Data Protection Impact Assessment

Data Protection Impact Assessments (DPIAs) help determine if a project is high risk. DPIAs aim to identify and minimise the risks of a project or process in relation to processing personal data.

When done properly, it demonstrates how the organisation complies with its data protection obligations.

The DPIA should be completed in the first instance by the person most familiar with the data processing activity before being provided to the Data Governance Officer of the Controller Department for review and submission to the DPU. If the person completing the form does not have all of the information necessary to answer the questions, they should consult with other relevant departments or suppliers to obtain that information.

Please see the Data Protection Toolkit webpages for details of the process for completing the DPIA or contact the DPU (dpu@gov.je) if you have any questions.

DPIA Ref (for DPU use only)	DPIA 262.2023
Process/Project Name:	St Johns Road Trial Scheme
Controller Department (Lead Dept that determines use of the data):	IE
Other Controller Departments involved (if applicable)	
Lead Data Governance Officer (Name and Dept):	[redacted], I&E
Other DGOs involved (if applicable):	
Project Lead/Manager (where applicable):	[redacted]
Person completing form (If different to above)	[redacted]
Date on which processing will commence:	02/10/2023
Data Classification (see here for further details)	✓ Official ☐ Official - sensitive ☐ Secret ☐ Top Secret
Associated DPIA(s) (if relevant)	

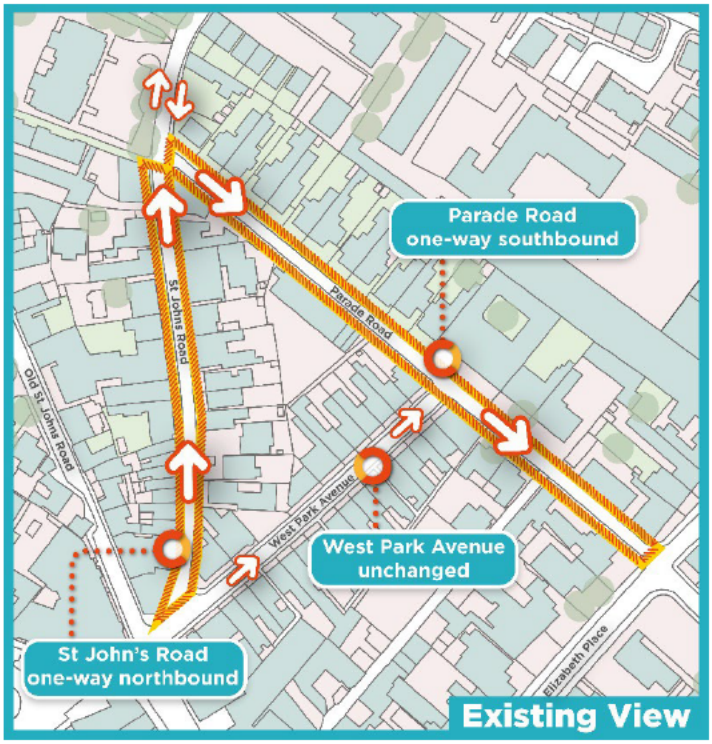
1 DPIA SCREENER

1.1 Project Overview

Explain broadly what the project will entail and how it will use personal data

Purpose of the scheme and data processing activities

A 3 month one-way road trial is to take place on the southern section of St Johns Road and the surrounding area including Parade Road to make the area safer for residents and pedestrians (more info: www.gov.je/stjohnsroad).



GoJ I&E Transport will organise the following:

- **An online survey** to assess all road user behaviour in this area before and during this traffic rerouting trial. The online engagement survey platform will be hosted on the Government of Jersey Citizen Space hub. WSP (external consultant) have generated the survey questions and will be analysing the results. The questions have been split into two surveys a "Pre-Trial Survey" and a "Post-Trial Survey" – this is to gain public feedback on the usage (environment and experience) before and after the 3 month one way road trial.
- **Air quality monitoring**. The GoJ Natural Environment Water and Air Team will install two Clarity air quality monitors on 4th October on Parade Road and at Helvetia School. The data will be collected before, during and after the 3 month one-way road trial. This data will be analysed and reported on by Ricardo Energy & Environment.
- **Specialist AI Road Space User equipment** will be installed. VivaCity Labs Ltd will install 6 x AI sensors which process blurred-at-source video data locally on the device, and only transmits anonymised traffic data.

Data collection timeframe. Data will be undertaken for the following periods:

- Baseline ("Pre-Trial" or "before" data) – prior to 30 October 2023
- Pilot - 30 October for 3 months
- Post-trial ("after" data) – approx. 5 February 2024 onwards

The AI sensor data will be collected 24/7 for the full week covering a typical weekday and a weekend day (Saturday or Sunday).

Survey

- Baseline Survey

GoJ (I&E) will host the questionnaire on their online survey platform - CitizenSpace.

It is proposed that a postcard letterdrop is completed for directly-impacted residents, providing a link to the online survey (& QR code), detailing the period the survey is running until, and providing the DFI@gov.je email contact.

In addition to the online survey, paper copies will be made available (on request) for those not online or unable to complete online.

- Post Pilot Survey

In addition to the Baseline survey, to be undertaken prior to the pilot scheme implementation period, a further survey will be undertaken during or after the pilot scheme to determine how respondents feel and if views have altered as a result of the scheme.

The survey will identify if there is support for the scheme to be implemented permanently in the future. Questions for this post pilot survey are set out beside the baseline survey questions below to show how they will align, enable analysis and direct comparisons.

The questions being asked in both surveys can be found below.

<table>
<tr><th>Baseline survey</th><th>Post pilot survey</th></tr>
<tr><td>1. As a resident, which of the following best describes you?
▪ St Johns Road resident
▪ Parade Road resident
▪ Old St John's Road resident
▪ Westmount Road resident

▪ Elizabeth Lane resident
▪ Roussel Street resident
▪ Roussel Mews resident
▪ Undercliffe Road resident
▪ West Park Avenue resident

▪ Wider St Helier resident
▪ Resident from another parish
▪ Visitor to the area
▪ Other (free text)</td><td>▪ [redacted]</td></tr>
<tr><td>2. Please confirm your comments are your own personal opinion and you are not responding on behalf of an organisation or group. These will be captured separately by invitation.
▪ I confirm I am providing my own personal opinion.</td><td>▪ [redacted]</td></tr>
<tr><td>3. How do you currently travel in and around the St John's Road and Parade Road area?
<table><tr><td></td><td>How do you travel most often in and around the St John's Road and Parade Road area?</td><td>Which other sorts of transport have you used to travel in and around the St John's Road and Parade Road</td></tr></table></td><td>▪ [redacted]</td></tr>
</table>

	Please tick ONE box only.	area in the last few months? Please tick as many as apply.
Walk (including scooting and skateboarding)		
Cycle (including E-Bike)		
Car driver		
Car passenger		
Bus/coach		
Motorcycle/scooter		
Taxi		
Van or goods vehicle		
Mobility aid (i.e., wheelchair or mobility scooter)		
Don't use		
Other (Please write in)		

4. Based upon your current experience (past few weeks), please score **St John's Road** from zero to 10 (10 is best):

- [Contextual] - Overall, how satisfied are you with the street today?
- How safe do you feel travelling on this street?
- [People feel relaxed] How would you rate the quality of the pavements on this street, thinking about the pavement width, pavement surface and pavement obstructions?
- [Clean Air] - How clean do you think the air on the street is today?
- [People feel safe] How intimidated do you feel by the traffic on this street?
- [Not too noisy] How noisy are you finding this street today?
- [Easy to cross] How easy do you think it is to cross this street?
- [Things to see and do] How attractive do you find this street?
- How enjoyable are you finding being on this street?
- How clean and free from litter, dog mess and other rubbish do you find this street?
- How would you rate the trees, plants, and green spaces on this street?
- How would you rate the provision of vehicle parking on this street?

