
Data Protection Impact Assessments

October 2018

- What is a DPIA?
- Why do I need one?
- How do I complete one?

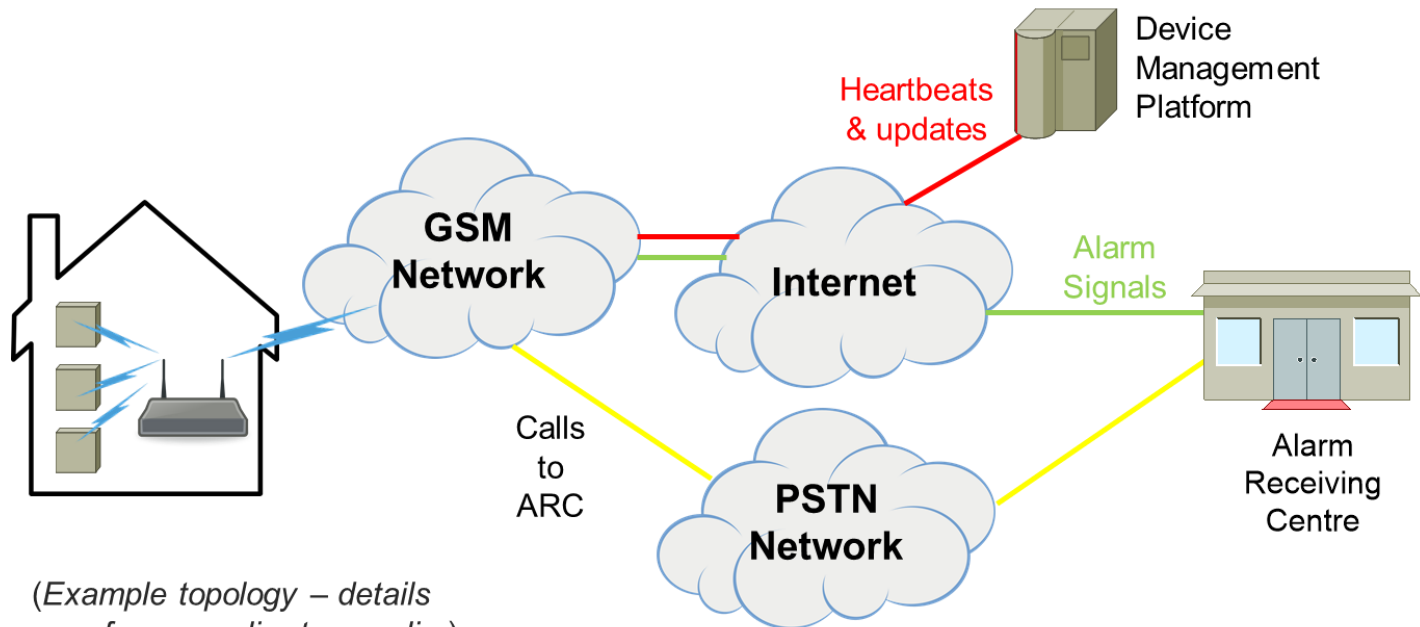
- *“A Data Protection Impact Assessment (DPIA) is a process to help you identify and minimise the data protection risks of a project.”*

Source: Information Commissioner's Office: <https://ico.org.uk/>

- The DPIA process is designed to identify:
 - The personal data you are collecting and processing
 - The reasons and consent for collecting and processing it
 - The risks associated with the collection and processing
 - Appropriate measures to mitigate the identified risks

- Completion of a DPIA is not mandated by the National Programme
 - Data Protection risk sits with Partnerships
- But.... we are strongly recommending Partnerships complete a DPIA given technology change associated with Digital Telecare
 - *“The risks associated with the collection and processing Personal Data”*

Why Do I Need One?











(Example topology – details vary from supplier to supplier)

Why Do I Need One?

Your identity is a steal on the Dark Web.

