

Privacy by Design Policy

How we design Products and Services with Privacy in mind

1 Scope

Projects which may impact privacy and data protection will be subject to a Privacy Impact Assessment (PIA) at an early stage of the project and then throughout its lifecycle.

For example, when:

- building a new IT system for storing or accessing personal data;
- developing legislation, policy or strategies that have privacy implications;
- embarking on a data sharing initiative; and
- using data for new purposes.

2 Responsibilities

The SIRO is responsible for ensuring a PIA [screening](#) questionnaire (ASL IG F001 Privacy-Impact-Assessment- Checklist Template) is undertaken to determine if a full Privacy Impact Assessment is required.

PIA's will be reviewed at the management meeting.

3 Procedure

The PIA will be conducted following the Information Commissioner's Office [Code of Practice](#) using the Annexes to record the outcomes and if a PIA is required.

Aseptika documentation, such as data flow maps and asset registers will be updated accordingly.

Specialist privacy advice must be sought if required.

4 Document History

Document History				
Version	Date released for approval	Contributors Initials	Reviewers Initials	Changes from Previous Version
V1.1	12.02.2018	GL		First Draft
V1.2	14.02.2018	KAA		Update to new format
V1.3	15.02.2018	KAA		Formatting
V1.4	16.02.2018	JMA		Updating
V1.5	03.05.2018	ETRA		Update to a new template and a new document number
V2.0	11/12/2018	ETRA	KAA, JAA, CB	Annual review and part of CC2018-0187