

Data protection impact assessment (DPIA) full scale – Scottish islands Survey (2023)

1. Introduction

The purpose of this document is to report on and assess against any potential data protection impact as a result of the implementation/use of conducting the Scottish islands Survey (2023.)

2. Document metadata

2.1 Name of policy/project/initiative: Scottish Islands Survey (2023)

2.2 Date of report: 13/09/2023

2.3 Version number: 1.0

2.4 Author of report: Emma McCallum/Rod Allen

2.1 Name of information asset owner (IAO) of relevant business unit: Simon Fuller, Deputy Director, RESAS

Policy/project/initiative name	Date of report:	Version number	Report author	Business unit IAO
Scottish Islands Survey (2023)	13/09/2023	1.0	Emma McCallum/Rod Allen	Simon Fuller, Deputy Director, RESAS

2.2 Date for review of DPIA

Review date	Details of update	Completion date	Approval Date
October 2023	James Hutton Institute, successful contractor to review and add detail	6 November 2023	15 November 2023

3. Description of the project and personal data

3.1 Description of the work

Rural and Environment Science & Analytical Services (RESAS) is a division of the Scottish Government. We (“RESAS”, “Scottish Government”, “SG”, “us”, “we”, “our”) have been tasked with the development and delivery of the Scottish Islands Survey (2023).

The survey will collect data from a sample of islands residents, stratified by age and sex in order to better understand people's current situations and perceptions of key aspects of island life. This information will be used to measure the progress of the implementation of the National Islands Plan. The survey will provide data from which the impact of the plan can be measured and compared to the baseline survey data collected in 2020. It will also provide evidence to carry out Island Community Impact Assessments (ICIAs).

The project will assist Scottish Ministers in meeting the statutory provisions in the Islands (Scotland) Act 2018 to conduct annual reports and a five yearly review of the National Islands Plan. The primary aim of these activities is to improve outcomes for communities across Scotland's islands.

3.2 Personal data to be processed

Variable	Data Source	Number of data subjects (people)	Categories of data subjects	Data subjects relationship to controller
Postcodes	Scottish Postcode Directory (SPD)	c. 27,000		
Name, address, postcode	Experian	26,620		
Age group	Experian	26,620		
Gender	Experian	26,620		
Information relating to the opinions, attitudes and experiences of island communities, in relation to the strategic objectives of the National Islands Plan.	Survey (Respondent)	20,000 surveys are sent out. Estimated response rate is c. 4,000		
Ethnicity	Survey	As above		
Religion	Survey	As above		
Sexual orientation	Survey	As above		
Trans Status	Survey	As above		
Mental health and long-term health condition	Survey	As above		
Email address and/or phone number	Survey	As above		
Income	Survey	As above		

Note: The GDPR’s definition of personal data – Article 4 states that “‘personal data’ means any information relating to an identified or identifiable natural person (‘data subject’)” i.e. only information that can lead to identification of an individual is considered as personal data. So although income is sensitive information for some, it is not personal information as per this

definition. Income information will be collected using income brackets, as set out in the Scottish Government Core and Harmonised survey questions guidelines.

3.3 How this data will be processed

Who will own and manage the data?

Ownership

Scottish Government is the data controller and owner of the data. The delivery of the survey has been contracted by SG to an independent research body, the James Hutton Institute (JHI), who will process the survey data on behalf of SG. In doing so, JHI agrees to comply strictly with SG data protection regulations and in line with UK General Data Protection Regulation (“UKGDPR”).

Why will it be gathered?

Personal data will be collected and processed for three purposes:

1. To create a representative sample of island residents stratified by age and gender and to send out the survey to that sample group
2. To collect, aggregate and analyse answers from respondents of that sample group
3. To collect contact information for follow-up research

How will it be gathered?

The process for each of the above is described below:

1. Sampling data

JHI will draw postcodes for the Scottish Islands from the Scottish Postcode Directory (SPD). This data is publicly available. In order to create a representative sample of island residents that is stratified by age and gender, JHI will pass the postcodes to Experian who match them to their own database. Experian then supply JHI with the name, address, age group and gender of available individuals that are linked to those postcodes. JHI can then create their sample set. Under 18s will not be surveyed and no data is collected on this demographic. Address and contact details supplied by Experian to JHI are never connected to any resultant survey information.* It is processed by JHI only once, and destroyed no later than 30 days after receipt. This data is not shared with SG. JHI will pass the names and addresses to third party printing and posting services who will delete the names and addresses five days after use and are covered by a Data Processing Agreement.

* The Scottish Postcode Directory includes other matched geographic variables (e.g. Local authority, data zone, census output area, grid reference, SIMD etc.) which are useful for analysing survey results at different geographic scales. Experian data is matched into the Scottish Postcode Directory (SPD) variables using postcode as the linkage. Once matched, and once the surveys have been dispatched, the postcode variable is deleted from the sampling framework to ensure individuals cannot be identified from it once the survey results are returned. The other geographic variables are retained.

