

DATA PRIVACY IMPACT ASSESSMENT

The aim of this Data Privacy Impact Assessment (DPIA) is to assist the University to identify and minimise the privacy risks of proposals, projects or processing operations. Conducting a DPIA will help to ensure that potential issues are identified at an early stage and provide the most effective way for the University to comply with its data protection obligations.

The DPIA should be used alongside any existing University project management and risk management processes and procedures. The time and resources dedicated to a DPIA should be scaled to fit the nature of the proposals, projects or processing operations.

For example, if you are conducting a project that involves the purchase of new software or introduction of a new processing system that will use personally-identifiable information, whether you're collecting it or it is being provided to you from another source, you should consider whether a DPIA is required.

This document comprises **TWO sections**:

1. A set of screening questions, for those who are unsure whether or not they need to complete a DPIA.
2. A template form for a DPIA. This form walks you through all the issues you need to consider when conducting a DPIA.

WHEN SHOULD A DPIA BE USED

The following questions will help you to decide whether a DPIA is necessary or if you need to take further advice.

SECTION 1 – SCREENING QUESTIONS

The following questions will assist you to decide whether a DPIA is necessary. Answering 'yes' or 'maybe' to any of the questions is an indication that a DPIA would be a useful exercise. Expand on your answers as the project develops if you need to.

If the answer to any of the questions below is 'yes' or 'maybe' then complete SECTION 2 of this form and return it to the Data Protection Officer at dpo@bolton.ac.uk

If you have been instructed by a research funder or data provider to complete a DPIA, do not complete SECTION 1 and go straight to SECTION 2 (Data Privacy Impact Assessment Form).

		Yes	Maybe	No
1.	Will the project involve the collection of new information about individuals?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2.	Will the project make or require individuals to provide information about themselves?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.	Will information about individuals be used for a purpose it is not currently used for, or in a way that it is not currently used?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.	Does the project involve using new technology which might be considered as being privacy intrusive? For example, use of biometrics (fingerprint technologies)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

		Yes	Maybe	No
5.	Does the project involve third parties (eg. service providers responsible for the development or maintenance of new software) having access to University systems where individuals information is held?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.	Will information about individuals be disclosed to organisations or people who have not previously had access to the information?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7.	Will the project result in you making decisions or taking action involving individuals in a way that could have a significant impact on them?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8.	Is the information about individuals likely to raise privacy concerns or expectations? For example, criminal records, educational records, health records or any other information that people would consider to be private.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9.	Will the project require you to contact individuals in ways which they may find intrusive?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10.	Has the research funder or data provider requested or asked for the results of a Data Privacy Impact Assessment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

SECTION 2 – DATA PRIVACY IMPACT ASSESSMENT FORM

This form is to be completed if answers to the Screening Questions in SECTION 1 indicate that a DPIA is or maybe required.

The form follows the process that is used in the Information Commissioner's Office (ICO) ['Conducting Privacy Impact Assessment'](#) Code of Practice

STEP 1 : PROJECT OUTLINE

You may find it helpful to link to other relevant documents related to the project, for example a project proposal or the research ethics form.

State why the need for a DPIA was identified with reference to your answers to the Screening Questions. Please answer as fully as possible.

- **What are the aims of the proposed project?** *Explain what the project aims to achieve.*
- **What data is going to be collected, transferred or used?**
- **Where will data be collected from?**
- **How will the data be used?**
- **Why is this project necessary?**
- **How will this benefit the University?**
- **How will this benefit the individual whose data is being used?**
- **Will this benefit any third parties?**

STEP 2 : DESCRIBE THE INFORMATION FLOWS

You should describe how information relating to individuals' personal data will be collected, used, stored and deleted.

It may be useful to refer to a flow diagram or another way of explaining data flows – where you are getting the data from, where it will be stored and where it could be transferred to. State how many individuals are likely to be affected by the project.

For example: data will be collected from research participants via online forms; data will be stored encrypted on departmental drives; pseudonymised dataset will be provided to department X.

- How will the information be collected?
- How will the individuals be informed of why/how their data is collected?
- Who will have access to the information (including third parties external to the University)?
- How many individuals are likely to be affected by the project?
- Where will the data be stored (physically and/or electronically)?
- How long will you need to keep the data for?
- When and how will it be destroyed?
- How are you going to continue to monitor the use, storage and retention of the data?

CONSULTATION REQUIREMENTS

Explain what practical steps you will take to ensure that you identify and address privacy risks. Who should be consulted internally and externally? How will you carry out the consultation? Link this to the relevant stages of your project management process. Consultation can be used at any stage of the DPIA process.

For example: discussed storage with Information Security Team.

Please list the relevant parties who need to be consulted about this project.

Internal Stakeholders <i>Eg. all students & staff</i>	External Stakeholder <i>n/a</i>	Other third parties <i>n/a</i>
How will you carry out the consultation and at what stage of the project management process? For example: before or after you start collecting, transferring or using data <i>The system will be formally approved/ rejected by [COMMITTEE].</i>		

STEP 3 : IDENTIFY THE RISKS

Identify any key privacy risks and the associated compliance and corporate risks, describe the actions you propose to take to reduce the risks and any future steps which would be necessary. **For example:** the production of new guidance or future security testing for systems.

Please see the Guidance Notes for the types of risks to be considered.

Privacy Issue	Risk to Individuals	Risk Level (Eliminate/Reduce/Accept)	Associated organisation/ corporate risk	Action to Reduce Risk/Solution	Result: is the risk eliminated, reduced, or accepted?	Evaluation/Comment: is the final impact on individuals after implementing each solution a justified, compliant and proportionate response to the aims of the project?
<i>E.g. Using video to assess research subjects' attitudes to race</i>	<i>If released could cause harm and distress to research subjects due to subject matter</i>	<i>Eliminate</i>	<i>Could lead to future research being affected if potential research subjects think the School will not keep their data secure.</i>	<i>Provide access to videos on site if requested, without providing a copy</i>	<i>Eliminated – the videos would not be released outside the School.</i>	<i>Final impact is justified, compliant – research subjects can still see videos – and proportionate.</i>

PLEASE SEND THE COMPLETED FORM TO THE DATA PROTECTION OFFICER (dpo@bolton.ac.uk)

DATA PROTECTION OFFICER USE ONLY

STEP 4 : RECORD THE DPIA OUTCOMES

It is important that a record is kept of what privacy solutions are taken forward, the risks identified and whether they are eliminated, reduced or accepted.

Note: *If a DPIA indicates that the data processing is high risk, and you cannot sufficiently address those risks, you will be required to consult the ICO to seek its opinion as to whether the processing operation complies with the GDPR.*

Risk	Approved solution	Approved by
See Step 3 above.	As suggested at Step 3 above. In addition, contractual documentation to include data processing arrangements.	Data Protection Officer

STEP 5 : INTEGRATE THE DPIA OUTCOMES BACK INTO THE PROJET PLAN

Dates for reviewing the privacy outcomes should be included if this is a long-term project (more than 12 months)

Action to be taken	Date for completion of action(s)	Responsibility for Action(s)	Review Date(s)
e.g. Access to videos onsite	When requested: within 40 days of request being made	Project Manager	Annual Review

Contact for future privacy concerns : [INSERT DETAILS]

STEP 6 : SIGN OFF

Information Commissioner's Office consulted: YES NO

Signed:.....

Position: Data Protection Officer

Date:.....