- [redacted]

4. [redacted]

5. Based upon your current experience (past few weeks), please score **Parade Road** from zero to 10 (10 is best): ▪ [Contextual] - Overall, how satisfied are you with the street today? ▪ How safe do you feel travelling on this street? ▪ [People feel relaxed] How would you rate the quality of the pavements on this street, thinking about the pavement width, pavement surface and pavement obstructions? ▪ [Clean Air] - How clean do you think the air on the street is today? ▪ [People feel safe] How intimidated do you feel by the traffic on this street? ▪ [Not too noisy] How noisy are you finding this street today? ▪ [Easy to cross] How easy do you think it is to cross this street? ▪ [Shade & shelter] How easy do you think it would be for you to find shelter, for example, if it was very sunny or raining? ▪ [Places to stop and rest] How easy do you think it would be for you to find somewhere to sit or rest on this street if you needed to? ▪ [Things to see and do] How attractive do you find this street? ▪ How enjoyable are you finding being on this street? ▪ How clean and free from litter, dog mess and other rubbish do you find this street? ▪ How would you rate the trees, plants, and green spaces on this street? ▪ How would you rate the provision of vehicle parking on this street?	▪ [redacted]
6. Proposals For more information on the pilot scheme, please visit: www.gov.je/stjohnsroad	▪ [redacted]
7. Overall, do you think the pilot scheme will provide an improvement: ▪ Strongly Agree ▪ Agree ▪ Neither Agree/Disagree ▪ Disagree ▪ Strongly Disagree	6. [redacted]
8. Which features of the proposals are important to you? Please tick all that apply. ▪ Having a better balance between vehicle traffic, pedestrians, and cyclists ▪ Less dominant to traffic ▪ Improving cycling facilities to make it easier, safer, and more appealing to cycle within and through the area ▪ Improving pedestrian facilities to make it easier, safer, and more appealing to walk within and through the area	7. [redacted]

▪ Reducing vehicle speeds ▪ Maintaining parking on Parade Road ▪ Creating a street environment that is accessible and inclusive for all individuals ▪ None of these ▪ Other (free text)	[redacted]
9. Do you feel the proposals will encourage you to change the way you travel? ▪ Walk or cycle more ▪ Walk or cycle less ▪ Take public transport more ▪ Take public transport less ▪ Drive more ▪ Drive less	8. [redacted]
10. Are there any elements of the pilot scheme that you would like to comment on? Free text box (200 words)	▪ [redacted]
11. About you ▪ Organisation or group name (if applicable) ▪ Postcode - this data is to identify the areas respondents are from, not to identify individuals (required)	▪ [redacted]

The Diversity Monitoring questions below are **optional.** They will be applicable to both the Baseline and Post Pilot surveys, and they will be included after the above questions.

Diversity Monitoring

The Government of Jersey would like to ask these questions about personal characteristics (age, cultural and ethnic background, gender, health and mobility conditions) to make sure we're hearing a diversity of voices for this scheme. If respondents choose to answer these questions, the responses will be completely anonymous.

The I&E Transport Projects team is collecting this anonymous data and will share it with GoJ Cabinet Office Policy team. WSP will also see this anonymous data to analyse travel patterns and to make sure we are including everyone's needs when it comes to transport infrastructure and design. These diversity questions are asked via the GoJ Citizenspace platform. The CitizenSpace privacy policy can be found here. Once downloaded, the data will be stored in the associated GoJ Transport Projects secure job file. The data will be deleted after 10 years by the Project Lead. All reporting of this data will be anonymous and will not identify any individual.

Should we include this next statement prior to the diversity questions?

This questionnaire is based on protected characteristics defined in the Discrimination (Jersey) Law 2013 and is compliant with the Data Protection Law (Jersey) 2018. By completing this questionnaire, you are consenting for your data to be used to generate anonymous statistical reports on diversity in responses to government consultations. Click here for the Government of Jersey's privacy notice.

1. Do you want to respond to the diversity monitoring questionnaire?

- Yes
- No

[If yes to the above question >]

2. What is your age group?

- Under 16
- 16 – 24

- 25 – 34
- 35 – 44
- 45 – 54
- 55 – 64
- 65 – 74
- 75 – 84
- 85+

3. What is your cultural and ethnic background?

- White
- Jersey
- British
- Irish
- French
- Polish
- Portuguese
- Romanian
- South African
- Other White background
- Black, Black British or Black Jersey
- Caribbean
- African
- Latin American
- Black British/Jersey
- Other Black background
- Asian, Asian British or Asian Jersey
- Indian
- Thai
- Chinese
- Asian British/Jersey
- Other Asian background
- Mixed race
- Asian and Black
- Black and White
- White and Asian
- Other mixed background

4. What is your sex?

- Male
- Female
- Prefer not to say

5. Is your gender the same as the sex you were registered at birth?

- Yes
- No
- Prefer not to say

6. Do you have any physical or mental health conditions or illnesses lasting or expected to last 12 months or more?

- Yes
- No
- Prefer not to say

7. Do any of your conditions or illnesses reduce your ability to carry out day-to-day activities?

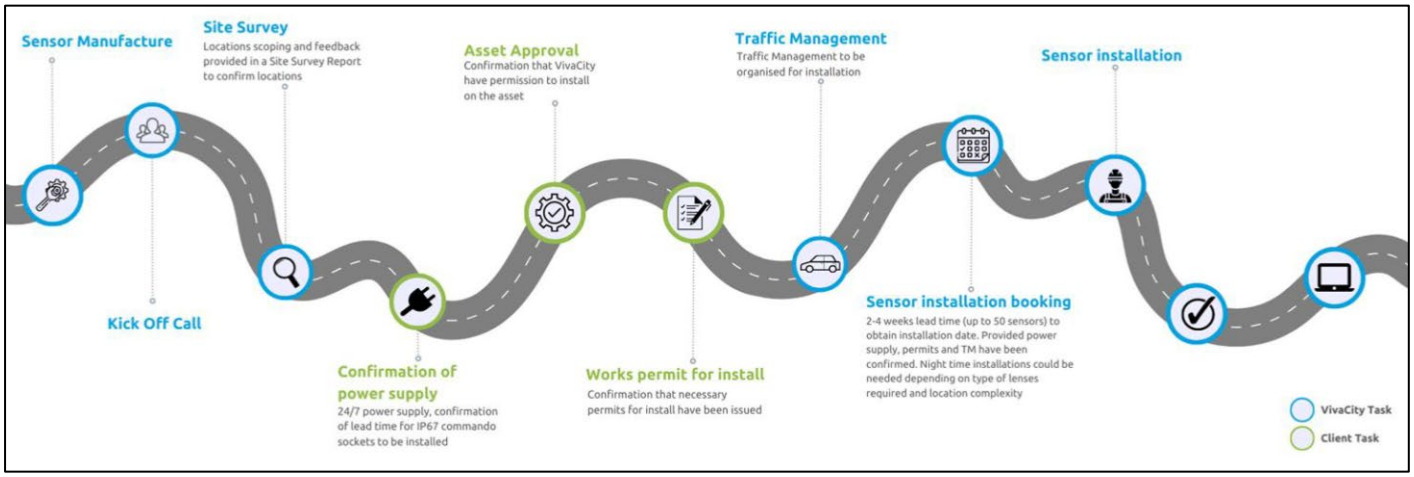
- A lot
- A little
- Not much

Air quality monitoring. The GoJ Natural Environment Water and Air Team will install two Clarity air quality monitors on 4th October on Parade Road and at Helvetia School. The air quality data will be collected before, during and after the 3 month one-way road trial. This data will be analysed and reported on by Ricardo Energy & Environment.

