Privacy Impact Assessment (PIA)
The SGC 'Privacy Impact Assessment Policy and Procedure' requires officers responsible for any change initiative (for example a new policy, process, procedure, project, IT system or procurement activity) to consider the privacy impact of that work. This template will support officers to consider privacy impacts and if necessary put in place solutions to address privacy issues.

Please contact the appropriate information asset owner/assistant as detailed in the information asset register
if you require any support in completing this template and to sign off solutions to privacy risks.

Initiative name	Library service universal offer to primary age children		
Responsible Officer	Martin Burton	Information Asset Owner	Andrew Best
Version and date	V1 20.1 .22		

The following screening questions will identify if a privacy impact assessment (PIA) is required. Answering 'yes' to any question will require a PIA to be completed. You may expand on the answers as work progresses.

No	Question	No	Yes	Comments
1	Will the initiative involve the collection of new information about individuals?	N		Data is already held by CAH
2	Will the initiative compel individuals to provide information about themselves?		Y	As above
3	Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information? NB. This includes individuals who have previously accessed information but now work for a different organisation.	N?		The data is already by South Gloucestershire Council, it is an internal transfer of data

Names of children and school will be used by a card production company to produce the cards and batch by school |
4	Will you be using information about individuals for a purpose it is not currently used for, or in a way it is not currently used?		Y	The data is used by CAH to know who is registered at schools
5	Does the initiative involve you using new technology which might be perceived as being privacy intrusive? For example, the use of biometrics or facial recognition.	N		
6	Will the initiative result in you making decisions or taking action against individuals in ways which can have a significant impact on them?	N		
7	Is the information about individuals of a kind particularly likely to raise privacy concerns or expectations? For example, health records, criminal records or other information that people would consider to be particularly private.	N		
8	Will the initiative require you to contact individuals in ways which they may find intrusive i.e. invasive, indiscreet, interfering or upsetting?	N		

If all questions have been answered 'no' a copy of this document should be retained in accordance with our records retention policies and as the initiative develops reference made to the screening questions in

case any answers change to 'yes'. If any question has been answered 'yes' please continue to complete the rest of this template.

Letter to parents (see Step Two)

Dear Parent / Carer,

Encouraging children to read for pleasure is a key part of their school journey and research shows that reading for pleasure plays a significant role in improving children's life chances and opportunities. We are also aware of the negative impact the Covid-19 lockdowns have had on many children's literacy, learning and wellbeing.

To support all children in South Gloucestershire to develop a love of reading and have free access to books, South Gloucestershire Libraries are working with all primary schools in South Gloucestershire over the next 4 years to give every primary school aged child a library card. Each year, children in Reception and Year 6 classes will be automatically registered with the library service and given a library card. In order to meet the immediate needs of younger children, this year children in Year 1 will also be included.

It is free to join the library and borrow books and children do not pay any charges on overdue books.

In June your child will be registered to use the library and given a library card at school for them to take home. This means that you do not have to apply for a card for your child. Don't worry if your child already has a South Gloucestershire library card, once your child receives their new library card, you can drop the old one back to any South Gloucestershire Library the next time you visit.

We take our use of data very seriously and have carried out a full data protection assessment of this project, if you wish to see the Privacy Impact Assessment and the Legitimate Interest Assessment please go to XXXX website . The data (your child's name, address, age, school and gender) will only be shared within the Library Service. Only your child's name and school will be shared with the company we are using the print the cards with your child's name. If you do NOT want your child to have a library card then please email librariest@southglos.gov.uk phone 01454 86…. or call into any South Gloucestershire Library and we will ensure that we do not join them to the library service.

If you have any questions about this process or want to know more about the library then please drop into any South Gloucestershire Library, contact us on 01454 86….. or go to our FAQs page on the website

We will be contacting you again in a couple of weeks to tell you more about the Summer Reading Challenge and other exciting opportunities for your child.