2. Survey data

Data will be collected by the contractor via a mixed-method survey (postal and online). This will include standardised demographic data (e.g. age, sex), special category data (detailed in section 3.2) and include questions on a range of social, economic and cultural issues relating to the opinions, attitudes and experiences of island communities. JHI will employ third party English and Gaelic

language data entry teams to process returned surveys, covered by a Data Processing Agreement. The survey results are aggregated with statistical disclosure control ensuring respondents cannot be identified from the final dataset. At the end of the project this pseudonymised dataset is transferred from JHI to SG.

3. Follow-up research

Additional contact details are collected during completion of the survey only if an individual chooses to provide them and gives permission specifically to a) be re-contacted with summary findings, b) be re-contacted for follow-up research conducted by or on behalf of The Scottish Government that is considered to be in the public interest. Contact details expressly given for reason a) will be stored securely by JHI and deleted after summary findings are sent out. Contact details expressly given for reason b) will be transferred to SG at the end of the project and held by SG only.

All data derived from the survey is transferred from the contractor to SG at the end of the project via Objective Connect, a secure data transfer online system. The files are encrypted and password protected.

Who will have access?

In the sampling and surveying phases the contractor, JHI, will process and analyse the data which will be stored securely in folders with access restricted to the project team. SG shall not have access to any data. JHI may need to share personal data with third party service providers, including printer and mailing services, data entry and translation services teams. A data processing agreement will be put in place between JHI and any third party service providers in which the confidentiality and security of the information is assured.

At the end of the project JHI will transfer a copy of the survey dataset directly to the UK Data Archive Service once appropriate disclosure control measures have been applied. The disclosure control methods fully anonymise the data and protect respondents' identities. The data can then be shared with the wider research community.

At the end of the project JHI will also transfer a pseudonymised version of the survey dataset and a re-contact file to SG for storage. Both files will be accessible only to a small number of analysts in the rural communities team within RESAS. These datasets can be shared with researchers through a special data request application that follows a rigid approval process against a set of criteria, including researcher's accreditation and the security of the research environment. Applications are carefully considered by the survey project manager, and if necessary by the Scottish Government's Data Access Panel run by the Office for the Chief Statistician & Data Officer (OCS).

How will it be stored, and disposed of when no longer needed?

Data provided by Experian to JHI will be used only once and held for no longer than 30 days.

Under the terms of their contract with SG, all data collected by JHI and used to inform the analysis will be stored securely with suitable access restrictions in place for the duration of the project and until such time as it is deleted which shall be no later than 6 months after the project's completion defined as the contract end date including any contract extensions.

At the end of the project, the anonymised dataset and contact file will be transferred to SG using Objective Connect. The anonymised dataset will be held securely by RESAS in a restricted drive. The information is held on a separate server which has restricted access. The dataset will be disposed of once conditions for it to be kept no longer apply, in accordance with Scottish Government

policies. The contact details, (email, telephone number and a unique ID) supplied with consent for follow-up samples, will be deleted after 5 years. A Data Sharing Agreement is NOT required between the parties. The data belongs to Scottish Government and there is a contract in place. Nevertheless, a Data Sharing Agreement has been requested by the James Hutton Institute and will be put in place between SG (RESAS) and the contractor to cover the transfer of this data to SG.

3.4 The purpose(s) of the processing

The purpose of the processing is to a) create a sample set and mailing list, b) gather data by which to monitor and review the objectives of the National Islands Plan in compliance with the Islands (Scotland) Act 2018 through a survey of a sample of the inhabitants of Scotland's islands and c) gather contact information for follow-up research from consenting survey participants.

4. Data controllers and data processors/sub processors

4.1 Data controllers

Organisation	Scottish Ministers		
Activities			
Is the organisation a public authority or body as set out in Part 2, Chapter 2, Section 7 of the Data Protection Act 2018?	Yes		
Lawful basis for processing under UK General Data Protection Regulation (UK GDPR) Article 6 for the collection and sharing of personal data – general processing	(e) The legal basis for processing under Article 6 of UK GDPR / Data Protection Act 2018 is (e) Public task, carried out in the public interest, “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. This falls under the Islands (Scotland) Act 2018.	Lawful basis for processing under UK General Data Protection Regulation (UK GDPR) Article 9 – special category data or Article 10 – criminal convictions data Include condition from Schedule 1 or 2 of the Data Protection Act 2018	The condition for processing Special Category personal data under Article 9 is (2) (g) public interest and the research meets the specific condition set out in paragraph 8, Part 2 of Schedule 1 of the DPA 2018, ‘8. Equality of opportunity or treatment’.
Law enforcement – if any law enforcement processing will take place – lawful basis for processing under Part 3 of the Data Protection Act 2018	N/A	Legal gateway for any sharing of personal data between organisations	N/A

