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| **Data Protection Impact Assessment**  **Form** |

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| **Description of project/Processing:** |  | |
| **Screening Questionnaire completed (Name/date)** |  | |
| **Screening Questionnaire outcome** | DPIA not required |  |
|  | Consult DPO |  |
|  | DPIA required |  |

This document should be used to record your consideration of factors as part of a Data Protection Impact Assessment and the steps you can take to reduce any risks identified.

It uses the processes set out in the Information Commissioner’s Office guidance on DPIAs. You may find the ICO’s guidance of use to you as you complete the DPIA:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/accountability-and-governance/data-protection-impact-assessments/>

The DPIA needs to be signed off by the University’s Data Protection Officer, please forward this form, when completed to [data-protection@bradford.ac.uk](mailto:data-protection@bradford.ac.uk)

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| **Screening questionnaire** | | |
| **You must undertake a DPIA if the processing of personal data will:** | **✓** | **🗶** |
| * Be a change to the nature, scope, contect or purposes of the processing we already carry out |  |  |
| * Use systematic and extensive profiling or automated decision-making to make significant decisions about people |  |  |
| * Process special category data or criminal offence data on a large scale |  |  |
| * Systematically monitor a publicly accessible place on a large scale |  |  |
| * Use new technologies |  |  |
| * Use profiling, automated decision-making or special category data to help make decisions on someone’s access to a service, opportunity or benefit |  |  |
| * Carry out profiling on a large scale |  |  |
| * Process biometric or genetic data |  |  |
| * Combine, compare or match data from multiple sources |  |  |
| * Process personal data without providing a privacy notice directly to the individual |  |  |
| * Process personal data in a way which involves tracking individuals’ location or behaviour |  |  |
| * Process children’s personal data for profiling or automated decision-making or for marketing purposes, or offer online services directly to them |  |  |
| * Process personal data which may result in a risk of physical harm if a security breach occured |  |  |
| * We consider carrying out a DPIA in any major project involving the use of personal data |  |  |

If your processing involves any of the above, you must complete the rest of the form (steps one to six) and it must be signed off (step seven) by the University’s Data Protection Officer, please forward this form, when completed to [data-protection@bradford.ac.uk](mailto:data-protection@bradford.ac.uk)

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| **You may have to undertake a DPIA if the processing of personal data will involve any of the following and so you must should consult with the Data Protection Officer:** | **✓** | **🗶** |
| * Evaluation or scoring |  |  |
| * Automated decision-making with significant effects |  |  |
| * Systematic processing of sensitive data or data of a highly personal nature |  |  |
| * Processing on a large scale |  |  |
| * Processing of data concerning vulnerable data subjects |  |  |
| * Innovative technological or organisational solutions |  |  |
| * Processing involving preventing data subjects from exercising a right or using a service or contract |  |  |

If your processing involves any of the above, you must consult the University’s Data Protection Officer who will advise you whether a DPIA is necessary. Email: [data-protection@bradford.ac.uk](mailto:data-protection@bradford.ac.uk) or phone 01274 233021.

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| **Step one: Identify the need for a PIA** |
| Explain broadly what project aims to achieve, what the benefits will be to the University, to individuals and to other parties and what type of processing it involves. You may find it helpful to refer or link to other documents, such as a project proposal. Summarise why you identified the need for a DPIA (this can draw on your answers to the screening questions). |
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| **Step two: Describe the processing** |
| **Describe the nature of the processing** |
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| **Describe the scope of the processing** |
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| **Describe the context of the processing** |
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| **Describe the purposes of the processing** |
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| **Step three: Consultation requirements** |
| **Consider how to consult with relevant stakeholders:** describe when and how you will seek individuals’ views – or justify why it’s not appropriate to do so. Who else do you need to involve within your organisation? Do you need to ask your processors to assist? Do you plan to consult information security experts, or any other experts? |
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| **Step four: Assess necessity and proportionality** |
| **Describe compliance and proportionality measures, in particular:** what is your lawful basis for processing? Does the processing actually achieve your purpose? Is there another way to achieve the same outcome? How will you prevent function creep? How will you ensure data quality and data minimisation? What information will you give individuals? How will you help to support their rights? What measures do you take to ensure processors comply? How do you safeguard any international transfers? |
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| **Step five: identify and assess risks** | | | | | | | |
| **Describe source of risk and nature of potential impact on individuals.** Include associated compliance and corporate risksas necessary. | | | **Likelihood of harm** | | **Severity of harm** | | **Overall risk** |
|  | | | Remote, possible or probable | | Minimal, significant or severe | | Low, medium or high |
| **Step six: identify and assess risks** | | | | | | | |
| **Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 5** | | | | | | | |
| **Risk** | **Options to reduce or eliminate risk** | **Effect on risk** | | **Residual risk** | | **Measure approved** | |
|  |  | Eliminated reduced accepted | | Low medium high | | Yes/no | |

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| **Step 7: Sign off and record outcomes** | | |
| **Item** | **Name/date** | **Notes** |
| Measures approved by: |  | Integrate actions back into project plan, with date and responsibility for completion |
| Residual risks approved by: |  | If accepting any residual high risk, consult the ICO before going ahead |
| DPO advice provided: |  | DPO should advise on compliance, step 6 measures and whether processing can proceed |
| Summary of DPO advice: | | |
| DPO advice accepted or overruled by: |  | If overruled, you must explain your reasons |
| Comments: | | |
| Consultation responses reviewed by: |  | If your decision departs from individuals’ views, you must explain your reasons |
| Comments: | | |
| This DPIA will kept under review by: |  | The DPO should also review ongoing compliance with DPIA |