

Project Screening

Impact Assessment Id: #855

1. Your Details

Name of person completing screening assessment

Philip Coulson

Job Title

Public Rights of Way Operations Manager

Directorate

Economy & Infrastructure

Service Area

Highways & Transport Operations

Email Address

PCoulson@worcestershire.gov.uk

Connection to project (e.g. project manager)

Project Manager/Commissioner

2. Project Summary

For the purposes of the impact assessment screening, we will refer to the activity or area being assessed as a project.

Project Name

Public Rights of Way Improvement Plan Survey

Name of Project Sponsor

Paul Smith

Name of Project Manager

Philip Coulson

Name of Project Lead

Philip Coulson

Project Reference (if known)**Please give a brief description of the project**

Consultation with the public, parish councils and other identified stakeholders to gain feedback on how the current public rights of way network meets the public's needs. The information will be used to produce a Rights of Way Improvement Plan - prior to publication there will be a section stage of consultation to gain feedback on the proposed actions within the plan before it approved by the CMR/Cabinet as policy.

3. Data Protection

We need to establish if the proposal involves processing personal data. Personal data is information that relates to an identified or identifiable individual.

Name of Information Asset Owner

Paul Smith

Senior officer responsible for the project's information assets

Does the project, any project work stream or project outcome involve any personal data? Some examples of personal data are given below.

Yes

Appearance:

photograph, physical description

Keep it Green, Keep it on the Screen

Basic Identifiers:

name, date of birth, age, biometric data, ethnic origin, gender, genetic data, race, sex

Contact Details:

address, email address, home phone number, mobile phone number, postcode

ID Number:

National Insurance Number, driving licence number, NHS number, online identifier, other general identifier

Employment:

work related training/awards

Financial:

income/financial/tax situation

Lifestyle:

health or social care, living habits, marital status, philosophical beliefs, political opinions, religion, sex life, trade union membership

Technology:

login/username, device MAC address (wireless network interface), device IMEI number, IP Address, location data (travel/GDPS/GSM data), website cookies

Does the project, any project work stream or project outcome involve:**Evaluating or scoring individuals (including profiling and predicting)? No**

e.g. building behavioural or marketing profiles of individuals based on their web activity

Profiling, automated decision-making or special category data to help make decisions on access to a service, opportunity or benefit, or otherwise have a significant effect on an individual? No

e.g. asking an individual to submit personal data that is then analysed by a computer system, with the result that the individual's request to use a service is either accepted or refused.

Systematic monitoring? No

e.g. installing a CCTV or ANPR system on council premises, or any covert surveillance including anything under RIPA.

Processing of 'special category' personal data (or 'sensitive personal data')? Yes

e.g. processing health or social care data.

Processing personal data on a large scale? Yes

e.g. implementing a new social care record system.

Datasets that involve combining, comparing, or matching data from multiple sources? No

e.g. matching or merging service users' personal data against or with personal data held by a third party (e.g. the NHS).

The personal data of vulnerable people? Yes

e.g. processing children's personal data or social service client's data.

The use or application of innovative technological or organisational solutions? No

e.g. using fingerprint recognition technology to control access to a building.

The transfer of personal data outside of the European Union? No

e.g. storing personal data in a cloud service hosted in the US or using a third party that uses technology hosted in the US.

Preventing individuals from exercising a right or using a service or contract? No

e.g. screening applicants before allowing them to use a web service.

Processing personal data that could result in a risk of physical harm in the event of a security breach? No**The use of third parties? Yes**

e.g. as a service provider or hosted service

Processing children's data for profiling, automated decision-making, any marketing purposes, or to offer any online services directly to them? Yes

e.g. apps designed for use by children

4. Equality

We need to determine whether the project could affect residents and/or Council staff because they share any of the Protected Characteristics defined in the Equality Act 2010 namely Age, Disability, Gender Reassignment, Marriage/Civil Partnership, Pregnancy, Race, Religion/Belief, Sex and Sexual Orientation.

Does the project relate to an area where data/research indicates that inequalities are already known to exist? Yes

Could this project have any effect on, service delivery or usage, other aspects of daily life or community participation levels for people because they belong to any of the groups below?

Age No

e.g. a person belonging to a particular age group (for example 18 – 30-year olds).

Disability Yes

e.g. A person has a disability if she or he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

Gender Re-Assignment No

e.g. The process of transitioning from one gender to another.

Marriage/Civil Partnership Status No

e.g. Marriage is a union between a man and a woman or between a same-sex couple. Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples (except where permitted by the Equality Act).

Pregnancy/Maternity No

e.g. Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

Race No

e.g. Refers to the protected characteristic of race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.

Religion or Belief No

e.g. Religion refers to any religion, including a lack of religion. Belief refers to any religious or philosophical belief and includes a lack of belief. Generally, a belief should affect your life choices or the way you live for it to be included in the definition.

Sex No

Sexual Orientation No

e.g. Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

Health Inequalities No

e.g. Any preventable, unfair & unjust differences in health status between groups, populations or individuals that arise from the unequal distribution of social, environmental & economic conditions within societies.

5. Public Health

We also want to understand if the project will have any impacts on public health.

The social, economic, cultural and physical environment in which people live their lives has a significant effect on their health and wellbeing. Although genetics and personal behaviour play a strong part in determining an individual's health, good health starts where we live, where we work and learn, and where we play.

Improving public health requires taking a broader view of the conditions that create health and wellbeing, from how we plan and develop our urban spaces and places, to the opportunities for employment, recreation, and social connection available to all who live in them.

Health inequalities are the preventable, unfair and unjust differences in health status between groups, populations or individuals that arise from the unequal distribution of social, environmental and economic conditions within societies, which determine the risk of people getting ill, their ability to prevent sickness, or opportunities to take action and access treatment when ill health occurs.

Could the project have an impact on any of the following factors?

Social and Economic Yes

e.g. culture, social support (neighbourliness, social networks/isolation), spiritual participation, employment opportunities.

