



Commissioner for Older People
for Northern Ireland

29 May 2014

Niall McGrath
Information Manager
Land and Property Services
Queen's Court
56-66 Upper Queen Street
Belfast
BT1 6FD

Dear Mr McGrath

RE: Draft Privacy Impact Assessment and Data Sharing Agreement on the use of SpatialNI Vulnerability and Asset Mapping in Emergency Incidents (Deadline 30th May 2014):

I am writing to you in relation to the consultation on the Draft Privacy Impact Assessment and Data Sharing Agreement on the use of SpatialNI Vulnerability and Asset Mapping in Emergency Incidents, on behalf of the Commissioner for Older People for Northern Ireland (COPNI). COPNI has been established to promote awareness of issues relating to older people and be an authoritative champion for them.

COPNI welcomes the principle established in this draft Privacy Impact Assessment and Data Sharing Agreement that in an emergency situation the authorities should be able to use and share data, to prioritise help to those deemed most vulnerable. COPNI agree with the definition of vulnerable people in the *Vulnerable People Protocol*. People who are in receipt of Health and Social Care services or packages of care, known to Health and Social Care, customers of utilities, agencies or other Government departments who are deemed to be vulnerable, and members of the public who have declared themselves vulnerable are all people who may need assistance from responders, and need it quickly.

These groups will include older people, who may have reduced mobility, health conditions, reliance on carers or a need for electric/electronic adaptations at home, that make them especially vulnerable during emergency situations, and potentially in need of specialised help from responders. A system like this one that makes it easier for responders to quickly and accurately prioritise help to those who are most vulnerable, including older people, is to be welcomed.

Where there are still concerns is in the question of privacy and use of the data after the emergency response has ended. COPNI welcomes the safeguards that have been placed around the sharing of data, particularly with regard to disposing of data within a



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reasonable timeframe, only using relevant data, and sharing of data being within the data protection principles. COPNI recognises the legal situation where prior consent is not needed from individuals if the data protects the 'vital interests' of people, or in a civil emergency. However, ideally there should be as much effort made to obtain prior consent as possible, with information given to people about the Vulnerability and Asset Mapping system. If this could be integrated into existing systems, where people give consent for the use of data that then might be used on the Vulnerability and Asset Mapping system, it would lead to more people giving their consent for their data to be used in emergency situations.

How the information is sought from older people is very important. Proper information must be given to older people in a reassuring way. The process must be one that does not cause older people undue alarm, that gives them appropriate assurances about how the data will be used, and informs them clearly for what purpose the data is being sought.

If you would like to discuss any of these points in further detail, please do not hesitate to contact the Commissioner's Policy Team:

Emer Boyle, Head of Legal and Policy Advice

(028) 90 890 894

emer.boyle@copni.org

Yours sincerely

A handwritten signature in black ink that reads "Emer Boyle".

Emer Boyle
Head of Legal and Policy Advice
Commissioner for Older People for Northern Ireland