4.2 Data processors and sub processors

Organisation	Activity	Contract in place compliant with UK GDPR Art 28? Yes/No
James Hutton Institute	<p>Principle data processor: collection, processing and temporary storage of data required for sampling purposes and data derived from the survey and transfer of survey data to SG</p> <p>All data deleted 6 months after project completion.</p>	Yes
Winter & Simpson	<p>Data sub processor: Printing</p> <p>Has name and address information</p>	Data Processing Agreement (The agreement is between W&S and JHI subject to approval by SG)
Johnston Mailing	<p>Data sub processor: Posting</p> <p>Has name and address information</p>	Data Processing Agreement (The agreement is between JM and JHI subject to approval by SG)
Cleardata	<p>Data sub processor: Data entry (English)</p> <p>Does not have name and address information, only survey responses, some of which have email addresses and telephone numbers from respondents who opt to provide it.</p>	Data Processing Agreement (The agreement is between Cleardata and JHI subject to approval by SG)
Sabhal Mòr Ostaig	<p>Data sub processor: Data entry (Gaelic)</p> <p>Sabhal Mòr Ostaig (SMO) will be sent Gaelic paper surveys for input to the online questionnaire, Does not have name and address information only survey responses, some of which have email addresses and telephone numbers from respondents who opt to provide it.</p> <p>SMO will also carry out any telephone interviews requested in Gaelic. In this specific situation, JHI will send SMO the names and phone numbers of anyone who specifically requests this service.</p>	Data Processing Agreement (The agreement is between SMO and JHI subject to approval by SG)

4.3 Data flows – flowchart at Annex B

This chart describes the data flow between controllers and processors in the project.

This chart (Annex B) shows all the data flows in the project, including the flow of personal information. Personal data is information that relates to an identified or identifiable individual. What identifies an individual could be as simple as a name or a number. Even if an individual is identified or identifiable, directly or indirectly, from the data you are processing, it is not personal data unless it 'relates to' the individual. Information which has had identifiers removed or replaced in order to pseudonymise the data is still personal data for the purposes of UK GDPR. Information which is truly anonymous is not covered by the UK GDPR.

5. Stakeholder analysis and consultation

5.1 Stakeholders

Group	Interest
Scottish Government	Data Controller
RESAS	Will contract manage the project
Islands policy team	Will use the outputs of the project to monitor the implementation of the National Islands Plan (NIP) and will sit on the research advisory group.
SG analysts	Contributed to the question review and may use outputs to contribute to research in policy areas related to the objectives of the NIP.
Administrative Data Research Scotland (SG) and National Records of Scotland (NRS)	Available for questions on methodological robustness of the project
Scottish Rural Action, Highlands and Islands Enterprise, Scottish Islands Federation	Stakeholders are part of research advisory group.
Biomathematics and Statistics Scotland (BioSS)	Advice on sampling and data analysis
Scotland's Rural College's (SRUC)	Research advice and survey promotion
Data protection and information assets team	Will be consulted on DPIA
Participants	Data subjects

5.2 Method used to consult with these groups when making the DPIA

The survey contractors, James Hutton Institute, have been fully involved in this Data Protection Impact Assessment. Internal discussions have been held with SG colleagues and the DPIA has been reviewed by the Information Assurance and Data Protection Team. The DPIA has been sent to the Research Advisory Group and sub contractors for information. The DPIA and privacy notice will be published on James Hutton's website which will host the Scottish Islands Survey pages. A link has been sent round stakeholders involved in the project and survey respondents are made aware the DPIA is available. The Privacy Notice was printed and sent out with the survey. There was Scottish Government branding on the information sheet sent out with the privacy notice.

5.3 Data protection issues identified by these groups during consultation

None at present

5.4 Method used to communicate the outcomes of the DPIA

This Data Protection Impact Assessment will be published on the Scottish Islands Survey website hosted by JHI along with the privacy notice. An email will be sent to alert stakeholders that a new version has been published.

6. Questions to identify data protection issues

6.1 Necessity

The Scottish Islands Survey (2023) is necessary to monitor the progress of the implementation of the National Islands Plan, a statutory requirement under the Islands (Scotland) Act 2018, through comparability with the earlier National Islands Plan Survey 2020 and future island surveys.

6.2 Proportionality

Current major Scottish and UK surveys do not collect data which can be analysed specifically at an island-level. A problem for the Scottish Island Regions geography is that some of the current data zones cover both islands and mainland Scotland, or straddle more than one Scottish Island Region. The Scottish Islands Survey uses island-specific sampling and is therefore uniquely positioned to collect data exclusively from island regions and with questions aimed at addressing key known issues affecting island communities.