Specialist AI Road Space User equipment - VivaCity

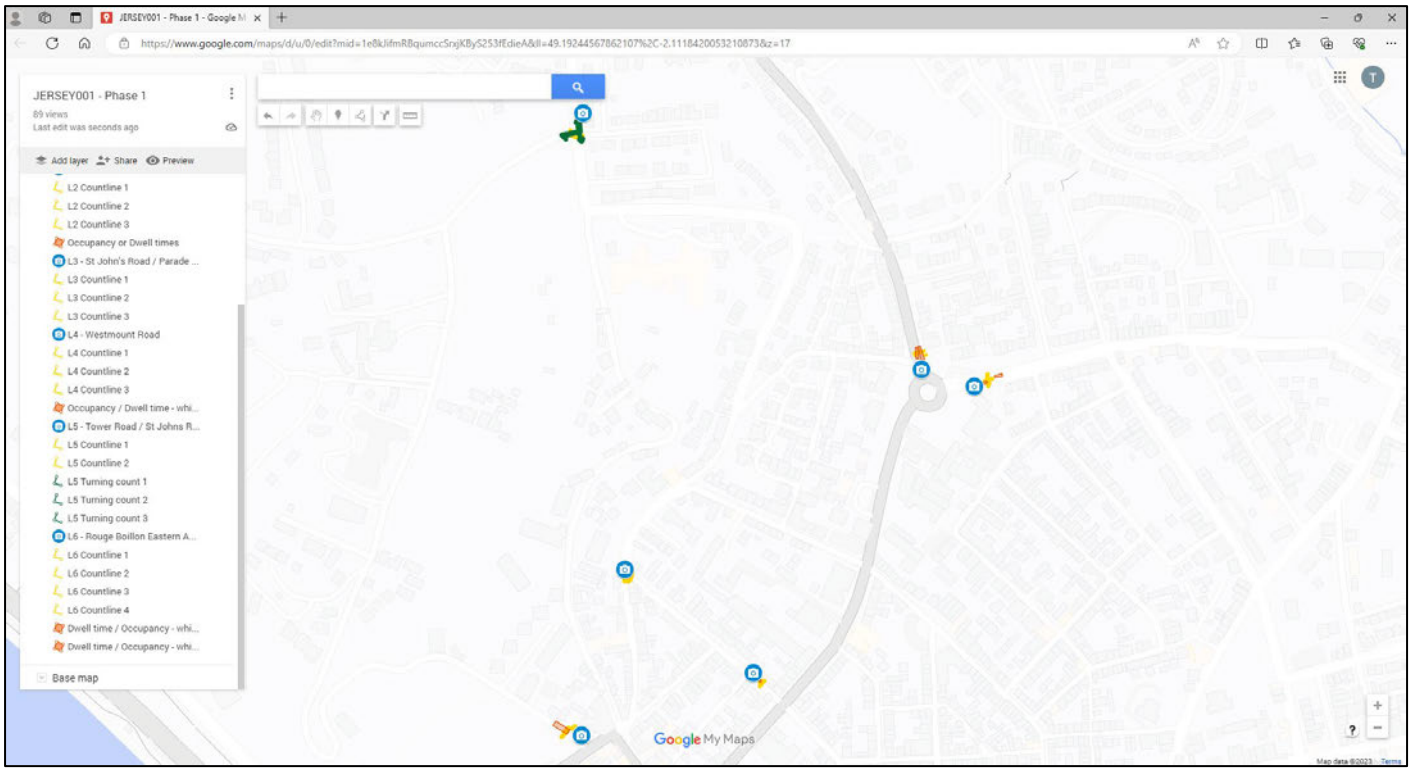
Six AI sensors are to be purchased by I&E from VivaCity Labs Ltd. They will be installed and maintained by VivaCity for a 12 month duration after which they will become an asset. The sensors are required to look at the effects of a new one way system on traffic flows and congestion around St Helier. The data collected will assist with classified traffic counts, vehicle and pedestrian tracks, occupancy and turning counts.

The process involved is shown below.



A small amount of validation footage will be sent to ensure the device is set up correctly, however this will be blurred at source automatically by the device to remove faces / registration plates. VivaCity AI sensors are GDPR compliant and do not store images or stream CCTV. Each sensor is fitted with a sticker as shown.

At present the proposed locations for data capture are as below:



For further information the VivaCity data protection team have sent a detailed DPIA (attached).

More information on the AI sensors can be found on the link: Welcome (vivacitylabs.com)

Number of individuals impacted (approx.)	1000

Identify the data subjects (check all that apply):			
☐	Employee Candidates	✓	General Public
☐	Employees	☐	Children
☐	Former Employees	☐	Vulnerable groups (e.g. elderly, prisoners, individuals with mental health issues)
☐	Suppliers including Contractors		
☐	Other (explain)		

1.2 Types of Data

What types of Personal Data will you be processing (check all that apply)			
☐	**Contact details** such as name, postal address, email address or telephone number	☐	**Online Identifiers** such as a unique personal identifier, online identifier, internet protocol address, account name.
☐	**Professional or employment-related information** such as their job role, employment history, work contact details, employer.	☐	**Internet or other electronic network activity information**, including, browsing history, search history, and information regarding a consumer's interaction with an internet website, application, or advertisement
☐	**Business data** such as business name or business contact details	✓	**Location/ geographic data**
☐	**Official Identity Information** such as a social security number, Taxpayer Identification Number (TIN), driver's license number, passport number, or other similar.	☐	**Inferences** drawn from any of the information identified above to create a profile about a person
☐	**Financial details** such as bank account number, credit card number, debit card number, or any other financial information	☐	**Sensitive information** such as adoption records, safeguarding issues, complaints or investigations, or where departments receive information anonymously from 3rd parties
☐	**Public Service information**, such as records of an individual's property, benefits or services provided, obtained, or considered, or other Government record histories or communications.		
✓	**Other** (explain)	A small quantity of Quality Assurance imagery may be transmitted containing blurred images of pedestrians / motor vehicles. Face blurring and licence plate blurring technology will be used.	