Here are what the most common pieces of information sell for:



<p>Social security number</p>  <p>\$1</p>	<p>Online payment services login info (e.g. Paypal)</p>  <p>\$20-\$200</p>	<p>Credit or debit card (credit cards are more popular)</p>  <p>\$5-\$110</p> <p>With CVV number \$5 With bank info \$15 Fullz info* \$30</p>	
<p>Drivers license</p>  <p>\$20</p>	<p>Loyalty accounts</p>  <p>\$20</p>	<p>General non-financial institution logins</p>  <p>\$1</p>	
<p>Diplomas</p>  <p>\$100-\$400</p>	<p>Passports (US)</p>  <p>\$1000-\$2000</p>	<p>Subscription services</p> <p>\$1-\$10</p>	<p>Medical records</p> <p>\$1-\$1000**</p>



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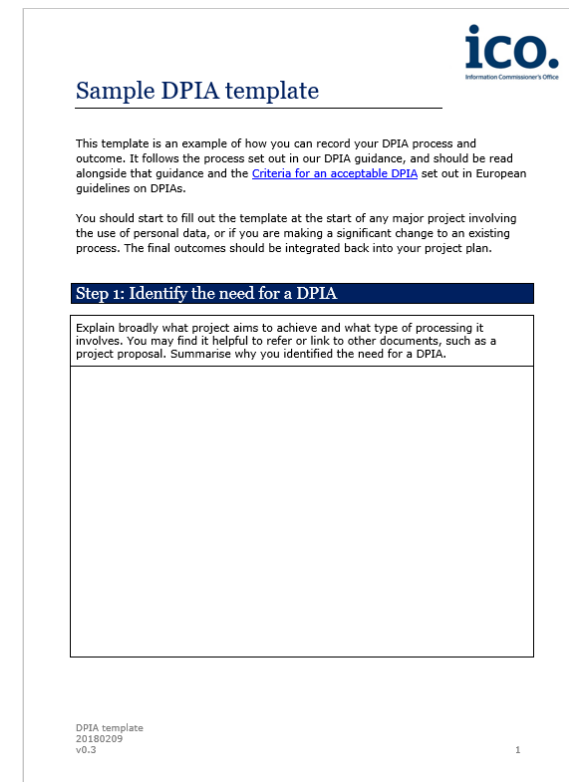
French fans renew Auld Alliance at Murrayfield

OVERCOME THE ROAD TAX PRICE INCREASE. WHEN YOU PURCHASE BEFORE 30TH JUNE AT PENTLAND LAND ROVER.

Source: Experian, December 2017

<https://www.experian.com/blogs/ask-experian/heres-how-much-your-personal-information-is-selling-for-on-the-dark-web/>



- Use a DPIA template:
 - Partnerships' own templates
 - Information Commissioner's Office
- Format:
 1. Identify the need for a DPIA
 2. Describe the processing
 3. Consultation process
 4. Assess necessity and proportionality
 5. Identify and assess risks
 6. Identify measures to reduce risk
 7. Sign off and record outcomes





The image shows a sample DPIA template document. At the top right is the ICO logo (Information Commissioner's Office). The title is "Sample DPIA template". Below the title is a paragraph explaining that the template is an example of how to record a DPIA process and outcome, following the process set out in the ICO's DPIA guidance and the European guidelines on DPIAs. It also states that the template should be used at the start of any major project involving the use of personal data, or if making a significant change to an existing process. Below this is a section titled "Step 1: Identify the need for a DPIA" with a dark blue header. Underneath is a text box with the instruction: "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." The text box is currently empty. At the bottom left of the page, it says "DPIA template 20180209 v0.3". At the bottom right, there is a small number "1".

<https://ico.org.uk/media/for-organisations/documents/2258857/dpia-template-v1.docx>

How Do I Complete One?

- NOT a 'cut and paste' exercise, but large degree of commonality between partnerships
- Format:
 1. Identify the need for a DPIA 
 2. Describe the processing 
 3. Consultation process 
 4. Assess necessity and proportionality 
 5. Identify and assess risks 
 6. Identify measures to reduce risk 
 7. Sign off and record outcomes 

- Format:
 - 5. Identify and assess risks 
 - 6. Identify measures to reduce risk 
- Data protection risks include:
 - Technical – equipment and how it is deployed (Andy)
 - People – staff, users, 3rd parties
 - Operational – processes, data access, sharing, etc
 - Needs to cover end-to-end service

Threat actors from analysis of 750 healthcare cyber security incidents:

- 43% External
- 56% Internal
- 4% Partner and
- 2% Multiple parties

Source Verizon, 2018 Data Breach Investigations Report:

<https://www.verizonenterprise.com/verizon-insights-lab/dbir/>

- The move to Digital Telecare raises a number of Data Protection risks
- A DPIA allows Partnerships to demonstrate that Data Protection risks are identified and managed
- Template DPIAs are available:
 - Some elements of the DPIA will be common to all Partnerships
 - Support is available via the national programme

