertain about any GDPR compliance aspects, he/she should contact the College's Data Protection Officer for further guidance.

Information Asset Owner	Data Protection Officer	Compliance and Information Governance Manager
Signature	Signature	Signature
Name	Name	Name
Date	Date	Date

(Note: The form contains handwritten signatures and dates. The Data Protection Officer's date is 3/10/19. The Compliance and Information Governance Manager's signature is written over the signature line.)

Part 5 – Record keeping

There should be a permanent record of who signs off any DPIA and when this took place. Accordingly, each Information Asset Owner must:

- retain a copy of the final completed DPIA for his/her records (regardless of whether only the screening questions have been completed or the full DPIA has been completed); and
- send a copy of the final completed DPIA to the local Data Protection Co-Ordinator (if one has been nominated) (regardless of whether only the screening questions have been completed or the full DPIA has been completed); and
- send a copy of the final completed and approved DPIA to the College's Data Protection Officer (regardless of whether only the screening questions have been completed or the full DPIA has been completed).

If any approval is granted on the basis that certain actions are to be taken by a set deadline and those actions are not completed by that deadline, the Information Asset Owner should bring this to the attention of the approvers and suggest appropriate remedial action.

Part 11 – Further information / guidance

For more information / guidance on the creation and use of DPIA's please contact the Data Protection Officer and/or view the following:

Information Commissioner's Office - [Guide to the General Data Protection Regulation \(GDPR\)](#) page 100

Information Commissioner's Office - [Data Protection Impact Assessments \(DPIAs\) guidance](#)

Article 29 Working Party - [Guidelines on Data Protection Impact Assessments](#)