Will you be processing any of the following special category data?			
☐	Race	☐	Genetic Data
x	Ethnic origin	☐	Biometric Data
☐	Political opinions	☐	Sex life
☐	Religion	x	Health
☐	Philosophical beliefs	☐	Criminal Record
☐	Trade Union membership	☐	Alleged criminal activity
x	Other (explain)	Gender (optional). All opt-in questions.	

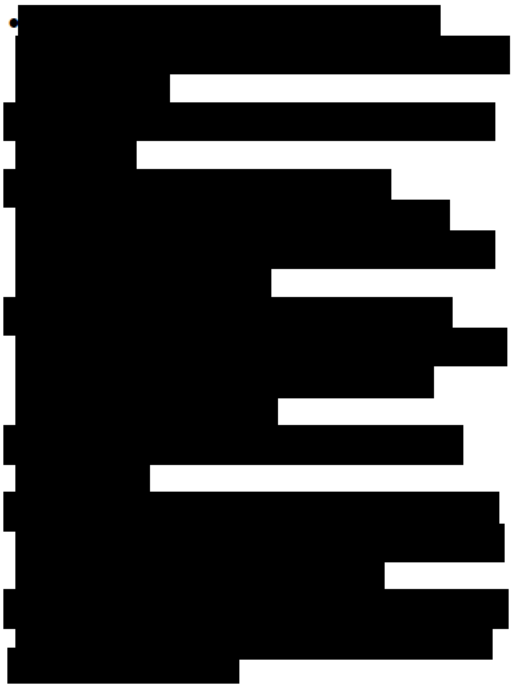
1.3 Data Flow

Describe the flow of data internally and to/from other parties (e.g. in-house and third-party service providers). Include a data flow diagram that details data input, output, retention and processing.
Surveys There are six free text boxes that do ask people to submit any further comment they have in relation to the scheme and there is always the risk that customers will put data in there that could identify them. If this happens, identifiable personal data will be redacted from any final reports.

Pre-Trial Engagement Survey

Post-Trial Engagement Survey

- GoJ to send a postcard to all directly-impacted addresses containing a link to the online survey
- GoJ CitizenSpace consultation hub to host the survey
- Results will be downloaded from CitizenSpace and stored on password-protected I&E Transport Projects server in the correct project file
- WSP (external consultant) will analyse anonymous results that will be shared with them via a secure SharePoint limited access file or via email.
- WSP UK & Ireland Privacy Policy can be found here.
- Results will be summarised and presented to the public in report format with a link to be published on a GoJ webpage.
- Any identifiable personal data entered into free text answer boxes will be redacted in any final reports.



If any personal data is inadvertently provided as part of the questionnaire responses, I&E will redact the information where required before questionnaire responses are shared with the public.

Any person wishing to address/obtain further details on this scheme will be advised to write/email into the I&E Transport Department using the DFI@gov.je email address or the Government of Jersey postal address as below:

Infrastructure and Environment,
Operations and Transport,
Beresford House,
St Helier,
Jersey,
JE2 3JX.

The Government of Jersey will act in accordance with Transport and Highway's Privacy Policy and Retention Schedule: Transport and Highways' privacy policy and retention schedule (gov.je)

Air Quality Monitoring

The sensors will detect Nitrogen Dioxide (NO_2) and Particulate Matter ($PM_{2.5}$ and PM_{10}). Ricardo (external consultant) will collect available air quality data from the Clarity web dashboard for quality checking and processing by our team of analysts. Sensor status' will be checked for faults regularly on the dashboard and local operators will be informed of any issues.

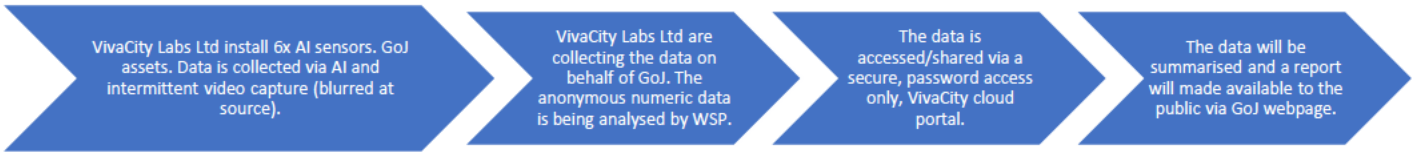
Following the completion of the monitoring phase, data will be ratified by Ricardo's expert data team to best practice Quality Assurance/Quality Control standards applicable to indicative AQ sensor data. This includes utilising any available co-location data to ensure accurate data scaling and correction as well as screening time series for spurious data and comparison against other data sources.

Ricardo are committed to respecting privacy and complying with data privacy regulations, such as The General Data Protection Regulation (GDPR) (Regulation EU 2016/679) and their privacy policy can be found here.

Specialist AI Road Space User equipment - VivaCity

Onsite AI sensors with cameras (GoJ (IE) Asset) transmit anonymised numeric data to Vivacity Portal which is then shared with WSP UK for analysis and returned to GoJ (IE) as data and a report.

WSP UK will delete data once project is complete. WSP UK & Ireland Privacy Policy can be found here.



VivaCity Privacy & Cookies - VivaCity (vivacitylabs.com)

1.4 Screening

Consult with your DGO to complete this section.

The following statements will help determine whether a DPIA is necessary for your project (check all that apply):

	CATEGORY A (See the EPDB guidelines here for further details);	**Yes / No**	**If 'Yes' then please provide further details**
1.	**Profiling:** The project will involve a systematic and extensive evaluation of personal aspects relating to natural persons that is based on automated processing, and on which decisions are based that produce legal effects concerning, or similarly significantly affecting, those persons. *E.g. analysing or predicting aspects concerning performance at work, economic situation, health, personal preferences or interests, reliability or behaviour, location or movements, in order to create or use personal profiles* (See Art 16 DPJL);	no	
2.	**Publicly Accessible Places:** The project will systematically monitor a publicly accessible place on a large scale (See Art 16 DPJL);	yes	The sensors will be in publicly accessible places, however only anonymised traffic data will be recorded.
3.	**Large-scale use of Special Category Data**: The project will process special category data or criminal offence data on a large scale (See Art 16 DPJL);	no	
4.	**Evaluation or scoring**: The project will involve evaluation or scoring data subjects on the basis of their personal data including profiling and predicting behaviour. Especially from "aspects concerning the data subject's performance at work, economic situation, health, personal preferences or interests, reliability or behaviour, location or movements". *E.g. screening a data subject against a credit reference database or against an anti-money laundering and counter-terrorist financing (AML/CTF) or fraud database, or offering genetic tests directly to data subject in order to assess and predict the disease/health risks, or building behavioural or marketing profiles based on usage or navigation on its website.;*	no	
5.	**Automated decision making:** The project will result in automated decisions being made about data subjects which will have a legal or similar effect. *E.g. the processing may lead to the exclusion or discrimination against individuals.* Processing with little or no effect on individuals does not match this specific criterion;	no	

