

DIGITAL DATA PROTECTION IMPACT ASSESSMENT ALPHA PROJECT CLOSURE REPORT

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Sign off

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Project Review

Introduction

The appropriate handling of personal data is the responsibility of all individuals in an organisation. The current privacy legislation, the Data Protection Act 2018 and the General Data Protection Regulation have made an effective best practice mechanism, the 'Data Protection Impact Assessment (DPIA)' and made it a legal requirement in some instances of processing. The Data Protection Impact Assessment is an extremely useful organisational tool and the benefits that can be derived from undertaking them far outreach the initial ones of identifying and managing any risk to privacy on specific projects.

In December 2018, the GMCA were successful in our bid to secure funding for the Digital Data Protection Impact Assessment project. Our bid further outlined the challenges faced around current paper and word documents based practices with regards undertaking a DPIA and detailed how the creation of a universal and compliant digital tool could support and empower staff.

It was important to understand early on in the project the drivers behind the project and articulate the part of plumbing we were seeking to fix. We felt it useful to create digital content to convey this to stakeholders and interested individuals:

User stories were a big focus of the project it was imperative to ensure the digital solution we sought to develop was addressing the needs of the users. In addition to gaining insight from several different user groups, we also collated valuable feedback from show and tell sessions, which included cross-sectoral national stakeholders.



1. ***As a Non- Information Governance Specialist, I need to be able to easily complete a data protection impact assessment so that I can continue to deliver my projects and work.***
2. ***As an Information Governance Lead, I need to be able to accurately assess a data protection impact assessment in order to provide the correct advice and guidance***
3. ***As a Data Protection Officer, I need to ensure that Data Protection Impact Assessments are complete appropriately as that I can be sure that the organisation is compliant with legislation and reduce our risk of fines or enforcement action.***
4. ***As a Senior Risk Owner, I need a process that supports data protection by design and that I can easily understand and sign off so that I can keep track of all the work under my remit.***
5. ***Having strategic responsibility for the Information Governance agenda in a city region area, the assurance a consistent, visible and collaborative digital tool will provide is of great importance. As a devolved area, a tool that is used consistently across government departments will certainly fix the plumbing from central to local.***

Keeping sight of our user journeys has been key in our approach and project design. Particularly keeping sight of our primary user journey and objective: A tool that makes the process easier for non-Information Governance Professionals. [Appendix i](#) details the product we have developed.

Approach

We set out to ensure that our approach to designing a digital data protection impact assessment was aligned to GDS standards and the principles set out in the local digital declaration. This included designing with and around people's needs (outlined in the 'people' section below), to fundamentally focus upon fixing the plumbing and doing this safely and securely (outlined in the 'technical' and 'digital' section below). Finally, openness and collaboration were key to the success of this project and we learnt and adapted our approach as we went through.

The detail in the short video about our approach explains these three key elements further:

- Technical (ensuring a fit for purpose and compliant tool)
- People (ensuring that it met our core objective of being user friendly and meeting the needs of non-Information Governance professionals)
- Digital (bringing the project to life in a dynamic and innovative way)



The timescales were tight and on reflection, we may have worked in a slightly different way in terms of our approach. Whilst there was a lot that went well we have learned a lot about developing a digital project of this type. A lessons learnt log can be found in [Appendix i](#).

In order to ensure we kept to the design elements we firstly needed to create a project team with the relevant expertise as well as support us in working alongside a range of stakeholders.

Data Protection Expertise

The GMCA has a number of data protection subject matter experts in the Information Governance Team who have experience in undertaking DPIAs across large-scale programmes of complex, multi partner, cross- sectorial reform programmes. The project team recognised however that the value in co-design and collaboration on the content for the tool would make it a more viable product as the assurance of further SME's across public service delivery would ensure its scalability.

We brought in strategic partner from health and care (Greater Manchester Health and Social Care Partnership) and from Transport (Transport for Greater Manchester). Taking a proactive approach to continued engagement of key stakeholders, we also utilised existing networks and groups to maximise on knowledge gain. Groups such as the Association of GM Authorities IG group, comprising of representatives from our ten local authority partners were a mechanism for this.

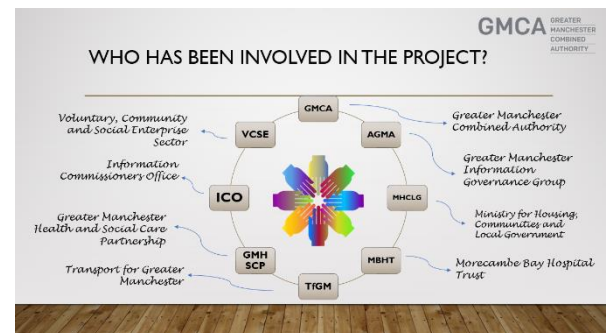
To provide a critical friend and assurance oversight, we also engaged the Information Commissioner's Office who gave their support to the project and provided vital insight as the national regulatory body for Information Governance.

The ICO said:

'The Information Commissioners Office (ICO) is pleased that Greater Manchester Combined Authority (GMCA) has consulted us right at the start of their exciting project to create a digital DPIA. This will enable the ICO to offer its advice and support to GMCA throughout its development, and we look forward to continuing this important collaboration'.

Technical Expertise

As mentioned in our initial bid our development team are from Morecambe Bay Hospital Trust (MBHT) and are the team behind the successful Information Sharing Gateway (ISG), a nationally used Information Governance tool that enables the creation of Information Sharing Agreements between multiple organisations. Our collaboration with MBHT has been fantastic. Their knowledge from the ISG has been crucial in enabling us to work at pace to build out a prototype system which really demonstrates the benefits of a digital data protection impact assessment tool whilst ensuring that any build fit within our broader of ambitions for integration through an automatic programming interface longer term.



People

This tool is designed with a focus on users from a none Information Governance background to use, and so we have collaborated with project professionals from range of organisations including the GMCA, local authorities within Greater Manchester and representatives from the Voluntary, Community and Social Enterprise Sector. These users gave their open and honest feedback on the language used in the proposed text used in the tool. The user feedback has been a key driver to understanding in more detail user needs. The feedback has directly contributed to us developing and being agile with our approach. We explain in more detail further on in the report but it became clear that the tool could be developed also as a way in which to provide educational guidance and coaching in plain English with regards the completion of DPIAs.

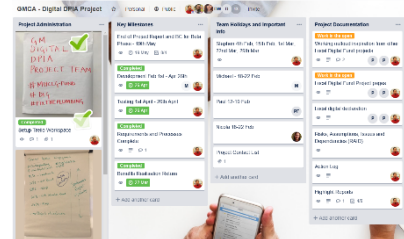
Along with the partners identified above, we have also valued the partnership with the Local Digital Collaboration Unit. The Unit's contributions have been welcomed and we have found significant added benefit to working with the team including access to training opportunities through the GDS academy which in particular has shaped and informed our approach to agile and visual working (e.g.

use of Trello). It was great to meet members of the team in person when attending the pre project workshop in London and at the roadshow event in Bradford. It has been a very positive experience working with the Local Digital Collaboration Unit with an open and co-operative spirit.