Physical Health Yes

e.g. physical activity is expected to increase, influenza vaccination uptake increase

Mental Health & Wellbeing Yes

e.g. benefits to children's mental health, benefits to adult carer wellbeing.

Access to Services Yes

e.g. access to (location/disabled access/costs) and quality of primary/community/secondary health care, child care, social services, housing/leisure/social security services; public transport, policing, other health relevant public services, non-statutory agencies and services.

5. Environmental Sustainability

We want to understand if the project activity and project outcomes will have an impact on environmental sustainability. Please be mindful that the Council has committed to reduce its emissions to net-zero by 2050 and most projects are likely to have an impact on this target. This should be a key consideration in your project delivery and should be reviewed when completing these screening documents.

Could this project have an impact on the categories listed below?

Greenhouse Gas (GHG) Emissions (including CO2) Yes

e.g. increased GHG emissions as a result of project implementation, which may also be linked with efficient use of resources in WCC buildings; transport; emissions from waste; and procurement.

Efficient Use of Resources Yes

e.g. consumption of energy resources, water, electricity, gas and heating fuels.

Transport Yes

e.g. number of people travelling, alternative transport modes.

Waste Yes

e.g. increase in waste generated or an increase in waste recycling.

Wildlife and Biodiversity Yes

e.g. impacts on the natural environment or enhancements to the natural environment.

N.B. This refers to any direct or indirect modifications to landholdings, including but not limited to removal of vegetation, alteration or demolition of buildings or modification of watercourses or lighting (not limited to just green space/trees).

Pollution to Land or Water Yes

e.g. risk of pollution to the local environment.

Pollution to Air Yes

e.g. risk of pollution to air, activity which may adversely affect air quality or increase emissions to air

Resilience to climate change Yes

e.g. risks of extreme weather and climate impacts on the project.

Historic Environment Yes

e.g. impacts on Historic Environment or enhancements of the Historic Environment.

Procurement Yes

e.g. could procurement associated with the project result in an increase of natural resources (such as long-distance shipping of goods); could use be made of local resources or work forces to support delivery of the project.

7. Results of Screening

Data Protection	Will require a full impact assessment
Equality and Public Health	Will require a full impact assessment
Environmental Sustainability	Will require a full impact assessment

Data Protection Full Assessment
Impact Assessment Id: #855**1.0 Screening Information****Project Name**

Public Rights of Way Improvement Plan Survey

Name of Project Sponsor

Paul Smith

Name of Project Manager

Philip Coulson

Name of Project Lead

Philip Coulson

Please give a brief description of the project

Consultation with the public, parish councils and other identified stakeholders to gain feedback on how the current public rights of way network meets the public's needs. The information will be used to produce a Rights of Way Improvement Plan - prior to publication there will be a section stage of consultation to gain feedback on the proposed actions within the plan before it approved by the CMR/Cabinet as policy.

Data Protection screening result

Will require a full impact assessment

Equality and Public Health screening result

Will require a full impact assessment

Environmental Sustainability screening result

Will require a full impact assessment

1.1 Background and Purpose

Background and Purpose of Project?

To support your answer to this question, you can upload a copy of the project's Business Case or similar document.
<https://www.gov.uk/guidance/local-authority-rights-of-way-improvement-plans>

The County Council has a legal duty to produce a Right of Way Improvement Plan. A initial survey will be used to assess how the network meets the needs of the public. Following this there will be a further consultation to gain the public's views on the new draft plan prior to it being adopted as policy.

The actions within the plan may for example change how we work or identify specific follow on projects. These actions may have environmental impacts once identified.

Upload Business Case or Support documents

☐ [Worcestershire ROWIP Appendices 4a and 4b Blackwood Bayne.pdf](#)

Project Outputs

Briefly summarise the activities needed to achieve the project outcomes.

Initial consultation

Assessment of consultation feedback and other sources of information

Draft Plan produced

Draft Plan consulted on

Finalised Plan Approved by CMR, Cabinet and Full Council

Project Outcomes

Briefly summarise what the project will achieve.

An update Public Rights of Way Improvement Plan with specific identified objectives.

Is the project a new function/service or does it relate to an existing Council function/service?

Existing

Was consultation carried out on this project?

No

1.2 Responsibility

Directorate/Organisation

Economy & Infrastructure

Service Area

Highways & Transport Operations

1.4 Specifics

Project Reference (if known)

Not Recorded

Intended Project Close Date *

September 2026

1.5 Project Part of a Strategic Programme

Is this project part of a strategic programme?

No

2.0 Personal Data

Who are you processing data about?

Customers, clients or service users

Representatives of other organisations

What personal data will be collected? *

The second stage is to list all of the types of personal data that you believe the project/works/additional processing will utilise.

Please select yes for as many examples of types of data that are relevant and include any others in the free text at the bottom of the page.

Basic Identifiers:

Name

No

Date of Birth

No

Age

Yes

Gender

Yes

Sex

Yes

Contact Details:

Address

No

Email Address

No

Home Phone Number

No

Mobile Phone Number

No

Postcode

Yes

ID Number:

National Insurance Number

No

Driving Licence/Number

No

NHS Number

No

Other General Identifier

No

Employment:**Work Related Training/Awards**

No

Financial:**Income/Financial/Tax Situation**

No

Appearance:**Photograph**

No

Physical Description

No

Lifestyle:**Living Habits**

No

Marital Status

No

Technology:**Login/Username**

No

Device MAC Address (Wireless Network Interface)

No

Device Mobile Phone/Device IMEI No

No

Location Data (Travel/GDPS/GSM Data)

No

Online Identifier e.g. IP Address

No

Website Cookies

No

Other Data Types Collected

We will be asking if the subject if they have a disability and what impact has on there use of the service.
We will be asking the standard equality questions.

