

GMSS Data Protection Impact Assessment (DPIA) Proforma

Document Control

Title / Reference:	Data Protection Impact Assessment Proforma
Status:	Approved
Version:	V1
Date Issued / Ratified:	March 2020
Originator of Document & Job Role:	IG Team
File Classification:	Official Data
Retention:	Life of the organisation plus 6 years (place of deposit)
Target Audience:	All GMSS staff & 3 rd party partners
Links to other strategies, policies, procedures etc:	<ul style="list-style-type: none"> • Data Security, Protection & Confidentiality Policy • Data Security, Protection & Confidentiality Framework • Confidentiality Audit Procedure • Data Security Breach & Incident Reporting Policy • Secure Transfer of Data Policy • Acceptable Use Policy • Records Management Policy • Risk Management Policy • Information Risk Policy • Subject Access Request Policy • Registration Authority (Smart Card) Procedure • Data Security, Protection & Confidentiality Staff Handbook <p>This list is not exhaustive</p>

Change History

Summary of Changes	Name	Date	Version
Changed in line with GDPR and DPA 2018	IG Team	Nov 19	1
Changes following Policy Review – added introduction and cover sheet	IG Team / MC / AB	Feb 20	1

Review

Name	Role	Date	Version
IG Group		Nov 19	1
Governance Committee		Mar 20	1

Approval

Name	Role	Date	Version
IG Group		Nov 19	1
Governance Committee		Mar 20	1

Distribution

Name	Role	Date	Version
Saved in policy folder		Nov 19	1
Updated policy tracker		Mar 20	1
GMSS Publication scheme		Mar 20	1
The Bulletin		Mar 20	1
People Matters		Mar 20	1

Introduction

Where the proposed new system / process is to use personal / special category data or significantly change the way in which personal data is handled, the attached DPIA Assessment must be completed. It must be completed as soon as this is identified by the Project Manager / System Manager or Information Asset Owner during the business case phase of a project. The Information Asset Owner must be informed as soon as possible as an Information Risk Assessment needs to be completed; the DPIA can contribute to the IG risk assessment.

This process is a mandated requirement on the Data Security & Protection Toolkit . Some of the considerations that will be taken into account are whether a new system / process will:

- Allow personal information to be checked for relevancy, accuracy and validity
- Incorporate a procedure to ensure that personal information is disposed of through archiving or destruction when it is no longer required
- Have an adequate level of security to ensure that personal information is protected from unlawful or unauthorised access and from accidental loss, destruction or damage
- Enable the timely location and retrieval of personal information to meet subject access requests

On completion of a DPIA, the Project Manager/System Manager will have information to help address key issues which must be *in place before any installation/go live dates are decided*.

Data Protection Impact Assessment (DPIA) Proforma

Reference:	
Name of Initiative / Project / System:	
Date DPIA Commenced:	
Date DPIA Completed:	

The DPIA Process

- 1) Please complete each section 1 - 7 with as much detail as possible.
- 2) Once you submit the DPIA for approval to/via your Information Governance Lead / Data Protection Officer
 - a. The DPIA proforma will be vetted and you may receive some comments / questions asking for further information. Please answer these promptly and resend the DPIA again.
 - b. The DPIA then goes for approval. It is considered by the relevant IG DPIA approval process.
- 3) Once approved, the process / system can start to be introduced or modification to an existing system / process can continue.

If you proceed without completing and without approval from the IG DPIA approval process, you are accepting the risk you may be acting unlawfully.