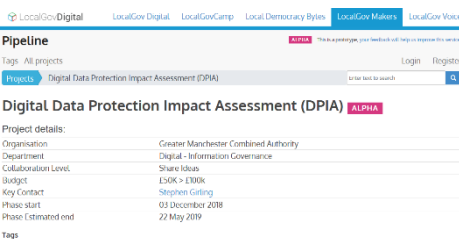
The contribution of all of the project team members has directly contributed to the success of the Alpha phase of this project and will be vital to the continued success in the next phase.

Working in the Open

Whilst our three key work strands have driven the project development, our commitment to working in the open has been crucial to ensuring we created the conditions which actively enabled collaboration across the project team and with key partners and stakeholders. We have tried to ensure this through a variety of ways. As our team were based across different sites we have utilised Trello as our project management tool along with Huddle as our document-sharing platform ensuring not just an effective way of sharing information and documents but also openness amongst the project team and stakeholders.



Throughout the project, we have maintained a constant presence on social media, using Twitter to promote our project and to share information about our work. This included links to the



LocalGovDigital Pipeline site where we provide regular updates on the project. As well as the short videos embedded within this report to help keep individuals informed of our journey.

We attended the Local Digital Collaboration Roadshow in

Bradford and it was great to hold a round table discussion on our project and gather useful feedback from attendees. We followed this up by attending the LocalGovDigitalCamp in Manchester where we presented the Digital DPIA project. This again gave the opportunity to talk to delegates whose experiences of DPIA's reflected our user research and it was very positive that what they thought would make the process easier, reflected what we had begun to build out in our prototype system.



MHCLG provided members of the project team with Agile for Teams training. This training course was positive on a number of levels not just providing quality professional development but also the chance to reflect on the project and our working styles. We took several key learning points from the training and applied them within our approach.

To view some of our approaches to working in the open these are the links to various platforms we have utilised throughout the project:

[Digital DPIA Trello Board](#)

[Digital DPIA LocalGovDigital Pipeline Page](#)

[Digital DPIA Twitter Feed \(via GMCA Digital\)](#)

[Digital DPIA YouTube Channel](#)

[Digital DPIA Digital DPIA GitHub](#)

Our Project Journey / User Insight

From our discovery phase, our user research findings could be grouped into three thematic areas:-

- The lack of a consistent approach amongst organisations – despite attempts to create a standardised paper/electronic format there was still variations in the process amongst organisations.
- Staff feedback – templates were difficult to understand or complete, the language was often legalise and specialist competing assessments delay project start dates and sign off posts being complicated and lengthy.
- The lack of a suitable product on the market. The nearest solution being the French CNIL tool, which was found to be lacking in certain key areas and the content did not meet the needs of UK legislation.

For the alpha phase our first stage of user research focused on identifying what would make a tool compliant, ensuring it covered all the relevant consideration from a legislative perspective. It was important to undertake a baseline assessment as part of the discovery phase this involved collating exiting DPIA templates in use from a range of organisations in Greater Manchester. This allowed us to assess where the commonalities and gaps were and where organisations had specific requirements to allow for designing to the maximum potential user base.

Following consultation with Information Governance leads across our stakeholders, we identified a whole range of additional requirements that in the initial scoping exercise the project team has not identified.

These included:

- screener questionnaires – Before carrying out a DPIA a set of screener questions to be developed so that project professionals could assess if they needed to undertake a full DPIA
- CCTV usage – There are specific considerations with regards CCTV and the Surveillance Camera Commissioner
- Additional information was identified to be included to support the use of the Digital Economy Act Powers and the related Codes of Practice.
- A “light” version to support when DPIA were not a legal requirement but would support project management and risk
- The ability for the system to be interoperable and integrate with a data flow mapping tool

The additional requirements and a lot of the feedback received were valid however are parked for another stage of development due to time pressure associated with the alpha project timeframe.

The requirements identified as part of user/stakeholder engagement were added to the project backlog and we hope to explore these further within our beta development as part of the tools expansion. These expansions to the tool will bring further benefits to organisations and increase the usability.

Regarding learning from the discovery phase, the biggest barrier to completing a data protection impact assessment that came up most often was the templates were lengthy documents and that the language was inaccessible and confusing. We knew digitising the process would serve to reduce the perception of length by hiding excessive or irrelevant questions. However the language barrier would need a lot focus to ensure we understood this in enough depth to address it thoroughly.

The approach we took to ensure we kept to plain English and easy to understand phraseology meant addressing this in phases. The data protection SMEs worked on simplifying the questions designed to tease out the required information to assess privacy risk. Careful consideration had to be given to not losing in translation something that was key for legislative compliance. This was a key stage not just for improving the tool but also taking this group of stakeholders through the user journey and to gain their buy in and understanding of the challenges faced by none specialist staff.

In addition further amendments to the language were undertaken using “plain English” guidance. This key element of the design process was difficult, as not a lot of work has been undertaken in this area. Drawing upon examples from the Information Commissioner Office however did provide useful. It was felt that the approach we had taken gave us an end-product of a solid “clean” set of questions for the first stage of user feedback.

The sample questions were sent to a range of users. The feedback was grouped into three thematic areas:-

- Content design (i.e. Language) – The smallest of the areas and often was linked to specific words and phrases e.g. “processing”
- Understanding of the Question – A number of responses queried what was actually meant by the question and why it was being asked.
- Approach to answering the question – Linked to the point above, individuals often understood the question but had no idea how to approach answer it, the level of detail or where to find the information.

This created a turning point for the project and the project team. Based on the discovery phase insight the assumption had been that a simplified digital approach would provide a sufficient solution to the challenge. The project team had two choices – continue as planned and produce a tool that was compliant and spanned the full DPIA process but knowingly failed on key objective of being user friendly. Or to fully embrace an agile approach and change to the project to ensure the best possible tool was developed.

A specific project workshop was brought together to review the feedback. It highlighted that a key element missing from our current project (and in common with the existing French CNIL tool) was an educational element that supported, facilitated and held the hands of users as the questions were completed. It was agreed to develop and test this aspect further within the Alpha phase and agreement was reached within the project team to change the scope of what we were developing.

The team focused in specifically on one question that had received significant feedback and queries which was “conditions for processing”. Although the tool already broke down the potential options for conditions for processing through several questions, feedback had come back from users that they still felt unconfident in completing the question as it was perceived as a technical area, fearful of putting in the wrong answer or just generally did not understand it.

Since beginning the project the ICO has produced an interactive “[Lawful Basis for Processing Guidance Tool](#)”. The project team reviewed this and although it provided some useful technical guidance for us to incorporate, it still fell into a similar style and trap of our first iteration of questions in terms of language, jargon and assumed technical knowledge.