2.1 Legal basis for Personal Data

What is your lawful basis for processing the personal data? *

Please choose one of the following

Data Subject's consent for the purpose

No

Necessary for a contract with the Data Subject

No

Necessary to comply with a legal obligation

Yes

Necessary to protect the vital interests of an individual(s)

No

Necessary for a task in the public interest or exercise of official authority of Controller

Yes

Necessary for legitimate interests of Controller unless interests are overridden by the interests or rights of the individual (only available in limited circumstances to public bodies)

No

2.2 Special Data

What special category personal data (if any) will be collected? *

This section will not apply to all projects and should only be completed if it applies to you.

It is important that you read this section carefully, as these data types require additional care and protection.

If you do pick anything from this list, you will be required to give more details in Section 4 of this form.

You can read more about Special Category Data through this link;

<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/special-category-data/>

Race

Yes

Ethnic origin

Yes

Political opinions

No

Religion

No

Philosophical beliefs

No

Trade union membership

No

Genetic Data

No

Biometric Data

No

Sex life

Yes

Health or social care

Yes

2.3 Legal basis for Special Data

What is the relevant condition for processing the special category personal data? *

You must qualify under one of the below exemptions as well as having a legal basis from the previous question.

Explicit Consent

The data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject;

No

Employment and Social Security

Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject;

No

Vital Interests

Processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent;

No

Legitimate Interests of:

"a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim".

Processing is carried out in the course of its legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim and on condition that the processing relates solely to the members or to former members of the body or to persons who have regular contact with it in connection with its purposes and that the personal data are not disclosed outside that body without the consent of the data subjects;

Note – this is not often applicable to local authorities.

No

Publicly Available Data

Processing relates to personal data which are manifestly made public by the data subject;

No

Legal or Court Proceedings

Processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity;

No

Public Interest - Statutory Necessity

Processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject;

Yes

Medical, Health and Social Care Provision

Processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional and subject to the conditions and safeguards referred to in paragraph 3;

No

Public Health

Processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject, in particular professional secrecy;

No

Archiving or Scientific, Historical or Statistical Research Purposes

Processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

Yes

2.4**Information Involved**

Understanding the information flows involved in a project is essential to a proper assessment of privacy risks.

How will the data be collected? *

This section should be filled in for every project, not just those collecting Special Category data.

The data will be collected via an online survey.

What will the data be used for? *

This section should be filled in for every project, not just those collecting Special Category data.

The data will be used to shape the provision of the service to ensure it meets the needs of the public. In the case of the equality information this used to monitor how the feedback represents the population of the County and if necessary ensure the consultation has picked up responses from certain groups.

Has data already been collected?

No

Are the purposes for which you are collecting the data different? *

If the data you are hoping to use was not collected specifically for this project, please explain in the box below why it was collected. This will include data that you have collected from other teams within WCC.

Not Recorded

Explain why existing and/or less intrusive processes or measures would be inadequate *

In this section, you should explain why your new method/project is absolutely necessary and show that you have thought about all other options.

The collection and analysis of personal and special category data assists us in meeting and complying with our Public Sector Equality Duty, under the Equality Act 2010. Data is anonymised, and is categorised and captured based on the questions asked during the 2021 census, to ensure we can compare statistics of participation and engagement fairly

3.0 Other organisations

Are other organisations involved in processing the data?

Yes

Please provide details of each organisation that is involved in the processing of Data. Do this by adding to the below list. *

Organisation Name	Blackwood Bayne Ltd
Data Controller or Data Processor	Data Processor
Organisation's Role	Consultant
Data Sharing Agreement or Contract	Yes
Contract Reference Number/DSA Name	WCC 2024 2021
Organisation involved reason	The consultant is engaged in analysing the data and using that data to produce a draft plan.
Disclosure and Security	Use of Microsoft Teams to share data.

Organisation Name	SnapSurveys
Data Controller or Data Processor	Data Processor
Organisation's Role	Provider of Snap Surveys software for collecting questionnaire data from members of the public.
Data Sharing Agreement or Contract	Yes
Contract Reference Number/DSA Name	07572U/00.
Organisation involved reason	They are providing the survey software that allows members of the public to fill in the online questionnaire.
Disclosure and Security	Access to data from the server. The solution passed the information security checklist.

2 records

3.1 Storage detail

How will the information be stored? *

Please include details of whether data will be stored outside of the European Economic Area (EEA).

Please remember that cloud storage and back up servers maybe outside the EEA.

WCC servers based in the UK.

For how long will the data be retained? *

For the length of the project (approximately 2 years).

What is the deletion process? *

Files will be deleted from the server.

4 Consultation details

Consultation can be used at any stage of the DPIA process and is important to allow people to highlight privacy risks and solutions based on their own area of interest or expertise.

For further assistance and information please visit the [consultation toolkit section on Ourspace](#).

Explain what practical steps you are going to take to ensure that you identify and address privacy risks *

Consultation with the Corporate Information Governance Team.

Who should be consulted, internally and externally? Do you need to seek the views of members of the public? *

Consultation with the Corporate Information Governance Team and Equality Officer.

How will you carry out the consultation? *

(You should link this to the relevant stages of your project management process)

Discussions at the early stage of the project

5 Risk register

At this stage you should identify the possible privacy risks together with their likelihood, severity and overall level, and for high risks the measures taken to reduce the risk.

Add any risk to the relevant sections below.

Fair and Lawful Processing

Data must be processed lawfully, fairly and in a transparent manner.

Please also consider

- Have you identified at least one lawful basis for the personal data processed as part of the project?
- Does at least one Controller involved have a lawful power to act?
- Do you need to create or amend a privacy notice?
- How is your processing going to be transparent?

Risk that processing is not transparent, and individuals are unaware that data is being collected or why it is processed

Unmitigated Risk

Likelihood - Likely

Severity - Minimal Impact

Score - High

Mitigation/Solution

Privacy statement on questionnaire along with hyperlinks to Public Consultations and Surveys Privacy Notice and Public Rights of Way Privacy Notice.

