

Privacy Impact Assessment (PIA) – Screening Tool

Please use the PIA Screening Tool to identify whether your proposal is likely to have an impact on privacy and require further assessment.

When complete, a copy of this document must be forwarded to the Information Rights Unit (IRU): DataProtectionOfficer@wales.gsi.gov.uk and copied to your [Information Asset Owner](#)

IRU will endeavour to respond within 5 working days.

Title of Proposal:	Energy Efficiency Strategy
Department:	Natural Resources
Lead Official:	Lucy Thomas
Information Asset Owner:	Gretel Leeb
PIA Reference Number:	

1. Please describe your proposal:

- (i) *If this is a change to an existing system/ project/ process/ policy then please outline the present arrangements and how personal data is currently processed.*
- (ii) *Detail how the new system/ project/ process/ policy will work, including how the personal data will be processed and whether the personal data will be shared with 3rd parties.*

Current position

This is the first energy efficiency strategy for Wales.

The encouragement of energy efficiency is devolved to Wales; however, we do not have the powers to regulate on energy efficiency. We will continue to work with the UK Government in respect of their regulatory measures.

Proposed change

We are developing a new strategy that considers not just the Welsh Government's role in driving this agenda, but also the role of other organisations, of businesses and of householders.

The policy intention is to deliver the proposed vision for Wales by 2025, that is;

- We want to ensure that Wales is in the best possible position to realise its full energy efficiency potential and become a major exporter of energy efficiency technology and know-how.

Through the information submitted during the call for evidence and other evidence available, areas of action have been identified under the following five key themes: overcoming barriers; developing the supply chain; skills and education; innovation; and finance.

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The Welsh Government will not process or hold personal data as part of this strategy development and high level implementation. However, the Welsh Government is committed to undertaking a Privacy Impact Assessment for any personal data may be processed, or held, for any actions that we take forward to deliver on the strategy.

2. Will the proposal involve the processing¹ of information that could be used to identify individuals (personal data)?

☒ No – There is no need to complete the remainder of this form. Please forward your answers to IRU at DataProtectionOfficer@wales.gsi.gov.uk

☐ Yes – Please complete the remainder of the form.

3. Has privacy impact screening or assessment already been carried out?

☐ Yes – Please provide details below. ☐ No

Details of completed PIA (date; outcomes)

4. Please tick the personal data items that will be processed:

Personal

- | | |
|---|--|
| <input type="checkbox"/> Name | <input type="checkbox"/> Telephone Numbers |
| <input type="checkbox"/> Home Address | <input type="checkbox"/> Date of Birth |
| <input type="checkbox"/> Business Address | <input type="checkbox"/> Driving Licence Number |
| <input type="checkbox"/> Postcode | <input type="checkbox"/> Passport / ID Card Number |
| <input type="checkbox"/> Email Addresses | <input type="checkbox"/> Photographs / images
(which could be used to identify an individual) |
| <input type="checkbox"/> Unique identifying number
e.g. store loyalty card, library card etc | <input type="checkbox"/> Other (please specify) |

Sensitive

- | | |
|--|---|
| <input type="checkbox"/> Racial / Ethnic Origins | <input type="checkbox"/> Biometric data e.g. DNA, finger-prints |
| <input type="checkbox"/> Political opinions | <input type="checkbox"/> Personal financial information (e.g. bank or credit card details) |
| <input type="checkbox"/> Religious beliefs | <input type="checkbox"/> Mother's maiden name |
| <input type="checkbox"/> Trade Union membership | <input type="checkbox"/> NI Number (or equivalent) |
| <input type="checkbox"/> Physical / mental health or condition | <input type="checkbox"/> Tax, benefits or pensions records |
| <input type="checkbox"/> Sexual life | <input type="checkbox"/> Health or social service |

¹ The term 'processing' includes a wide range of activities such as collection, use, disclosure, retention or disposal of information.