The key difference between the ultimate approach the project team took compared to the existing tools (beyond language) was to further break down the questions to enable a more step by step approach and created a more richer and complete response. Following successfully completing this particularly technical question it was agreed to review all the questions again with this lens and develop a more sophisticated level of logic to maximise the benefit of this resource for our key user group. The experience was a valuable and positive lesson learnt not just from a project development viewpoint but also our broader approach to project management. Taking a more agile approach enabled us appropriate reflection points so that we could truly listen to user feedback and its implication. Not to mention our ability to ultimately change direction that would not have happened if we had followed a more traditional fully waterfall style methodology.

Through our final show and tell and initial testing stages, we received positive feedback regarding what has been developed of the DPIA process so far – there is definitely a high interest level and demand for the tool from a range of organisations. The additional education approach where the tool provides additional guidance and learning as a user progresses through the process has also been warmly received. This has been reassuring and was a key aspect on which we wanted feedback.

A key area that has not yet been developed but is a key requirement is the ‘Risk’ section of the tool. Risk registers for DPIA’s are a notoriously difficult section for users to complete. Often key risks are overlooked but the process is also arduous, as risks have to be pulled from previous responses manually. We discussed with users using a similar approach to the Information Sharing Gateway where a register is generated based on the user responses and generally, this was seen as a suitable approach. However, we have received additional requests and details to the user stories for the section. Individuals also need it to be editable to enable unique risk (due to the diverse range of topic areas) to be added and also to review and finesse the background logic model to the register in terms of the RAG rating to enable more variance as for some of the risk areas a high nuance of detail would

be needed. Additionally the ability to generate a more detailed risk register will make project initiation processes far more robust as they would not just support the information governance process but assist in the broader project risk management processes.

Moving into the next phase, we have some refinements to make to the areas already developed as well as a number of requirements that have fallen out of scope but are required for a minimum viable project as they are crucial to the DPIA process. We also have a project log of parked additional user requirements to meet the range of project topic and areas requiring data protection impact assessments (CCTV and a “lighter” option for the process have been repeatedly mentioned). As detailed, further on we have reviewed a number of project approaches to develop this.

For further information on the development of the prototype for the Alpha phase, please see [Appendix i](#).

Stakeholder Feedback

Information Governance Professionals

The feedback we have received from information governance stakeholders has been very encouraging. Through the show and tell sessions we have been able to demonstrate the tool we have developed and some of the feedback received from these sessions has been:

“We did over 60 PIA’s last year and will probably do more this year (we do them as Business Privacy Impact Assessments) so anything that could help us save even 30 minutes off the time spent would be a benefit.”

“I think the alpha version of this looks really good”

“Very interested to see the Alpha format of the Digital DPIA tool, based on the ISG”

“I’m sure you’ve heard this before but the work you’re doing will be music to many an ear!”

Even though the tool is aimed at making the process easier for non IG professionals, we believe strongly that the follow on benefit from this will be a much improved process for IG professionals too and so far what we have done reflects this. The show and tell sessions have resulted in our pool of stakeholders growing with interest coming nationally, not just within Greater Manchester. These stakeholders are keen to stay involved with the project and present us wider opportunities for user testing in the next phases.

General Users

As part of the development of the content for the digital data protection impact assessment tool, we sought feedback from non information governance professionals on the wording of the questions. We collated this feedback and the common theme coming from this was regarding processing and understanding what this meant within the context of the assessment.

This informed our change of approach during the Alpha phase to move from developing a DPIA with all of the questions to specifically focussing on the Legal section and ensuring that a user can properly articulate their processing activities.

The below image shows the common themes that came from the feedback provided to the questions:



It was the common theme relating to processing which combined with a member of our own development team highlighting the need to go further into processing and making it truly user friendly that led to the change in approach.

Initial Testing

The Alpha phase testing of the system has been contained to the project team. This was driven largely by the change in focus to really build out the Legal section rather than create a skeleton DPIA in the prototype. Because of the timescales and the effort it has taken to produce the detailed Legal section and because at this stage a user wouldn't be able to replicate a DPIA within the tool, we opted for show and tell sessions to present out product, rather than inviting user testing. We fully acknowledge that more extensive user testing needs to take place in the next phase and we are committed to facilitating this.

Within the project team we have tested the areas which have been developed within the system and then we have presented this functionality to project stakeholders. We are confident that what we have developed does bring the overall objective of the project.

The Vision for the Future

The vision for the digital DPIA is for it be a business and organisational enabling tool. A dynamic, collaborative and interoperable mean in which organisations can undertake DPIAs and then go on to derive further benefits. Such as providing a dynamic risk profile to the organisation where privacy is concerned. Data analysis capability where data standards designed into the development of the tool to provide a picture of risk across a city region area. The ability to make elements of DPIAs public and to share them with other organisations undertaking the same or similar projects. The development of a digital DPIA that is scalable at a national level user base is an ultimate game changer in how IG practices can become in line with digital government, large scale digital health and care transformation programmes and serves to fix the plumbing by linking digital tools that exist in other areas privacy and IG practices to provide a suite of 21st century privacy and IG tools.

This video presents the vision for the digital data protection assessment tool:



Next Phase Options

This section of the report will detail the options for the next phase of the project starting with our preferred option, an intensive beta phase to deliver a full product.

As part of the planning for the next stage of the project we will explore a variety of approaches to the development including a low code approach which will put the user needs first and a focus on detailed coding second. As such, the costings for the next phase are indicative and will be refined in any subsequent funding applications.

Intensive Beta Phase – Full Product

With a significant level of investment the Beta phase could run to deliver the full DPIA product. The aim of this project phase will be to have developed a product that delivers all of the key requirements and demonstrates interoperability with the Information Sharing Gateway and a data mapping tool.

Within this phase, developing an MVP would be prioritised and the plan would be to go live with an MVP to a contained number of stakeholders within the first half of the project, and then to develop the additional requirements and release them to the tool over the second half.

The data protection impact assessment would be developed to its fullest form including integration with the Information Sharing Gateway and potential integration with data flow mapping software.

As part of the project, ergonomic testing will take place with a range of potential users to ensure that the product delivers value to organisations and delivers on the benefits. This testing will focus on how the users use the DPIA tool and the learning from this will influence how the tool is developed through the iterative cycles. Towards the end of the project, there will be time dedicated to full system testing, ensuring that processes within the tool are joined up and that user end to end journeys can be completed.

The project will engage with stakeholders across Greater Manchester and nationally throughout the 26 weeks with the objective of readying them for the adoption of the tool via a Go Live phase. By delivering a tool that is fully integrated with the ISG and with a data mapping software, we will have an existing user group which we can approach and invite to adopt the usage of the tool.

It is envisaged with this option to have multiple developers working simultaneously on different aspects of the development, co-ordinated into sprints and then released to the live product based on a prioritised approach.

As part of this project, consideration will need to be given to the hosting of the tool on a long term basis so along with user stakeholder engagement, there will be a focussed drive on promoting the tool to key national organisations who are best placed to host and maintain the tool.

