

[Privacy Impact Assessment]

[A document following the ICO code of practice for assessing risks to individuals physical and data privacy]

[City of York Council | Business Intelligence Hub]

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Version control

Version	Start date	End date	Description	Author(s)
1	13/12/2018		1 st draft	BIH Officer

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Introduction

York Open Data (YOD) was launched in March 2015. It offers residents and businesses free access to a wealth of information about their city, to help to build new products, understanding and solutions to all kinds of challenges such as those around sustainability, transport, energy and community engagement.

The platform has hundreds of datasets which cover a diverse range of topics such as:

- council and city performance
- community assets
- information on individual business sectors in York
- the 21 ward profiles

The platform is also the place where Local Government Transparency Code related information is published, such as members' allowances or payments to suppliers.

The datasets are presented under different formats such as geospatial ones - that can be previewed on a map, or tablelike ones (ie csv, excel) that allow the viewer to filter and analyse the data. Most of them are shared under the OG license which entitles the users to make use of data freely in whichever way they want to.

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1. Identify the need for the PIA

1.1 Explain what the project aims to achieve.

The main aims for the YOD project are:

- Improve transparency and meet DCLG's transparency agenda
- Increase the amount of freely available data
- Improvement in data quality held by the council
- Efficiency in responding to FOI requests
- Support of developing new, data-driven technologies
- Support democracy and local governance involvement

1.2 What will the benefits of the project be to the organisation, to individuals and to other parties?

The benefits of the project are:

- Easy and free access to information for the public
- Efficient way of improving council's transparency
- Platform providing data feeds for potential open-market business opportunities
- Single point of CYC's data openly available to the public
- Improving data standardisation
- Improved information architecture and secured data sharing processes

1.3 Are there any other relevant documents related to the project, for example a project proposal?

Yes, some of them being:

Document	File path
Joint Fund Application Form - City of York Council	Internal
1311_CRD_CRI_DESLOC_FullApplicationVers2.0.0_38050-282201.v2	Internal
CASE FOR SUPPORT Final for Submission	Internal
CYC_YOD_UserGuide_v1.0	Internal

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1.4 Summarise why the need for a PIA was identified (this can draw on your answers to the screening questions).

- There is a potential for the project to collect limited personal information for users deciding to take advantage of “Contact Us” facilities within the platform.
- The users are potentially able to provide unrestricted amount of personal information through the “Contact Us” channel
- In specific circumstances of using the platform, the information about the IP address of the user may be collected.

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2. Describe the information flows

2.1 Describe the collection, use and deletion of personal data.

- The York Open Data platform enables users to get in touch with the council by filling in a “Contact Us” form within the Frequently Asked Questions section of the platform. (<https://www.yorkopendata.org/faqs/>) .
- The user can provide as much or as little amount of personal data as desired when making use of the “Contact Us” functionality. Once the user clicks “Send Message” an email gets sent to business.intelligence@york.gov.uk containing the data supplied by the user.
- A member of the Business Intelligence Hub (BIH) reads the email and either deals with it or forwards it to the relevant person and deletes it from the business.intelligence mailbox.
- The person dealing with the email decides whether a reply is suitable for the email or not. If it isn't then the person dealing with it deletes it. If a reply is deemed appropriate then the person dealing with the email replies to the user and then deletes it.

The legal basis for using personal information (Legal basis)

- The personal information is collected and used in accordance with the Data Protection Act 2018.

2.2 How many individuals are likely to be affected by the project?

Service area (data system)	Number of individuals affected
York Open Data	unknown

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3. Consultation requirements

3.1 Explain what practical steps you will take to ensure that you identify and address privacy risks.

The proposed solution includes secure channels to send and store the information.

Who should be consulted, internally and externally?

- Senior Managers in the Business Intelligence Hub
- Information Governance,
- Information and Communication Technology teams (including Domain Services, Database Team, Support Desk),
- External partners (where necessary)

3.2 How will you carry out the consultation?

The following governance boards will provide oversight during development:

- Business Intelligence Information Architecture Board

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4. Identify the privacy and related risks and the solutions

4.1 Identify the key privacy risks and the associated compliance and corporate risks.

- The privacy risks associated with the project are minimal as the data shared is aimed to be depersonalised. The only circumstances where data can include personal information are those where “Contact Us” channel is used.

4.2 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).

- Personal information received via the “Contact Us” not to be shared or forwarded without a particular need.
- Keep a history of list of recipients of the messages coming through “Contact Us”

4.3 Who is responsible for integrating the PIA outcomes back into the project plan and updating any project management paperwork?

Responsibility for integrating the PIA outcomes into the YOD project paperwork will be undertaken by the Business Intelligence team including:

- Ian Cunningham (Head of Business Intelligence)
- Claudia Rodriguez-Nuno (Senior Business Intelligence Officer)

4.4 Who has approved the privacy risks involved in the project?

Ian Cunningham (Head of Business Intelligence)

4.5 What solutions need to be implemented?

None apart from already existing ones

4.6 Who is responsible for implementing the solutions that have been approved?

n/a

4.7 Who is the contact for any privacy concerns which may arise in the future?

- Ian Cunningham (Head of Business Intelligence)

4.8 Date for completion of actions/solution(s)

n/a

YOD