

Annex A

DoH DATA PROTECTION IMPACT ASSESSMENT SCREENING EXERCISE

Please read chapter 4 of accompanying guidance before completing this exercise

Project Name: Consultation on Prototype Regional Obesity Management Service (ROMS)

Business Area:

**Elective Care and Cancer Policy
Directorate**

Branch: ROMS Team

1. PROJECT SUMMARY

The Department of Health is consulting on its plans to introduce a prototype Regional Obesity Management Service (ROMS) in Northern Ireland. It is intended that this will include the provision of both preventative measures and active multidisciplinary weight loss strategies, including, where appropriate, bariatric surgery (weight loss surgery). The key objective of the ROMS is to achieve a significant risk reduction in the burden of obesity-related co-morbidities among the group of patients targeted in the service. It is intended that this will be achieved by facilitating significant and sustained weight reduction in the individuals and improvement in their long-term health. This will initially be introduced as a prototype model for a period of two years, at which point an evaluation will take place, with a view to further expansion.

2. STAKEHOLDERS

A range of stakeholders were involved in the development work taken forward by the Department in 2019. This included clinical representation across a range of professions, as well as individuals with lived experience. Further engagement with stakeholders has taken place in 2023 during the preparation of this consultation paper. The public consultation will likely result in responses from individual stakeholders such as doctors, nurses, mental health professionals, allied health professionals, people with lived experience and carers, as well as representative organisations, charities and professional bodies.

3. BRIEF DESCRIPTION OF PERSONAL DATA INVOLVED

Personal data held will be the names and email addresses of those who respond to the consultation. This will likely include individuals responding in their professional roles, individuals responding on behalf of stakeholder organisations/bodies, and also individuals responding in a private capacity.

There is also the potential to receive consultation responses from individuals with lived experience who, in doing so, may choose to disclose information regarding their personal experiences. However, while this will serve to provide useful context to their response, the personal data provided will not be used elsewhere, specifically referenced or published. All personal data will be securely stored in accordance with Data Protection requirements.

4. PRIVACY ASSESSMENT

Use this checklist to assess the project for privacy risks. The questions below will help you consider whether a DPIA is necessary.

| (i) Does the project/activity involve any of the following high risk processing? | Yes | No | If yes, explain your response |
|--|--------------------------|-------------------------------------|-------------------------------|
| Systematic or extensive profiling, evaluation or scoring | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| Large scale processing of sensitive data | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| Systematic monitoring of individuals | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| Use of new technology or novel use of existing technology | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| Denial of an individuals' access to a service | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| Profiling of individuals on a large scale | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| Processing of biometric data | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| Processing of genetic data | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| Processing of sensitive data or data of a highly personal nature | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| Combining, comparing or matching data obtained from multiple sources | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| Invisible processing | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |

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|---|--------------------------|-------------------------------------|--------------------------------------|
| Tracking geolocation or behaviour | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| Targeting of children or other vulnerable individuals | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| Risk of physical harm | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| If you answer yes to any of the questions in section 4 (i) above, it is likely that a DPIA will be automatically required. Consult the DoH Data Protection Officer for further advice. | | | |
| (ii) Does the project involve any of the following? | Yes | No | If yes, explain your response |
| Automated decision-making with a legal or similar significant effect. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| Processing of data on a large scale. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| A change to an existing policy, process or system that involves personal data (e.g. new legislation or policy that makes it compulsory to collect or disclose information). | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| A change in location of a business area or branch (e.g. plans to centralise a service or an office move). | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| A practice or activity that is listed on a risk register (e.g. activities listed on your business area's risk register or health and safety register). | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| Collecting new information about an individual (e.g. gathering information about an individuals' location). | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| A new way of gathering personal information (e.g. collecting information online rather than on paper forms). | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| A change in the way personal information is stored or secured (e.g. cloud storage). | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| A change to how sensitive personal information is managed (e.g. moving health records to a new database). | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |

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|--|--------------------------|-------------------------------------|--|
| Transferring personal information offshore (e.g. using a cloud based application to store data). | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| A decision to retain personal information for longer than previously kept (e.g. keeping information for 10 years when you previously only held it for 7). | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| Using information classed as 'special category data' (e.g. information about an individual's health). | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| Using personal data already held for a new purpose (e.g. to obtain customer profiles). | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| Disclosing information to a third party (e.g. following a request from a law enforcement agency to provide information for a particular purpose). | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| Sharing or matching personal information held by different organisations or in different datasets (e.g. combining data with other information held on systems or sharing information to enable organisations to provide services jointly). | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| A change in policy that results in people having less access to information that you hold about them (e.g. archiving documents after 6 months into a facility from which they cannot be easily retrieved). | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| Establishing a new way of identifying individuals (e.g. a unique identifier, a biometric, or online identity system). | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| Introducing a new system for searching individuals' property, persons or premises (e.g. adopting a new policy of searching data on mobile phones that have been returned for upgrading). | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |