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☐ Criminal & court records
(inc. alleged offences)

☐ Educational records

records e.g. Housing or Child Protection

☐ Employment records (inc. self-employment and voluntary work)

☐ Other (please specify)

Details:

5. For the personal data being processed, please indicate:

Who the Data Controller is: (see notes section for the definition of a Data Controller)	<i>Details: In the case of joint data controllers, please indicate the personal data each has responsibility for.</i>
Any Data Processors: (see notes section for the definition of a Data Processor).	<i>Details: In the case of data processors, please indicate the personal data each has responsibility for.</i>
Will the data be shared?	<i>Details: Please specify if the data will be shared internally with other parts of the Welsh Government or externally with third parties. Also indicate if the personal data being shared is non-identifiable / anonymised.</i>

6. What is the legal basis for processing the data?

Details:

All of the Welsh Government's powers are derived from statute. Please identify the legal power the Welsh Government is exercising to carry out this proposal.

7. Will the proposal involve new or significantly changed processing of personal data about each individual?

Details:

For example, have you been collecting personal information from individuals for a particular purpose and would now like to use that information for a different purpose?

Data Handling

8. Will the personal data be consolidated, linked or matched with data from other sources?

☐ Yes – Please provide details below.

☐ No – Go to Q9.

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Details:

For example, are you planning to compare or link the data that you collect with data held in another database?

9. Does the proposal involve new or changed data collection, retention or sharing policies / practices for personal data?

☐ Yes – Please provide details below. ☐ No – Go to Q10.

Details:

Technology

10. Will the proposal involve the introduction of privacy-intrusive technologies such as:

☐ Yes – Please provide details below. ☐ No – Go to Q11.

- | | |
|--|---|
| <input type="checkbox"/> Smart cards | <input type="checkbox"/> Digital image and video recording |
| <input type="checkbox"/> RFID tags
(radio-frequency identification) | <input type="checkbox"/> Profiling, data mining or logging of electronic traffic
(process to identify patterns in large data sets) |
| <input type="checkbox"/> Biometrics | <input type="checkbox"/> Locator technologies (e.g. GPS, mobile phone tracking) |
| <input type="checkbox"/> Visual surveillance (e.g. CCTV) | <input type="checkbox"/> Other (please specify Details below) |

Details:

Identity

11. Will the proposal involve new or changed identity management or authentication processes?

☐ Yes – Please provide details below. ☐ No – Go to Q12.

Details:

12. Will the proposal have the effect of enabling identification of individuals who were previously anonymous?

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☐ Yes – Please provide details below. ☐ No

Details:

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Notes

Data controller means a person who (either alone or jointly in common with other persons) determines the purpose(s) for which and the manner in which any personal data are, or are to be, processed.

A data controller must be a “person” recognised in law i.e.:

- individuals;
- organisations; and
- other corporate and unincorporated bodies of persons.

Data controllers will usually be organisations, but can individuals e.g. the self employed / sole traders. Even if an individual is given responsibility for data protection in an organisation, they will be acting on behalf of the organisation, which will be the data controller.

In relation to data controllers, the term ‘jointly’ is used where two or more data controllers act together to decide the purpose and manner of any data processing. The term ‘in common’ applies where two or more data controllers share a pool of personal data that they process independently of each other.

Data controllers must ensure that any processing of personal data for which they are responsible complies with the DPA. Failure to do so risks enforcement action, even prosecution, and compensation claims from individuals.

Data processor means any person (other than an employee of the data controller) who processes the data on behalf of the data controller.

Data processors are not directly subject to the DPA (although most will also be a data controller in their own right for the processing they do for their own administrative purposes). Data controllers remain responsible for ensuring their processing complies with the DPA, whether they do the processing in-house or by engaging a data processor. Where roles and responsibilities are unclear, they will need to be clarified to ensure that personal data is processed in accordance with the data protection principles.

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For completion by IRU:

Is a formal PIA assessment required for this proposal?

☐ Yes ☒ No

No personal data being processed.

Has advice on DPA compliance been provided?

☐ Yes ☒ No

N/A – No personal data being processed.