SECTION 1: GENERAL INFORMATION

DPIA Question	DPIA Response																							
1A. DPIA Contact Details: <i>Please list all parties involved in the DPIA and the lead contact for each organisation</i>	<table border="1" data-bbox="347 268 1468 477"> <thead> <tr> <th data-bbox="347 268 496 338">Name</th> <th data-bbox="499 268 635 338">Role</th> <th data-bbox="636 268 895 338">Organisation / Depart</th> <th data-bbox="898 268 1342 338">Email</th> <th data-bbox="1345 268 1468 338">Tel. No</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>				Name	Role	Organisation / Depart	Email	Tel. No															
Name	Role	Organisation / Depart	Email	Tel. No																				
1B. Initiative / System / Process Name:	Enter Name																							
1C. Please state the key partnerships involved in this initiative: <i>Please note if this is a joint initiative, please state from each organisation</i>	<table border="1" data-bbox="347 884 1409 1787"> <thead> <tr> <th data-bbox="347 884 608 958">ACCOUNTABILITY PERSONNEL</th> <th data-bbox="611 884 879 958">Name and Title</th> <th data-bbox="882 884 1150 958">Organisation and Department</th> <th data-bbox="1153 884 1409 958">Contact Details</th> </tr> </thead> <tbody> <tr> <td data-bbox="347 963 608 1171"> Data Controller(s) – who determines the way data is processed? </td> <td></td> <td></td> <td></td> </tr> <tr> <td data-bbox="347 1176 608 1496"> Data Processor(s) – do they process data on behalf of data controller (please note this is not the system supplier) </td> <td></td> <td></td> <td></td> </tr> <tr> <td data-bbox="347 1500 608 1641"> Information Asset Owners (IAO's) </td> <td></td> <td></td> <td></td> </tr> <tr> <td data-bbox="347 1646 608 1787"> Information Asset Administrators (IAA's) </td> <td></td> <td></td> <td></td> </tr> </tbody> </table>				ACCOUNTABILITY PERSONNEL	Name and Title	Organisation and Department	Contact Details	Data Controller(s) – who determines the way data is processed?				Data Processor(s) – do they process data on behalf of data controller (please note this is not the system supplier)				Information Asset Owners (IAO's)				Information Asset Administrators (IAA's)			
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1D. Project Proposal Aims / Purpose for completing	Description, purpose and benefits (please embed / attach any Service Specifications / Business Cases, previous versions of DPIA or other relevant documentation to which this DPIA relates):																							

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DPIA:	<p>Where and who is this project aimed? I.e. Demographic / cohort or Borough(s) or GM Wide:</p> <p>How many records are being processed, transferred or accessed (approx.)?</p> <p>What is the frequency of the transfer / access?</p> <p>Data System / Initiative is due to go live / commence?</p>																																	
1E. Link to any wider initiative?	Enter links to any wider initiative if applicable																																	
1F. Is this initiative in line with achieving national or local guidance / strategy or mandate?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, please provide details below:																																	
1G. Information Technology / System Supplier Involvement	<p>Please list applicable information technology kit / systems / software for this initiative to take place (please list current and / or new):</p> <table border="1" data-bbox="347 1308 1406 1520"> <thead> <tr> <th data-bbox="347 1308 550 1379">System Name or IT Kit</th> <th data-bbox="550 1308 836 1379">Used by (state organisation)</th> <th data-bbox="836 1308 1406 1379">System Supplier Details (System Name and Contact Details):</th> </tr> </thead> <tbody> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> </tbody> </table> <table border="1" data-bbox="347 1559 1406 1850"> <thead> <tr> <th colspan="3" data-bbox="347 1559 1406 1592">Confirmation of IT Provide Involvement / IT Leads Support</th> </tr> <tr> <th data-bbox="347 1592 550 1704">Name:</th> <th data-bbox="550 1592 836 1704">Organisation:</th> <th data-bbox="836 1592 1406 1704">Confirm (Yes / No) if aware / involved regarding this initiative. If No, please seek input prior to submitting this DPIA</th> </tr> </thead> <tbody> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> </tbody> </table>	System Name or IT Kit	Used by (state organisation)	System Supplier Details (System Name and Contact Details):													Confirmation of IT Provide Involvement / IT Leads Support			Name:	Organisation:	Confirm (Yes / No) if aware / involved regarding this initiative. If No, please seek input prior to submitting this DPIA												
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SECTION 2: SCREENING QUESTIONS

The screening questions below highlight key areas which have the potential to cause privacy risks. Answers to these questions will highlight any particular privacy risks / issues that can assist you to populate risk assessments.