6.	**Systematic Monitoring:** The project will involve the systematic monitoring (including data collected through networks or "a systematic monitoring of a publicly accessible area") of data subjects such as by observing, monitoring or controlling data;	yes	This project will track road usage through the St Johns Road and Parade Road area, however the data produced will be anonymised numeric data.
7.	**Special Category or Sensitive Data:** The project will process sensitive data or data of a highly personal nature. For example, health records, criminal records, or other information that people would consider to be particularly private;	yes	Asking diversity and inclusion questions. Opt-in only.
8.	**Large Scale Data Processing:** The project will involve processing data on a large scale – this may be as a result of processing large quantities of personal data, processing personal data of large quantities of data subjects; processing for a particularly long time or processing across a large geographic area;	no	
9.	**Data matching:** The project will combine, compare or match data from two or more sources for different purposes and/or by different controllers in a that would exceed the reasonable expectations of the data subject. For example, data gathered directly from the data subject for the purpose of sending a newsletter is supplemented with information gathered by third parties in order to assess the data subject's interests and send them more targeted advertising;	no	
10.	**Vulnerable data subjects:** The project concerns the personal data of children or other vulnerable data subjects such as employees, more vulnerable segments of the population requiring special protection (mentally ill persons, asylum seekers, or the elderly, patients, etc.), and in any case where an imbalance in the relationship between the position of the data subject and the controller can be identified;	no	
11.	**Innovative Use or applying new technological or organisational solutions:** The project will use a new technology that involves a novel form of data collection and usage, possibly with a high risk to individuals' rights and freedoms. For example, combining use of fingerprint and face recognition for improved physical access control;	no	New technology but it does not use any personal identification data to generate the anonymous numeric data.
12.	**Prevention of right or service:** The project will prevent individuals from exercising a right or using a service or contract. For example, where a bank screens its customers against a credit reference database in order to decide whether to offer them a loan.	no	
13.	**Denial of Service:** The project will use profiling, automated decision-making or special category data to help make decisions on someone's access to a service, opportunity or benefit (see the ICO guidance on DPIAs here for further information);	no	

14.	**Targeting of children or other vulnerable individuals:** The project will process children's or other vulnerable individuals' personal data for profiling or automated decision-making or for marketing purposes, or offer online services directly to them (see the ICO guidance on DPIAs here for further information);	no	
15.	**Risk of physical harm**: where the processing is of such a nature that a personal data breach could jeopardise the physical health or safety of individuals (see the ICO guidance on DPIAs here for further information).	no	

CATEGORY B (see the ICO guidance on DPIAs here for further information)		Yes / No	If 'Yes' then please provide further details
1.	**Innovative technology:** The project will involve the use of innovative technologies, or the novel application of existing technologies (including AI).	yes	The sensors use AI to interpret traffic flows and create anonymous numeric data – this happens within the device so no raw data is transmitted.
2.	**Biometric or Genetic Data:** The project will process biometric or genetic data other than in the provision of health care direct to the data subject.	no	
3.	**Invisible processing**: The project will process personal data obtained from a third party without providing a privacy notice directly to the individual.	no	
4.	**Tracking:** The project will involve tracking an individual's geolocation or behaviour, including but not limited to the online environment.	yes	Not tracking for individual purposes. Generic.

CATEGORY C		Yes / No	If 'Yes' then please provide further details
1.	**New Data**: The project will involve the collection of new information about individuals.	yes	Yes. Opt-in survey questions only. We are not collecting information on specific individuals – all data is automatically anonymised and turned into numeric data.
2.	**Data Obligatory:** The project will compel individuals to provide information about themselves.	no	
3.	**Data Sharing:** Information about individuals will be disclosed to organizations or people who have not previously had routine access to the information.	no	Only anonymous and/or numeric information.
4.	**New Use**: You are using information about individuals for a purpose it is not currently used for, or in a way it is not currently used.	no	New technology (not about individuals)
5.	**Intrusive contact:** The project will require you to contact individuals in ways which they may find intrusive (for example, texting personal mobiles, cold calling or invitations to participate in surveys).	yes	A posted with a link to the online surveys will be sent to all directly-impacted residents to let them know there is a survey if they wish to take part.
6.	**Changes to existing processing**: The project involves making changes to the way personal information is obtained, recorded, transmitted, deleted, or held.	no	

1.5 Screening Assessment

Number of boxes marked "Yes" in Category A	3	If this is greater than 1, then you **must** carry out a full DPIA. If this is greater than 0, you should carry out a full DPIA unless you can justify the reasons for not carrying out a DPIA and the DPO agrees.
Number of boxes marked "Yes" in Category B	2	If this is greater than 0 AND Category A is greater than 0 **OR**, if this is greater than 1, then you **must** carry out a full DPIA
Number of boxes marked "Yes" in Category C	2	If this is greater than 0, it is recommended that a DPIA is completed unless you can justify the reasons for not carrying out a DPIA.

If you have marked just one of the Category B boxes, you should consult your Data Governance Officer in the first instance, or the Data Protection Unit (DPU@gov.ie) if you are still unsure, to establish whether a DPIA is required.

If you have not marked any of the boxes, you may still need to carry out a DPIA if you think that the processing is **likely to result in a high risk to the rights and freedoms of individuals**, taking into account the nature, scope, context and purposes of the processing.

If in doubt, please complete the DPIA screener and consult your Data Governance Officer in the first instance, or the Data Protection Unit if you are still unsure.

1.6 Screening Sign Off

The DGO should complete this section

Is a Full DPIA required?	Data Governance Officer Name
No	[redacted]
Summarise why you identified the need for a Full DPIA or the reason/justification if a Full DPIA is not required	
Full DPIA NOT required. Although we have three yesses on Cat A, two in Cat B and two in Cat C, the number of individuals impacted is considered minimal, and data being collected is all anonymised almost instantly. In regard to Special Category Data, it will also be anonymised and kept within Government.	
Date submitted to DPU	18/10/2023

The DPU Manager should complete this section

Escalation to DPO required?	No
Summary of DPU comments:	
Returned as Final 27/10/2023	
Date of last DPU review	DD/MM/YYYY

1.7 Actions Required

- **If a Full DPIA is required, please complete sections 2 and 3 below.**
- **If a Full DPIA is not required, please delete section 2 and 3 below and send to the DPU for logging.**
- **Even if a Full DPIA is not required, consider the points in 1.8 below**
- **If is not clear whether a Full DPIA is required or if the DGO has any concerns, please speak to the DPU about whether to escalate to the DPO**

The DGO should complete this section, if relevant

If escalated to DPO, please complete all subsequent rows		
Date submitted to DPO		
Summary of DPO advice (DPO to complete):		
DPO advice accepted or overruled?	**Accepted/Overruled**	
If overruled, you must explain your reasons below		

1.8 Other points to consider

Even if a full DPIA is not required, you should still consider whether the following actions may be necessary to ensure your processing is compliant with data protection laws and best practice.

