

Privacy Impact Assessment Screening Record

This form should be used to record the fact that a screening process has been conducted and the conclusion is that (1) neither a full nor small scale Privacy Impact Assessment (PIA) is warranted and that the proposal is fully compliant with the Data Protection Act or (2) that a full or small scale PIA is required.

Project / Proposal Name:	P359 – Data Publication Platform
Description: (include details of what the project/proposal aims to achieve and what the benefits will be)	<p><u>Release of free of charge versions of HMLR's Commercial and Corporate Ownership and Overseas Companies Datasets</u></p> <p>Reasoning for 'yes' answers below – please advise</p> <p>This release will consist of free of charge versions of existing HMLR products referred to above.</p> <p>A significant difference is that customers will be verified by transfer to the Worldpay payment processing service to make a zero debit/credit card transaction. Only customers that complete this process will be approved to access the data (exceptions below).</p> <p>Customers will be required to enter a valid debit/credit card on Worldpay's system. No debit/credit card information will be entered on HMLR's systems, be transferred to HMLR or be available to be retained by HMLR in any form.</p> <p>Citizens will input the following on registration: Title, first name, surname, address 1, town/city, country, postcode (UK address only), telephone number, email address</p> <p>Exceptions to this are expected to be: Companies with a Company Registration Number; Government Departments; Local Authorities and Charities. [REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>Companies will input the following on registration: Organisation name, company registration number or organisation type, (Government Department, Local Authority, Charity), address 1, town/city, country, postcode (UK address only) Person applying on behalf of company: Title, forename, surname, telephone number, email address.</p> <p>We recognize that the wider release of this data and the capture of a user's information will be effected by GDPR, therefore we assume that a PIA will be required – would you be able to advise whether this will be a full or small scale assessment please?</p> <p>Regards [REDACTED]</p> <p>24/08/17</p>

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Privacy Impact Assessment Screening Questions		
<p>The screening process consists of a series of questions focusing on issues including technology, identity, multiple organisations, data, exemptions and exceptions. The answers to the questions need to be considered as a whole to decide whether the overall impact and the related risks warrant a full or small scale PIA. The key characteristics addressed represent significant risk factors and the responses will need to be analysed during the PIA process to ensure that these risks are mitigated fully.</p>		
Question	Yes	No
Will the proposal involve the collection of new personal information about individuals?	x	
Will the proposal compel individuals to provide information about themselves?	x	
Will information about individuals be used for a purpose it is not currently used for, or in a way it is not currently used?	x	
Will the proposal result in decisions being made or action being taken against individuals in ways which could have a significant impact on them?		x
Does the proposal apply new or additional information technologies which might be perceived as being privacy intrusive? For example, the use of biometrics or facial recognition.		x
Does the proposal involve technologies that substantially reveal personal information, such as visual surveillance, digital imaging or video recording?		x
Does the proposal involve new identifiers or the additional use of existing identifiers, such as digital signatures?		x
Does the proposal involve use of a new identifier for multiple purposes?		x
Might the proposal have the effect of denying anonymity or converting transactions that could previously be conducted anonymously into identified transactions?		x
Does the proposal involve multiple organisations, whether they are Government agencies or private sector organisations?		x
Does the proposal involve new or significantly different handling of personal data that is particularly likely to raise privacy concerns or expectations and which may be of particular concern to individuals?	x	
Is the justification for the new data-handling unclear or unpublished?		x
Does the proposal involve new or different data collection policies or practices that may be unclear or seek excessive information that is not relevant to the purpose?		x
Does the proposal involve new or significantly different handling of a considerable amount of personal data about each individual in the database?		x
Does the proposal involve new or significantly different handling of personal data about a large number of individuals?		x
Does the proposal involve new or substantially changed identity authentication requirements that may seek excessive personal information?	x	