Potential Privacy Risk		Yes	No	Unsure	Comments
a)	Will the initiative involve any profiling / risk stratification of individuals?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
b)	Does the new system / process / initiative rely on automated processing without human intervention to make a decision?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
c)	Does the new system / process / initiative involve large scale processing of special categories of data (such as health and genetic data)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
d)	Does the processing involve systematic monitoring of a public area on a large scale (e.g. CCTV)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
e)	Is the information about individuals likely to raise privacy concerns or expectations e.g. using health records, criminal records or other information people would consider particularly private?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
f)	Will the initiative involve the collection of information about individuals?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
g)	Are you using information about individuals for a purpose it is not currently used for, or in a way it is not currently used?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
h)	Will the initiative require you to contact individuals in ways which they may find intrusive?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
i)	Will the information about individuals be disclosed to organisations or people who have not previously had routine access to the information?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
j)	Does the initiative involve you using new technology which might be perceived as being intrusive? e.g. biometrics or facial recognition	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
k)	Will the initiative result in you making decisions or taking action against individuals in ways which can have a significant impact on them?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
l)	Will the initiative compel individuals to provide information about themselves?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.

If you have answered yes to any of the questions above, please continue to complete the DPIA in full.

If you have answered NO to ALL questions above, please send to your IG lead for confirmation/approval that this full assessment doesn't need to be completed.

Please complete a risk assessment if you have answered 'Yes' to any of the above questions (you can use the template in Section 7 or following your information risk assessment process for your organisation).

This must be presented with the completed DPIA to the DPO and approving committee / group.

SECTION 3: DATA ITEMS Please tick the boxes regarding the data items you will be processing for this initiative, system, project.

<p>3A. Personal Details <i>Information that identifies the individual and their personal characteristics</i></p> <p><input type="checkbox"/> Forename(s)</p> <p><input type="checkbox"/> Surname</p> <p><input type="checkbox"/> Address</p> <p><input type="checkbox"/> Postcode</p> <p><input type="checkbox"/> Date of Birth</p> <p><input type="checkbox"/> Age</p> <p><input type="checkbox"/> Gender</p> <p><input type="checkbox"/> Physical Description</p> <p><input type="checkbox"/> Home Tel Number</p> <p><input type="checkbox"/> Mobile Tel Number</p> <p><input type="checkbox"/> Other Contact No.</p> <p><input type="checkbox"/> Email Address</p> <p><input type="checkbox"/> GP Details</p> <p><input type="checkbox"/> Legal Representative (Next of Kin)</p> <p><input type="checkbox"/> NHS Number</p> <p><input type="checkbox"/> NI Number</p> <p><input type="checkbox"/> Photographs/Pictures</p> <p><input type="checkbox"/> Genetic/Biometric</p> <p><input type="checkbox"/> Other, list below:</p>	<p>3B. Physical or Mental Health or condition</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Not applicable</p> <p>List any data items below:</p>	<p>3C. Family lifestyle & social circumstances <i>Information relating to the family of the individual and their social circumstances</i></p> <p><input type="checkbox"/> Marital / partnership status</p> <p><input type="checkbox"/> Carer / relatives</p> <p><input type="checkbox"/> Children / Dependents</p> <p><input type="checkbox"/> Social status e.g. housing</p> <p><input type="checkbox"/> Not applicable</p> <p>List other data items below:</p>	<p>3D. Financial Details</p> <p><input type="checkbox"/> Income</p> <p><input type="checkbox"/> Salary</p> <p><input type="checkbox"/> Benefits</p> <p><input type="checkbox"/> Not applicable</p> <p><input type="checkbox"/> Other, please list below:</p>	<p>3E. Offences including alleged offences <i>Information relating to any offences committed or alleged to have been committed by the individual</i></p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Not applicable</p> <p>List any data items below:</p>
	<p>3F. Sexual Identity and life</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Not applicable</p> <p>List any data items below:</p>	<p>3G. Education & Training</p> <p><input type="checkbox"/> Education / Training</p> <p><input type="checkbox"/> Qualifications</p> <p><input type="checkbox"/> Professional Training</p> <p><input type="checkbox"/> Not applicable</p> <p><input type="checkbox"/> Other, please list below:</p>	<p>3H. Religious or other beliefs of a similar nature</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Not applicable</p> <p>List any data items below:</p>	<p>3I. Criminal Proceedings, outcomes and sentences</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Not applicable</p> <p>List any data items below:</p>
	<p>3J. Trade Union Membership</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Not applicable</p> <p>List any data items below:</p>	<p>3K. Employment Details</p> <p><input type="checkbox"/> Employment Status</p> <p><input type="checkbox"/> Career Details</p> <p><input type="checkbox"/> Not applicable</p> <p><input type="checkbox"/> Other, please list below:</p>	<p>3L. Political opinions</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Not Applicable</p> <p>List any data items below:</p>	<p>You must confirm that the data items you have ticked above are relevant and necessary for this initiative and there is a justified reason for their use. Tick the box below to confirm this:</p> <p><input type="checkbox"/> Confirm</p>