Your faithfully,

South Gloucestershire Libraries

Step one – Identify the need for a PIA

Initiative outline	We want to process data to enable us to join all primary school children (and rising 5s) to the Summer Reading Challenge (including library membership) as an entitlement.
Note – explain what the initiative aims to achieve, what the benefits will be to the organisation, to individuals and to other parties. You may find this information in management reports, committee papers, a project mandate, brief or PiD.	Children will be engaged via schools to borrow books and receive prizes, medal & certificate to encourage them to read for pleasure over the summer holidays. This links in with a wider school engagement programme across the full year.
	Reading for pleasure is linked to improved life chances for children and those who read regularly from an early age are more likely to attend tertiary education, have professional employment, earn more and be an active and engaged resident.
	The need is even greater this year where children have missed significant amounts of schooling due to the pandemic.
	Studies have shown that children from more disadvantaged backgrounds are likely to have had less access to books and are more likely to have had extended screen time. By engaging all children in the challenge we are ensuring that those from families who feel a barrier towards library usage or engaging with books are not disadvantaged and all children have equal access to the challenge.
	No third parties will benefit from the processing of this data.
	The impact for not processing this data would be significant. Children would be disadvantaged by not being able to become library members and all the benefits this entails, not processing the data would also create inequality of access amongst their peers. Not being a library member would exclude children from taking part in the Summer Reading Challenge and the personal, societal and educational benefits thereof.
	We know from experience that more vulnerable children within our communities are less likely to have parental involvement.
	A pilot authority (Newham) ran a a similar scheme, whereby 100% of pupils from 23 schools became library members through a secure data transfer and took part in the Challenge. Subsequently during school visits in the summer term all children were able to borrow a library book and begin their Summer Reading Challenge, creating a sense of excitement around reading and all children being given equal access.

Why is a PIA required? *Note – this can draw on your answers to the screening questions.*	The data is being used within South Gloucestershire Council for a purpose not previously used

Step two – Describe the information flows

Information flows *Note – describe how personal information is collected, stored, used and deleted explaining what information is used and what is it used for and who has access to it. It may also be useful to refer to process diagrams or another way of explaining data flows. To obtain a full understanding of information flows it is important that you consider all of the following information:* • *How many individuals will be affected?* • *How information is collected?* • *Why is information collected?* • *How will the information be stored?* • *For how long will the information be stored?* • *Where has information come from?* • *Who will have access to the information?* • *How will information be deleted?* • *Can analysis or reporting of anonymised data sets identify an individual?* • *Can combining various sets of data result in the identification of an individual?* • *Potential risks with the information flow?* • *For use of existing data does the consent form/s used to collect the original data, and the associated privacy notices, cover the use of the data being considered by the initiative.*	Information flow 1. CAH hold data collected through / with schools (25,000 children) this is used to record who is registered at South Gloucestershire schools, record attainment etc 2. Data is held on a secure database as per CAH school data regulations 3. Data is transferred to LibrariesWest consortium which operates the Library Management System (LMS) . the data is held for as long as a child is a member and continues to use the service, if the membership is not used for three years the data is deleted . All library staff will have access to the information in line with the data use for libraries The following data will be used • Name of child • Name of parent • Date of birth • Address • Gender • School 4. Names of children and school are supplied to the card production company -transfer agreement agreed. 5. Library cards are sent to the library service 6. The library service delivers to schools for distribution to pupils This information is proportionate to purpose. We require forename and surname as each library record pertains solely to the individual, through which they can be identified. Addresses are required so that individuals can be contacted by the library service and we require date of birth to ensure that individuals are borrowing age appropriate materials. We are collecting gender and ethnicity data to demonstrate that we are reaching a wider demographic and to inform our work around targeting sub sections of the community from evidence gathered. Anonymised data regarding ethnicity and gender is submitted to The Reading Agency, a national

charity responsible for the Summer Reading Challenge to inform their research around the pattern of reading across the country. Reports using anonymised reports will be run on how many children have used the library with the new cards by age, geographical area (Local Super Output area) and school.

Reports will not identify any particular child

Without this data we are unable to join children to the library or to the Summer Reading Challenge and as outlined in our previous response the positive impacts of children being given equal access to books and reading significantly improves their well-being and life outcomes.

The findings of a study, conducted by University College London, shows that reading for pleasure has lasting implications not just for children's literacy, but also beyond into vocabulary, maths and their wider cognitive development. In fact, reading for pleasure is more important for children's cognitive development than their parents' level of education and is a more powerful factor in life achievement than socio-economic background.

We are not able to achieve our purpose without the processing due to lack of engagement from schools and parents and as demonstrated we are processing the minimum of data required for engagement and statistical purposes.

Risk of data flow

Transfer of data to company for printing of cards – we will ensure that we adhere to a secure method of transfer and the company has a policy in place for the storage and destruction of data.

The data will be transferred securely to the library service from within the Council by the CAH Education Team It is uploaded to the library management system by the systems coordinator.