		Yes / No	If 'Yes' then please provide further details
1.	The organisation will be using a new technology provider for the collecting, storing, or processing of personal data	No	
2.	The organisation will be using a new system with a current provider for the collecting, storing, or processing of personal data	No	
3.	There is a new data sharing initiative between Government of Jersey and/or a third-party that will result in the sharing of personal data sets as joint controller or controllers in common	No	
4.	Consent is required or will be requested for the processing activity	No	
5.	There is a specific law in place that requires the personal data to be collected for this processing activity	No	

Consider the following if any of the above apply		
Are any of boxes 1 – 3 marked "Yes"?	No	Review any Data Sharing Agreement (DSA) or Data Processing Agreement (DPA) to confirm they are appropriate / still valid. You may also need to complete the NSCC checklist available here.
Is box 4 marked "Yes"?	No	Confirm Consent practices are appropriate
Is box 5 marked "Yes"?	No	Investigate whether an Art. 18 DPIA was completed in relation to the law, which may already address whether the risks associated with the processing activity have been mitigated
For all contexts, please ensure you update the relevant Department Privacy Notices and ROPA		

2 FULL DPIA

2.1 Overview

For each of the Type of Personal Data ticked in 1.2 above, list the exact personal data involved. e.g. Contact Details - Name, address, telephone number; Official Identity Documents - Copy of passport, utility bill; Online Identifiers – IP address

For each Type of Personal Data identified, state the source of the data and how it will be collected? e.g. Contact Details - provided by the Data Subject, Official Identity Documents – provided by another GOJ dept, a Partner Agency/ third party (name them if possible); Online Identifiers – collected automatically through website.

What geographic area are the data subjects located in (e.g. UK, EU or Jersey only)?

If the project links with another processing activity or system that is covered under a separate DPIA, please describe the scope of this specific DPIA and list any associated processing that is out of scope and why.

Is the processing being carried out by a competent authority[1] for law enforcement purposes[2]?	Yes ☐ If yes, please complete Appendix 1 (available here) in addition to the sections below	No ☐

[1] See Schedule 1 of the DPJL for a list of competent authorities

[2] "law enforcement purpose" means any of the following purposes, namely the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including the safeguarding against, and the prevention of, threats to public security.

2.2 Describe the Processing

How will you use the personal data? List a purpose for each type of personal data collected identified under 1.1 E.g. Contact Details – to update individuals via email regarding the progress of their complaint; Official Identity Documents – to comply with legal obligation to validate identity of the individual	
Type of Data	Use

How will you store the personal data (including backups)? *Please consult with M&D if the data is being stored on a GOJ system or you are not sure how the data is being stored*

Will access to the personal data be restricted to certain personnel within the Department and, if so, how will this be controlled? If anyone outside the Department will have access, please detail these in section 2.4. below. *You can cross-refer to the relevant Roles-Based Access Control Procedure if applicable*

Where (in terms of systems and geography) will the personal data be collected, stored, accessed and transferred? Insert a diagram if it is easier. E.g. collected through the GOJ website in Jersey, stored on databased hosted by Microsoft Azure in the US, accessed by GOJ employees in Jersey, transferred to local drives on GOJ network in Jersey, shared with third party in the UK)	
Collected:	
Stored:	
Accessed:	
Transferred/Shared with:	

How long will the personal data be retained? If you can't specify an exact period of time, please detail how the retention period would be calculated (e.g. for the duration of the pandemic)

How will you delete the personal data if the data subject asks you to and when you no longer have use for it?

Will any personal data be passed to the archivist? If so, please state the trigger for archiving and which data will be archived.

2.3 Context of the Processing

How much control do data subjects have over how their data is processed? For example, is it optional to provide certain data or can they opt out of certain parts of the processing? If so, how is this control provided to data subjects?

Would data subjects expect their data to be used in this way?

Are there any concerns over this type of processing or apparent security concerns?

Are there any current issues of public concern to be taken into account? For example, would the processing involve sharing data with other Government entities that members of the public have previously expressed concern about or could the processing unfairly prejudice a certain part of the public (such as those who are not IT literate if the processing requires access to the internet or a smart phone).

2.4 Data Sharing

2.4.1 Internal Government Sharing

List all other Government of Jersey Department/entities(s) who will have access to or use the data and specify their role as one of the following: **- Controller (will determine the purpose and means of processing of the personal data that is shared with it);** **- Joint Controller (jointly with the Controller Department/entity determines the purpose and means of processing the personal data); or** **- Processor (processes the data on behalf of another Department/entity and does not use it for its own purposes)**			
Department/Entity	Controller/Joint Controller/Processor	Data to be shared/accessed	Method of transfer/access

Please describe the purpose for each sharing/access detailed above.

Please describe the data sharing procedures or data processing agreements that are in place with each of the Departments/entities listed above.

2.4.2 External Sharing

List all third parties (e.g. suppliers) who will have access to or use the data and specify their role as one of the following: **-Controller (will determine the purpose and means of processing of the personal data that is shared with it);** **- Joint Controller (jointly with the Government determines the purpose and means of processing the personal data); or** **- Processor (processes the data on behalf of the Government and does not use it for its own purposes)** **- Sub-processor (contracted by the Processor to provide some of the processing activities)**			
Supplier/Third Party	Controller/Joint Controller/Processor/Sub-processor	Data to be shared/accessed	Method of transfer/access

Please describe the purpose for each sharing/access to a Controller detailed above.

Please describe the data sharing procedures/agreements or data processing agreements that are in place (or will be prior to the processing taking place) with each of the third parties listed above.

Will any personal data be published on the Internet or in another media? If yes, please provide details.

2.4.3 International Transfers

Will the project require you to transfer (or permit access to) personal data outside of the EEA (including the UK)?	☐ Yes	☐ No (move to next section)
State the jurisdiction where the data will be transferred to/accessed from.		
Transfers outside the EEA can only be made where one of the following mechanisms is in place with the recipient. Please tick the relevant transfer mechanism as set out in the DPJL *(if processing for law enforcement purpose, please complete Appendix 1 instead of the below)* *Speak to your DGO if you are not sure which of these applies*		
Consent (specify details in section 2.9)	☐	
Adequacy Decision by the Commission[3]	☐	
Standard Contractual Clauses **(please indicate which version)**	☐ version: Directive 95/46 ☐ 2021 ☐	
Binding Corporate Rules	☐	
Public Authority MOU/Instrument	☐	
Certification/ Code of conduct	☐	
Derogation (please specify which of the exceptions in Schedule 3 of the DPJL apply)	☐	

[3] See here for a list of Countries deemed adequate

2.5 Fairness and Transparency

At the time that the processing activity begins, will the data use/processing be covered in the Controller Department's Privacy Notice? *Speak to your DGO if you are not sure*	Yes ☐	No ☐
If yes, please detail how the notice will be made available to data subjects (e.g. link to webpage).		
If no, please state why and explain how you will inform the Data Subjects of how their data will be used?		
If the current published privacy notice will need to be amended to cover the proposed processing activity, please append a tracked version of the privacy notice to the DPIA showing the intended changes.		

Will individuals be informed in any other ways about how their personal data will be used (e.g. with click through boxes, privacy statements, media campaigns, just in time notices)?

Do you envisage using the personal data for any other purpose in the future? If so, please provide details.

2.6 Accuracy

Are you able to update and amend personal data when necessary, after it has been collected and recorded? Please provide details.

Are you satisfied that the personal data processed is of good enough quality for the purposes proposed? If not, why not?

2.7 Necessity and Proportionality

Explain why the personal data needs to be used for the project. What are the benefits to the public? Include any relevant documentation links, as appropriate.

What are the benefits of the project:	
To the Data Subject *E.g. more objective or safer interactions, improved service or ease of use, more convenience or improved health and well-being.*	
To the public *E.g.* better/lower cost health care, environmental enhancements such as water conservation, energy cost reduction; infrastructure enhancements; economic improvement; more accessible/usable technology.	
To the Government *E.g. Enhanced public relationships, enhanced employee satisfaction; engagement and productivity; fraud prevention; enhanced or maintenance of cyber or physical security.*	

Is there another way to achieve the same outcome without processing the personal data? Please explain.

