

PRIVACY IMPACT ASSESSMENT

PROJECT NAME:	Creatives in Crisis: How freelance creatives mobilise online communities in response to the COVID-19 pandemic.
PROCESS DESCRIPTION:	<p>Despite the economic importance of the UK's creative industries, much of the work undertaken in the sector is characterised as low paid (e.g. Siebert and Wilson, 2013), insecure (e.g. Gill and Pratt, 2008), and sometimes even exploitative (Banks and Hesmondhalgh, 2009). The often individualised and freelance nature of creative work, and the power imbalance between these workers and those who purchase their labour or products led to falling wage rates and insecure employment across many creative occupations, even before the COVID-19 pandemic struck. As a largely non-unionised group of workers, freelance creatives have often found it challenging to resist these power imbalances and achieve fairer pay for all. This research will utilise a netnographic approach, supplemented by online video interviews, to consider how freelance creative workers are affected by the unprecedented COVID-19 pandemic and explore how they are mobilising online communities to respond. By uncovering the impact of the COVID-19 pandemic on these workers, this research will better enable the government, professional associations and the third sector (where relevant) to support freelance creatives, in addition to developing academic knowledge on how macro social events impact on labour relations in the creative industries.</p>

PIA manager:	Holly Patrick	Position:	
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Date PIA started:	26/5/2020
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Section 1 – Preparation for Screening

1.1 Data Management Plan.

This should be provided to Governance services to accompany this form. If any of the details in here answer the questions below please cross refer.

1.2 Preliminary stakeholder analysis. Please detail all individuals involved the in the project and those that may be affected by it. At this stage you want to have as broad a list of groups as possible.

Freelance Creatives

Creative Informatics

Creative Scotland

Creative Edinburgh

The Institute for Capitalising on Creativity

Freelance Workers Union

1.3 Environmental scan. Provide details of any scan to identify if these processes have already been reviewed and would apply to this project. This involves seeking information about prior projects of a similar nature, from both inside and outside the organisation

Stage 1 completed by:	Holly Patrick	Date:	26/5/2020
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Section 2- Screening

The questions below, which are based on those used in the ICO's PIA Handbook, have been used to help determine whether a PIA is necessary, and, if so, how extensive it needs to be.

Screening Q	Y/N	Details
Will there be new or additional information technologies that have substantial potential for privacy intrusion?	N	
Will there be the creation of new identifiers or re-using of existing identifiers?	Y	New, anonymous identifiers will be created for datums.
Will the initiative involve multiple organisations, whether they are public service partners, voluntary sector organisations or private sector companies?	N	Although the results of the research will be disseminated broadly, data gathering will be limited to the researcher, and data analysis to the researcher and any academic collaborators.
Will the research have access to personal details about each individual in an existing database?	N	
Will there be new or significantly changed consolidation, inter-linking, cross-referencing or matching of personal data from multiple sources.	N	

Changes to data handling procedures

	Y/N	Details
Will there be new or changed data collection practices that may be unclear or intrusive?	N	
Will there be changes to data quality assurance or processes and standards that may be unclear or unsatisfactory?	N	
Will there be new or changed data security arrangements that may be unclear or unsatisfactory?	N	

Stage 2 completed by:	Holly Patrick	Date:	26/5/2020
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Stage 3- Outcome of screening

3.1 Preliminary identification of risks

You do not need to do a detailed assessment of the risks at this at this stage, but before proceeding with the PIA it is important to be reasonably clear about what the main risks are.

	Description of risk	Preliminary assessment of exposure Low/Medium/High
Risk 1	Breach of data management principles by transcription service	Low
Risk 2	Data security breach	Low
Risk 3	Identifiers not removed from data	Low/Medium
Risk 4		
Risk 5		
Risk 6		
Risk 7		
Risk 8		

3.2 Decision on how to proceed

Name of Information Management Team Member who agreed this decision	Lindsay Ramage
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The next steps are:

Need full PIA assessment

Proceed to School Integrity Committee review of project- you will need to provide the DMP and a privacy notice defined by the details in Appendix A

Stage 3 completed by	Lindsay Ramage	Date	27/5/2020
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Appendix A

Data Protection Compliance Check

Note: completion of this template requires knowledge of the Data Protection legislation (DPA 2018 & GDPR). It should be completed with assistance from the Governance Services IG team.