SECTION 4: PROCESSING ACTIVITY DETAILS

1. Is the data for the initiative / within the system going to be used to deliver Direct Care?

The definition of direct care is:

A clinical, social or public health activity concerned with the prevention, investigation and treatment of illness and the alleviation of suffering of individuals. It includes:-

- supporting individuals' ability to function and improve their participation in life and society
- the assurance of safe and high quality care and treatment through local audit,
- the management of untoward or adverse incidents
- person satisfaction including measurement of outcomes undertaken by one or more registered and regulated health or social care professionals and their team with whom the individual has a legitimate relationship for their care

Yes, please go to question 2

No, please go to question 3

DPIA Question	DPIA Response
<p>2. Please confirm the legal basis for processing for direct care</p>	<p>I confirm that this initiative is for the provision of direct care and confirm the legal basis for processing under Article 6 and 9 of the GDPR and the Data Protection Act 2018 (Sch 1, Part 1) is as follows:</p> <p><input type="checkbox"/> Art 6 (1) (e)'...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...'</p> <p>And, DPA 2018 - Sch1,Part 1-Health or Social Care</p> <p><input type="checkbox"/> Art 9 (2)(g)...substantial public interest on the basis of Union or Member State Law which is proportionate to the aim pursued...</p> <p><input type="checkbox"/> Art 9 (2) (h)'...medical diagnosis, the provision of health and social care or treatment or the management of health or social care systems...'</p> <p><input type="checkbox"/> Art 9 (2)(i)'...substantial public interest in the area of public health, such as protection against serious cross border threats to health or ensuring high standards of healthcare and of medicinal products or medical services...'</p> <p>And, DPA 2018 - Sch1,Part 1-Health or Social Care</p> <p>In some cases, explicit consent can be obtained for processing for direct care, please state if you will be obtaining explicit consent for the processing for direct care at all?</p> <p><input type="checkbox"/> Yes explicit consent will be obtained for direct care as per GDPR Article 6 (1)(a) – Consent and Article 9 (2)(a) - Explicit Consent</p> <p><input type="checkbox"/> No</p>