Is there any personal data that you wish to collect that is not strictly required for the purposes of the project? E.g. do you intend to collect postal addresses even though information will not be posted to individuals. If yes, please provide details.

Will the data be anonymized / pseudonymized at any stage in the processing? If so, please provide details. If not, please explain why not?

2.8 Lawful Basis

The DPJL includes a list of the lawful bases for which processing personal data is permitted. Please indicate with a cross below which basis applies to the processing activities undertaken by the project. If you cannot identify any other lawful basis, you will need to request consent from the data subjects. Consult with your DGO and / or LOD if you are unsure which legal basis applies.

Note: If processing is by a competent authority for law enforcement purposes, please complete Appendix 1 instead.

	Personal Data	Special Category	Details (including which processing activity it relates to)
Consent (If checked, go to Section 2.9)			
Performance of a contract			Specify Contract .....
Vital Interests			
• **where consent could be given**			
• **where consent cannot be given**			
Public Function			
• **Administrations of justice**			
• **Exercise of functions by an enactment**			Specify enactment .....
• **Exercise of functions of the Crown, State or any public authority**			
• **Exercise of functions of a public nature with legal basis in Jersey law**			Specify Law .....
Legal obligation			
Employment and social fields			
Legal proceedings			
Public functions			
Public interest			
Medical purposes			
Public health			
Archiving and research			
Avoidance of discrimination			
Prevention of unlawful acts			
Protection against malpractice and mismanagement			
Counselling			
Functions of a police officer			

2.9 Consent Requirements

Only complete if you have ticked 'consent' as your legal basis under the section above.

If relying on consent to process personal data, how will this be collected and recorded?

If relying on consent, have you got a procedure for individuals to opt out of their personal data being used for that purpose?

What will you do if consent is withheld or withdrawn? How will this be recorded?

Can an alternative condition for processing be used instead of consent? If yes, please provide details.

2.10 Technical and Organisational Measures / Security

Consult with M&D or the relevant supplier if you are unsure what security measures are in place

Describe the technical measures in place to protect the personal data. E.g. Password protections, Multi factor authentication, Technical Access Controls, Logging / Audit / tracking capabilities, Vulnerability scanning / penetration testing, encryption

Describe the testing that has been performed to ensure the system has been appropriately secured. E.g. Vulnerability Scanning, Penetration Testing, OWASP Top 10, Configuration Scan, SAST / DAST / IAST

Will the system be integrated into the Government's SOC and SIEM?	**Yes** ☐	**No** ☐	**N/A** ☐
If no or n/a, please indicate why:			

Describe the organisational measures in place to protect the personal data. E.g. Role Based Access Controls, Security training, Acceptable Use / Data Handling policies, Confidentiality Agreements, Physical security / CCTV

How will the availability of the personal data be ensured? Describe the back-up procedures for the data and any alternative methods of accessing the data in the event that the primary method is unavailable. Are there any contractual requirements on the storage provider (such as Service Level Agreements) to guarantee availability of the data?

List any relevant certification or code (such as ISO 27001 or Cyber Essentials) that applies to the security of the personal data.

Has an NSCC form been completed in relation to all relevant applications?	**Yes** ☐	**No** ☐	**N/A** ☐
If yes, please append to the DPIA			
If no or n/a, please indicate why:			

Are the technical and organisational measures proportionate to the risk of harm posed to the rights of data subjects in the event of unauthorized or unlawful processing, accidental loss, destruction or damage to their data?	**Yes** ☐	**No** ☐	**N/A** ☐
Please provide a justification for the response provided above:			

2.11 Full Risk Assessment

2.11.1 Methodology

In this section, you must describe all data protection risks and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary. Risks to the Government of Jersey and Risk to the Data Subject should be considered.

Further details on the Government of Jersey's risk management strategy are available here.

Risks are scored using a risk scoring matrix taking into account the likelihood of a risk occurring and its potential impact should it occur. To calculate the risk score, multiply the impact score by the likelihood score. **If the residual risk score is between 15 and 25, add to Corporate Risk Register and escalate the DPIA to the DPO.**

		Potential Impact				
		Negligible (1)	Minor (2)	Moderate (3)	Major (4)	Catastrophic (5)
Likelihood	Almost Certain (5)	5	10	15	20	25
	Likely (4)	4	8	12	16	20
	Probable (3)	3	6	9	12	15
	Unlikely (2)	2	4	6	8	10
	Rare (1)	1	2	3	4	5

Likelihood

Score	Likelihood Descriptor	Likelihood Description
1	Rare (Less than 5%)	Will only occur in exceptional circumstances probably never happen.
2	Unlikely (5% to 20%)	May occur at some time but not likely to occur in the foreseeable future
3	Probable (21% to 50%)	May occur at sometime within the foreseeable future and recur occasionally.
4	Likely (51% to 80%)	Will probably occur in most circumstances but not a persistent issue.
5	Almost Certain (80% to 100%)	Expected to occur in most circumstances. Possibly frequently.

Consequences / Potential Impact examples by Level:

Score	Impact	Financial	Reputational	People / Health and Safety
1	**Negligible**	No Financial impact	No adverse effect on an Individual's Reputation	Incident with no injury sustained Negligible effect on wellbeing/ personal safety
2	**Minor**	Minimal Financial Loss	Low level impact to an Individual's reputation	Minimal injury sustains Minor impact on wellbeing / personal safety
3	**Moderate**	Moderate Financial Loss	Local media attention	Significant injury sustained Short term impact on wellbeing / personal safety
4	**Major**	Major Financial Loss	Local media attention leading to harassment or abuse	Long term disability sustained Ongoing impact on wellbeing / personal safety
5	**Catastrophic**	Catastrophic Financial Loss	National media attention leading to substantial harassment or abuse	Casualty sustained Long term impact on wellbeing / personal safety

Risk Control

Actions will be developed to 'manage down' risks above the Government's tolerance threshold. These should be considered while documenting risks related to the processing of personal data. The options available will be one or more of the following:

Tolerate	Where our ability to take effective action is limited or where the cost of mitigating the risk outweighs the potential benefit.
Treat	Take action to control the risk to an acceptable level by means of containment (before the risk materialises) or contingent actions (once the risk has happened).
Transfer	Pass some aspects of the risk to another party. This can take the form of a conventional insurance transaction or paying a third party to take on risk in another way (for example through outsourcing services). The Government acknowledge that people and reputation risk cannot be transferred and that contracting can raise a range of other risks that need managing.
Terminate	Where feasible we will, by doing things differently, remove certain risks.

Most risks can be managed by 'treating' them. Relatively few risks have to be transferred.

Any proposals to address risks must identify the resources required to deliver the improvements, the individual responsible for their implementation and the key date(s) involved. They will be incorporated into service and project plans and recorded in each risk register.

2.11.2 High Risk Processing

Provide further detail on the high-risk processing activities identified by the screener in section 1.3. What are the risks that the activities will pose to data subjects? How is this risk mitigated?