Our intended purpose and method is widely understood, the majority of people understand what a library is, how it works and why personal data is required to create library memberships. Children are brought into the library through a year long engagement programme and are often in a position where they can help to inform parents who may be unfamiliar with the process.

We are undertaking an innovative project as we will be reaching a wider group of children who might not have had access to the library or the Summer Reading Challenge previously. We are part of a national pilot scheme by the Reading Agency which will encourage access to the library

and the Summer Reading Challenge as an entitlement for all rather than a privilege for those children whose parents understand the benefits of reading.

Expectations from the Reading Agency are that we are able to provide statistics around gender and ethnicity of participants to inform further research.

Impact

The impact of the processing is likely to be positive. Children will have access to all the benefits of being a member of the library which includes borrowing books and AV and digital resources as well as use of public computers. As a library service we understand that not all parents and children will engage fully and that following an initial visit organised through the school that some children may not re-engage, resulting in books not being returned.

As a library service we are prepared to accept these losses off-set by the benefits of more children being given access to the service.

We also appreciate that parents might be concerned about receiving notification from the council and a request for payment of lost and non-returned items. We no longer charge of non-return of books, damage of children books or late returns, this will be explained to parents

Individuals will not lose any control over their personal data as they can ask for their library record to be deleted and this information will be given to parents in initial communications.

We do not consider that there will be any negative impact on children having access to the library.

Some parents may object to the processing of their child's data and find it intrusive, however they will be given the option to opt out of the process. The data we are collecting and processing is minimal and considering that a large percentage of the population have a library card proves that the information required for a library record is not considered intrusive or irrelevant by the majority.

In fact it is a standard process which is part of a long-standing tradition of library membership. As a service we do not receive complaints about data required for this purpose.

	We would be happy to explain this process through letters sent out to all parents, providing an email contact for them to ask any questions and through other routes including information to teachers via CAH and appearances South Gloucestershire wide head teacher meetings. Safeguards adopted to minimise risk include the folder where the data is held is only accessible to council officers preparing and uploading the data to the library management system. Any staff member accessing the library management system would need to be fully trained The system also has a time out function so that data cannot be seen when not in use.
Advice sought and consultation *Note – explain what practical steps you will take to ensure that you identify and address privacy risks. Who needs to provide advice? Who should be consulted, internally and externally? How will you obtain advice and carry out consultation?*	The scheme is based on similar schemes run in 10 authorities in the UK including Newcastle, Jersey and Newham. Feedback from these authorities demonstrated that there were no complaints form parents on the use of the data. The scheme is supported by the DCMS and Arts Council England. These local authorised use of the data under the Legitimate Interest clause of data processing

Step three – identify the privacy related risks

Note – identify the key privacy risks and the associated legislative compliance and corporate risks. Corporate and compliance risks identified should be referred to the Information Asset Owner.

Annex 1 provides an extract from the ICO's code of practice to help you identify where there is a risk that the initiative will fail to comply with the Data Protection Act or other relevant legislation, for example the Human Rights Act.

	Consequence		
Privacy risk/ issue	**Identify risks to individuals**	**Identify legislative compliance risks**	**Identify associated organisation/ corporate risk**
Storage and transfer of data	Potential access to data by unauthorised personnel	Data breach	Potential prosecution

Step four – identify privacy solutions

Note – describe the action you could take to reduce risks, and any future steps which would be necessary (e.g. the production of new guidance or future security testing for systems).

You will need to score the privacy risk by multiplying the impact of the risk happening (1-3) by the likelihood of the risk happening (1-3) using the key shown in the table below. Once you have identified the solutions (mitigating actions/ opportunities) to manage or mitigate the privacy risk you need to calculate the residual score. Any privacy risk with a residual score of 6 or more should be considered high risk by the Information Asset Owner.