DPIA Question	DPIA Response																								
<p>3a. Is the data for the initiative / within the system going to be used to deliver Secondary Use Purposes or not for Direct Care?</p> <p>3b. What is the legal basis that permits you to carry this out for Secondary Use Purposes or not for Direct Care?</p> <p>3c. Please confirm the legal basis under Art 6 (for personal data) and 9 (for special categories of data) under GDPR for processing for Secondary Use Purposes or not for Direct Care</p>	<p><input type="checkbox"/> Yes, please state the indirect care reason and legal basis below:</p> <p>Not for Direct Care Processing</p> <p><input type="checkbox"/> Commissioning</p> <p><input type="checkbox"/> Monitoring Health and Social Care</p> <p><input type="checkbox"/> Public Health</p> <p><input type="checkbox"/> Research</p> <p><input type="checkbox"/> Not applicable</p> <p><input type="checkbox"/> Other, please specify below Click here to enter text.</p> <p><input type="checkbox"/> Explicit Consent</p> <p><input type="checkbox"/> Section 251 of the NHS Act 2006</p> <p><input type="checkbox"/> The Health and Social Care Act 2015</p> <p><input type="checkbox"/> The Care Act 2014</p> <p><input type="checkbox"/> Not applicable</p> <p><input type="checkbox"/> Other Legal Gateway, please state below: Click here to enter text.</p> <table border="1" data-bbox="488 1153 1327 1917"> <thead> <tr> <th data-bbox="488 1153 906 1261">Article 6 lawful basis for processing</th> <th data-bbox="906 1153 1327 1261">Article 9 – lawful basis for processing special categories of data</th> </tr> </thead> <tbody> <tr> <td data-bbox="488 1261 906 1299"><input type="checkbox"/> Article 6 (1)(a) - Consent</td> <td data-bbox="906 1261 1327 1299"><input type="checkbox"/> Article 9(2)(a) - Explicit Consent</td> </tr> <tr> <td data-bbox="488 1299 906 1366"><input type="checkbox"/> Article 6 (1)(b) - Contractual Necessity</td> <td data-bbox="906 1299 1327 1366"><input type="checkbox"/> Article 9(2)(b) - Employment</td> </tr> <tr> <td data-bbox="488 1366 906 1433"><input type="checkbox"/> Article 6(1)(c) - Compliance with legal obligations</td> <td data-bbox="906 1366 1327 1433"><input type="checkbox"/> Article 9(2)(c) - Vital Interests</td> </tr> <tr> <td data-bbox="488 1433 906 1500"><input type="checkbox"/> Article 6(1)(d) - Vital Interests</td> <td data-bbox="906 1433 1327 1500"><input type="checkbox"/> Article 9(2)(d) - Charity or not for profit bodies</td> </tr> <tr> <td data-bbox="488 1500 906 1568"><input type="checkbox"/> Article 6(1)(e) - Public interest or in exercise of official authority</td> <td data-bbox="906 1500 1327 1568"><input type="checkbox"/> Article 9(2)(e) - Manifestly made public by data subject</td> </tr> <tr> <td data-bbox="488 1568 906 1635"><input type="checkbox"/> Article 6(1)(f) - Legitimate Interests</td> <td data-bbox="906 1568 1327 1635"><input type="checkbox"/> Article 9(2)(f) - Legal Claims</td> </tr> <tr> <td data-bbox="488 1635 906 1702"><input type="checkbox"/> Not Applicable</td> <td data-bbox="906 1635 1327 1702"><input type="checkbox"/> Article 9(2)(g) - Substantial public interest</td> </tr> <tr> <td data-bbox="488 1702 906 1769"></td> <td data-bbox="906 1702 1327 1769"><input type="checkbox"/> Article 9(2)(h) - Health and Social Care</td> </tr> <tr> <td data-bbox="488 1769 906 1836"></td> <td data-bbox="906 1769 1327 1836"><input type="checkbox"/> Article 9(2)(i) - Public Health</td> </tr> <tr> <td data-bbox="488 1836 906 1904"></td> <td data-bbox="906 1836 1327 1904"><input type="checkbox"/> Article 9(2)(j) - Historical, statistical or scientific purposes</td> </tr> <tr> <td data-bbox="488 1904 906 1951"></td> <td data-bbox="906 1904 1327 1951"><input type="checkbox"/> Not Applicable</td> </tr> </tbody> </table>	Article 6 lawful basis for processing	Article 9 – lawful basis for processing special categories of data	<input type="checkbox"/> Article 6 (1)(a) - Consent	<input type="checkbox"/> Article 9(2)(a) - Explicit Consent	<input type="checkbox"/> Article 6 (1)(b) - Contractual Necessity	<input type="checkbox"/> Article 9(2)(b) - Employment	<input type="checkbox"/> Article 6(1)(c) - Compliance with legal obligations	<input type="checkbox"/> Article 9(2)(c) - Vital Interests	<input type="checkbox"/> Article 6(1)(d) - Vital Interests	<input type="checkbox"/> Article 9(2)(d) - Charity or not for profit bodies	<input type="checkbox"/> Article 6(1)(e) - Public interest or in exercise of official authority	<input type="checkbox"/> Article 9(2)(e) - Manifestly made public by data subject	<input type="checkbox"/> Article 6(1)(f) - Legitimate Interests	<input type="checkbox"/> Article 9(2)(f) - Legal Claims	<input type="checkbox"/> Not Applicable	<input type="checkbox"/> Article 9(2)(g) - Substantial public interest		<input type="checkbox"/> Article 9(2)(h) - Health and Social Care		<input type="checkbox"/> Article 9(2)(i) - Public Health		<input type="checkbox"/> Article 9(2)(j) - Historical, statistical or scientific purposes		<input type="checkbox"/> Not Applicable
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<p>4. Human Rights Act 1998 – Is there any interference with Article 8 of the HRA 1998?</p>	<p><input type="checkbox"/> Yes, please state why is it necessary and proportionate to do so Click here to enter text.</p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Don't know – require guidance</p>																								