Use the methodology set out in 2.11.1 to calculate the levels of risk and appropriate Risk Control.

Describe the source of risk and the nature of potential impact on individuals	Likelihood of harm	Impact of harm	Inherent Risk Score	Risk Control	Mitigation/ Solution (please include an explanation of how the solution will affect the risk score)	Residual Risk Score
Example: *Automated decision making may deprive data subject of a benefit to which they are entitled*	*3*	*4*	*12*	*Treat*	*Provide the opportunity to appeal an automated decision so that it is reviewed by a human. This will reduce the likelihood of harm to 1.*	*4*

2.11.3 Necessity, Proportionality and Retention

Personal data collected must be relevant but not excessive, in relation to the purpose for which it is processed. Personal data must be kept no longer than is necessary for the purpose for which it is processed. Appropriate time limits must be established for the periodic review of the need for the continued storage of personal data.

Use the methodology set out in 2.11.1 to calculate the levels of risk and appropriate Risk Control.

Describe the source of risk and the nature of potential impact on individuals	Likelihood of harm	Impact of harm	Inherent Risk Score	Risk Control	Mitigation/ Solution (please include an explanation of how the solution will affect the risk score)	Residual Risk Score

2.11.4 Fair, Lawful and Transparent

Data must be processed lawfully, fairly and in a transparent manner.

Use the methodology set out in 2.11.1 to calculate the levels of risk and appropriate Risk Control.

Describe the source of risk and the nature of potential impact on individuals	Likelihood of harm	Impact of harm	Inherent Risk Score	Risk Control	Mitigation/ Solution (please include an explanation of how the solution will affect the risk score)	Residual Risk Score

2.11.5 Accuracy

Personal data processed must be accurate and, where necessary, kept up to date, and every reasonable step must be taken to ensure that personal data that is inaccurate is erased or rectified without delay.

Use the methodology set out in 2.11.1 to calculate the levels of risk and appropriate Risk Control.

Describe the source of risk and the nature of potential impact on individuals	Likelihood of harm	Impact of harm	Inherent Risk Score	Risk Control	Mitigation/ Solution (please include an explanation of how the solution will affect the risk score)	Residual Risk Score

2.11.6 Security

Personal data must be processed in a manner that ensures appropriate security of the personal data, using appropriate technical or organisational measures (and, in this principle, "appropriate security" includes protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.)

Use the methodology set out in 2.11.1 to calculate the levels of risk and appropriate Risk Control.

Describe the source of risk and the nature of potential impact on individuals	Likelihood of harm	Impact of harm	Inherent Risk Score	Risk Control	Mitigation/ Solution (please include an explanation of how the solution will affect the risk score)	Residual Risk Score

2.11.7 Data Protection Rights

Consider the rights and assess whether data subjects would be able to fully exercise these rights. For example: If an individual makes a subject access request, will you be able to easily identify, retrieve and extract the data?

Use the methodology set out in 2.11.1 to calculate the levels of risk and appropriate Risk Control.

Describe the source of risk and the nature of potential impact on individuals	Likelihood of harm	Impact of harm	Inherent Risk Score	Risk Control	Mitigation/ Solution (please include an explanation of how the solution will affect the risk score)	Residual Risk Score

2.11.8 External Data Sharing

Your processing may involve the sharing of personal data with third party individuals, organisations or agencies. Use this section to outline the risks that are associated with any data sharing of this nature, including the necessity and proportionality of any such sharing, the contracts or agreements in place, and any data security issues that this may present. You should also record any risk related to international transfers here.

Use the methodology set out in 2.11.1 to calculate the levels of risk and appropriate Risk Control.

Describe the source of risk and the nature of potential impact on individuals	Likelihood of harm	Impact of harm	Inherent Risk Score	Risk Control	Mitigation/ Solution (please include an explanation of how the solution will affect the risk score)	Residual Risk Score

2.11.9 Additional Risk Factors

Describe any further risks, ensuring that any risks not already identified are included.

Use the methodology set out in 2.11.1 to calculate the levels of risk and appropriate Risk Control.

Describe the source of risk and the nature of potential impact on individuals	Likelihood of harm	Impact of harm	Inherent Risk Score	Risk Control	Mitigation/ Solution (please include an explanation of how the solution will affect the risk score)	Residual Risk Score

2.12 Consultation Log

Detail steps taken to consult stakeholders (e.g. Data Subjects, Data Governance, Legal and Processors). Add a new row for each.

Who	When	How	Outcome
Notes:			
Consultation Responses reviewed by:			If your decision departs from individuals' views, you must explain your reasons
Comments:			

2.13 Publication

Is there an intention to publish the finalised DPIA or provide it to third parties?	☐ **Yes**	☐ **No**
If yes, please provide further details:		
Can this DPIA be shared in full for an FOI request?	☐ **Yes**	☐ **No**
If no, will there be a redacted version under FOI made available if needed?	☐ **Yes**	☐ **No**

3 REVIEW AND APPROVAL

3.1 DGO

All DPIAs must be reviewed and approved by the Lead DGO

Approved Date	Data Governance Officer Name	Department
DD/MM/YYYY		
Notes		
CISO approval required?		Yes/No
This DPIA will be kept under review by:		
Date last reviewed		DD/MM/YYYY
Date Next review due		DD/MM/YYYY

Once the DPIA is approved by the DGO, please submit it to the DPU (dpu@gov.je) for logging.

Date DGO approved version submitted to DPU	**DD/MM/YYYY**
Escalation to DPO required?	Yes/No
Summary of DPU comments:	
Date of last DPU review	DD/MM/YYYY

3.2 CISO

Unless the DGO states not required, sections 2.10 and 2.11.9 must be reviewed and approved by the CISO.

Approved Date	CISO Name
DD/MM/YYYY	
Notes	

3.3 DPO

If the DPIA identifies residual risks above the Government of Jersey overall Risk Appetite (see methodology in 2.11.1), or where risks have been tolerated (see section 3.5.2 below), the DPIA should also be sent to the DPO (dpo@gov.je) for review.

If escalated to DPO, please complete all subsequent rows		
DPO advice provided:	**Yes/No**	**DPO should advise on compliance and whether JOIC consultation is required**
Summary of DPO advice:		
DPO advice accepted or overruled by:		**If overruled, you must explain your reasons and add the decision to the relevant risk register**
Comments:		

The decision on whether JOIC consultation is required is made jointly by the DGO and DPO.

JOIC consultation required	Yes/No

3.4 JOIC

If JOIC is consulted, please complete all subsequent rows		
JOIC advice provided:	**Yes/No**	
Summary of JOIC advice:		
Action taken as a result of JOIC advice		

3.5 Remedial Actions

3.5.1 Outstanding Actions

For each mitigation / solution activity identified under the Full Risk Assessment section at 2.11 that has not been completed, allocate an owner and date for completion.

Activity	Owner	Date Due	Date Completed

3.5.2 Tolerance of Residual risks

If any Residual Risk is above the Government of Jersey's official Risk Tolerance Threshold (see appendix B of the Risk Management Strategy here) at the point that processing commences, then the risk must be managed in line with the Government of Jersey Risk Management Strategy.

Risk	Residual Risk Level	Approved by (name)	Date Approved

DOCUMENT CONTROL

Version No.	Summary of Change	Author	Date