Digital Standardisation

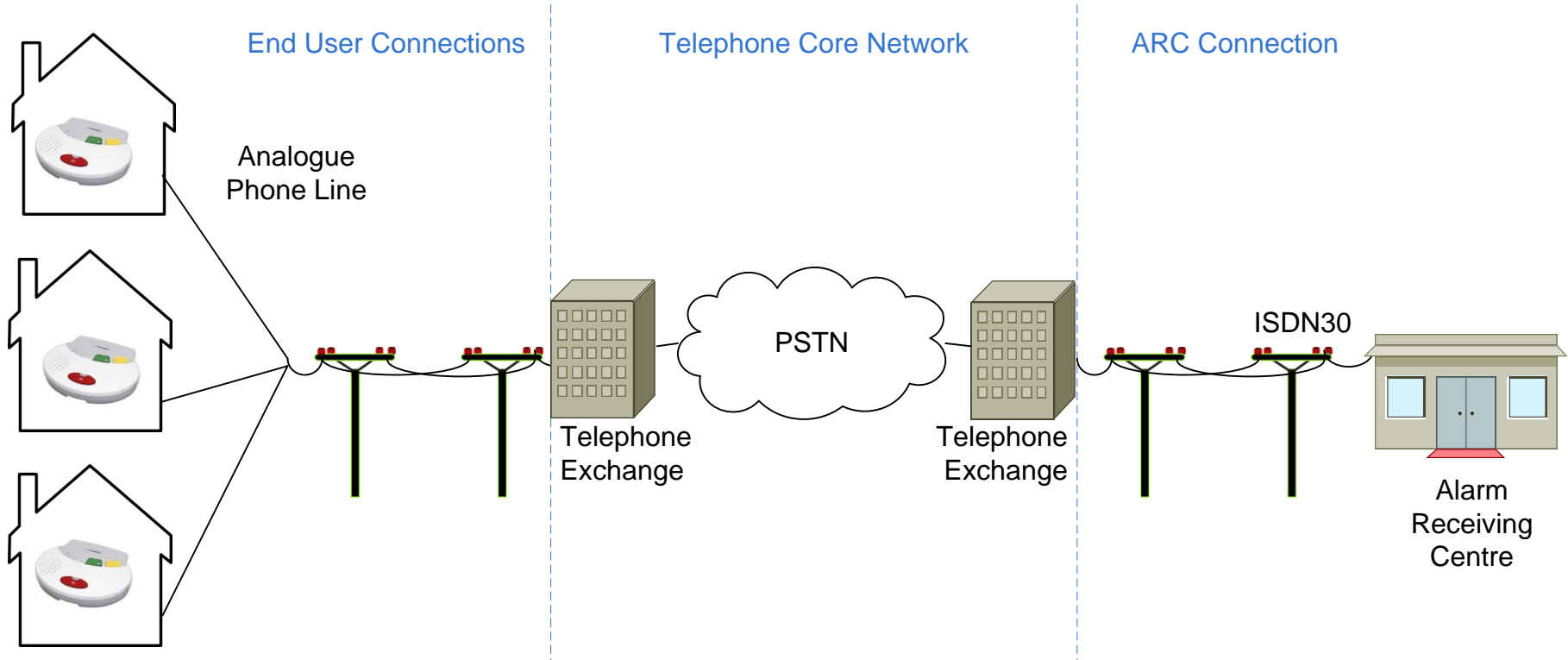
Defining and Measuring Failed Calls

October 2018

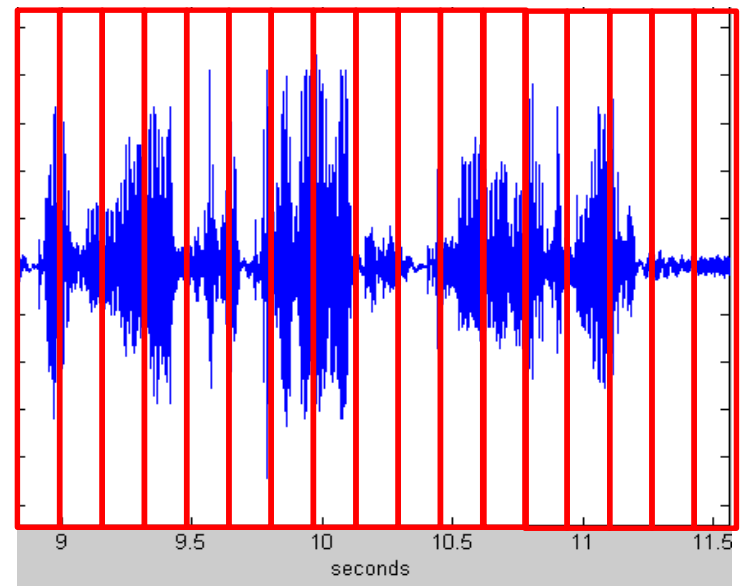
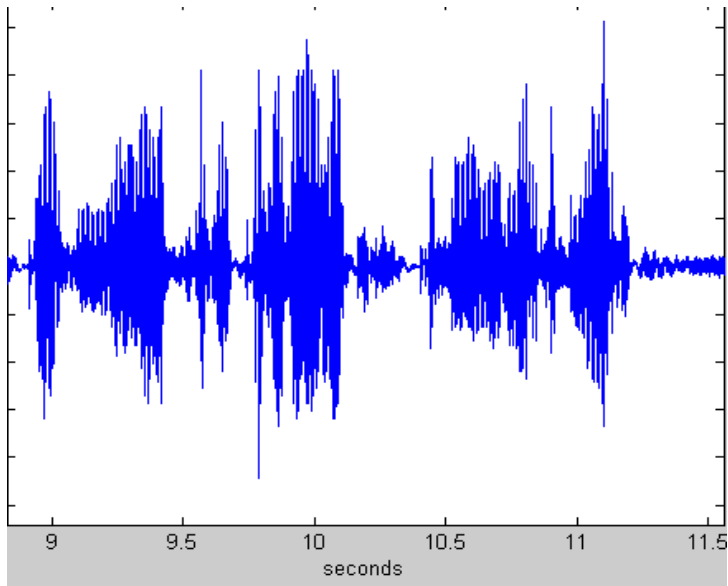
- Why Measure Failed Calls?
- What Causes Analogue Calls to Fail?
- Defining a Failed Call
- Reporting Failed Calls

- Failed calls are not answered by an Alarm Receiving Centre: Risk to Users
- Network changes being made by telecoms companies increase the risk of failed calls