Mitigated Risk

Likelihood - Unlikely

Severity - Minimal Impact

Score - Low

Result

Accepted

Risk that information is being processed unlawfully

Unmitigated Risk

Likelihood - Unlikely

Severity - Some Impact

Score - Low

Mitigation/Solution

There is a contract in place with the data processor. The Business Intelligence Team in the Council has procured a 2-year agreement with SnapSurveys for the Snap Surveys Software License and Services Agreement.

Mitigated Risk

Likelihood - Unlikely

Severity - Minimal Impact

Score - Low

Result

Accepted

Specific, explicit and legitimate purposes

The purpose for which you process personal data must be specified, explicit and legitimate. Personal data collected must not be processed in a manner that is incompatible with the purpose for which it was originally collected.

Please also consider

- Does your project plan cover all of the purposes for processing personal data? If not your plan needs amending accordingly.
- Are all elements of the processing compatible with the original reason and justification for the processing?
- What are these specific, explicit and legitimate purposes?

Risk of 'mission creep' and information is used for different, or incompatible purposes to that identified when originally collected

Unmitigated Risk

Likelihood - Reasonably Unlikely

Severity - Minimal Impact

Score - Low

Mitigation/Solution

Equality Data will be deleted once no longer required and will be split from other responses, other data will be held securely on Teams so won't be available to others. Methodology for a ROWIP is very specific. Questions raised are for a very specific purpose so will have little further broader value.

Mitigated Risk

Likelihood - Unlikely

Severity - Minimal Impact

Score - Low

Result

Accepted

Adequate, relevant and not excessive

Personal data processed must be adequate, relevant and not excessive in relation to the purpose for which it is processed.

Please also consider

- Is the quality of the information adequate for the purposes it is used?
- If not, how is this to be addressed?
- Are measures in place to ensure that data is limited to that which is needed to fulfill the aim of the processing?
- Which personal data elements do not need to be included without compromising the needs of the project?

Risk of loss of control over the use of personal data

No Risk

Risk that inadequate data quality means the information is not fit for the identified purpose(s) potentially leading to inaccurate decision making

Unmitigated Risk

Likelihood - Reasonably Unlikely

Severity - Some Impact

Score - Medium

Mitigation/Solution

Questions are based on the legal requirements of producing a ROWIP. A comms plan is in place in order to gain sufficient numbers of responses. Key stakeholders will be contacted to make them aware of the survey.

There will be a second stage of public consultation which will allow for further feedback on the findings.

Mitigated Risk

Likelihood - Unlikely

Severity - Minimal Impact

Score - Low

Result

Reduced

Risk that any new surveillance methods may be an unjustified intrusion on individuals' privacy

No Risk

Accurate and timely

Personal data processed must be accurate and, where necessary, kept up to date, and every reasonable step must be taken to ensure that personal data that is inaccurate is erased or rectified without delay.

Please also consider

- If you are procuring new software does it allow you to amend data when necessary?
- How are you ensuring that personal data obtained from individuals or other organisations is accurate?
- Do you have processes in place to keep data up to date?
- If any data sets are to be merged, what checks are carried out to ensure that the right data records are matched/merged together?

Any data matching or linking, including whole data sets may link wrong records together

No Risk

Storage limitation

Personal data must be kept for no longer than is necessary for the purpose for which it is processed. Appropriate time limits must be established for the periodic review of the need for the continued storage of personal data.

Please also consider

- What are the risks associated with how long data is retained and how they might be mitigated?
- Has a review, retention and disposal (RRD) policy been established?
- How does the software enable you to easily act on retention criteria – does it enable bulk review/destruction; set review periods; extract for long-term preservation/retention of the corporate memory?

Risk information is retained for the wrong length of time (both too long and too short)**Unmitigated Risk**

Likelihood - Unlikely

Severity - Minimal Impact

Score - Low

Mitigation/Solution

The data off of SNAP surveys will be deleted within a month after the completion of the consultation (3 months long). This requires a manual deletion by the Comms Team.

The anonymised data is brought over into TE00457. This has a 3 year Deletion Policy after date of last modification on it.

Mitigated Risk

Likelihood - Unlikely

Severity - Minimal Impact

Score - Low

Result

Accepted

Risk information is not securely destroyed when its retention period has been reached**Unmitigated Risk**

Likelihood - Reasonably Unlikely

Severity - Some Impact

Score - Medium

Mitigation/Solution

Once information has been securely downloaded from the Snapsurvey site we will formally request the comms team delete the data. We will request formal confirmation that this has happened.

3 year retention policy built into Teams site.

Mitigated Risk

Likelihood - Unlikely

Severity - Some Impact

Score - Low

Result

Reduced

Security

Personal data must be processed in a manner that ensures appropriate security of the personal data, using appropriate technical or organisational measures (and, in this principle, “appropriate security” includes protection against unauthorised or unlawful processing and against accidental loss, destruction or damage).

Please also consider

- What technical and organisational measures are in place to ensure that the data is protected to an adequate level?
- What training on data protection and/or information sharing has been undertaken by relevant staff?
- What access controls are in place to enforce the ‘need to know’ principle?
- What assurance frameworks are utilised to assess adequacy of security measures in place e.g. NHS DSPT; Cyber Essentials Plus; PSN Certification?

Risk of loss of confidentiality

Unmitigated Risk

Likelihood - Unlikely

Severity - Minimal Impact

Score - Low

Mitigation/Solution

Equality data will be split from other responses and saved separately.

Data will be saved separately on Teams site and deleted at the earliest opportunity on Snap Survey.

Data will be assessed before passing to the consultant and data such as any names will be deleted.

No raw data will be saved on the U drive.

Consultant and Snap Survey both have a contract in place.

Mitigated Risk

Likelihood - Unlikely

Severity - Minimal Impact

Score - Low

Result

Reduced

Risk of inadequate security controls in place to protect and secure personal data, including inappropriate access

No Risk

Risk that workers processing the data are not aware of their data responsibilities

Unmitigated Risk

Likelihood - Reasonably Unlikely

Severity - Some Impact

Score - Medium

Mitigation/Solution

Staff have completed online GDPR Training

Liaison with the Corporate Information Governance Team

GDPR is covered in the Consultants contract.