DPIA Question	DPIA Response
<p>5. Common Law duty of confidentiality compliance</p>	<p>Please tick the aspect of common law of confidentiality you are adhering to for this initiative (<i>please note the common law duty of confidentiality is not absolute</i>):</p> <p><input type="checkbox"/> Consent whether explicit or implied (implied meaning that the individual knows or would reasonably expect the proposed use of disclosure and has not objected)</p> <p><input type="checkbox"/> authorised or required by law, for example, under statute, common law or legal proceedings</p> <p><input type="checkbox"/> Overriding public interest, for example, where a patient is contagious or the public is at risk, such that there is public interest in disclosure that overrides maintaining confidentiality</p>
<p>6. Caldicott Principles compliance</p>	<p>Please tick to confirm that this initiative complies with the 7 Caldicott principles</p> <p><input type="checkbox"/> Complies</p> <p><input type="checkbox"/> Does not comply</p> <p><input type="checkbox"/> Don't know – require further guidance</p>
<p>7. Criminal Convictions & Offences Data – please state if you intend to process this data for this initiative / project / within a system?</p>	<p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Please note this data is not covered by the GDPR. The DPA 2018 makes further provisions for processing this data when organisations are processing this other than law enforcement agencies.</p>
<p>8. What are the arrangements for individual's to object to their information being processed, right to erasure and the right to data portability, right to be informed, right to rectification and right to restrict processing?</p>	<p>Please state arrangements for objections if the purpose is for direct care below: Click here to enter text.</p> <p>OR</p> <p>Please state what the arrangements are to opt out of the initiative for indirect care once they have been provided with appropriate communication about it? Click here to enter text.</p>
<p>9. Please state how the public / patients / staff have or will be informed of the initiative? For example, fair processing /privacy notices / consultation</p>	<p><input type="checkbox"/> Consultation, please provide details below Click here to enter text.</p> <p><input type="checkbox"/> Fair Processing Notice / Privacy Notice</p> <p><input type="checkbox"/> Other Information, please specify below: Click here to enter text.</p> <p>Please include copies of leaflets / notices and information regarding the consultation process and events</p>
<p>10. Will the information you are collecting be used for other purposes than those indicated in this DPIA in the future?</p>	<p><input type="checkbox"/> Yes</p> <p>If yes, please state legal basis for processing this in future below: Click here to enter text.</p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Don't know</p>

DPIA Question	DPIA Response
11. Will there be data quality checks implemented to ensure the data is of good enough quality?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Don't know
12. How are you ensuring that personal data from individuals / other organisations is accurate and up to date?	<input type="checkbox"/> Manual data quality checks in place <input type="checkbox"/> Integration engine checks <input type="checkbox"/> Other, please state below: Click here to enter text.
13. How long will the data be retained for in this initiative / project / system?	Please state number of months / years below: Click here to enter text.
14. How has this retention period been decided?	<input type="checkbox"/> As per the Records Management NHS Code of Practice <input type="checkbox"/> Legal Statute, please state: Click here to enter text. <input type="checkbox"/> Locally agreed decision <input type="checkbox"/> Other, please state below: Click here to enter text.
15. How will the data be securely destroyed / archived once it is no longer required	<input type="checkbox"/> Securely destroyed following local policies and national guidance Click here to enter text. <input type="checkbox"/> Archived in secure environment. Please state reasons for archive and where the data will be stored below: Click here to enter text.
16. Are there Subject Access Request Procedures for individual's to request access to the information held?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Don't know
17. If obtaining explicit consent, are their procedures in place to deal with individual's right for withdrawal of consent, right to erasure and the right to data portability?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Don't know If yes, please specify policy / procedure name: Click here to enter text.
18. Marketing: Will the asset / system send marketing messages by electronic means? If yes, please state what you are intending to send for marketing purposes: Have individuals been informed of the	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Don't know Click here to enter text.

DPIA Question	DPIA Response
marketing and the option to opt in?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Don't know
19. Automated Decision Making: Is automated decision making to be used within the asset / system? If yes, please describe this process and reason for it and if there is any human intervention involved in decision making.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Don't know Click here to enter text.

SECTION 5: DATA FLOW MAPPING

Data Flow Mapping Table - Each flow of data for the initiative must be identified and documented to ensure this is securely undertaken and in accordance with GDPR and DPA 2018. Please complete the table below:

Flow	Processed by or transferred from:	Processed by or going to:	Method of transfer	Security controls	Where will the data be stored following transfer
<i>GP Referral Letter</i>	<i>GP Practice</i>	<i>NHS Trusts, Private Healthcare Supplier</i>	<i>e.g. secure email (NHSnet) Post</i>	<i>Encrypted email Limited as sent via Royal Mail</i>	<i>Saved in secure network folder Patients paper casenotes</i>

Section 5: Data Flow Mapping continued...

