Kent Fire & Rescue Service

PRIVACY IMPACT ASSESSMENT:

Project Name	Project ■

DOCUMENT APPROVAL SIGNATURES

Role	Name	Date agreed
Project Manager	■■■■■■	
Project Sponsor	■■■■■■■	
FINAL APPROVAL		

VERSION CONTROL

Version Number	Date	Change Description

GUIDANCE

To help complete this Privacy Impact Assessment you may want to refer to the 'Conducting privacy impact assessments code of practice' published by the Information Commissioner's Office. This document is available using the following link: https://ico.org.uk/media/for-organisations/documents/1595/pia-code-of-practice.pdf

1 BACKGROUND

Explain what the project aims to achieve, what the benefits will be to the organisation, to individuals and to other parties. You may find it helpful to link to other relevant documents related to the project, for example the Project Management Plan (PMP) or Project Proposal. Also summarise why the need for a Privacy Impact Assessment was identified (this can draw on your answers to the screening questions).

Project ▮ will be looking to replace our current on premise CRM ▮ with one single instance of ▮. This will allow us to have all premises in one solution and therefor allow the organisation to share and view risk data against one version of the premises. This will remove the need for L2 officers to interrogate all 3 systems separately when responding to an incident and allow each team to be aware of risk data at each site.

In choosing the ▮ system we will be placing people and premises data into ▮.

2 DESCRIBE THE INFORMATION FLOWS

The collection, use and deletion of personal data should be described here. It may also be useful to refer to a flow diagram or another way of explaining data flows.

Here is an illustration of the Project ▮ Data Flows

The data will be subject to these retention periods. The system will flag items for deletion and then auto delete.
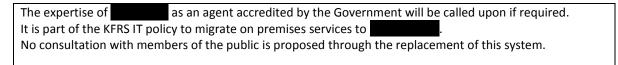
2.1 WHO WILL BE IMPACTED?

Who will be impacted? You should also say how many individuals are likely to be affected.

Migration of the data to ▮ will impact data we hold about people and premises. The list of data this impacts can be found here.
This will impact any data we hold on members of the public in Kent as we are moving this into ▮ platform.

2.2 CONSULTATION REQUIREMENTS?

Explain what practical steps you will take to ensure that you identify and address privacy risks. Who should be consulted, internally and externally? How will you carry out the consultation?

The expertise of ▮ as an agent accredited by the Government will be called upon if required.
It is part of the KFRS IT policy to migrate on premises services to ▮.
No consultation with members of the public is proposed through the replacement of this system.

3   PRIVACY RISKS AND MITIGATION

Identify the key privacy risks and the associated corporate risks. Describe the actions you could take to reduce the risks, and any future steps which would be necessary (e.g. the production of new guidance or future security testing for systems).

Privacy Issue	Risk to individuals	Compliance risk	Associated corporate risk
Malicious Attack	If anyone where to hack the ■■■■ ■■■■ / ■■■■ where our data will be held then there would be a GDPR issue.	General Data Protection Regulations 2018 Data Protection Act 2019	GDPR Fine Damage to Service image
Loss of Hard Copy data	Decreased risk as forms will be digitalised	General Data Protection Regulations 2018 Data Protection Act 2019	GDPR Fine Damage to Service image

3.1 IDENTIFY PRIVACY SOLUTIONS

Describe the actions you could take to reduce the risks, and any future steps which would be necessary

(E.g. the production of new guidance or future security testing for systems).

Risk	Solution(s)	Result **Is the risk eliminated, reduced, or accepted?**	Evaluation **Is the final impact on individuals after implementing each solution a justified, compliant and proportionate response to the aims of the project?**
Malicious Attack	▉▉▉▉▉ state their data centres are ▉▉▉▉▉▉▉▉▉▉▉▉▉▉▉▉▉▉▉▉▉▉ ▉▉▉▉▉▉▉▉▉▉▉▉▉▉▉▉▉▉▉	Risk is reduced	Justified through mitigation of risk of threat to Authority, and the rights and freedoms of the individual, through data losses
Loss of Hard Copy data	Digitized Forms	Risk is reduced as the organisation currently does this on paper forms	This is a compliant response and allows us to be more secure with our people data

4   SIGN OFF AND RECORD OF THE PRIVACY IMPACT ASSESSMENT OUTCOMES

Who has approved the privacy risks involved in the project? What solutions need to be implemented?

Privacy Risk	Approved Solution	Approved by

5   INTEGRATING THE PRIVACY IMPACT ASSESSMENT OUTCOMES BACK INTO THE PROJECT

Who is responsible for integrating the privacy impact assessment outcomes back into the project? Who is responsible for implementing the solutions that have been approved?

Action to be taken	Completion date	Owner for action

6   Data Protection Officer Sign Off

Summary of review of DPIA:

Are the risks sufficiently managed?

Are there any additional controls/actions that can be taken? If so what?

If the activity is too high risk report to the ICO.

Name…▮▮▮▮▮▮▮▮▮………….. Date…………▮▮▮▮▮▮▮▮▮……….