

IMPACT ASSESSMENT – INTEGRATED IMPACT ASSESSMENT

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Impact Assessment Team

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DATA PROTECTION – FULL IMPACT ASSESSMENT

Author Details

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Email Address	n/a
Service	n/a

Data and Evidence

Questions	Answers
What existing sources of information have you gathered to help identify how personal data may be affected by this Policy, Strategy or Service Change?	<input type="checkbox"/> Consultations <input checked="" type="checkbox"/> National or Local Data <input checked="" type="checkbox"/> National or Local Research <input type="checkbox"/> Customer Complaints <input type="checkbox"/> Customer Feedback
Are there gaps in available data selected above?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If yes, please describe the data gaps that exist	<p>Diffley Partnership has been commissioned to independently conduct this IIA by The Highland Council (THC).</p> <p>This is based upon published information up to 24 November 2025.</p> <p>Diffley Partnership has consulted public sources, including:</p> <p>Visitor Levy Consultation Document (1).pdf Visitor Levy Consultation Impact Assessments.pdf Visitor Levy (Scotland) Act 2024 Visitor Levy Guidance for Local Authorities I VisitScotland.org</p>

	As more information is published about the visitor levy, either at a national or local authority level this will necessitate updates of IIAs.
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Stakeholder Engagement or Consultation

This section gives an opportunity to engage with the people likely to be affected by your policy, strategy, or service change. For example, if there is no impact-related data or information available, then you may need to consult to fill in the gaps. You may wish to consider Area Committees, Community Councils, working with subject area experts and contacts from different organisations. The most appropriate stakeholders to engage with or more formally consult, will vary from case to case and you may wish to give more detail around the relevant stakeholders. There may also be information or data from other consultations, customer feedback and monitoring exercises that could be referred to.

Questions	Answers
<p>Have any stakeholders been involved in the development of this Policy, Strategy or Service Change at this stage?</p> <p><i>For example - involving stakeholders in the development of the Policy, Strategy or Service Change may include activities such as holding user/staff workshops, undertaking user experience surveys or customer journey mapping or any other input from interested parties (Key stakeholders) such as this</i></p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>
<p>Please specify any stakeholders that have been involved in the development of this Policy, Strategy or Service Change.</p>	<p>Diffley Partnership have been commissioned to independently conduct this IIA.</p> <p>THC has held a public consultation and stakeholder consultation.</p>
<p>In addition to involving stakeholders, has there been any more formal consultation undertaken on this Policy, Strategy or Service Change to date?</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>

<p><i>For example - more formal consultation may include Community Councils, Area Committees, Ward Managers, Council Boards or Committees, Executive Leadership Team, Community Planning Partnership, or other partner organisations such as Highlife Highland, Highland & Island Enterprise or UHI.</i></p>	
<p>Please specify what you have consulted on, who you have consulted with and/or if any concerns were raised and any outcomes?</p>	<p>Diffley Partnership have been commissioned to independently conduct this IIA.</p> <p>THC has held a public consultation and stakeholder consultation.</p>
<p>Will there need to be any more formal consultation undertaken on this Policy, Strategy or Service in the future?</p>	<p><input type="checkbox"/>Yes</p> <p><input type="checkbox"/>No</p>
<p>How will you carry out your more formal consultation and in what timescales?</p> <p>Guidance</p> <p>You should make it easy for people to give their views and you may wish to give consideration around meetings (including virtual) as well as written consultations, ensuring materials are available in different formats such as large print or Gaelic.</p> <p>You may also wish to consider & seek guidance on most appropriate ways to consult Children & Young People. Community Councils and Area Committees could assist in the best approach that would ease participation.</p> <p>If undertaking in person consultation, then weather and travel need to be factored into timescales. You may want to consider developing a communication plan for reaching your target audience.</p>	<p>This is an internal matter for THC.</p>

Data Protection – Impact Assessment

Questions	Answers
<p>Why will you need to process personal data as part of this proposal?</p> <p><i>Include details of applicable legislation</i></p>	<p>We gather this proposal would require the processing of personal data for the purposes of exemptions and rebates.</p> <p>See section 11 of the Act.</p> <p><u>Visitor Levy (Scotland) Act 2024</u></p> <p>We gather this proposal would require the processing of personal data for the registers of liable persons.</p> <p>See section 73 of the Act.</p> <p><u>Visitor Levy (Scotland) Act 2024</u></p>
<p>Will the data be used for purposes other than what is set out in the proposal?</p> <p><i>Such as reporting to Scottish Government.</i></p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>From the Annual Reporting section on the Guidance on the Levy it does not appear that the annual reporting requirements of THC to Scottish Government would include Personally Identifiable Information (PII).</p> <p><u>Guidance on the Visitor Levy.pdf</u></p>
<p>If yes – What other purposes will the data be used for?</p>	

