

Report to:	QSMTM
Report by:	Claire Stephen, Acting Head of Policy and Communication
Meeting Date:	Tuesday 13 September 2022
Subject/ Title: (and VC no)	CR: New Website DPIA (VC174797)
Attached Papers (title and VC no)	DPIA VC161859

Purpose of report

1. To seek SMT approval of the new website DPIA and agree the publication recommendations are set out in paragraph 19.

Recommendation and actions

2. It is recommended that SMT:
 - (i) approves the DPIA,
 - (ii) agrees the publication recommendations in the final paragraph of this report.

Executive summary

3. The SMT agreed the business case for the development of a new website (see VC156720 and VC156873 respectively). A new website was required due to:
 - (i) The decommissioning of platform and content management system (Active Edition)
 - (ii) A number of accessibility issues constituting a disproportionate burden to address via the legacy system.
4. Since then, a DPIA related to the new website project was drafted and shared with the, HOCS, GDPR WP and the DPO. The DPOs comments were as follows:
 - (i) the DPIA is comprehensive in its terms and has been well prepared.
 - (ii) agreed that the risk to processing is low and or the most part the personal data is restricted to that of the SMT in terms of business requirements and in the interests of transparency
 - (iii) noted that a data minimisation approach was adopted, which is consistent with the purposes of processing
 - (iv) whilst website analytics will be process IP addresses this will not result in the identification of individuals and, in any event, we are moving to GA4, which will not store IP addresses.
 - (v) for personal data being processed, privacy notices are in place.
 - (vi) noted that provision has been made for individual rights requests in terms of the UK GDPR and the website (and corresponding DPIA) will be kept under review.

5. These comments have now been incorporated into the final DPIA and SMT approval is now needed. The DPIA will remain a living document.

Risk impact

6. Our Website is our core communication tool to:
 - (i) promote FOI rights
 - (ii) meet statutory obligations (publication scheme duty)
 - (iii) engage with public/practitioners
7. The effective implementation of UK GDPR and data protection requirements ensures that there are relevant policies and procedures in place, including policies and procedures relating to information governance, data incidents, subject access, HR Governance and privacy by design.
8. This DPIA documents and accounts for the use of personal data on our website. This documentation and the approach taken to the use of personal data in/on our new website evidences that operational risks are mitigated as far as possible.
9. Throughout the design of the new website, we adopted a data minimisation principle, this in and of itself, mitigates any risk associated with the incorrect/inappropriate use or loss of personal data.

Equalities impact

10. There is no direct impact arising from this report.

Privacy impact

11. The DPIA gives further detail about the privacy impacts of the project.
12. In summary, as long as the appropriate measures are taken as outlined in the DPIA, data processing can be minimised and individuals' privacy rights protected.

Resources impact

13. Resource for the implementation of Phase 1 of the new website was accounted for in 2021-22 budget.
14. Further ongoing human resource required to periodically review the content of this DPIA as website functionality is altered/developed.

Operational/ strategic plan impact

15. As our primary communication tool, the successful implementation of the website phase 1 project is directly associated with the following operational objectives:
- (i) BAU IAP 2 and 7
 - (ii) BAU IRM 7
 - (iii) BAU CEP 8 and 9
16. It is anticipated that the project will be carried forward into the new operational plan for 2022-23 and will meet similar objectives.

Records management impact (including any key documents actions)

17. None

Consultation and Communication

18. The Head of Corporate Services, the GDPR Working Party and the Commissioner's DPO has been consulted in the production of this DPIA.

Publication

19. I recommend that this committee report and the DPIA are published in full.