

# Customer Feedback Policy DPIA

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This follows the process set out in the ICO DPIA guidance, and should be read alongside that guidance and the [Criteria for an acceptable DPIA](#) set out in European guidelines on DPIAs.

## Submitting controller details

Name of controller	Tbc (Customer Services?)
Subject/title of DPO	Corporate Director of Governance
Name of /DPO	Lorraine Fowkes

## Step 1: Identify the need for a DPIA

Explain broadly what project aims to achieve and what type of processing it involves. You may find it helpful to refer or link to other documents, such as a project proposal. Summarise why you identified the need for a DPIA.

In the process of handling a complaint, compliment or comment, the council will be required to collect personal data and, in some circumstances, this would fall under the category of sensitive personal data.

The revised policy is proposing the collection of equality profile information to monitor equality impact in line with our Public Service Equality Duty.

It is necessary to collect, store and use this data to administer the process and to investigate all complaints made.

Confidentiality of this information is maintained by storing on a system which is purpose built for complaints with limited users being allowed access. This system also maintains the function to fully audit any access to the system.

The council will keep information relating to complaints for a period of six years following the complaint being finalised. All information which is passed the retention period is securely destroyed.

## Step 2: Describe the processing

**Describe the nature of the processing:** how will you collect, use, store and delete data? What is the source of the data? Will you be sharing data with anyone? You might find it useful to refer to a flow diagram or other way of describing data flows. What types of processing identified as likely high risk are involved?

Data will be collected when customers complete an online Customer Feedback Form – and this will include equality profile monitoring. The completion of this data is voluntary. Collated, not individual data, will be analysed for the purpose of monitoring the overall profile of customers to compare with the known demographics of the area.

Complaints investigations information is retained for six years before being deleted securely.

**Describe the scope of the processing:** what is the nature of the data, and does it include special category or criminal offence data? How much data will you be collecting and using? How often? How long will you keep it? How many individuals are affected? What geographical area does it cover?

The voluntarily completed equality monitoring data will be collected as part of the process of submitting feedback. This will only be used at aggregate level for the purposes of comparing the profile of those providing feedback to the known demographic.

**Describe the context of the processing:** what is the nature of your relationship with the individuals? How much control will they have? Would they expect you to use their data in this way? Do they include children or other vulnerable groups? Are there prior concerns over this type of processing or security flaws? Is it novel in any way? What is the current state of technology in this area? Are there any current issues of public concern that you should factor in? Are you signed up to any approved code of conduct or certification scheme (once any have been approved)?

Those providing feedback will do so on a voluntary basis. It will only be analysed at aggregate level.

**Describe the purposes of the processing:** what do you want to achieve? What is the intended effect on individuals? What are the benefits of the processing – for you, and more broadly?

Collecting equality profile information will allow the profile of those submitting feedback to be compared to the known demographic of the area.

## Step 3: Consultation process

**Consider how to consult with relevant stakeholders:** describe when and how you will seek individuals' views – or justify why it's not appropriate to do so. Who else do you need to involve within your organisation? Do you need to ask your processors to assist? Do you plan to consult information security experts, or any other experts?

Customer Feedback reporting will include aggregate data on the equality profile information provided.

## Step 4: Assess necessity and proportionality

**Describe compliance and proportionality measures, in particular:** what is your lawful basis for processing? Does the processing actually achieve your purpose? Is there another way to achieve the same outcome? How will you prevent function creep? How will you ensure data quality and data minimisation? What information will you give individuals? How will you help to support their rights? What measures do you take to ensure processors comply? How do you safeguard any international transfers?

We will only analyse the data at aggregate level to understand the profile of those providing feedback.



## Step 5: Identify and assess risks

<b>Describe source of risk and nature of potential impact on individuals.</b> Include associated compliance and corporate risks as necessary.	<b>Likelihood of harm</b>	<b>Severity of harm</b>	<b>Overall risk</b>
	Remote, possible or probable	Minimal, significant or severe	Low, medium or high

## Step 6: Identify measures to reduce risk

<b>Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 5</b>				
<b>Risk</b>	<b>Options to reduce or eliminate risk</b>	<b>Effect on risk</b>	<b>Residual risk</b>	<b>Measure approved</b>
None	N/A	Eliminated reduced accepted	Low medium high	Yes/no

## Step 7: Sign off and record outcomes

<b>Item</b>	<b>Name/position/date</b>	<b>Notes</b>
Measures approved by:		Integrate actions back into project plan, with date and responsibility for completion
Residual risks approved by:		If accepting any residual high risk, consult the ICO before going ahead
DPO advice provided:		DPO should advise on compliance, step 6 measures and whether processing can proceed
Summary of DPO advice:		
DPO advice accepted or overruled by:		If overruled, you must explain your reasons
Comments:		
Consultation responses reviewed by:		If your decision departs from individuals' views, you must explain your reasons
Comments:		
This DPIA will kept under review by:	Grant Mitchell	The DPO should also review ongoing compliance with DPIA