Based on a 26 week intensive Beta phase, the milestone plan would look like:

Wk 1 - 2	Wk 3 - 4	Wk 4 - 24	Wk 22 - 24	Wk 22 - 26
<ul style="list-style-type: none"> •Scope definition •Project initiation 	<ul style="list-style-type: none"> •Backlog refinement •Development planning 	<ul style="list-style-type: none"> •Sprint Dev Cycles •Ergonomic Testing 	<ul style="list-style-type: none"> •End to end user testing •Show and Tell Session 	<ul style="list-style-type: none"> •Project closure

A communications and engagement plan will run throughout the project lifecycle.

Outputs

- A fully developed digital data protection impact assessment tool
- Full integration with the Information Sharing Gateway
- Ergonomic testing and end to end user journey testing report
- Benefits realisation analysis
- All code available open source via the project GitHub page

Benefits

- A fully developed tool which is ready for Go Live with a range of stakeholders, both locally to Greater Manchester and nationally

- Would deliver a tool that can immediately be adopted and will deliver real benefits to organisations
- Would allow for review of benefits to inform ways of maximising future investment
- Full integration with the ISG and data flow mapping software

Considerations

- This approach will require a dedicated full time team to deliver a complex set of requirements in order to achieve the goal of a fully developed product
- This approach requires significant investment

Resource Costings

<u>Resources required</u>			
Resource	Quantity required	Total cost/value for this application	Funding Source
Digital Developers	24 weeks equivalent	£216,000	Local Digital Fund
IG Lead	13 weeks	£26,000	GMCA / In Kind
IG Lead(s)	26 Weeks	£42,000	Local Digital Fund
Lead Partners IG Support	22 Days	£9,000	GMCA / in Kind
Agile Project Manager	26 weeks	£23,400	Local Digital Fund
Administration Support	26 days equivalent	£4,160	GMCA / In Kind
ISG Developer	25 days equivalent	£10,460	Local Digital Fund
3 rd Party Data Flow Mapping Developer	3 weeks	£10,000	Local Digital Fund
ICT Services Manager – Testing and On boarding	10 days equivalent	£5,000	Local Digital Fund
Business Analyst	26 weeks	£17,500	Local Digital Fund
Branding		£5,000	Local Digital Fund
Project Expenses	Ad Hoc	£15,000	Local Digital Fund

(inc. room hire, events, refreshments, printing etc.)			
Total funding requested of MHCLG:		£344,360	
Total Funding Contributed by applicants:		£39,160	

Intensive Beta Phase - MVP

An option which would require a lower initial investment is 26 week Beta phase which would deliver a minimal viable product. This product would then be tested and iterated based on user feedback to further develop the additional features which would be out of scope of the MVP. This approach would allow the project to develop a product which is ready for use in a shorter timescale however it would not include the additional requirements and the interoperability with the Information Sharing Gateway would potentially be in a more limited capacity as part of the MVP, but would be developed as a further iteration.

The focus on this phase would be to develop the tool to a point where it could be used to process a data protection impact assessment with the requisite level of detail to hand hold a user through the process. The risk generation tool would be built out but as a minimum requirement and so this would not necessarily have all of the 'should' and 'could' have requirements, just the must haves. The sign off process would also be developed.

The key difference between this approach and the first option is the level of resource and therefore what is achievable in the timeframe. With this option, the project would be looking to deliver a minimal viable product which at the end of the phase can go live and then with adequate supporting mechanisms which would need to be resourced as a next phase, iterated to develop the tool to its full potential.

Based on a 26 week intensive Beta phase, the milestone plan would look like:

Wk 1 - 2	Wk 3 - 4	Wk 4 - 18	Wk 18 - 24	Wk 22 - 26
<ul style="list-style-type: none"> •Scope definiton •Project initiation 	<ul style="list-style-type: none"> •Backlog refinement •Development planning 	<ul style="list-style-type: none"> •Development •Testing 	<ul style="list-style-type: none"> •End to end user testing •Show and Tell Session 	<ul style="list-style-type: none"> •Project closure •Ongoing agile development planning

A communications and engagement plan will run throughout the project lifecycle.

Outputs

- A minimal viable product digital data protection impact assessment tool
- Partial integration with the Information Sharing Gateway
- Testing report of the end to end user journey
- Benefits realisation analysis
- Soft launch users identified
- All code available open source via the project GitHub page

Benefits

- A useable tool would be developed in a shorter time frame than the extensive Beta phase

- Would provide opportunity to see a basic version of the tool being used in a live environment in the next phase which would generate valuable user insights for improvements
- Would allow for review of benefits to inform ways of maximising future investment

Considerations

- This approach is reliant on further development once it is completed in order to iterate and improve the tool from an MVP, to a complete tool and funding is not secured for this
- The tool which can be created would not deliver on all of the user benefits so there is a risk to adoption across organisations
- Would not potentially deliver a full integration with the Information Sharing Gateway

Resource Costings

<u>Resources required</u>			
Resource	Quantity required	Total cost/value for this application	Funding Source
Digital Developers	22 weeks equivalent	£120,000	Local Digital Fund
IG Lead	65 Days	£26,000	GMCA / In Kind
IG Lead(s)	65 Days	£26,000	Local Digital Fund
Lead Partners IG Support	22 Days	£9,000	GMCA / in Kind
Agile Project Manager	26 weeks	£23,400	Local Digital Fund
Administration Support	26 days equivalent	£4,160	GMCA / In Kind
ISG Developer	25 days equivalent	£10,460	Local Digital Fund
ISG Project Admin	12 weeks	£11,250	Local Digital Fund
ICT Services Manager – Testing and On boarding	10 days equivalent	£5,000	Local Digital Fund
Business Analyst	26 weeks	£5,000	Local Digital Fund
Project Expenses (inc. room hire, events, refreshments, printing etc.)	Ad Hoc	£2,500	Local Digital Fund

Total funding requested of MHCLG:	£203,610
Total Funding Contributed by applicants:	£39,160

Extensive Beta Phase

The third approach to progressing forward with this work is to do a an extensive beta phase in order to produce a digital data protection impact assessment that is fit for purpose and delivers the user benefits which have been at the heart of this project.

The milestone plan for this phase is:

Wk 1 - 6	Wk 7 - 8	Wk 9 - 44	Wk 44 - 48	Wk 49 - 52
<ul style="list-style-type: none"> •Requirements •User research •Project initiation 	<ul style="list-style-type: none"> •Requirement refinement •Development sprints planned 	<ul style="list-style-type: none"> •Development •Testing 	<ul style="list-style-type: none"> •End to end user testing 	<ul style="list-style-type: none"> •Project closure

A communications and engagement plan will run throughout the project lifecycle.

The first 8 weeks of this phase will be focused on gathering feedback on the Alpha phase development, conducting further user research with a wider pool of stakeholders developed during the Alpha phase of the project and developing a detailed backlog of user stories.

The project will be scoped out during this phase and the development of each of the components broken down into sprints. As we work through the sprints we will commit to conducting retrospectives at the end of each to ensure that the project team is functioning to the best of its ability.