Limited number of people involved in project.

Mitigated Risk

Likelihood - Unlikely

Severity - Minimal Impact

Score - Low

Result

Reduced

Risk that information is distributed using inappropriate methods

No Risk

Risk of re-identification of pseudonymized or anonymised data (e.g. collecting matching and linking identifiers and information may result in information that is no longer safely anonymised)

Unmitigated Risk

Likelihood - Reasonably Unlikely

Severity - Some Impact

Score - Medium

Mitigation/Solution

Keep it Green, Keep it on the Screen

Survey doesn't ask for names.

Any data regarding IP addresses will be deleted.

Equality and broader response will be split and saved separately on Teams.

Responses will be checked for names etc in qualitative fields before passing to consultant.

Mitigated Risk

Likelihood - Unlikely

Severity - Minimal Impact

Score - Low

Result

Accepted

Risk that information is transferred to a 'third country' without adequate safeguards

No Risk

Financial and reputational

Risk of identity theft or fraud

No Risk

Risk of financial loss for individuals or other third parties

No Risk

Risk of financial loss for the Council (including ICO fines)

No Risk

Risk of reputational damage to the Council, partners, and processors

No Risk

Health, safety and wellbeing

Risk of physical harm to individuals

No Risk

Risk of physical harm to staff and workers

No Risk

Risk of discrimination

No Risk

Risk of other significant economic or social disadvantage

No Risk

Individuals Rights

Data protection legislation gives data subjects' various rights (listed below). Limiting or restricting any of these rights is likely to be a significant impact so the justification for any restriction, as well as mitigations, must be fully outlined.

Inability to meet individuals' right to be informed

Unmitigated Risk

Likelihood - Unlikely

Severity - Some Impact

Score - Low

Mitigation/Solution

Cover webpage which explains about the RoWIP. Public Consultations and Surveys Privacy Notice and Public Rights of Way Privacy Notice on the first page of the survey. Statement regarding responses for Equality questions also in place.

Mitigated Risk

Likelihood - Unlikely

Severity - Minimal Impact

Score - Low

Result

Reduced

Inability to meet individuals' right of access

No Risk

Inability to meet individuals' right to rectify inaccurate data

No Risk

Inability to meet individuals' right to restrict processing

No Risk

Inability to meet individuals' right to object

No Risk

Inability to meet individuals' rights relating to automated decision making and profiling

No Risk

Additional project specific risks

No additional risks recorded

6 Declaration

I confirm to the best of my knowledge that the information I have provided is true, complete and accurate *

Selected

I confirm that I will make sure that data protection has been and continues to be considered throughout the project life cycle and should circumstances change in the project to include any processing of personal data a further Data Protection Impact Assessment Screening will be carried out *

Selected

7 Application Details**Last Updated Date Time**

02/05/2025 16:05:39

Screening Submitted Date Time

25/02/2025 11:00:57

Last Reopened Date Time

No Date Recorded

Full Impact Submitted Date Time

02/05/2025 15:05:39

Approved/Rejected Date Time

02/05/2025 16:08:29

Current User Dashboard Request Status

Complete

8.0 People with access to the original screening

[Philip Coulson](mailto:PCoulson@worcestershire.gov.uk) (PCoulson@worcestershire.gov.uk)

8.1

People with access to this data protection assessment

[Philip Coulson \(PCoulson@worcestershire.gov.uk\)](mailto:PCoulson@worcestershire.gov.uk)

9

Direct Questions

Question:

Hello Philip,

Thank you very much for this submission. I have made some minor amendments to the form so far. I was hoping that you could answer some questions for me:

- Can you explain how the equality questionnaire data will be processed from creation to anonymisation? How are we ensuring that it is anonymised?
- How is the data being moved from the questionnaire to the Teams site for analysis?
- How and when will the data be deleted from the questionnaire server?
- Can you remind me what the Teams site number this will be stored on (TEXXXX)?

Asked by Philip Bouchier (PBouchier@worcestershire.gov.uk) at 27/02/2025 15:14:37

Philip Coulson (PCoulson@worcestershire.gov.uk) has been asked this question.

Response:

The questionnaire doesn't ask for the person's name or full address (just postcode, details of disability, and equality questions) - if any details are included within test boxes are clearly identify individuals these will be removed by PROW Managers before before passing to the consultant.

Some analysis is done via SNAP survey software. Tabulated raw data and qualitative responses will be shared between officers and with the consultant in excel format via a Teams channels.

The intention is data will be moved directly from the SNAP software onto the Teams site (not saved on the U Drive).

We can delete the data as soon as the summary reports have been produced at the end of the consultation. Usually a max of 6 weeks.

The teams site has not been set up at this point (currently requested via My IT #229588).

Philip Coulson (PCoulson@worcestershire.gov.uk) at 04/03/2025 15:00:26
(User was not logged in when response was submitted. Identity Unverified)

Add Response

Equality and Public Health Full Impact Assessment

Impact Assessment Id: #855

1.0 Screening Information

Project Name

Public Rights of Way Improvement Plan Survey

Name of Project Sponsor

Paul Smith

Name of Project Manager

Philip Coulson

Name of Project Lead

Philip Coulson

Please give a brief description of the project

Consultation with the public, parish councils and other identified stakeholders to gain feedback on how the current public rights of way network meets the public's needs. The information will be used to produce a Rights of Way Improvement Plan - prior to publication there will be a section stage of consultation to gain feedback on the proposed actions within the plan before it approved by the CMR/Cabinet as policy.

Data Protection screening result

Will require a full impact assessment

Equality and Public Health screening result

Will require a full impact assessment

Environmental Sustainability screening result

Will require a full impact assessment

1.1 Background and Purpose

Background and Purpose of Project?