Where you have already provided the information at Stage 1 of the main PIA Template, simply cross-refer to the relevant answer.

	Question	Answer
1.	What type of personal data is going to be processed?	This project does not rely on the gathering of personal data. Some personal information may be inadvertently gathered (e.g. twitter handles), but this will be deleted before analysis. Any verbatim comments marked for inclusion in publications will furthermore be reverse-searched to ensure they are not traceable.
2.	Which of the grounds in Article 6 (GDPR) will provide a legitimate basis for the processing?	Art 6(1)(e), performance of a task in the public interest/exercise of official duty vested in the Controller by Statutory Instrument No. 557 (S76) of 1993 as amended, e.g. for education and research purposes.
3.	<p>If Special Category (sensitive) personal data is going to be processed, which of the grounds in Article 9 (in addition to the Article 6 grounds) will provide a legitimate basis for that processing?</p> <p>Note – Special Categories of personal data consists of information as to (a) the racial or ethnic origin of the data subject, (b) their political opinions, (c) their religious or philosophical beliefs, (d) whether they are a member of a Trade Union, (e) their physical or mental health,</p>	This project does not aim to gather sensitive data, and previous research by the researcher did not uncover any such data. If any such concerns around sensitive financial, health, or discrimination information in the data are identified, these data will be deleted.

	(f) their sexual life, (g) genetic or biometric data Processing of personal data relating to criminal convictions and offences can only be carried out under the control of official authority as per Article 10	
4.	Are there any special considerations relating to Article 8 of the Human Rights Act that will not be covered by the PIA? Note – This Article provides that everyone has the right to respect for his private and family life, his home and correspondence. It is subject to qualifications relating to national security, crime etc.	A concern with gathering online data is that it was not produced for the purpose of research, and participants may be uncomfortable with it being used in this way. The research will abide by the APA and Association of Online Researchers guidance on the use of social media sites such as Facebook and faculty guidance on using social media for research. In practice, this means gaining informed consent from participants wherever possible and practicable (i.e. where the researcher can identify and contact the participant, and doing so would not engage an unduly long amount of time). Where informed consent is not practicable, the researcher considers whether the location of the data is an inherently public or private space. If it is a private forum, the data is considered to be private and is not gathered, if the forum is public, the data will be gathered for analysis and alongside an identifier, reminding the researcher to ensure any traceable or identifiable signifiers are not used in any quotes.
5.	Will any of the personal data be processed under a duty of confidentiality? If yes, how is that confidentiality being maintained?	No
6.	Has a Privacy Notice been drafted How and when will this Privacy Notice be provided to data subjects?	Yes, it will be provided alongside the consent form, and will be published on the project webpage.
7.	Does the project involve the use of existing personal data for new purposes?	No

8.	What procedures will be in place for checking that the data collection procedures are adequate, relevant and not excessive in relation to the purpose for which the data will be processed?	The researcher will review the data collection plan monthly to ensure it is commensurate with the aims set out in the privacy notice.
9.	How will the personal data be checked for accuracy?	Personal data will be gathered in the course of the research, but as is not part of the analysis and wont be checked for accuracy. Any personal data collected will be separated from the anonymised data (in a password protected spreadsheet) and will be deleted after analysis.
10.	Has the personal data been evaluated to determine whether its processing could cause damage or distress to data subjects?	The processing shouldn't cause any distress as it is not the focus of the research
11.	Will there be set retention periods in place in relation to the storage of the personal data?	Personal data will be destroyed as soon as it is no longer required.
12.	<p><i>What technical and organisational security measures will be in place to prevent any unauthorised or unlawful processing of the personal data?</i></p> <p>Approval from Information Services for technical security is required for any electronic systems used.</p>	<p>Any personal identifiers inadvertently gathered will be erased before data processing to avoid any risk of unlawful processing.</p> <p>Data will be processed on my personal laptop, at my personal home (due to the COVID-19 lockdown). My personal laptop is protected by enhanced virus protection and firewall software, and as the laptop will not leave my house during the processing period, its physical security is highly unlikely to be compromised.</p>
13.	Will you be transferring personal data to a country outside of the European Economic Area? If so where, and what arrangements will be in place to ensure that there are adequate safeguards over the data?	No