The development phase will be broken down into two main stages however within these stages there will be a series of sprints:

Stage 1 – To complete the remaining requirements needed for a full DPIA.

Developing an interactive tool is key for the longer-term success of the project. In this development phase we will be able to build out each section of the tool to the same detail as the Legal section developed in the alpha phase, and we will build out the interoperability with the Information Sharing Gateway. This will be a key selling point for the adoption of the digital data protection impact assessment tool as it will interact with a nationally recognised and used data protection tool. This interoperability is a key component of the tools which underpin the Greater Manchester Information Framework and so being able to deliver this would be a great benefit.

During this development we will conduct user testing after the completion of each sprint which will enable better testing with our core users. Our stakeholders will be able to see the development and evolution of the tool and they will play an active part in bringing the tool to completion.

Additional User Stories

There is a strong business case to develop two additional user stories – the CCTV module and a “light” version of the tool. Without these we know that the tool will not fully meet the need of our stakeholder and particular Local Authorities. Therefore, these additional requirements would be strongly considered for scoping into the development of the tool.

CCTV Module - CCTV is a growing area of public concern due to its increasing use but is a valuable tool utilised by a range of public bodies. From a Data Protection Impact Assessment viewpoint, there are specific technical and legislative aspects that need to be considered which will require additional questions to be built into the tool.

“Light” Version – Not every type of project legally requires a DPIA. However, there is a need for all organisations to evidence a “privacy by design” approach and that this has been considered as part of a project design and implementation. The demand for a light version of the tool has come from this aspect. Building in additional screener questions at the start of the process would enable a light version of the DPIA to be completed for project that did not require the full assessment. This is beneficial as it makes DPIA’s part of business as usual and not a painful addition to the project initiation process. It aids organisations in demonstrating privacy by design and default as well as aiding project management through a more detailed risk register.

Stage 2 – Refinement and Product ‘Go Live’ Readiness

The second stage of the development in this phase would be to ensure that the tool we have developed is refined and made ready to go live in the next phase. This will include focus on hosting and how the tool will be maintained, supported and updated in the future.

Next Phase Planning

Upon completion of this extensive Beta phase we would then be in a position to move into the next phase of Go Live. This will be informed by the Beta phase but at the moment, this is how we envision the project proceeding:

We would like to start the roll out of the tool with a soft launch to partners and stakeholders within Greater Manchester, and with key national stakeholders who have shown an active interest in the project, in the first instance. This would enable live usage of our MVP with each of the ten local authority areas as well as cascading the tool through of Information Governance Overview and Networking structures that include Health, Transport, Voluntary Community and Social Enterprise Sector and Housing Associations. Not only does this enable us to have an effective user feedback and query mechanism (both through the tool and face to face through our networks) but it enables the project team to actively support the training and embedding process within these organisations. We feel this is important in order to help support and create additional resources and tools that may help users – whether that is user documentation or papers explaining the tool to senior managers to aid embedding it into project management processes. During this phase the tool would be available to other Local Authorities but simply would be targeting our communications at this audience.

After the initial launch across Greater Manchester we would be look at a full launch of the tool on a national level. Key considerations need to be made on how to facilitate this particularly around the hosting and support of the tool. Through the development of the tool and when we do the soft launch, significant attention will be paid to how we scale this nationally and showcasing our tool to suitable national bodies who have the ability to make this a nationally available product.

Outputs

The outputs from this phase would be:

- A fully developed digital data protection impact assessment that delivers benefits on multiple levels and facilitate difference processes which rely on DPIA's, for example CCTV and a lighter version of the Digital Data Protection Impact Assessment
- Extensive testing reports and project logs of how the tool has been developed and iterated based on user feedback
- Detailed stakeholder engagement report
- Detailed benefit realisation report facilitated by having a system which can give an accurate reflection of the improvements and efficiencies a fully developed digital DPIA can bring
- All code available open source via the project GitHub page

Benefits

- A tool which is complete and ready to deliver the maximum amount of benefits when it goes live
- Full integration with the Information Sharing Gateway
- User testing at each stage of the development
- Focused end to end testing and user research of the completed tool
- A tool which is ready to rolled out across Greater Manchester and to nationally interested organisations
- Provides greater opportunity for stakeholder engagement events and showcasing of the tool

Considerations

- Significant investment is required to deliver an extensive Beta phase
- Having a 52 week project with the aim of a fully developed tool as an output presents a risk to delivery
- Would require a carefully planned scope in order to execute and so would be a less flexible model in terms of change

Resource Costings

<u>Resources required</u>			
Resource	Quantity required	Total cost/value for this application	Funding Source
Digital Developer	48 weeks equivalent	£144,000	Local Digital Fund
IG Lead	130 Days	£52,000	GMCA / In Kind
Lead Partners IG Support	45 Days	£18,000	GMCA / in Kind
Agile Project Manager	52 weeks	£46,800	Local Digital Fund
Administration Support	26 days equivalent	£4,160	GMCA / In Kind
ISG Developer	50 days equivalent	£20,920	Local Digital Fund
ISG Project Admin	25 weeks	£22,500	Local Digital Fund
ICT Services Manager – Testing and On boarding	20 days equivalent	£10,000	Local Digital Fund
Business Analyst	6 weeks	£10,000	Local Digital Fund
Branding		£5,000	Local Digital Fund
Project Expenses (inc room hire, events, refreshments, printing etc)	Ad Hoc	£5000	Local Digital Fund
Total funding requested of MHCLG:		£263,220	
Total Funding Contributed by applicants:		£74,160	

Second Alpha Phase

We are very proud of what we have achieved in this first Alpha phase of the project however we recognise that because of the focus on developing a prototype which truly demonstrates the user value of the tool, we haven't been able to do as much user testing as we had originally planned. Therefore, if we were to do a second Alpha phase, we could build out the bones of the tool so that a user can run through the entire process and we could then conduct extensive user testing and research in order to further evidence the benefits of a digital data protection impact assessment.

This development in this phase wouldn't go into the level detail as we have in the Legal section, as that section demonstrates the future potential of the tool. The development in this phase would instead move back to the original aim of producing an outline digital data protection impact assessment with some risk functionality. There would not be full interoperability with the Information Sharing Gateway, however there would be a minimal amount to demonstrate the benefit of full operability in the future.

Based on a 12 week second Alpha, the milestone plan would look like:

Wk 1	Wk 2 - 6	Wk 6 - 10	Wk 10 -12
<ul style="list-style-type: none"> • Scope definition • Project planning 	<ul style="list-style-type: none"> • Development 	<ul style="list-style-type: none"> • User testing • User focus groups 	<ul style="list-style-type: none"> • Project closure report • Next phase planning

A communications and engagement plan will run throughout the project lifecycle.