To support your answer to this question, you can upload a copy of the project's Business Case or similar document.
<https://www.gov.uk/guidance/local-authority-rights-of-way-improvement-plans>

The County Council has a legal duty to produce a Right of Way Improvement Plan. A initial survey will be used to assess how the network meets the needs of the public. Following this there will be a further consultation to gain the public's views on the new draft plan prior to it being adopted as policy.

The actions within the plan may for example change how we work or identify specific follow on projects. These actions may have environmental impacts once identified.

Upload Business Case or Support documents

☐ [Worcestershire ROWIP Appendices 4a and 4b Blackwood Bayne.pdf](#)

Project Outputs

Briefly summarise the activities needed to achieve the project outcomes.

Initial consultation

Assessment of consultation feedback and other sources of information

Draft Plan produced

Draft Plan consulted on

Finalised Plan Approved by CMR, Cabinet and Full Council

Project Outcomes

Briefly summarise what the project will achieve.

An update Public Rights of Way Improvement Plan with specific identified objectives.

Is the project a new function/service or does it relate to an existing Council function/service?

Existing

Was consultation carried out on this project?

No

1.2 Responsibility

Directorate/Organisation

Economy & Infrastructure

Service Area

Highways & Transport Operations

1.3 Specifics

Project Reference (if known)

Not Recorded

Intended Project Close Date *

September 2026

1.4 Project Part of a Strategic Programme

Is this project part of a strategic programme?

No

2 Organisations Involved

Please identify the organisation(s) involved:

Worcestershire County Council

Details of contributors to this assessment:

Name	Philip Coulson
Job title	Public Right of Way Operations Manager
Email address	pcoulson@worcestershire.gov.uk

3.0 Who will be affected by the development and implementation

Please identify group(s) involved:

Service User

Staff

Communities

3.1 Information and evidence reviewed

What information and evidence have you reviewed to help inform this assessment? *

Feedback from survey, inc general public, members, user groups representatives and staff. Internally held information on the condition of the network.

3.2 Summary of engagement or consultation undertaken

Who and how have you engaged, or why do you believe engagement is not required? *

We are are engaging parish Councils, user group representatives and other relevant stakeholders in a consultation. The consultation will be publicised via social media and the Council's website, press releases, via engagement with user groups and local members.

3.3 Summary of relevant findings

Please summarise your relevant findings. *

Consultation process not started yet so not known at this point.

4 Protected characteristics - Equality

Please consider the potential impact of this activity (during development & implementation) on each of the equality groups outlined

Keep it Green, Keep it on the Screen

below. **Please select one or more impact box(es) below for each equality group and explain your rationale.** Please note it is possible for the potential impact to be both positive and negative for the same equality group and this should be recorded. Remember to consider the impact on e.g. staff, public, patients, carers etc. who are part of these equality groups.

Age

Potential neutral impact selected.

Explanation of your reasoning:

No known impact based on the characteristic of age. We will aim to engage a wide range of audiences through our consultation process. We will capture demographic data to ensure we can reach a diverse audience and comply with our Public Sector Equality Duty, and adhere to our values of inclusion and participation.

Disability

Potential neutral impact selected. Potential negative impact selected.

Explanation of your reasoning:

Whilst we endeavour to ensure our consultation process is accessible and inclusive for disabled people, it is acknowledged that we may not be able to mitigate the negative impacts experienced by all disabled people – dependent on their individual requirements. We commit to taking positive action and steps to promote accessibility throughout the course of the project wholly and will make reasonable adjustments if requested. Documents, consultation survey and relevant information will be provided in a format suitable for a range of users, and adaptations, alternative formats and methods in contribution can be requested by groups or individual users and considered throughout the project.

We will aim to engage a wide range of audiences through our consultation process. We will capture demographic data to ensure we can reach a diverse audience and comply with our Public Sector Equality Duty and adhere to our values of inclusion and participation.

Gender reassignment

Potential neutral impact selected

Explanation of your reasoning:

No known impact based on the characteristic of gender reassignment. We will aim to engage a wide range of audiences through our consultation process. We will capture demographic data to ensure we can reach a diverse audience and comply with our Public Sector Equality Duty, and adhere to our values of inclusion and participation.

Marriage and civil partnerships

Potential neutral impact selected.

Explanation of your reasoning:

No known impact at this stage

Pregnancy and maternity

Potential neutral impact selected.

Explanation of your reasoning:

No known impact based on the characteristic of pregnancy and maternity. We will aim to engage a wide range of audiences through our consultation process. We will capture demographic data to ensure we can reach a diverse audience and comply with our Public Sector Equality Duty, and adhere to our values of inclusion and participation.

Race including travelling communities

Potential neutral impact selected.

Explanation of your reasoning:

No known impact based on the characteristic of race. We will aim to engage a wide range of audiences through our consultation process. We will capture demographic data to ensure we can reach a diverse audience and comply with our Public Sector Equality Duty, and adhere to our values of inclusion and participation.

Religion and belief

Potential neutral impact selected.

Explanation of your reasoning:

No known impact based on the characteristic of religion or belief. We will aim to engage a wide range of audiences through our consultation process. We will capture demographic data to ensure we can reach a diverse audience and comply with our Public Sector Equality Duty, and adhere to our values of inclusion and participation.

Sex

Potential neutral impact selected.

Explanation of your reasoning:

No known impact based on the characteristic of sex. We will aim to engage a wide range of audiences through our consultation process. We will capture demographic data to ensure we can reach a diverse audience and comply with our Public Sector Equality Duty, and adhere to our values of inclusion and participation.

Sexual orientation

Potential neutral impact selected.

Explanation of your reasoning:

No known impact based on the characteristic of sexual orientation. We will aim to engage a wide range of audiences through our consultation process. We will capture demographic data to ensure we can reach a diverse audience and comply with our Public Sector Equality Duty, and adhere to our values of inclusion and participation.

5 Characteristics - Public health

Other vulnerable and disadvantaged groups

Potential neutral impact selected.

