



Data Protection Impact Assessment (DPIA)

This template must be used to record your DPIA process and outcome. It follows the process set out in our [DPIA Guidance](#), both should be read together.

Start to fill out the template at the beginning of any project/process involving the use of personal data, or if you are making a significant change to an existing process. Integrate the final outcomes back into your project plan.

STEP 1: Identify the need for a DPIA

Explain broadly what the project aims to achieve and what type of processing it involves. You may find it helpful to refer or link to other documents, such as a project proposal. Summarise why you identified the need for a DPIA.

The Scottish Fire and Rescue Service (SFRS) is legally required to prepare a Strategic Plan every three years. Consultation of the draft Plan with key stakeholders is a statutory requirement of the Strategic Plan development process.

In order to gauge the views of stakeholders, the public and our staff an online questionnaire will be utilised.

The consultation questionnaire will follow the main structure of the Strategic Plan and respondents will be invited to give answers to specific questions. The opportunity will also be available to provide reasons for their answers, allowing a more in depth analysis to take place.

The questionnaire will be downloadable and hard copies may be posted out to meet specific respondent's requirements if requested. Hard copies will be returned directly to the Planning and Performance Team to ensure confidentiality.

In order to fully analyse the results received, some personal information will be requested to allow us to identify any data trends. Personal data will also be requested to enable a receipt of response or to enable feedback to any queries received.

The questionnaire will be clear that SFRS is subject to the provisions of the Freedom of Information (Scotland) Act 2002 and would therefore have to consider any request made to it under the Act for information relating to responses made to this

consultation exercise.

Additionally, respondents will be required to give express permission for their comments to be published. It will be made clear that any such comments will be published anonymously.

Respondents will also be given the opportunity to comment on how we have conducted the consultation exercise. This will provide us with Stakeholder's views on what worked well and what could be improved to help inform future exercises.

STEP 2: Describe the processing

Describe the nature of the processing:

- how you collect the data;
- how you use the data;
- who you share the data with;
- retention periods;
- whether you are using any new technologies;
- which screening criteria you flagged as likely high risk
- how you store the data;
- who has access to the data;
- whether you use any processors;
- security measures;
- whether you are using any novel types of processing;

Data will be collected via the online platform Citizen Space and via hard copy questionnaire that will be returned to the Planning and Performance Office at the West Service Delivery Area HQ. Hard copy information received will then be input into Citizen Space too allow all feedback to be reported on. Any paper forms will be destroyed once input into Citizen Space. Personal data such as name, email address, IP address and unique reference number will not be saved as this is not required for analytical purposes.

The data will be saved in Citizen Space. Only four Service administrators have access to the CitizenSpace software.

Any analytical work using the data will be exported to an excel spreadsheet and saved on a secure server that can only be accessed by the Performance and Strategic Planning Manager and the Planning and Performance Officer.

Any reports submitted to management or published on our communication platforms will be entirely anonymous. This includes redacting any identifying personal information within free text responses.

Any personal information provided will be destroyed within three months of the end of the consultation.

The data will be used to inform the next Strategic Plan. All reports on the feedback received will be anonymised.

Describe the scope of the processing:

- nature of personal data;
- sensitivity of the personal data;
- duration of the processing;
- geographical area covered
- volume & variety of the personal data;
- extent and frequency of the processing;
- number of data subjects involved;

The questionnaire will ask the following information:

Categories of personal data:

- Name (optional)
- Email address (optional)
- Organisation, group or team name
- Local authority area
- IP address (system generated)
- Unique response identifier (system generated)

Special categories of personal data (Optional):

- Age
- Gender / gender identity
- Disability
- Caring responsibilities
- Care experienced
- Ethnicity
- Sexual Orientation
- Religion or belief

Special categories of personal data is requested to determine if our consultation is fair and inclusive and there is a satisfactory level of engagement across protected characteristic groups. The provision of this information is optional. However, the Privacy Notice will make it clear that if this information is provided, consent has been provided for us to use this information.

The data will be collected over a period of 10 weeks. It will then be processed for a further four weeks.

The data will be collected from all over Scotland.

As this is a public consultation exercise, it is impossible to anticipate how many responses will be received.

Describe the context of the processing:

- Nature of your relationship with the individual;
- Extent to which individuals are likely to expect the processing;
- Are there prior concerns over this type of processing or security flaws;
- Current issues of public concern;
- Whether you comply with GDPR codes of or GDPR certification schemes;
- Any previous experience of this type of processing
- Extent to which individuals have control over their data;
- Do they include children or other vulnerable groups;
- Relevant advances in technology or security;
- Source of the data;
- Have you considered & complied with relevant codes of practice;

The information will come from members of the public, external stakeholders and staff. All respondents will be provided with:

- Privacy Policy – a link to Citizen Space’s Privacy Policy is available from every page of CitizenSpace.
- Data Protection Impact Assessment – a full impact assessment has been completed and will be published on CitizenSpace, available from the landing page housing the consultation material.
- Privacy Notice – a Privacy Notice, that clearly states how personal information will be managed, has been completed and will be published on CitizenSpace, available from the landing page housing the consultation material.
- Privacy Statement – text within the survey will clearly states what will happen with respondent’s comments:

“Scottish Fire and Rescue Service (SFRS) is committed to protecting your privacy when you use our services. The Strategic Plan Consultation Privacy Notice explains how we use information about you and how we protect your privacy.