Outputs

- A prototype tool which demonstrates the end to end user journey
- Testing report of the user journey through the tool
- User research report
- Benefits case for developing to a Beta product
- All code available open source via the project GitHub page

Benefits

- Lower risk investment to complete the development of a prototype tool
- The prototype tool would allow a user to work through the process albeit without all of the detail
- Will allow for focussed user testing on the Alpha which will inform the scope of the Beta phase
- Allows for focused user research on the phase one Alpha prototype, and the phase two Alpha developments, to further strengthen the business case for the Beta phase

Considerations

- Slows down the momentum gained from the first Alpha phase in taking the prototype tool onto the next level
- Stakeholders have demonstrated that the benefits from the tool comes from the detail within in and the guidance it provides to a user, along with breaking down the questions with a sophisticated level of functionality. We have built this in one section in the first Alpha phase, but the second phase of building out the prototype would not allow for this

Resource Costings

<u>Resources required</u>			
Resource	Quantity required	Total cost/value for this application	Funding Source
Digital Developer	10 weeks equivalent	£30,000	Local Digital Fund
IG Lead	24 Days	£9,600	GMCA / In Kind
Lead Partners IG Support	12 Days	£4,800	GMCA / in Kind
Agile Project Manager	52 weeks	£10,800	Local Digital Fund
Administration Support	6 days equivalent	£960	GMCA / In Kind
ISG Developer	50 days equivalent	£20,920	Local Digital Fund
ISG Project Admin	6 weeks	£5,400	Local Digital Fund
Project Expenses (inc room hire, refreshments, printing etc)	Ad Hoc	£250	Local Digital Fund
Total funding requested of MHCLG:		£67,370	
Total Funding Contributed by applicants:		£15,360	

Discovery Phase

Reflecting on the user research and testing done to date, we could take the approach to do a short term discovery phase where we focus solely on taking the prototype we have developed and do user testing and research to inform the next Beta phase of the project.

If we were to do this phase we could spend focussed time on developing an extensive backlog of user requirements. We would do detailed user research and analysis which would take the form of workshops, surveys, show and tell sessions and user testing.

Outputs

- Detailed user research on as-is data protection impact assessment processes
- Detailed backlog of user stories
- User testing report of the prototype developed in phase 1
- Proposal report for Alpha or Beta phase development
- All code available open source via the project GitHub page

Benefit

- Provides opportunity for a detailed retrospective on the Alpha phase
- Provides opportunity for user testing on the prototype developed in first Alpha phase
- Would create a solid platform of user research and testing for future phases
- Low risk investment to provide assurance on the direction of travel for the digital DPIA tool

Considerations

- We are confident in what we have developed, why we have developed it and the benefits. Therefore, a discovery phase would likely only serve to re-inforce what we already know
- This would slow down the development of a tool for which there is a strong demand
- The outputs produced in this phase whilst being very detailed, can be done within the others phases too

Based on a 10 week discovery phase, the milestone plan would look like:

Wk 1 - 2	Wk 3 - 8	Wk 8 - 10
<ul style="list-style-type: none"> • Analysis planning • User research planning • Testing planning 	<ul style="list-style-type: none"> • User testing workshops • User focus groups - research • Surveys of potential users • Presentation of the tool at events and meetings • Development of project backlog 	<ul style="list-style-type: none"> • Analysis of testing and research • Detailed benefits realisation report

Resource Costings

<u>Resources required</u>			
Resource	Quantity required	Total cost/value for this application	Funding Source
IG Lead	20 Days	£8,000	GMCA / In Kind
Lead Partners IG Support	10 Days	£4,000	GMCA / in Kind
Project Manager	10 weeks	£9,000	Local Digital Fund
Administration Support	5 days equivalent	£500	GMCA / In Kind
Business Analyst	10 weeks	£6,750	Local Digital Fund
Project Expenses (inc room hire, refreshments, printing etc)	Ad Hoc	£1000	Local Digital Fund
Total funding requested of MHCLG:		£16,750	
Total Funding Contributed by applicants:		£12,500	

Summary of Options

Option	Benefits	Limitations	Funding Required	Conclusion
Intensive Beta – Full Product	<ul style="list-style-type: none"> Develop a full Digital DPIA tool Product will be deliver significant value into organisations Interoperability with the ISG and other third party systems Focus on ergonomic testing and user experience 	<ul style="list-style-type: none"> Requires significant investment Highest level of complexity in terms of development and testing against timeframe 	£383,520	Preferred Option
Intensive Beta - MVP	<ul style="list-style-type: none"> Shorter timescale to develop an MVP Focus on ergonomic testing and user experience 	<ul style="list-style-type: none"> Lack of clarity over post project development – structure not in place to support Limited integration with the Information Sharing Gateway Does not include additional requirements 	£242,770	Second Choice Option
Extensive Beta	<ul style="list-style-type: none"> Develop a full Digital DPIA Includes additional requirements Extensive testing including ergonomic testing and end to end user journey testing 	<ul style="list-style-type: none"> Highest risk option in terms of finance Higher risk option in terms of project success and failure Less flexibility with project change 	£259,220	Third Choice Option

	<ul style="list-style-type: none"> • Wide scope for engagement activities • Full interoperability with the Information Sharing Gateway 			
Alpha 2	<ul style="list-style-type: none"> • Creates an end to end process DPIA tool • Lower risk investment option to allow for further evidencing of benefits • Facilitates user testing and user research 	<ul style="list-style-type: none"> • Delays the momentum gathered to take the prototype on to the next level • Question over the value of developing a basic tool against having more time to continue development approach begun in 1st Alpha. 	£67,370	Fourth Choice Option
Discovery	<ul style="list-style-type: none"> • Allows for a detailed retrospective on the Alpha phase • Will create a detailed backlog of user stories • Will provide opportunity for analytical and statistical research 	<ul style="list-style-type: none"> • Delays the advancement of the development of the DPIA tool • User testing is limited to the Legal section of the tool, not the full process • We are confident with the benefits this tool will bring so not a blocker to progression 	£16,750	Not a preferred option

Conclusion and Recommendation

Conclusion

We believe that this tool has real scalability and can make an impact on a national scale. There is a gap within the Information Governance sector for a standardised approach to data protection impact assessments and a tool which will bring benefit to organisations. The digital data protection impact assessment tool prototype which we have developed is the starting point to fill this gap.

We are confident that the prototype we have developed meets the user requirements we have identified and actually goes further than we originally envisaged in making it a user friendly, accessible tool. We have the passion, drive and momentum to really drive this product forward and progress it onto the next stage.

As the Greater Manchester Combined Authority, we hold a strategic position across Greater Manchester and we see this tool as being a key component of a Greater Manchester Information Framework. We have had engagement from stakeholders beyond Greater Manchester too and so once we have a tool which is user ready, we have prominent channels which we can utilise for early adopters and our integration with the Information Sharing Gateway will be crucial for this.

Through our commitment to working in the open, the code for the system we create will be available for others to adopt, and we will do a considered piece of work in the next phase to identify options for hosting the tool which enable national usage once we are in the go-live phase.

Recommendation

For the next phase we recommend undertaking an intensive Beta in order to deliver a fully functioning digital data protection impact assessment by the end of the project phase.