Explanation of your reasoning:

Disadvantaged groups will be targeted as part of the consultation so that we can fully understand and accommodate for their needs.

Health inequalities

Potential neutral impact selected.

Explanation of your reasoning:

The consultation process enables risks that impact of health inequalities, an improved rights of way strategy will in turn potentially reduce health inequalities by encouraging citizens to be more physically active.

Social and economic

Potential positive impact selected.

Explanation of your reasoning:

Project may identify and put in place actions to reduce such inequities. Accessing rights of way is a low cost activity and improved wellbeing of our citizens will positively impact social and economic streams.

Physical health

Potential positive impact selected.

Explanation of your reasoning:

Project is likely to identify and put in place actions to increase physical health via greater use of the network

Mental health and wellbeing

Potential positive impact selected.

Explanation of your reasoning:

Project is likely to identify and put in place actions to increase mental health and wellbeing via greater use of the network

Access to services

Potential positive impact selected.

Explanation of your reasoning:

Project is likely to identify and put in place actions to broaden and increase the use of the network.

6 Actions to mitigate potential negative impacts

Risk identified	Feedback doesn't represent full range of potential users views
Actions required to reduce/eliminate negative impact	We are drawing together a large number of known groups to directly consult with. Consultation will be advertised via a number of mediums - i.e. social media, press releases and the above groups.
Who will lead this action	Equality Data Will Be Monitored Throughout Consultation Period By The Comms Team And the consultant and if necessary adjustments will be made to the coms strategy to target specific groups.
Timeframe	Throughout the period of the consultation.

How will you monitor these actions?

Equality Data Will Be Monitored Throughout Consultation Period

Any new risks identified as part of the consultation process will be acted upon

7 When will you review this equality and public health estimate(EPHIA)?

Yes - upon production of the draft plan DATE?

8 Declaration

The following statement has been read and agreed:

- All public bodies have a statutory duty under the Equality Act 2010 to set out arrangements to assess and consult on how their policies and functions impact on the 9 protected characteristics: Age; Disability; Gender Reassignment; Marriage & Civil Partnership; Pregnancy & Maternity; Race; Religion & Belief; Sex; Sexual Orientation
- Our Organisation will challenge discrimination, promote equality, respect human rights, and aims to design and implement services, policies and measures that meet the diverse needs of our service, and population, ensuring that none are placed at a disadvantage over others
- All staff are expected to deliver and provide services and care in a manner which respects the individuality of service users, patients, carers etc, and as such treat them and members of the workforce respectfully, paying due regard to the 9 protected characteristics

I confirm to the best of my knowledge that the information I have provided is true, complete and accurate

I confirm that I will make sure that Equality and Public Health have been and continue to be considered throughout the project life cycle and that, if circumstances change in the project, a further Equality and Public Health Impact Assessment Screening will be carried out.

8 Application Details

Last Updated Date Time

07/05/2025 17:36:12

Screening Submitted Date Time

25/02/2025 11:00:57

Last Reopened Date Time

No Date Recorded

Full Impact Submitted Date Time

01/05/2025 15:00:37

Approved/Rejected Date Time

07/05/2025 17:36:12

Current User Dashboard Request Status

Complete

9.0 People with access to the original screening

[Philip Coulson \(PCoulson@worcestershire.gov.uk\)](mailto:PCoulson@worcestershire.gov.uk)

9.1 People with access to this equality and public health assessment

[Philip Coulson \(PCoulson@worcestershire.gov.uk\)](mailto:PCoulson@worcestershire.gov.uk)

10 Direct Questions

No Questions Asked

Environmental Sustainability Full Impact Assessment

Impact Assessment Id: #855

1.0 Screening Information

Project Name

Public Rights of Way Improvement Plan Survey

Name of Project Sponsor

Paul Smith

Name of Project Manager

Philip Coulson

Name of Project Lead

Philip Coulson

Please give a brief description of the project

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Environmental Sustainability screening result

Will require a full impact assessment

1.1 Background and Purpose

Background and Purpose of Project?

To support your answer to this question, you can upload a copy of the project's Business Case or similar document.
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Is the project a new function/service or does it relate to an existing Council function/service?

Existing

Was consultation carried out on this project?

No

1.2 Responsibility

Directorate/Organisation

Economy & Infrastructure

Service Area

Highways & Transport Operations

1.3 Specifics

Project Reference (if known)

Not Recorded

Intended Project Close Date *

September 2026

1.4 Project Part of a Strategic Programme

Is this project part of a strategic programme?

No

2 Greenhouse Gas Emissions

Could the project result in an increase in GHG emissions (including CO2)? Yes

Please be mindful that the Council has committed to reduce its GHG emissions to zero by 2050 and most projects are likely to have an impact on this target. This should be a key consideration in your project delivery and should be reviewed when completing the assessment.

Please explain your answer below:

Potentially but impact not known at this stage until final plan is agreed.

Have you undertaken an assessment of the project to know if there will likely be an increase in GHG emissions? No

Please explain your answer below:

Not recorded

3 Resources

Will the project result in increased consumption of electricity, gas or other heating fuels? No

e.g. project may require use of additional buildings, lighting and heating in buildings, additional ICT equipment, etc.

Will the project reduce energy needs and result in reduced consumption? No

e.g. disposal of WCC property assets

Will the project require additional water resources leading to an increase in water consumption? No

e.g. increased use of water through construction processes

Might there be a decrease in water consumption? No

e.g. will the project involve water saving measures or initiatives

Will the project result in the use of other resources, materials or minerals? Yes

e.g. use of natural resources such as wood; or use of aggregate minerals?

Please explain your answer below:

Projects identified in the final plan may result in additional resource requirements - for example purchase of stone, timber. Local suppliers and work force would be considered during any procurement process.

4 Transport

Will the project result in more people needing to travel? Yes

e.g. will there be additional cars on the road

Please explain your answer below:

Potentially if the project impacts the scale of the PRoW Teams work.