6.3 Justification

The information collected in the survey provides reliable information to the government and others on the current situations and perceptions of key aspects of life for inhabitants of the Scottish islands. This information is used to monitor changes over time and inform policy. It is justified in that it meets a legal requirement and the required information cannot be collected from existing data sources.

6.4 Involvement of multiple organisations

The Scottish Government has commissioned the survey to the James Hutton Institute because they have experience running similar surveys and are an independent unbiased institution.

James Hutton Institute will run the survey on behalf of the Scottish Government and process the data. JHI will use sub-contractors, all named in this assessment, who are specialised in providing specific services required to run the survey and process the resultant data.

6.5 Anonymity and pseudonymity

SG, JHI and any contracted third parties commit to preserving the anonymity of participants during all stages of the project and after project completion. Personal data is only shared within these contracted groups as a necessary condition of delivering the survey.

At project completion a pseudonymised copy of the dataset of survey results will be transferred to SG and a fully anonymised version to the UK Data Archive. Before the data is transferred, JHI will have conducted statistical disclosure controls to ensure no identifying variables or combination of variables are left in the dataset.

A unique serial number is assigned to each respondent to the survey by the contractor and this is included in the survey dataset which will be sent to SG. It can only be used to match into age, sex and at a geographical level at which the participant cannot be identified after the statistical disclosure controls have been carried out.

The unique identifier number is also included in a separate file of contact information (consisting of the identifier number, email and/or telephone number only). This is supplied to RESAS in SG only, accessible only to a small number of analysts in the rural communities team, and is stored separately to the dataset. It only includes participants who consented to be re-contacted and who provided their

email address and/or telephone number. The unique identifier will permit follow-up research to be conducted on island residents and to match in other variables in order to create a sample group relevant to the research. Only a sub-set of survey variables would be released to future researchers with strict conditions on special data set release for any follow-up research. A separate Data Protection Impact Assessment would be undertaken by future researchers in the event of any follow-up research taking place to ensure the continued anonymity of survey respondents.

In certain (rare) circumstances where participants disclose information that makes the contractor concerned that they, or someone else, is at serious risk of harm, UK GDPR allows for the processing (including disclosure) of their personal data where this is “necessary in order to protect the vital interests of the data subject or of another natural person”. We will be kept fully informed by the contractor in the unlikely event that any such disclosure issues arise.

6.6 Technology

Within Scottish Government, personal data is held electronically on restricted areas of the Scottish Government secure server as described in Section 3.3. This section also briefly describes the JHI procedures. Each new or additional information technology is assessed for privacy intrusion before it is used in the project.

The Scottish Government survey team only uses technology cleared by Scottish Government IT experts.

6.7 Identification methods

Each respondent to the Scottish Islands Survey is identified within the survey datasets by a unique serial number.

The contractor will conduct Statistical Disclosure Control (SDC) to ensure no person or organization is identifiable from the results of an analysis of survey or administrative data, or in the release of microdata. The contractor is thus tasked with ensuring that reverse identification is not possible in the dataset they transfer. This will be done through suppressing below threshold numbers and optionally through record switching if there is a further concern about exceptional or unusual records prior to publication.

6.8 Sensitive/Special Category personal data – including biometric data

The survey will contain a set of voluntary Equalities Monitoring questions and will therefore collect a limited amount of sensitive/special category personal data. This includes:

- Sexual orientation
- Trans status
- Ethnicity
- Religion
- Mental health
- Long-term health condition

The contractor will be expected to store the dataset securely and any data transferred to SG at the end of the contract will be collated and anonymised.

We will not be collecting any other special category personal data. In the event that any other data is accidentally obtained during fieldwork, this information will be deleted securely from the dataset. The responsibility of deletion will be with the contractor.

6.9 Children or other vulnerable data subjects (people)

The survey does not collect from respondents under 18 years old.

6.10 Data matching or linkage

Please see section 6.5

6.11 Changes to data handling procedures

Any notable changes to data handling procedures will be assessed from a data protection/privacy perspective and the DPIA will be updated accordingly. Additionally, the DPIA will be reviewed throughout the project to consider whether any updates are required.

6.12 Statutory exemptions/protection

Not applicable

6.13 Automated decision making or profiling

Not applicable

6.14 Other risks

Project risks refer to the potential for project objectives to be adversely affected by issues that are related to the implementation of an individual project or to specific features of a project that make it more risky than other projects. After a careful risk assessment, the project as a whole is judged to be low risk. Further information on risk is contained in Section 8. There are always leakage risks when dealing with personal data. Appropriate measures are being taken and continually reviewed to ensure personal data stays confidential.