Appendix

Appendix I - Prototype Digital Data Protection Impact Assessment Tool

Overview

We have developed a data protection impact assessment tool which keeps the user at the heart of the journey. We have taken great steps to ensure that the tool acts as an educational tool, giving the user an understanding of why they are being asked to give certain answers and what they should be considering when deciding on the options to choose.

The first phase development has focussed on creating the structure of the tool and then within that structure, building out the registration, user profile and legal sections of the tool.

This screenshot shows the landing site for the digital data protection impact assessment.



The current design of this page is reflective of the Information Sharing Gateway (ISG). Whilst this is a positive in reinforcing the interoperability between the two, if we move to a Beta phase we would look at the imagery and branding to give the digital data protection impact assessment tool its own identity. Which we feel would aid the use of the tool with any other digital sharing agreement tool and not limit it to the ISG.

The next screenshot of the tool shows the projects area where a user can track open DPIA's and create new ones.

Projects

Projects ☐ Include Archived

Enter text to search...

ID	Name	Screen	DPIA	Status	Assigned To	Created By	Sign Off Date	Archived
PR000003	test			Initiated	Nicola	Nicola		
PR000004	Test1			DPIA Required	nicolabriggs@btconnect.com	nicolabriggs@btconnect.com		

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Upon launching a new DPIA, the user would first complete the screening questions section. The development of this section throughout the project was interesting. We started off with a set of sixteen questions but because we were keeping the user at the heart of our development and because in actual fact, a user doesn't need to answer 16 questions if they for example give a particular answer to 3 key questions, we added logic to make this a two tier process. We then identified that the screening questions should in fact be a four tier system and so we have no gone from one set of sixteen questions to developing a four tier logic. So as you can see in the screenshot, three questions are presented to the user initially and if necessary, driven by the answer given, more questions will be presented and this logic continues over four tiers before a decision is presented to the user on whether a DPIA is required or not.

Project Screening

Project Screening PR0000004

1) Will you be evaluating or profiling large numbers of individuals? E.g. performance at work, economic situation, health, personal preferences or interests, reliability or behaviour, location or movements of individuals

2) Will the data being processed include special category data of large numbers of individuals? E.g. racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; genetic data; biometric data; health data; or data concerning a person's sex life or sexual orientation.

3) Use of CCTV in a publicly accessible area. CCTV includes use of cameras including ANPR, AFR, dashcams, drones, fixed cameras, mobile cameras etc.

4) Does the project involve you using new or innovative technology?

A DPIA is required for this project

Save Project Screening

Initial three questions

Logic derived further questions based on a four tier model

Outcome of the screening questions presented to the user

This screenshot demonstrates the structure within the tool. You will see at the top of the screen there is the overall structure and then on the next level the structure of the assessment itself. As mentioned in the report, the focus of the development was the Legal section.

Project DPIA PR0000001

Legal Process Rights Security Risks Documents Finalise

Legal

Personal Data (Article 6)

Q1. Will you be processing personal information? Yes No

Special Data (Article 9)

Q2. Will the project involve the use of *sensitive types* of data, like health, care or ethnicity data? Yes No

Health Confidentiality

Q3. Will collected data include any items relating to an individual's health or care? Yes No

Responsibilities of Data Controller and Data Processor

Q4. Have the responsibilities of the data controller and data processor been identified?

☒ a.) Yes - a contract is in place with processors

☐ b.) Yes - an agreement is in place between controllers

☐ c.) No - I need help

☐ d.) n/a no third parties are involved

Structure of the tool and the structure of the assessment.

Main focus of the development

As part of our focus on the Legal section we have maintained a focus on the user and keeping that main objective of an easier DPIA process central to how we have developed the tool. An example of this is not over facing the user with a series of questions, but only presenting the questions that are relevant based on the answer to previous questions. Another example is providing the user with guidance through information popups throughout the assessment. There is potential in the next

phase for these popups to be more sophisticated and contain technical guidance along with plain English explanations. The following screenshot highlights these features:

Legal

Personal Data (Article 6)

Q1. Will you be processing personal information? Yes ☒ No ☐

Q1a. Have the conditions for processing been identified and recorded for the data items/categories? Yes ☒ No ☐

If you are using data that could identify a living person you must pick one of the following "Conditions" as the legal basis allows you to use it for your project.

- You must NOT adopt a one-size-fits-all approach.
- No one basis should be seen as always better, safer or more important than the others
- You might consider that more than one basis applies, in which case you should identify and document all of them.

☒ a.) Consent - the individual has given clear consent for you to process their personal data for a specific purpose - Article 6 - 1(a)

i.) How will you collect and inform the individual about what they are consenting to?

- ☐ On-line/Electronic explanation
- ☐ Paper based explanation
- ☐ None of the above

ii.) Can consent be considered 'freely given'?

- ☐ Yes
- ☐ No

iii.) If consent for any of the purposes is withdrawn can this processing be stopped immediately?

- ☐ Yes
- ☐ No

☐ b.) Contract

- the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract. Article 6 - 1(b)

Answering 'Yes' results in further questions.

Information popup option

Project DPIA PR0000001

Legal

Legitimate Interest

If you want to use Legitimate Interests as a reason to use the data, you will need to satisfy the additional requirements. This will require you to undertake a legitimate interests assessment. For more details on what this should contain go to <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/legitimate-interests>

Additional files (optional): Optional (max 5 MB)

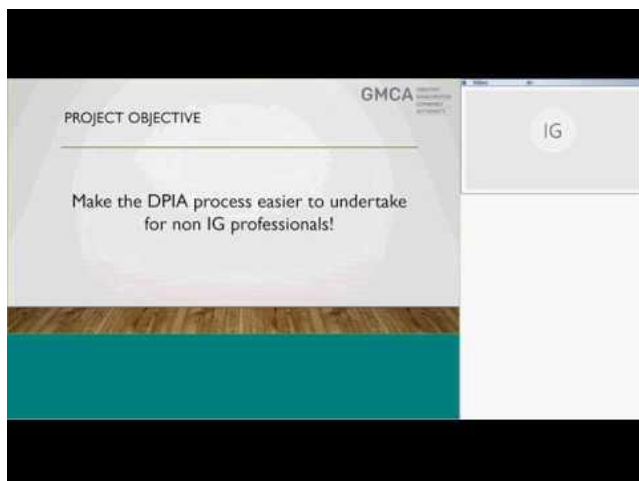
Special Data (Article 9)

Q2. Will the project involve the use of sensitive types of data, like health, care or ethnicity data? Yes ☐ No ☐

Example of an information pop-up

The legal section is more expansive than the screenshots above, but this demonstrates the approach taken. This approach will be replicated throughout the tool and will be expanded upon to maximise the opportunities to aid the user in the completion of the assessment.

To watch a recording of the Show and Tell webinar held on 23rd April 2019 please click below. This webinar will give you a complete overview of the project and the development.