DPIA Question	DPIA Response	Comments
1. Will information be sent outside of the UK	<input type="checkbox"/> Yes, please go to question 2. <input type="checkbox"/> No, please go to question 6.	
2. Will information be sent outside the UK but within the European Economic Area (EEA)?	<input type="checkbox"/> Yes, please go to question 5 <input type="checkbox"/> No, please go to question 3	
3. Will information be sent outside the EEA?	<input type="checkbox"/> Yes, please go to question 5 <input type="checkbox"/> No	
4. Will the information be sent to the USA?	<input type="checkbox"/> Yes, please go to question 5 <input type="checkbox"/> No	
5. Please state the country data will be sent too and the data security and protection arrangements in place.	Country: Click here to enter text. Security Arrangements: Click here to enter text.	
6. Is there an Information Sharing Agreement in place between the relevant parties that covers the processing agreements?	<input type="checkbox"/> Yes, please specify below: <input type="checkbox"/> Data Processing Contract <input type="checkbox"/> Service Level Agreement <input type="checkbox"/> Memorandum of Understanding <input type="checkbox"/> No – Please explain why below: Click here to enter text.	

SECTION 6: ORGANISATIONAL, TECHNICAL AND SECURITY MEASURES

DPIA Question	DPIA Response	Comments												
<p>1. Data Protection Registration Fee – have all the controller / processors & suppliers involved in the initiative paid their data protection annual fee?</p>	<p><input type="checkbox"/> Yes, please state Name and ICO Registration Number below:</p> <p><input type="checkbox"/> No</p> <p>Click here to enter text.</p>													
<p>2. Accreditation Have all the parties completed an approved accreditation process in order to support compliance with the DPA 2018, GDPR, National Data Standards (Caldicott) and other national standards such as Cyber Essentials+, ISO 27001, Data Security and Protection Toolkit?</p>	<table border="1"> <thead> <tr> <th data-bbox="400 763 679 904">PARTNER NAME</th> <th data-bbox="679 763 959 904">ACCREDITATION SCHEME COMPLETED & SCORE</th> <th data-bbox="959 763 1222 904">AUDITED & OUTCOME</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> </tr> </tbody> </table>	PARTNER NAME	ACCREDITATION SCHEME COMPLETED & SCORE	AUDITED & OUTCOME										
PARTNER NAME	ACCREDITATION SCHEME COMPLETED & SCORE	AUDITED & OUTCOME												
<p>3. Training Is data security and protection training provided for all partners and are all staff compliant as per the IG Training Needs Analysis? Please also detail specific training required for the system?</p>	<table border="1"> <thead> <tr> <th data-bbox="400 1585 679 1659">PARTNER NAME</th> <th data-bbox="679 1585 959 1659">TRAINING SCHEME NAME</th> <th data-bbox="959 1585 1222 1659">COMPLIANCE INFORMATION</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> </tr> </tbody> </table>	PARTNER NAME	TRAINING SCHEME NAME	COMPLIANCE INFORMATION										
PARTNER NAME	TRAINING SCHEME NAME	COMPLIANCE INFORMATION												

<p>4. Incident Reporting Do all partners have appropriate measures in place to report data security and protection incidents / breaches and share lessons learned?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Don't know</p>	
<p>5. Policies and Procedures Do all partners have Data Security and Protection policies and procedures in place?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Don't know</p>	
<p>6. Contracts Are contracts (if required) in place with data processors and complaint with GDPR / DPA 2018?</p> <p>Are any sub-contractors used for this initiative?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Don't know</p> <p>If contracts are used (e.g. between GP and system supplier) please state the partners of the contract below: Click here to enter text.</p> <p>Has the NHS England Standard Contract for Goods and Services been used for this? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes – Please document them in their role in the processing: Click here to enter text.</p> <p><input type="checkbox"/> No <input type="checkbox"/> Don't know</p>	