7. UK General Data Protection Regulation (UK GDPR) principles

Principle	Compliant – Yes/No	Description of how you have complied
7.1 Principle 1 – fair and lawful, and transparent	Yes	<p>The legal basis for processing under Article 6 of UK GDPR / Data Protection Act 2018 is (e) Public task, carried out in the public interest, “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. This falls under the Islands (Scotland) Act 2018. The condition for processing Special Category personal data under Article 9 is (2) (g) public interest and the research meets the specific condition set out in paragraph 8, Part 2 of Schedule 1 of the DPA 2018, ‘8. Equality of opportunity or treatment’ (both also outlined in section 4.1).</p> <p>Individuals will be informed on how their data will be used and processed through a privacy notice, (see Annex A). Participants will be told that they can withdraw from participating in the research at any point before the questionnaire is returned. The survey data will be analysed, reported and published anonymously..</p>
7.2 Principle 2 – purpose limitation	Yes	<p>Personal data will be collected only for the purpose of carrying out the survey and used to develop the National Islands Plan. No identifiable personal data collected will be contained in the final dataset. Contact details for follow-up research in the public interest will be collected with express consent form participants and will be strictly controlled by the SG.</p>
7.3 Principle 3 – adequacy, relevance and data minimisation	Yes	<p>The contractor will only collect data that is relevant to the aims and objectives of the research. The data won’t be held for any longer than is required. Demographic data (using the standardised SG categories) will be collected as a part of this project. This is essential to understand the situational context of responses and explore differences in attitudes between different island communities.</p>
7.4 Principle 4 – accurate, kept up to date, deletion	Yes	<p>The contractor has to ensure the data collected is correct. Only the contractor can amend the dataset that includes personal data. The Experian data will be deleted 30 days after receipt and the raw data will be deleted post-project and no later 6 months. The anonymised dataset will be transferred to SG and deleted once conditions for it to be kept no longer apply, in accordance with Scottish Government policies. A permanent copy will be held in the UK Data Archive. A separate contact file will also be transferred, stored separately and deleted after 5 years.</p>
7.5 Principle 5 – kept for no longer than necessary, anonymization	Yes	<p>Data will be anonymised immediately after the project is completed and the anonymised dataset will be transferred to the Scottish Government within 6 months of the contract end date. All data held by the contractor will be deleted within 6 months of the end of the contract.</p>
7.6 UK GDPR Articles 12-22 – data subject rights	Yes	<p>The contractor will include a link to the privacy notice in the survey invitation which will inform participants what data will be held, who it will be shared with and how it will be stored. This will also inform them how to make a Subject Access Request for any personal data we hold on them.</p>

		<p>Individuals can have access to the data SG holds about them including data held by JHI during the contract period and it will be made clear what data the contractor will hold in that period. Data cannot be used for purposes other than research.</p> <p>A copy of the privacy notice can be found in Annex A.</p>
7.7 Principle 6 - security	Yes	<p>The contractor must ensure that personal data will be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisation measures such a storing data on secure devices with password protected access.</p> <p>The contractor also has to agree to protect personal data from unauthorised access at all times, during collection, storage and transmission. This includes both IT security and physical security.</p> <p>Data transferred to SG will be stored on SG devices in the eRDM secure server within restricted access folders.</p>
7.8 UK GDPR Article 44 - Personal data shall not be transferred to a country or territory outside the European Economic Area.	Yes	<p>Personal data will not be transferred to a country or territory outwith the EEA.</p>

8. Data protection risks identified, likelihood, impact, severity score, solutions or mitigation controls proposed and residual risk

Risk description		Leakage risks (survey responses)			
Risk ref number		1			
Potential impact on the data subjects (people)		Medium, most information collected is not sensitive. However, income, sexuality, ethnicity, religion and trans status are collected.			
Unmitigated risk score		Mitigation controls		Residual risk score	
Likelihood	3	1. Disclosure controls protecting individual anonymity are thoroughly tested before data is placed in the UK Data Service 2. Disclosure controls are applied to all data before its release, as set out in the Code of Practice for Statistics.		Likelihood	2
Impact	3			Impact	3
Score	MR (9)			Score	LR (6)

Risk description		Personal data leakage – name and address			
Risk ref number		2			

Potential impact on the data subjects (people)		Name and address are leaked.			
Unmitigated risk score		Mitigation controls		Residual risk score	
Likelihood	3	Access to these datasets is restricted to the contractor and only to those analysts who require it for business reasons and deleted within 30 days of receipt.		Likelihood	2
Impact	3			Impact	3
Score	MR (9)			Score	LR (6)