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|--|--------------------------|-------------------------------------|--|
| Surveillance, tracking or monitoring of movements, behaviour or communications (e.g. installing a new CCTV system or monitoring a member of staff's email account). | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| Changes to premises impacting on private spaces where clients/staff may discuss personal data (e.g. changing the location of a reception desk where people may disclose personal details or relocating a branch where sensitive personal data is processed). | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| New regulatory requirements that could lead to compliance action against individuals on the basis of information about them (e.g. adding a new medical condition to the requirements of a licence). | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| Other privacy intrusions such as body searches, or intrusion into physical space. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |

Additional Comments/Notes

5. INITIAL RISK ASSESSMENT

If you answered 'Yes' to any of the questions in section 4, use the table below to give a rating - either Low (L), Medium (M), or High (H) – to each of the aspects of the project set out in the first column. If you answered 'No' to all the questions in section 4, move on to section 6.

| Aspect of the Project | Rating (L, M or H) | |
|---------------------------------|--|--------------------------|
| Level of personal data handling | L – Minimal personal information will be handled | <input type="checkbox"/> |
| | M – A moderate amount of personal information (or information that could become personal information) will be handled | <input type="checkbox"/> |
| | H – A significant amount of personal information (or information that could become personal information) will be handled | <input type="checkbox"/> |
| Sensitivity of information | L – The information is not sensitive | <input type="checkbox"/> |
| | M – The information may be considered to be, or may become, sensitive | <input type="checkbox"/> |
| | H – The information is highly sensitive | <input type="checkbox"/> |
| Significance of the changes | L – Only minor change to existing functions/activities | <input type="checkbox"/> |
| | M – Substantial change to existing functions/activities; or a new initiative | <input type="checkbox"/> |
| | H – Major overhaul of existing functions/activities; or a new initiative that's significantly different | <input type="checkbox"/> |
| Interaction with third parties | L – No interaction with other agencies | <input type="checkbox"/> |
| | M – Interaction with one or two other agencies | <input type="checkbox"/> |
| | H – Extensive cross-agency (government) interaction or cross-sectional (non-government and government) interaction | <input type="checkbox"/> |
| Public impact | L – Minimal impact on the organisation and individuals | <input type="checkbox"/> |
| | M – Some impact on individuals is likely due to changes to the handling of personal information; or the changes may raise public concern | <input type="checkbox"/> |
| | H – High impact on individuals and the wider public; concerns over aspects of project or negative media interest is likely. | <input type="checkbox"/> |

6. SUMMARY OF PRIVACY IMPACT

The privacy impact for this project has been assessed as:

| | |
|---|-------------------------------------|
| Low – There is little or no personal information involved; or the use of personal information is uncontroversial; or the risk of harm eventuating is negligible; or the change is minor and something that the individuals concerned would expect; or risks are fully mitigated. | <input checked="" type="checkbox"/> |
| Medium* – Some personal information is involved, and several low to medium risks have been identified | <input type="checkbox"/> |
| High* – Sensitive personal information is involved, and several medium to high risks have been identified | <input type="checkbox"/> |
| Reduced risk – The project will lessen existing privacy risks | <input type="checkbox"/> |
| Inadequate information – More information and analysis is needed to fully assess the privacy impact of the project. | <input type="checkbox"/> |

Briefly summarise reasons for the rating given

While some personal information will be held it is unlikely that it will be a significant amount or sensitive in nature. The expectation is that we will hold only names and contact details which have been freely given by the people involved.

*** If you have assessed the privacy impact as medium or high, a DPIA must be carried out.**

7. RECOMMENDATION

A full data protection impact assessment **is** required

A full data protection impact assessment **is not** required

Reasons

The Privacy impact for this consultation has been assessed as low risk.

8. SIGN OFF

Project Manager

Name: Taryn McKeen

Date: 20/10/2023

Signed:

Taryn McKeen

Senior Responsible Owner/Information Asset Owner

Name: Catriona O'Connor

Date: 24/10/2023

Signed:

Catriona O'Connor