By answering this question you will understand:

1. if you are allowed to collect information
2. the process for collecting information on behalf of Hackney Council

**We are all responsible**

It is your responsibility to ensure that:

1. you have been given an appropriate privacy notice when collecting information.
2. that you record information accurately.
3. that you only record the information that is relevant to your work.

**Telling people why you are asking for that information and what you will do with it**

This applies however you are collecting the information: on the phone, in person or online. This also applies if, for example, you wear a body camera in the course of your work or are responsible for monitoring people’s movements.

1. You should be given a privacy notice by your manager, to read out to the person you are speaking to, or to publish online prior to collecting information.
2. Privacy notices must be:
   1. concise, transparent and easy to hear or read
   2. written in clear and plain language, particularly if addressed to a child
   3. free (you can’t charge a fee to the person from whom you are collecting the information, for them to access the privacy notice)

You do not need to obtain evidence (for example through a tick box) that the user has read or understood the privacy information.

**Example of a privacy notice**

This is an example of a privacy notice:

The Council will use personal data about you for the enforcement of parking and traffic contraventions and other compatible purposes.

This may be collected from you, or from other organisations. If the data is obtained from other organisations, this is done in accordance with data protection legislation.

You can read more information about this, and also about your Data Protection rights in line with the provisions of the General Data Protection Regulations and Data Protection Act 2018 by going to<https://www.hackney.gov.uk/privacy>. This includes how to contact the Data Protection Officer, how long your information is held, and how we process your personal information. Printed copies of the Council’s Privacy Notices can be provided on request.

The Council will:

* use personal data about you for the purpose of performing any of its statutory duties or public tasks.
* make any disclosures required by law and may also share this information, both across council departments and with other local authorities and government organisations.
* check information you have provided, or information about you that someone else has provided, with other information it holds.

The Council will not give information about you to anyone else, or use information about you for other purposes, unless the law allows this.

**If you need to collect more information**

You need to ensure that you consider privacy at the initial design stages and throughout the development process of any new products, processes or services that involve processing personal information. You will also need to think about any services you deliver with a third party, for example if they are moving their platform or otherwise changing the way they process information.

A Privacy Impact Assessment (PIA), also known as a Data Protection Impact Assessment, is a tool that must be used for projects meeting a certain threshold.

Even if your project doesn’t meet the threshold to require a PIA, you should still build privacy and security into the design and implementation.

The Council has a three step process for gathering information.

It’s important you understand this process because there are serious implications for you and the Council.

#### **Step 1: Check - are you collecting new information?**

Perhaps this information is already available from a colleague. If so, can you justify why you need to have access?

If the information you need to collect isn’t available elsewhere, how much information do you really need to ask people to provide?

#### **Step 2: Ensure that a Privacy Impact Assessment is carried out.**

There is a short set of screening questions that will indicate whether you need to do a full PIA. If you do, it is not a form filling exercise but is a consultation process that identifies and reduces privacy risks. It includes the following steps:

* identify the need for a PIA
* describe the information flows
* identify the privacy and related risks
* identify and evaluate the privacy solutions
* consult with internal and external stakeholders as needed throughout the process

#### **Step 3: The outcomes of the PIA must be recorded and signed off, and integrated into the project plan.**

Contact dataprotection@hackney.gov.uk if you need any advice about this.

**Accessing information**

As well as collecting information, you should also use this opportunity to make sure you are accessing existing information in the most appropriate way.

Check to see if you are able to access information that you no longer require. Perhaps you used to have a different job and still have access to databases that you no longer need. Maybe you managed someone who no longer works with you, but you can still see their HR record?

If in doubt, ask your Manager whether you need access, and how to have your access withdrawn if necessary.

If in doubt, you should contact the information owner, for example HR, and ask them to remove your access rights. You can always request to have access reinstated at a later date, if appropriate.

Tasks

**Basic**

Think of a service or project where you have to gather personal information.

Describe 3 things you will check before gathering that information.

**Intermediate**

Describe an example of the type of information you might still have access to, but no longer need.

**Advanced**

What do you need to do, if you think you need to collect additional information?

Name the assessment you will need to undertake.