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Does the proposal involve changing the medium of disclosure for publicly available information in such a way that the data becomes more readily accessible than before?		x
Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information?		x
Will the proposal require individuals to be contacted in ways which they may find intrusive?		x
Does the proposal involve new linkage of personal data with data in other collections, or significant change in data linkages?		x
Does the proposal involve new or significantly different consolidation, inter-linking, cross-referencing or matching of personal data from multiple sources?		x
Does the proposal involve new or different data security arrangements that may be unclear or unsatisfactory?		x
Does the proposal involve new or different data access or disclosure arrangements that may be unclear or permissive?		x
Does the proposal involve new or different data retention arrangements that may be unclear or extensive?		x
Does the proposal relate to data processing which is in any way exempt from legislative data protection measures, for example, processing of personal data for the purposes of national security?		x
Does the proposal's justification include significant contributions to public security measures? In these cases, personal data may need to be shared to ensure the safety of the public.		x
Does the proposal involve systematic disclosure of personal data to, or access by, third parties that are not subject to comparable data protection regulation?		x
If you have answered "yes" to any of the above questions this is an indication that a PIA may be required and you should refer to Corporate Legal and Assurance Services (CLAS) for further advice.		
Data Protection Act Compliance Check		
DPA Principle	Compliant	
	Yes	No
Data must be fairly and lawfully processed.	x	
Data must only be processed for specific and lawful purposes and not further processed in a way that is incompatible with the original purpose.	x	
Data collected must be adequate, relevant and not excessive.	x	
Data held must be kept accurate and up to date.	x	
Data must not be kept for longer than is necessary.	x	
Data must be processed in accordance with the data subject's rights.	x	

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Data must be kept secure.	x	
Data must not be transferred to countries outside the European Economic Area unless an adequate level of protection is ensured or an exemption applies.	x	
<p>If you have answered “no” to any of the above questions you should refer to CLAS for further advice.</p>		

<p>Conclusion</p> <p>Having completed the screening record, I confirm that:</p> <ul style="list-style-type: none"> - neither a full nor small scale PIA is warranted and that the proposal is fully compliant with the Data Protection Act. a full/small scale PIA is required. CLAS has been consulted and a summary of the advice received from CLAS is set out below. This screening record has been countersigned and approved by the Project Owner/SRO. <p><i>(delete as appropriate).</i></p>
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Completed by	Name:	
	Job Title:	
	Date:	

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Summary of any advice received from CLAS and steps taken

Further to your responses to the queries I have raised I am satisfied that the proposal is compliant with the Data Protection Act. Please provide a signed off copy of the PIA to [REDACTED] and copy me in.

Regards, [REDACTED] 18.10.17

Signed off and approved by	Project Owner / Senior Responsible Officer:	
	Date:	

The completed Screening Record must be forwarded to the Departmental Records Officer, [REDACTED], for inclusion on the PIA Log.

You may also need to consider whether a Fraud Impact Assessment and / or an Equality Impact Assessment is required.

Record of Queries raised for PIA with [REDACTED] email dated 27.8.17):

[REDACTED] has forwarded to me your email of 25 August 2017 together with the PIA screening record in respect of the Data Publication Platform. I have now considered this and confirm that a small scale PIA should be sufficient for this service.

Please let me have your confirmation/responses to the following:

1. From the information provided it appears the overriding objective/purpose for the project is to provide a platform to enable HM Land Registry to release free of charge versions of its commercial and corporate ownership dataset and overseas companies datasets. Please confirm.
Yes, that is correct.
2. It is noted that the description in the PIA is 'versions of the datasets'. Previously we have provided a free dataset for some of the data and subsequent releases have been available if customers have signed up for the commercial services. Will the earlier datasets be available to download from the service? If not, will they be made available by other means?
No, the previous versions of the service will not be available – however, there will be a period of dual running of the services during the notice period that will be served on present customers. It is anticipated that there will need to be a way to supply earlier datasets but have not yet

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resolved what this will be. Would you be able to provide advice on whether this option will need to be advertised?

3. I note the personal information individuals will be required to provide before they are able to access the data is title; first name; surname; address; telephone number; email address. How will this data be used and who will have access to it?

The data will be used to create an account that will allow customers to access the data [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

4. It is noted that companies, government departments, local authorities and charities will also be able to access the data using a 'non-citizen' channel. Personal data may be provided by individuals representing an organisation. If an individual is acting on behalf of an organisation will their personal data be provided via the citizen route or the organisational one. How will the data be used and who will have access to it?

Personal details provided by individuals representing an organisation will be provided via the organisational route, with the same uses and access as at question 3 above.

5. You have confirmed that information about individuals will be used for a purpose it is not currently used for, or in a way it is not currently used. Please provide details, for what purpose? It appears that the sole purpose of the data is to create an account to enable an individual to have access to the datasets? Please explain what other purpose the data will be used for.

My earlier confirmation was in relation to the Worldpay verification route only, as this did not previously apply to the existing data sets.

With this exception, I can confirm that information about individuals will be not used for a purpose it is not currently used for and the statement in this question is correct: the sole purpose of the data is to create an account to enable an individual to have access to the datasets.