Phase 2 Requirements

Throughout the Alpha phase of the project, we have been capturing requirements which are out of scope for this phase but will be considered for a future Beta phase. These requirements need exploration and expansion, many will be epics with a number of user stories beneath them. The following table will by no means be the complete list of requirements for phase 2, however it demonstrates some of these areas which will be considered that have been captured during the Alpha:

Digital DPIA Phase 2 Requirements, Suggestions and Ideas		
Backlog	Contributed by	Date
<p>Utilise the tool to demonstrate compliance to the Digital Economy Act</p> <p>Context contributed by Peter Wilson: <i>A number of the requirements that the Digital Economy Act COP state are standard asks in a DPIA and could map across. However there are a number of other questions that would need to be answered and 3 specific conditions that must be met. Following this discussion I think we would be better placed to consider this as a “bolt on” to the Digital DPIA in the same way we are looking at CCTV requirements. Trying to incorporate this into the body of the DPIA would prove confusing and of no value to a number of prospective users.</i></p>	XXXX	17/01/2019

<p><i>However having it as a separate screen that could be accessed and with some of the responses mapped across from the body of the DPIA would provide more accessibility.</i></p> <p><i>I would suggest that this is looked at in phase 2 alongside the CCTV work.</i></p>		
Integrate CCTV compliance into the tool	XXXX	17/01/2019
Integrate the ICO Lawful basis tool into the digital DPIA	XXXX	17/01/2019
Develop an 'In-tray' tab within the tool which gives users a view of the tasks and activity they need to be aware of, and DPIA's assigned to them.	XXXX	07/02/2019
Develop a heat map of the risks that can be extracted from the system and used for presentations and reporting.	XXXX	07/02/2019
Look to setup a Twitter account specifically for the Digital DPIA tool to enable more effective social media engagement	XXXX	07/02/2019
Explore the use of the AM charts plugin as a tool to create charts and reporting outputs from the tool. This is add-on functionality which is not part of the open source code.	XXXX	07/02/2019
Refine the screening questions process to expand out to a 5 tier question process. List of questions and proposed process has been drafted for this requirement.	XXXX	18/02/2019
Within the legal section, expand the list of categories of data out to the full list rather than just personal and special category which we have included in the Alpha phase	XXXX	18/03/2019

<p>We need a list of organisations registered with the ICO for the Digital DPIA tool and more widely for the ISG. The ICO are not able to provide us with this at the moment and so a solution could be to scrape their search functionality page on the website. This is the current evaluation of this option:</p> <p>It should be possible to do a background search on the ICO site using JavaScript libraries such as cheerio.js and nightmare.js.</p> <p>Following items are worth discussing:-</p> <ol style="list-style-type: none"> 1. Time/Effort 2. Performance – it might be slow. 3. Functionality – there are some limitations on the ICO website, such as a maximum of 100 search result entries and the search results for an organisation have varying amounts/types of information returned. We will need to review how the ISG would function together with the ICO website. <p>One idea might be to use screen scraping technology to call the following URL https://ico.org.uk/ESDWebPages/Entry/ZA425109 repeatedly while incrementing the number at the end. This could potentially allow us to build up a local database.</p>	XXXX	28/03/2019
Create the terms and conditions for the tool	XXXX	12/04/2019
We need to review the content of the guidance bubbles in the tool and create two tiers of guidance, one 'official' and one user friendly	XXXX	15/04/2019
Activate the CCTV screening question and build out the functionality associated to its selection - i.e. - refer to IG Lead	XXXX	22/04/2019

Lessons Learnt

We have gained valuable lessons throughout the Alpha phase of the project which will help us to work more effectively and collaboratively in the next phase of the project. This table details our key experiences and how they will influence the next phase of the project:

Experience

Understanding the complexity involved in developing a Digital DPIA tool has been invaluable during this Alpha phase. We thought we had a good grasp on what would be required for the tool however through user feedback and our own expertise within the project, we have learnt that to truly deliver value, there needs to be a sophisticated level of complexity within the tool to make the user experience easier.

Our experience of using Trello for the project planning and Huddle for document storage has been very valuable in informing how we want to continue in the next phase. We made the decision for the Project Manager to largely manage the Trello board and for documents to be shared and commented upon within Huddle. This decision was based on not duplicating effort and having clear functions for the different systems.

We have maintained a constant presence on social media and have utilised the Localgov pipeline for project updates. However it was difficult to generate traffic to the pipeline and the social media posts were perhaps lost in the wider usage of the GMCA Digital Twitter account. The resource required to produce newsletters and blogs was also slightly underestimated.

In the original planning of the Alpha phase project we had planned for user testing of the prototype in order to inform the next stage of development. Due to a change in direction of the development, driven by user need, this approach changed as we wanted to really demonstrate the benefits of the tool as not only an assessment, but also a way of guiding and teaching a user about DPIA's. The result of this was that there wasn't the time in the project to conduct the user testing and so this was largely confined to the project team.

In developing an alpha project we had some user stories and through collaboration and discussion via workshops, we were able to take these and build out the prototype.

Improvement

For the next phase of the project we now know what is involved in developing the sections of the tool to the required levels of complexity to really deliver user value. This has been exemplified in the Legal section we developed in the Alpha phase and will inform the next phase of development and the level of effort required.

For the next phase, we want to commit to utilising one platform and maximising its functionality. This will likely be Trello and we will commit to all project team members interacting more with the Trello board(s) and also using Trello to share documents. Depending on what is funded for the next phase this will take careful planning during project initiation but should provide a single view of the project for all stakeholders.

In the financial projections for the next phase we have accounted for a full time project manager in order to ensure that social media, blogging, newsletters, and other mediums for working out in the open are fully utilised. We have created a GitHub account for the Alpha phase project code and this will be used as another vehicle for promoting the project and providing stakeholders with updates. We will look to use either a specific Digital DPIA twitter account or create and GMCA Information Governance Twitter account which is more relevant to the project.

In the next phase of the project we will ensure that user testing is done to sense check what we have developed, although feedback gained from the events we have attended and the show and tell sessions has reassured us on this front.

Depending on the funding secured for the next phase, we will either do user testing and research up front to inform the Beta phase, or if an Alpha/Discovery, ensure that user testing is done within those phases.

Whilst this was viable for the alpha phase, for the beta phase we will need a more robust backlog of user stories to enable us to structure the sprints in developing the product.

	Particularly if we opt for an intensive Beta phase, we will need to prioritise the user stories to create an MVP which we can then iterate in future releases.
Having the right technology to best enable a remote project team that is not all located together is very important. The teleconferencing facilities we have at the GMCA are not fit for purpose for enabling dynamic conference calls which allow screen sharing, video conferencing and the recording of calls. The result of this was needing to use the teleconferencing software of our developers which worked but is not a reasonable long term solution.	For the next phase of the project, we need to spend more time considering ways of working and the technology that we have at our disposal to support this. Ahead of the next phase, if it is determined that there is not suitable technology in place, this will need to be remedied before the project starts.

Working out in the Open

We are committed to working out in the open and the code for our product is publicly available on GitHub here:

<https://github.com/DigitalDPIA/DigitalDPIA/wiki>