Risk description		Personal data leakage – email and telephone number			
Risk ref number		3			
Potential impact on the data subjects (people)		Email address and/or phone number are leaked.			
Unmitigated risk score		Mitigation controls		Residual risk score	
Likelihood	3	Access to datasets is restricted to only those analysts who require it for business reasons. There are different levels of access. Contact details are only available to the contractor until such time as it is transferred and deleted and to the core Scottish Islands Survey team within RESAS Rural Communities (currently 3 analysts). The remaining social data (which includes special category data, such as trans		Likelihood	2
				Impact	
				Score	

Impact	3	status, ethnicity, or religion) is accessible by access request.	Impact	3
Score	MR (9)		Score	LR (6)

Risk description	Data/IT security breach by sub-processor			
Risk ref number	4			
Potential impact on the data subjects (people)	Personal details, possibly linked to survey responses, are leaked through an IT security breach by one of the sub-processors.			
Unmitigated risk score	Mitigation controls		Residual risk score	
Likelihood	3	<ul style="list-style-type: none"> - Appropriate data processing and deletion clauses in the relevant DPAs with contracted sub-processors. - Use of secure file transfer site for transferring data between Hutton and sub-processors using encryption and password protection. 	Likelihood	2
Impact	3		Impact	3
Score	MR (9)		Score	LR (6)

Risk description	Excessive collection of personal data through free text survey responses			
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Risk ref number		5			
Potential impact on the data subjects (people)		Respondent provides personal details in a comments box, putting them at risk of identification.			
Unmitigated risk score		Mitigation controls		Residual risk score	
Likelihood	3	- Anonymisation of comments by Hutton		Likelihood	2
Impact	3			Impact	3
Score	MR (9)			Score	LR (6)

9. Incorporating data protection risks into planning

Risk	Ref number	How risk will be monitored and incorporated into planning	Owner
Data leakage (survey responses)	1	Survey responses will be stored in secure folder at Hutton, accessible only by immediate project team. Secure file transfer system will be used to send responses between sub-processors, Hutton and SG. Time has been allocated for disclosure controls to be applied to the survey dataset before it is transferred from Hutton to SG and deposited in the UK Data Archive.	Ruth Wilson
Data leakage (personal data)	2	Personal data will be stored in secure folder at Hutton, accessible only by immediate project team. Secure file transfer system will be used to send responses between sub-processors and Hutton. Once transferred to SG, the contact file will be stored in a secure folder, accessible only to Rod Allen, Emily Harris and Emma McCallum. Requests for contact file are reviewed by named person at SG.	Ruth Wilson (Hutton) Simon Fuller, SG

Data/IT security breach	3	Hutton's solicitor is drawing up data processing agreements with all sub-processors.	Ruth Wilson
Excessive collection of personal data	4	Comments left in response to the survey will undergo a thorough anonymisation process, with any identifying details redacted, before they are transferred from Hutton to SG and deposited in the UK Data Archive. Time and resource have been allocated to this exercise.	Ruth Wilson

The full risk assessment with mitigating actions is available on request. James Hutton Institute have provided a full risk register as part of their tender which is held on file.

10. Data Protection Officer (DPO) advice

Advice from DPO	Action	Reason advice not actioned
<p>Duplication</p> <p>Explain where there are anonymised and pseudonymised versions of the survey dataset</p> <p>Clarified that Scottish Government is the data controller, James Hutton Institute are the data processors, and Scottish Government is responsible for writing the Data Protection Impact Assessment and the Privacy Notice.</p>	<p>Mary Macdonald on behalf of Information Assurance and Data Protection Team reviewed the document and Rod Allen made the changes</p>	<p>All advice actioned</p>

11. Authorisation and publication

The DPIA report should be signed by your information asset owner (IAO). The IAO will be the Deputy Director or Head of Division.

- Before signing the DPIA report, an IAO should ensure that she/he is satisfied that the impact assessment is robust, has addressed all the relevant issues and that appropriate actions have been taken.
- By signing the DPIA report, the IAO is confirming that the impact of applying the policy/undertaking the project or initiative etc. has been sufficiently assessed against the risk to individuals' rights and freedoms.
- The results of the impact assessment must be published in the eRDM with the phrase "DPIA report" and the name of the project or initiative in the title.
- Details of any relevant information asset must be added to the Information Asset Register, with a note that a DPIA has been conducted.

I confirm that the impact of the Scottish Islands Survey has been sufficiently assessed against the rights of the data subjects (people):

Name and job title of a IAO or equivalent	Date each version authorised
Simon Fuller, Deputy Director, RESAS	15 Nov. 23

12. Annex A – privacy information

Privacy Notice

The information below sets out how the data we collect about you in order to conduct the Scottish Islands Survey 2023 will be used and your rights relating to this. A full data protection impact assessment (DPIA) has also been carried out and is available at <https://ruralfutures.hutton.ac.uk/scottish-islands-survey-2023>.