Have alternative transport modes been considered? Yes

e.g. could use be made of public transport/walking/cycling etc.

Please explain your answer below:

The Plan is intended to increase use of the public rights of way network.

5 Waste

Is there likely to be an increase in waste as a result of the project? Yes

e.g. construction waste, packaging waste etc.

Please explain your answer below:

Possibly is additional construction works are identified in the process.

Have opportunities to prevent, minimise, reuse or recycle waste been identified and considered? Yes

e.g. will recycling facilities be available as part of the project

Please explain your answer below:

This will be included in any potential future procurement process.

6 Wildlife and Biodiversity

Will there be any negative impacts on the natural environment? Yes

e.g. will the project involve removal of green space/trees; have wildlife surveys been considered; result in enhancements to green infrastructure; increased biodiversity opportunities etc.?

Please explain your answer below:

Potentially but not as yet identified and it is dependant upon final plan actions.

Has a preliminary ecological appraisal been undertaken? No

Please explain your answer below:

Not recorded

Has there been consideration of statutory assessments? Yes

e.g. Sustainability Appraisals, Strategic Environmental Assessments and Habitat Regulations Assessment Screening?

N.B. This is a matter of legal compliance - All plans and projects (including planning applications) which are not directly connected with, or necessary for, the conservation management of a habitat site, require consideration of whether the plan or project is likely to have significant effects on that site. This consideration – typically referred to as the 'Habitats Regulations Assessment screening' – should take into account the potential effects both of the plan/project itself and in combination with other plans or projects.

Please explain your answer below:

Plan will include consideration for Wildlife and Biodiversity.

7 Pollution to land/air/water

Is there a risk of pollution to the local environment? No

e.g.

- will there be surface water run-off or discharge into local water source?
- will there be any impact on local water quality?
- will any waste water require treatment?
- is there the potential for spillage of chemicals?
- is there the potential for emissions to air from combustion processes resulting in poor air quality?

8 Resilience to climate risks

Could climate risks affect your project? No

N.B. some projects may be more sensitive to future changes in the climate e.g. hotter and drier summers; milder and wetter winters; increased likelihood of extreme weather events. These climate risks may affect project delivery and should be considered at the early stages of project development.

Has the impact of extreme weather events on the project been considered? No

e.g. heat waves and flooding.

Is there a business/project continuity plan in place to ensure climate risks are minimised? No

e.g. can you ensure that the project is resilient to climate risks and can continue to deliver on outcomes.

Could the project exacerbate climate risks? No

e.g. increase flood risk or worsen temperature extremes in the locality.

9 Historic Environment

Have you checked with the WCC Historic Environment team as to whether there are any impacts on the Historic Environment (negative or positive)?

No

Check every development with the Historic Environment Team at the planning stage of each project. Further assessment may be required depending on the nature and scale of development. There may also be design options that would negate any need for further assessment (and lessen costs), or even opportunities to enhance heritage assets or their setting through the development.

Does the development have the potential to result in any impacts to the historic environment or opportunities for enhancement?

Yes

If yes, then further assessment will be required. This could take the form of a watching brief during groundworks if the potential is clearly understood and relatively low, or a more comprehensive desk-based and/or field investigation prior to development.

Please explain your answer below:

Possibly but dependent upon final actions identified within the plan.

10 Procurement

Could any procurement associated with the project have a detrimental environmental impact? Yes

e.g. procurement of goods from overseas that have to be shipped; use of unsustainable materials or materials that cannot be recycled at the end of their use?

Please explain your answer below:

Possibly but not known until final actions are identified in the plan.

Is there likely to be increased Greenhouse Gas emissions from products purchased for the project? No

e.g. carbon emissions from transport and manufacturing

Will you be able to make use of sustainable products? Yes

e.g. recycled, local, ethical etc.

Please explain your answer below:

This will be included in any relevant procurement process.

Have you considered the Public Services (Social Value) Act 2012? No

All major contracts let by the Council (those of more than £100,000 in total value) will be expected to deliver a meaningful contribution to our vision of Social Value in the county. The Act requires us to consider how the services we commission and procure might improve the economic, social and environmental well-being of the local area.

– please see: [Social Value](#)

11 Declaration

I have confirmed that to the best of my knowledge that the information I have provided is true, complete and accurate

I have confirmed that I will make sure that Environmental Sustainability has been and continues to be considered throughout the project life cycle and should circumstances change in the project a further Environmental Sustainability Assessment Screening will be carried out.

12 Application Details

Last Updated Date Time

12/05/2025 16:01:18

Screening Submitted Date Time

25/02/2025 11:00:57

Last Reopened Date Time

01/05/2025 14:59:51

Full Impact Submitted Date Time

02/05/2025 16:06:33

Approved/Rejected Date Time

12/05/2025 16:01:18

Current User Dashboard Request Status

Complete

13.0 People with access to the original screening

[Philip Coulson \(PCoulson@worcestershire.gov.uk\)](mailto:PCoulson@worcestershire.gov.uk)

13.1 People with access to this environmental sustainability assessment

[Philip Coulson \(PCoulson@worcestershire.gov.uk\)](mailto:PCoulson@worcestershire.gov.uk)

14

Direct Questions**Question:**

Many thanks for submitting the full Environmental Sustainability Impact Assessment. A response to the below is required before we can mark the assessment as being complete on the JIA system.

As a number of the environmental impacts are unknown at this stage in the consultation process, please could you advise that a new impact assessment will be completed for the final plan ahead of going to CMR/Cabinet approval (or for each individual discreet PROW project if necessary)?

Kind regards,
Katie Bruton
Sustainability Team

Asked by Katie Bruton (KBruton@worcestershire.gov.uk) at 07/05/2025 15:24:12

Philip Coulson (PCoulson@worcestershire.gov.uk) has been asked this question.

Response:

To confirm a new assessment will be made of the final plan.

Philip Coulson (PCoulson@worcestershire.gov.uk) at 07/05/2025 15:28:08

[Add Response](#)