The survey is a way of finding out your views about our draft Strategic Plan and the objectives we propose carrying out between 2019 and 22.

The data collected within the survey will be protected in line with the General Data Protection Regulations and Data Protection Act 2018.

Your participation in this is entirely voluntary and you can withdraw at any time.

We believe there are no known risks associated with this consultation; however, as with any online related activity the risk of a breach is always possible. To the best of our ability your answers in this survey will remain confidential and we will minimise any risks.

If you have any queries in relation to your personal data please contact SFRS.GDPR@firescotland.gov.uk

- For the benefit of staff, further information about the anonymity of the survey and how information will be used will be included in a range of internal communications methods including SFRS News articles and iHub articles.

All respondents will have full control over the data supplied as they will be providing it themselves via CitizenSpace.

Describe the purposes of the processing:

- your legitimate interests, where relevant;
- intended outcome for individuals;
- expected benefits for you or for society as a whole

The Strategic Plan Consultation exercise will provide stakeholders with an opportunity to express their points of view on our proposed plans which cover the next three years.

The consultation exercise encourages participation and involvement in our decision making processes and facilitates open dialogue which will strengthen the voice of communities, our partners and the public.

Providing a mechanism for stakeholders, the public and staff to contribute to our Strategic Plan – the Plan that guides everything that we do within the community - helps to foster transparency, trust, involvement and an understanding in our business.

STEP 3: Consultation process

Consider how to consult with relevant stakeholders: describe when and how you will seek individuals' views – or justify why it's not appropriate to do so. Who else do you need to involve within your organisation? Do you need to ask your processors to assist? Do you plan to consult information security experts, or any other experts?

The question set of the consultation exercise has been developed and agreed by the cross-representative Strategic Plan Working Group.

The Information Governance Team will also be consulted on the content of the questionnaire.

STEP 4: Assess necessity and proportionality

Describe compliance and proportionality measures, in particular:

- do your plans achieve your purpose;
- is there any other reasonable way to achieve the same result;
- lawful basis for the processing;
- how you will prevent function creep;

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|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none">• how you intend to ensure data quality;• how you intend to provide privacy information to individuals;• measures to ensure your processors comply. | <ul style="list-style-type: none">• how you intend to ensure data minimisation;• how you implement & support individuals rights;• safeguards for international transfers; |
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The basis for processing your personal data is that we have a legitimate interest in being able to determine if our plans are reflective of your expectations so that services can be provided appropriate to your needs.

SFRS employees are asked to identify themselves as employees to enable the collation of staff specific issues so that action can be taken as appropriate.

The system collates IP address information. This is intended to assist us in identifying suspicious responses, such as in the case of automated submissions, duplicate submissions, or where inappropriate content has been submitted.

Each participant who submits a response in Citizen Space is given a unique ID for that response. This ID is *response specific*, not user-specific, meaning that every response is given an ID not each respondent. This is designed to track and find formal submissions.

Special categories of personal data is requested to determine if our consultation is fair and inclusive and there is a satisfactory level of engagement across protected characteristic groups.

This covered under the Data Protection Laws:

Condition for processing personal data Article 6(a) and (f)

- (a) Individual has given clear consent to process the information by completing the survey.

Condition for processing special category data Article 9(2)(a)

- (a) The data subject has given explicit consent to the processing of the data by completing the survey.

The data provided will be contained in the Citizen Space system which can only be accessed by four Service administrators.

STEP 5: Identify and assess risks

Describe the source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary.	Likelihood of harm	Severity of harm	Overall risk
	Remote, possible or probable	Minimal, significant or severe	Low, medium or high
<ul style="list-style-type: none"> • Inability to exercise rights (including but not limited to privacy rights); • Inability to access services or opportunities; • Loss or control over the use of personal data; • Discrimination; • Identity theft or fraud; • Financial loss; • Reputational damage; • Physical harm; • Loss of confidentiality; • Re-identification of pseudonymised data; • Any other significant economic or social disadvantage. 	Remote	Minimal	Low
	Remote	Minimal	Low

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You must make an ‘objective assessment’ of the risks. You might find it helpful to use a structured matrix to think about likelihood and severity of risks – see [DPIA Guidance](#) (section 2.16).

STEP 6: Identify measures to reduce risk

Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 5.

Risk	Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved
		Eliminated, reduced or accepted	Low, medium or high	Yes/No

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STEP 7: Sign off and record outcomes

Item	Name/date	Notes
Measures approved by:		Integrate actions back into project plan, with date and responsibility for completion
Residual risks approved by:		If accepting any residual high risk, consult the ICO before going ahead
Info Gov Manager advice provided:		Info Gov Manager should advise on compliance, step 6 measures and whether processing can proceed
Summary of Info Gov Manager advice:		
Info Gov Manager advice accepted or overruled by:		If overruled, you must explain your reasons
Comments:		

NOT PROTECTIVELY MARKED

Consultation responses reviewed by:		If your decision departs from individuals' views, you must explain your reasons
Comments:		
This DPIA will be kept under review by:		The Info Gov Manager should also review ongoing compliance with DPIA