

Privacy Impact Assessment (PIA)

Proposals Definition: Scotland's Adoption Register

| Questions to identify Privacy Issues | Risk | Impact | Likelihood |
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| 1. Technology | | | |
| (1) Does the proposal include the use of new or additional technologies with the potential for privacy intrusion? | The software has been in use by Scotland's Adoption Register since 2011 and is also used by the Registers for England ¹ and for Wales ² . It is used to store and process the data gathered. The information is secure and is only accessible to 2 staff members. Online data entry will be used to gather information in the future and this has been tested and is used by existing register arrangements – the security of any software developments will be fully tested prior to implementation. Data breach' is unlikely, but the impact of any occurrence would be medium to high significance | Medium/High | Medium |
| 2. & 3. Identity | | | |
| (2) Identity: Does the proposal include new identifiers, or substantially change or re-use existing, identifiers or any intrusive or onerous identification, authentication or identity management processes? | <p>Personal data will be anonymised for use in statistical returns.</p> <p>Personal data will be held internally and no linkages will be provided to external parties unless provided by The Scotland Adoption Register Regulations 2016 in which it is disclosed solely for the purposes of matching. Some linkage</p> | Low | Low |

¹ Adoption Register for England operated by Coram/BAAF on behalf of the [Department for Education](#)

² Adoption Register for Wales operated by the National Adoption Service for Wales

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| | may be considered with data held by the Scottish Government in the future at which point a new PIA would be undertaken to judge impact and appropriateness. | | |
| (3) Identity: Does the proposal affect anonymity or pseudonymity; will previously anonymous or pseudonymous transactions be identified? | No previously anonymised data will be affected | Low | Low |
| 4. Justification | | | |
| (4) Is the justification for the proposal either unpublished or unclear? | The justification for this proposal is well documented and clear | Low | Low |
| 4a) Does the proposal involve new or changed data collection policies or practices that may be unclear or intrusive? | No new data collection processes have been created by this proposal, the register will use already collected and available data. | Low | Low |
| 4b) Does the proposal involve new or changed quality assurance or security processes or standards that may be unclear and/or unsatisfactory? | There will be some new quality assurance processes involved in the uploading of the data and ensuring the correct information is gathered ³ . These are not new processes and are well used and clear from examples across the country. | Low | Low |
| 4c) Does the proposal involve new or changed data access or disclosure arrangements that may be unclear or permissive? | Data will be sent to the register by the adoption agency. This process will be new for the very small number of agencies who have not used the Register (referral has been voluntary until now). Disclosure of information processes will again be new for these agencies but not for those currently using the Register. | Medium | Low |

³ Referral forms have been developed to ensure there is clarity about the information required.

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| 4d) Does the proposal involve new or changed data retention processes that may be unclear or extensive? | The data retention processes have become well established over the last 4 years and are identical to those used in other parts of the UK. Data retention and processing procedures are clear and well presented to adoption agencies. | Medium | Low |
| 4e) Does the proposal involve a new or changed medium or method of disclosure for publicly available information so data is more readily accessible? | This data is not publicly available | Low | Low |
| 5. Multiple organisations | | | |
| (5) Will the proposal involve multiple organisations, either government agencies (e.g. 'joined-up government' initiatives) or the private sector? | The proposal involves one central organisation which will be provided with information from 40 other organisations ⁴ . There will be a data sharing contract in place for this to happen | Low | Low |
| 6. & 7. Data | | | |
| (6) Does the proposal involve personal data of particular concern to individuals? | The majority of the data collected is sensitive personal data and therefore security measures need to be High | High | Low |
| (7) Does the proposal involve the linkage of personal data with data in other collections, or any significant change to existing data links or holdings? | The proposal does not currently involve the linkage with data held by other organisations. | Medium | Low |
| 8. 9. & 10. Data handling scope | | | |
| (8) Will the proposal handle a significant amount of data about | There will be no changes to existing data holdings. The proposal requires some | High | Low |

⁴ 32 Local Authorities, 5 voluntary adoption agencies and the Adoption Registers in England, Wales and Northern Ireland

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| each person, or significantly change existing data-holdings? | information to be held about each person. The data will not be of significant volume, but will be personal (including sensitive personal) information | | |
| (9) Will the proposal handle data about a significant number of people, or change significantly the existing population scope or coverage? | The proposal will not handle details of a significant volume of people, or change the existing population scope of information held | Low | Low |
| (10) Does the proposal consolidate, inter-link, cross-reference or match personal data from multiple sources? | The data does not interlink or cross refer information from multiple sources, nor does it match information held on the same person from existing sources. The proposal considers matching details of one individual to that of other individuals | Low | Low |
| 11.12. & 13 Exemptions & exceptions | | | |
| (11) Is the proposal to process any data that is exempt from legislative privacy protections? | Information that is processed about children in terms of subject access requests would be considered on a case by case basis under Data Protection legislation. The information held on the database will not be different from that which is held locally, and will also not be subject to access by the public | Low | Low |
| (12) Does the proposal's justification include significant contributions to public security measures? | no | Low | Low |
| (13) Does the proposal intend to disclose personal data to, or access by, third parties | no | Low | Low |

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| that are not subject to EU or comparable privacy regulation? | | | |
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