Who are we?

Rural & Environmental Science and Analytical Services (RESAS) is a division of the Scottish Government. Address is: Q spur, Saughton House Broomhouse Drive Edinburgh EH11 3XD. Telephone number: 0300 244 4000.

We (“RESAS”, “Scottish Government”, “SG”, “us”, “we”, “our”) have been tasked with conducting a survey of Scotland’s inhabited islands to better understand people’s current situations and perceptions of key aspects of island life in order to guide the National Island Plan’s objective to improve outcomes for communities across Scotland’s islands.

The James Hutton Institute (JHI), an independent and experienced research institute, has been contracted to deliver the survey on our behalf. Scottish Government controls how data is used for this project. We are committed to protecting your personal data and adhere to the principles of the UK General Data Protection Regulation (“GDPR”) when processing your personal data. In delivering the survey on our behalf, JHI will be acting under our instruction and will process data in strict compliance with our data protection regulations.

What information do we collect about you?

To deliver the survey we may collect and process the following data about you:

Contact details including name and address which we use to send you the survey.

Demographic information about you, including age and gender.

Some demographic information considered to be more sensitive under the data protection laws and requiring a greater level of protection. This includes ethnicity, religion, sexual orientation, trans status, mental health and long-term health conditions. This data is necessary for statistical purposes in the public interest.

Any other personal information you give as part of your answers to the survey questions.

Contact details including email address and telephone number so that we can send you the project findings and/or to conduct follow-up research, only if you choose to supply them.

What is our lawful basis for collecting and using your personal information?

The legal basis for processing personal data to this end is the performance of a task carried out in the public interest, under Article 6(1)(e) of the Data Protection Act 2018 (DPA 2018).

The condition for processing Special Category personal data under Article 9 is (2) (g) public interest and the research meets the specific condition set out in paragraph 8, Part 2 of Schedule 1 of the DPA 2018, ‘8. Equality of opportunity or treatment’.

The Scottish Islands Survey 2023 contributes to the monitoring and evaluation the National Islands Plan and provides evidence for conducting Island Community Impact Assessments (ICIAs). These are statutory requirements under the Islands (Scotland) Act 2018.

Participation in the survey is voluntary and you are free to withdraw at any time, before you return the questionnaire, without providing any reason and without your legal rights being affected.

How will we use your information?

The survey data will be collected and analysed by researchers at the James Hutton Institute and will be used in a report of the research findings. Your personal information will be anonymised. This means any information that can directly identify you, such as your name, email address or telephone number, will not be included in any published reports nor in the final survey results data.

If you choose to provide your email address to receive a copy of the survey findings it will be used by JHI for this purpose only and subsequently deleted.

If you choose to provide your email address and/or telephone number for follow-up research this information will only be held by SG, stored securely, and used only for research purposes.

Who will we share your information with?

Scottish Government will not share any personal information from which you can be identified. A fully anonymised survey results dataset will be held by RESAS and in the UK Data Archive. Access to contact information you share for follow-up research will only be granted by RESAS to SG departments who can demonstrate they are conducting research in the public interest. The James Hutton Institute obtained your name, postal address, age bracket and gender from Experian Marketing Services in order to select our survey sample. To learn more about how Experian help organisations with their marketing and advertising, including how to opt out, visit www.experian.co.uk/cip. This data is only used to create the sample and to send the survey to you. It is held by JHI, used only once and then deleted. It is not shared with Scottish Government.

JHI may need to share personal information they hold about you with third party service providers, such as printers, translation services and data entry teams. Any such data sharing will be limited to what is necessary to conduct the research and data protection safeguards are in place to ensure the confidentiality and security of your information. JHI have adopted appropriate technical and organisational measures to keep your personal data safe from unauthorised disclosure, alteration or destruction.

Will we send your information outside the UK?

No, we do not transfer your information outside the UK.

How long will we store your information?

Your name and address provided by Experian will be held by the James Hutton Institute for no longer than 30 days.

Whilst the project is live, JHI will process and store information contained in your survey responses. A final report of the findings will be published in May 2024. JHI will delete all project data no later than 6 months after project completion.

At project completion the Scottish Government will be transferred the anonymised survey results data set. A permanent copy will be held securely by RESAS and in the UK Data Archive. SG will also receive a contact file for follow-up research. This will be held for no longer than five years.

What are my rights in relation to the information held about me?

You have the right to request a copy of the personal data that the Scottish Government holds about you. If you would like a copy of some or all of your personal data, you can find more information on how you can do this by visiting <https://www.gov.scot/publications/subject-access-request-form/>

We want to make sure that your personal data is accurate and up to date. You may ask us to correct or remove personal data you think is inaccurate.