<p>Impact - Purpose Limitation:</p> <p><i>Is data shared with other Services or organisations?</i></p>	<p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>
<p>If Yes, which services or organisations?</p> <p>How will this be monitored?</p>	<p>Unknown</p>

<i>This should be documented in a data sharing agreement.</i>	
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Will you process personal data to carry out this process?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If Yes – will you anonymise the data where possible?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Have you confirmed that you will only process the minimum data required to fulfil the purpose? <i>Provide details if not.</i>	This is an internal matter for THC

How do you ensure data is kept up-to-date and accurate?	This is an internal matter for THC
How will you monitor data quality?	This is an internal matter for THC

How long the personal data will be kept for?	This is an internal matter for THC
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Is this included in the Council's retention schedules? <i>Contact DPO to have retention schedule updated</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
If you share data, how long the other parties will retain it for?	This is an internal matter for THC

<p><i>Does the IT system you use apply the retention appropriately?</i></p> <p><i>You may need to contact your system administrator.</i></p>	<p>This is an internal matter for THC</p>
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<p>Are you utilising the Council's existing systems to process the data?</p> <p><i>List all (new and existing) systems that will be used to process data.</i></p>	<p>This is an internal matter for THC</p>
<p>Will the data be held in the service provider's cloud?</p> <p><i>Provide details of the provider's security arrangements. The provider should be able to provide documentation.</i></p>	<p>This is an internal matter for THC</p>
<p>Provide details of how you will control access to the data.</p> <p><i>For example, multi factor authentication log in method or permissions restrictions.</i></p>	<p>This is an internal matter for THC</p>
<p>How will you ensure staff are aware of their responsibilities.</p> <p><i>For example, staff training and communication.</i></p>	<p>This is an internal matter for THC</p>

<p>Is there an up-to-date privacy notice available on the Highland Council website?</p> <p>Contact DPO for assistance creating or amending a privacy notice.</p>	<p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>
<p>Do you have Policies and Procedures for staff to follow?</p>	<p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>

What information do you intend to provide to Data Subjects about how their data will be used?	This is an internal matter for THC

<u>Justification:</u> Have any negative impacts been identified?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<u>Justification:</u> If so, can the negative impact identified, be justified?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<u>Justification:</u> Please provide some narrative as to why the negative impact can, or cannot, be justified.	This is an internal matter for THC
<u>Risks:</u> Have any risks been identified in relation to personal data?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If yes, can the risk be mitigated or tolerated?	<input type="checkbox"/> Mitigated <input type="checkbox"/> Tolerated <input type="checkbox"/> Neither
Detail why the risk can or cannot be mitigated or tolerated.	This is an internal matter for THC

Actions, Monitoring, and Review

<p><u>Actions:</u></p> <p>Are there actions identified to advance or promote personal data, or to mitigate potentially negative impact?</p>	<p><input type="checkbox"/>Yes</p> <p><input type="checkbox"/>No</p>
<p><u>Actions:</u></p> <p>If yes, please provide a narrative of the actions identified, as well as attach a relevant action plan.</p>	<p>This is an internal matter for THC</p>
<p><u>Monitor and Review:</u></p> <p>Please provide details of arrangements to monitor and review the policy, strategy or service change and any associated actions.</p>	<p>This is an internal matter for THC</p>

Summary of Conclusions

<p>All Full Impact Assessments should be referenced, and a summary of findings included in any relevant committee report(s), at which the proposed Policy, Strategy or Service Change will be discussed.</p> <p>Based on the information provided in this Full Impact Assessment, please provide a summary of your own conclusions as the line manager responsible for this proposal that may be included in any relevant committee report(s).</p>	<p>Most of this FIA is an internal matter for THC and Diffley Partnership can only comment on a few fields, referring to public sources.</p>
<p>Please enter the name & date of the committee(s) at which this proposal will potentially be Considered.</p>	<p>Unknown</p>

Publication

Full Impact Assessments will be published on the Highland Council's Impact Assessment Register

Data Protection – Impact Assessment Sign Off:

For completion by the Responsible Manager

Questions	Answers
Please check if you are satisfied that the following elements of the Data Protection Impact Assessment have been considered:	<input type="checkbox"/> Gathering information <input type="checkbox"/> Consultation and involvement <input type="checkbox"/> Assessing impact on Personal Data <input type="checkbox"/> Mitigating actions identified (if required) <input type="checkbox"/> Opportunity to promote Data Protection <input type="checkbox"/> Arrangements to monitor and review <input type="checkbox"/> Publication arrangements
Are you prepared to sign off the Data Protection Impact Assessment?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<u>Responsible Manager</u> Name	
<u>Responsible Manager</u> Position	
<u>Responsible Manager</u> Date	
If no, provide details of why and next steps	