6. Citizens are required to verify identity by completing a zero debit/credit card transaction with Worldpay. Please confirm:

(a) What data, if any, provided to Worldpay by the Citizen will be shared with HM Land Registry;

None

(b) If no data provided to Worldpay is accessible by HM Land Registry how will the service inform the citizen?

Citizens will be directed to a Worldpay confirmation screen and will receive a Worldpay transaction confirmation email.

(c) Will HM Land Registry have access to any transaction code provided to the citizen by Worldpay? If so, will this data be stored with the citizen account data or elsewhere?

Yes – stored with the citizen account data.

(d) Will the citizen be provided with a link to terms and conditions for use of the Worldpay site? If so, please confirm that these provide assurance to the citizen that their data will be processed in accordance with the Data Protection Act. (this

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will need to be updated prior to May to reflect the General Data Protection Regulations (GDPR)).

We have not provided a link to Worldpay's terms and conditions to date. The reasoning is that as we do not want to see any details that customers provide to Worldpay, once the customer has completed the LR screens, there would be a 'hand-off' to Worldpay that HMLR would have no involvement in.

Please advise if this is satisfactory.

- (e) It is noted only customers that complete the Worldpay process will be approved to access the data.

Correct with regards to citizens.

7. It is noted that you have confirmed the proposal involves new or significantly different handling of personal data that is particularly likely to raise privacy concerns or expectations and which may be of particular concern to individuals. Please explain how the personal data will be handled differently and if this is the case how are we proposing to explain this use to individuals.

As at question 5 above my confirmation related to the introduction of the Worldpay verification route only.

I can confirm that with this exception, the proposal does not involve new or significantly different handling of personal data that is particularly likely to raise privacy concerns or expectations and which may be of particular concern to individuals

8. The indications are that the proposal involves new or substantially changed identity authentication requirements that may seek excessive personal information? From the information provided it appears that the data requested would be standard account set up type data. The identity data would appear to be that provided to Worldpay. Is there a requirement for any additional identity authentication requirements? If so, please provide details.

No further identity authentication requirements – the data requested will be standard account data only.

9. Please confirm:

- whether IS security have provided advice and guidance in respect of these arrangements, if so, please provide details of their advice. –
Yes – IS security have provided advise and are satisfied that as the data will remain in Kahootz as it present there are no new security risks.
- What are the proposed retention periods for the data;
Personal data – this will need to be retained as long as the customer holds a valid licence, which are not intended to expire.
- What the destruction requirements will be;
As above – we are not aware of the need for destruction requirements.
- Who will be primary responsible for ensuring that the data is handled correctly –
Product Manager – [REDACTED]
- What period of review is anticipated to review the arrangement.
The arrangement will be reviewed after 6 months.
This is a temporary 'tactical solution' that is intended to meet the Government target of Autumn 2017 release and is expected to be required for around a year.
The datasets will subsequently be transferred to HMLR's Data Publication Platform that is scheduled to begin development in early 2018.

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10. Please confirm that you are satisfied that arrangements are in place to ensure the data will not be transferred outside of the European Economic Area. How will this be monitored?
In terms of personal data provide to set up an account, this will not be shared outside of HMLR.

█ Please confirm the benefits identified that this proposal may bring, have negative impacts been identified?

The benefits that this proposal will bring are primarily based around the stimulation of the housing market leading to wider benefits to the UK economy.

There is expected to be a negative impact to HMLR's commercial revenue. █

12. Please let me have details of the process in place in the event of any breach of security.

13. The data you propose to utilise contains personal data please confirm how this will be anonymised to ensure individuals cannot be identified.

The datasets themselves do not contain personal information. The personal data supplied to set up an account cannot be anonymised but will be stored securely and not shared outside of HMLR.

- █
15. All our services will need to be compliant with the GDPR so we will need to ensure that the service informs the customer how their data will be used; shared; retained and for how long; stored. How is it proposed that the service will meet these obligations? For example, will a short privacy statement for the Data Publication platform be required or is it anticipated that a section of the Personal Information Charter can be included for this service?

To be discussed at our meeting on 2/10/17.

(email 18.10.17)The remaining issues from our email exchange below are resolved as follows:

1. The issue around possible FOI requests for the versions of Overseas between the free version and the new release – and whether these can be released at the same time as the new release.

Previous versions of CCOD and Overseas will be released under the current Terms and Conditions.

2. █

Confirmation that users will be able to access Worldpay's terms and conditions from the pages Worldpay page they are directed from.

I can confirm that Worldpay's customers can access Worldpay's terms of use.