<p>7. Access Control and Rights for systems What are the access rights and roles for the data and who are they assigned too.</p> <p>How will access be controlled and monitored?</p>	<table border="1" data-bbox="400 170 1222 517"> <thead> <tr> <th data-bbox="400 170 679 248">Access Level</th> <th data-bbox="679 170 1222 248">Role Assignment</th> </tr> </thead> <tbody> <tr> <td data-bbox="400 248 679 315">Super User</td> <td data-bbox="679 248 1222 315"></td> </tr> <tr> <td data-bbox="400 315 679 517">User</td> <td data-bbox="679 315 1222 517"></td> </tr> </tbody> </table> <p>Access controls and monitoring process: Click here to enter text.</p>	Access Level	Role Assignment	Super User		User		
Access Level	Role Assignment							
Super User								
User								
<p>8. Auditing Is there an audit trail for the system?</p> <p>Please can you describe briefly how the audit trail works?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Don't know</p> <p>Click here to enter text.</p>							
<p>9. Storage of Data Where will the data used for this initiative be stored / accessed?</p> <p>Security at Rest</p> <p>Security in Transit</p> <p>Cloud Security</p>	<p><input type="checkbox"/> Within a paper based system stored securely <input type="checkbox"/> Within a system / application stored on secure network <input type="checkbox"/> Within a database / spreadsheet stored securely on network <input type="checkbox"/> Other, please state below: Click here to enter text.</p> <p>Are appropriate technical processes in place to protect the data from threats? Click here to enter text.</p> <p>When data is transferred from one system to another, are appropriate security processes in place to protect the data from threats? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Does the initiative involve cloud computing? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Is the processing compliant with the National Cyber security (NCSA) cloud security principles? <input type="checkbox"/> Yes <input type="checkbox"/> No Click here to enter text.</p>							

<p>10. Back Up: <u>Applicable for IT systems only:</u> Are there secure and reliable back up processes in place for the data stored on the system?</p> <p>If yes, please briefly describe what these are.</p>	<p> <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Don't know </p> <p>Back up information (<i>Please note you may need to contact IT Services for guidance regarding this question</i>): Click here to enter text.</p>	
<p>11. Business continuity Do you have a Business Continuity Plan in place if the system and / or process fail or is unavailable for any reason?</p> <p>If yes, briefly describe what the business continuity plan will be:</p>	<p> <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Don't know </p> <p>BCP Process: Click here to enter text.</p>	

SECTION 7: RISK ASSESSMENTS

Risks identified by completing this DPIA can be summarised in the table below and / or you can use your own risk assessment processes. Any risks that are likely to result in high risk to the rights and freedoms of individuals, in particular, automated processing, large scale processing of special categories of data (health) and systematic monitoring of a public area on a large scale must be documented with the DPO opinion sought and consultation with the ICO.

Which elements of the initiative give rise to privacy risks?	What is/are the potential or actual privacy risk(s)	Risk Score			Proposed solution(s)/mitigating action(s) – <i>systems and processes that are or will be in place and operating that mitigate this risk, including assurances</i>	Outcome of risk evaluation	Further Action	Date for completion	Residual Risk Score			Current status/progress
		Likelihood	Impact	RAG status					Likelihood	Impact	RAG status	

SECTION 8: APPROVAL AND SIGN OFF

The Data Privacy Impact Assessment must be approved and signed off by the relevant personnel, for example your Information Governance Group / DPO / Caldicott Guardian / SIRO. The DPO advice must be sought and also where there are high risks involved, the ICO must be consulted.

DPIA Approval Status	<input type="checkbox"/> Approved – no actions required <input type="checkbox"/> Approved with action plan (please complete table below) <input type="checkbox"/> Declined – please state reason below:	
Date:	<input type="checkbox"/> Are the data flows incorporated on the Data Flow Mapping Register or within the ISG <input type="checkbox"/> Are the assets logged on the Information Asset Register or within the ISG <input type="checkbox"/> Are information sharing arrangements documented in either an Information Sharing Agreement, ISG or planned as part of DPIA Actions	
Item	Name / Date	Notes
Residual Risks and Actions Approved by:		
DPO Advice Provided:		
Summary of DPO Advice: Click here to enter text.		
DPO Advice accepted or overruled by:		
ICO Advice Sought:		
Summary of ICO Advice (if applicable) Click here to enter text.		
Public Consultation Comments:	Click here to enter text.	
DPIA will be kept under review by:		
Date of next review: <i>This will change dependent upon the project.</i>		