	Impact (I)	Likelihood (L)	Score (S)
1	No or slight impact	Unlikely to happen	
2	Significant impact	Possible to happen	I x L
3	Major impact	Highly likely to happen	

Further guidance is available on the insurance, risk and opportunity management intranet site

Ref	The Risk What can happen and how it can happen	Consequence / benefit of event happening	Inherent Risk			Mitigating Actions / Opportunities	Residual Score			Further Action Required	Risk Owner	Open/ closed
			I	L	S		I	L	S			

Ref	The Risk What can happen and how it can happen	Consequence / benefit of event happening	Inherent Risk			Mitigating Actions / Opportunities	Residual Score			Further Action Required	Risk Owner	Open/ closed
			I	L	S		I	L	S			
1	Unauthorised access to data	Misuse of data	2	1	2	Data will be secured by being held in a folder on the South Gloucestershire system only accessible by chosen members of staff who work directly on the project or within the services (CAH / Library) The information will be saved as an excel document to a secure folder, on the South Gloucestershire network, accessible only by staff directly involved in the upload process. The data will also have a password on it.	1	1	1		MB	

Ref	The Risk What can happen and how it can happen	Consequence / benefit of event happening	Inherent Risk			Mitigating Actions / Opportunities	Residual Score			Further Action Required	Risk Owner	Open/ closed
			I	L	S		I	L	S			
	Transfer of data to 1. Card company 2.Liibrarieswest (Library system)	Data is not transferred securely ad is accessed by unauthorised persons	3	2	6	Secure methods of transfer will be used to include use of password protected files, separate communication of password, ensure all parties have data protection systems in place For LibrariesWest Once the data has been amended into the specific format required for upload to the Library Management system, a dedicated member of staff will follow the steps (outlined below) in order to upload the data.	3	1	3		MB	

Step five – sign off and record the PIA outcomes

Note – who has approved the privacy risks and solutions involved in this initiative? Who is responsible for implementing approved solutions?				
Risk	Approved solution	Approved by whom and date	Who is responsible for implementing the solution?	Date implemented

Step six – Integrate the PIA outcomes back into the key documentation

Note – key documentation must be updated with PIA approved solutions.

Approved solution (mitigating actions/ opportunities)	PiD (yes/no - date)	Project plan (yes/no - date)	Risk/ issue log (yes/no - date)	Action/ decision log (yes/no- date)	Comms/ consultation plan (yes/no - date)	EQIA (yes/ no - date)	Consultation report (yes/no -date)	Committee/ decision report (yes/no - date)	Information Asset Register

> **Principles of the Data Protection Act**
>
> This annex provides an extract from the Information Commissioner's Office 'Conducting Privacy Impact Assessments code of practice' to help you identify where there is a risk that the initiative will fail to comply with the Data Protection Act or other relevant legislation, for example the Human Rights Act. The principles listed are those set out in Schedule 1 of the Data Protection Act with italic notes explaining the information you need to consider.
>
> NB - The wording refers to projects using a broad definition and for the purposes of conducting a PIA should be applied to any initiative.

Annex 1

Principle 1
Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless:
a) at least one of the conditions in Schedule 2 is met, and
b) in the case of sensitive personal data, at least one of the conditions in Schedule 3 is also met.
Have you identified the purpose of the project?
How will individuals be told about the use of their personal data?
Do you need to amend your privacy notices?
Have you established which conditions for processing apply?
If you are relying on consent to process personal data, how will this be collected and what will you do if it is withheld or withdrawn?
If your organisation is subject to the Human Rights Act, you also need to consider:
Will your actions interfere with the right to privacy under Article 8?
Have you identified the social need and aims of the project?
Are your actions a proportionate response to the social need?

Principle 2
Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.
Does your project plan cover all of the purposes for processing personal data?
Have potential new purposes been identified as the scope of the project expands?

Principle 3

Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.

Is the information you are using of good enough quality for the purposes it is used for?

Which personal data could you not use, without compromising the needs of the project?

Principle 4

Personal data shall be accurate and, where necessary, kept up to date.

If you are procuring new software does it allow you to amend data when necessary?

How are you ensuring that personal data obtained from individuals or other organisations is accurate?

Principle 5

Personal data processed for any purpose or purposes shall not be kept for longer than necessary for that purpose or those purposes.

What retention periods are suitable for the personal data you will be processing?

Are you procuring software which will allow you to delete information in line with your retention periods?

Principle 6

Personal data shall be processed in accordance with the rights of data subjects under this Act.

Will the systems you are putting in place allow you to respond to subject access requests more easily?

If the project involves marketing, have you got a procedure for individuals to opt out of their information being used for that purpose?

Principle 7

Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.

Do any new systems provide protection against the security risks you have identified?

What training and instructions are necessary to ensure that staff know how to operate a new system securely?

Principle 8

Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country of territory ensures and adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

Will the project require you to transfer data outside of the EEA?

If you will be making transfers, how will you ensure that the data is adequately protected?