- No standard definition or reporting of failed calls:
 - Can't track prevalence or location of issues
 - Can't determine trends
 - Haven't got a benchmark to measure reliability of digital telecare against

What Causes Analogue Calls to Fail?



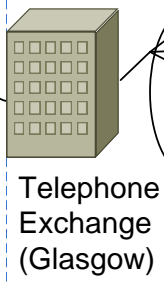
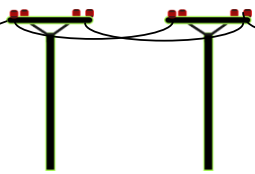
What Causes Analogue Calls to Fail?



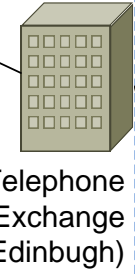
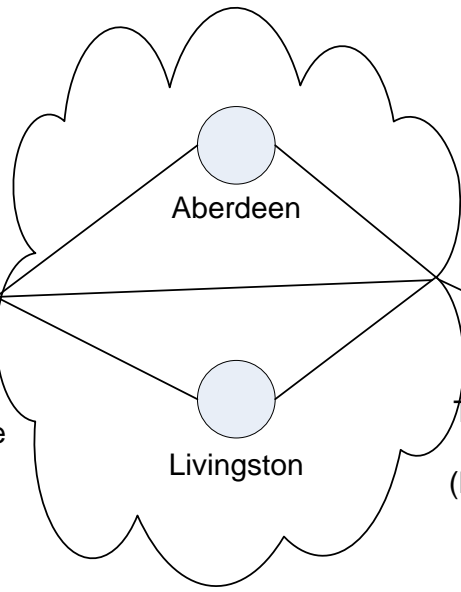
What Causes Analogue Calls to Fail?