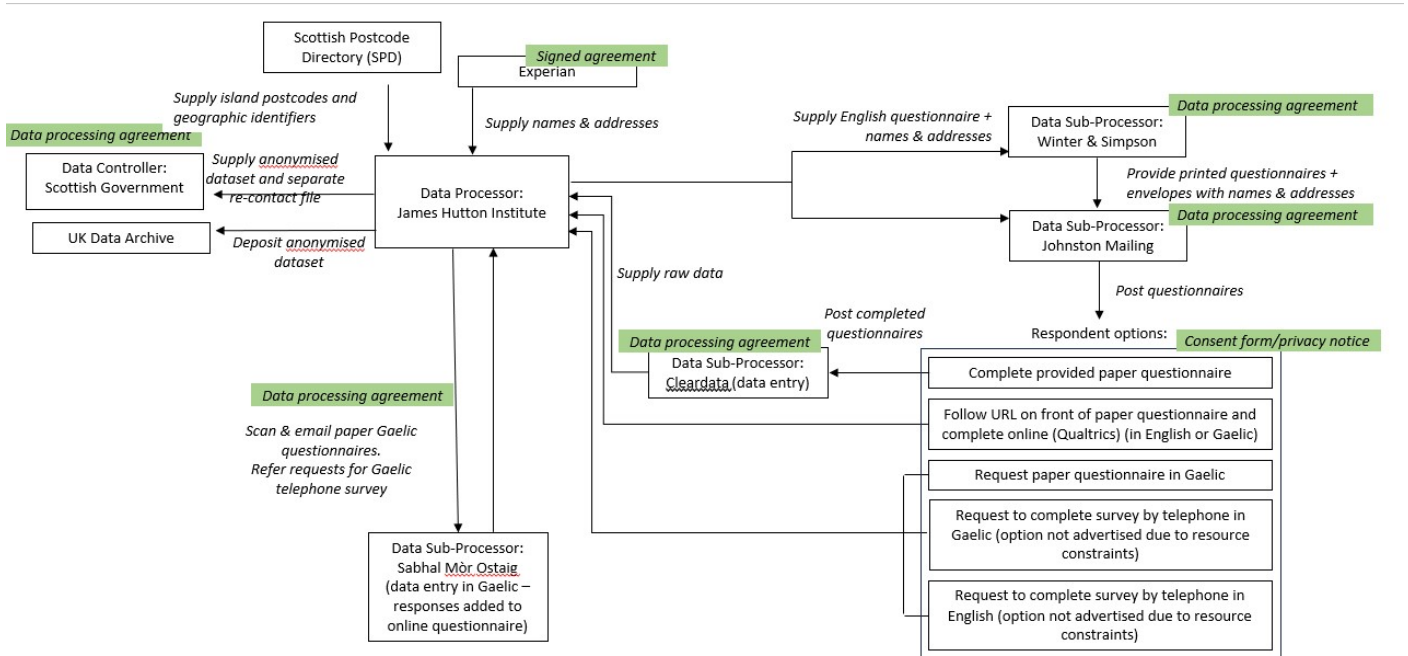
Do I have a right to complain about the way information has been used?

If you have any questions about the research or a complaint about how we have handled your personal information, please contact our Data Protection Officer by email at dataprotectionofficer@gov.scot.

You also have the right to lodge a complaint about data protection matters with the Information Commissioner’s Office. Visit their website for more information at <https://ico.org.uk/>

Please note that by completing this survey you acknowledge that you have read, understood and agree to the information provided in this privacy notice.

13. Annex B – data flowchart



14. Annex C – risk scoring

Risk assessment matrix

Likelihood	Severity of impact				
	Negligible (1)	Minor (2)	Moderate (3)	Major (4)	Extreme (5)
Almost certain (5)	LR (5)	MR (10)	HR (15)	HR (20)	HR (25)
Likely (4)	LR (4)	MR (8)	MR (12)	HR (16)	HR (20)
Possible (3)	VLR (3)	LR(6)	MR (9)	MR (12)	HR (15)
Unlikely (2)	VLR (2)	LR (4)	LR (6)	MR (8)	MR (10)
Remote (1)	VLR (1)	VLR (2)	VLR (3)	LR (4)	LR (5)

	HR = High risk
	MR = Moderate risk

	LR = Low risk
	VLR = Very low risk

Likelihood of occurrence definitions

	Remote 1	Unlikely 2	Possible 3	Likely 4	Almost certain 5
Likelihood	Can't believe this would happen – will only happen in exceptional circumstances (5-10 years)	Not expected to happen but definite potential exists (2-5 years)	May occur occasionally, has happened before on occasions – reasonable chance of occurring (annually)	Strong possibility that this could occur – likely to occur (quarterly)	This is expected to occur frequently, in most circumstances – more likely to occur than not (daily/weekly/monthly)