End User Connections

Analogue
Phone Line

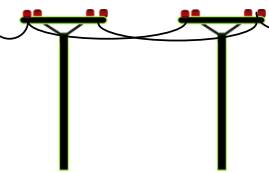


Telephone Core Network

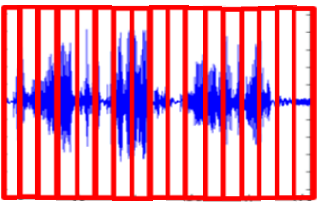


ARC Connection

ISDN30



Alarm
Receiving
Centre



- We need a standard definition of a failed call so everyone is measuring and reporting on the same thing....

“A call between an alarm unit and an Alarm Receiving Centre that has not been correctly answered due to failed analogue signalling caused by conversions between analogue and digital in a telecom provider’s network”

Failed call reporting should....

Include:

- Calls using any form of analogue signalling (DTMF, STMF, BS8521, etc)
- Calls from dispersed users and grouped housing deployments

Exclude:

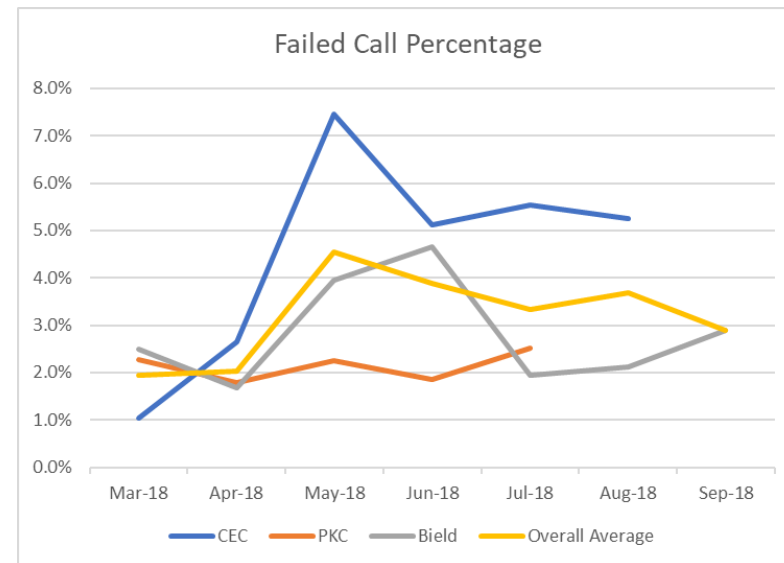
- Calls successfully logged by the ARC and/or routed to a call taker
- Calls using digital signalling (SCAIP, NowIP, Cenelec/ TS 50134-9, etc)
- Calls that fail due to faulty end-user equipment either generating multiple or corrupted calls
- Calls that are cancelled by the user prior to them being answered or routed to a call taker
- Repeat activations linked to equipment faults;
- Installation or pre-programming test activations.

Reporting Failed Calls

- Partnerships asked to report monthly:
 - Number of analogue telecare users served
 - Total number of analogue calls received during the month
 - Total number of failed analogue calls seen during the month.

Partnership		Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18
Edinburgh	Number of Users	9,144	8,800	8,987	9,174	9,054	9,024	
	Number of Calls	34,366	30,359	35,844	35,332	30,782	31,076	
	Number of Failed Calls	357	806	2,673	1,808	1,702	1,632	
	Calls per user	3.8	3.4	4.0	3.9	3.4	3.4	
Perth & Kinross	Number of Users	3,707	3706	3744	3733	3728		
	Number of Calls	8,742	8,452	9,507	8,269	8,978		
	Number of Failed Calls	199	152	215	153	226		
	Calls per user	2.4	2.3	2.5	2.2	2.4		
Bield	Number of Users	12,394	12,394	11,040	11,040	11,040	14,539	15,666
	Number of Calls	29,487	32,860	33,386	30,117	30,083	44,393	41,030
	Number of Failed Calls	735	549	1,319	1,402	582	942	1,189
	Calls per user	2.4	2.7	3.0	2.7	2.7	3.1	2.6

Failed Call Percentages		Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18
CEC		1.0%	2.7%	7.5%	5.1%	5.5%	5.3%	
PKC		2.3%	1.8%	2.3%	1.9%	2.5%		
Bield		2.5%	1.7%	4.0%	4.7%	1.9%	2.1%	2.9%
Overall Average		1.9%	2.0%	4.6%	3.9%	3.3%	3.7%	2.9%



- Programme will issue:
 - Explanatory paper
 - Instructions for running failed call reports (Tunstall, Jontek, Chubb)
 - Template for reporting

- Any Questions??