

Why do I need to complete a Data Protection Impact Assessment (DPIA)?

- A DPIA helps identify data privacy risks when planning new (and revising existing) projects and to identify actions to mitigate these risks.
- A DPIA should be carried as it is a useful tool to help organisations comply with data protection law.
- A DPIA is required:
 - where data processing is likely to result in a high risk of harm to individuals (e.g. new technology is used)
 - large volumes of data are processed
 - the data is sensitive o UCL conducts profiling activities leading to decisions which produce legal effects for individuals (such as credit screening), or
 - where UCL monitors publicly accessible areas (e.g. CCTV).
- Where high risks cannot be mitigated, it may be necessary for the Data Protection Officer to consult with the Information Commissioner's Office (ICO) prior to processing. UCL can be fine for not doing so.
- Failing to carry out a DPIA correctly or failing to consult the competent supervisory authority where required can each result in a fine.

When should I complete this DPIA?

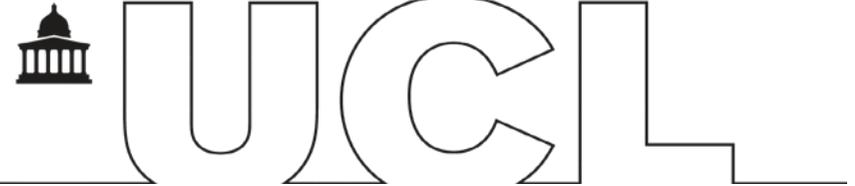
- As early as possible during project planning, prior to any contractual negotiations, and while there is still time to influence project design.
- The DPIA should be started as early as practical in the design of the data processing operation.
- The DPIA should be carried out prior to processing personal data as part of the project.

Who should complete this DPIA?

- The controller (i.e. UCL) is responsible and remains ultimately accountable for ensuring that the DPIA is carried out.
- The UCL Project Manager should own and complete this DPIA.
- UCL's Data Protection Officer should be consulted where risks cannot be mitigated.
- Relevant stakeholders (internal and external) should be consulted throughout the DPIA process to assist in identifying privacy risks

How should a DPIA be completed?

- This document must be read in conjunction with the guidance. It will assist you with the completion of this template.
- This table sets out the steps UCL should take to comply with data protection law when carrying out a DPIA prior to processing personal data.
- It is important to note that the intensity of a DPIA should be proportionate to the size of the project and the related privacy risk. Account should be taken of the nature, scope, context and purpose of the data processing.



Step 1 DPIA Team

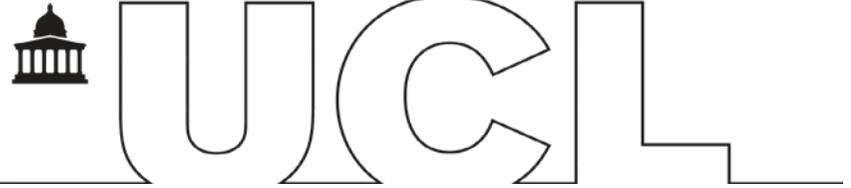
	Name	Job title	Email address (as contact point for future privacy concerns)
UCL Project Manager owning DPIA			
Third Part(y/ies) assisting with DPIA			

Step 2 Project Summary

Project Name	
Department /entity	
Parties involved with the project (internal /external)	
Date	

Step 3 Identify the need for a DPIA

Purpose/aims of the project Benefits to UCL Benefits to individuals	
Why was the need for a DPIA identified? Explain role of personal data in the project	



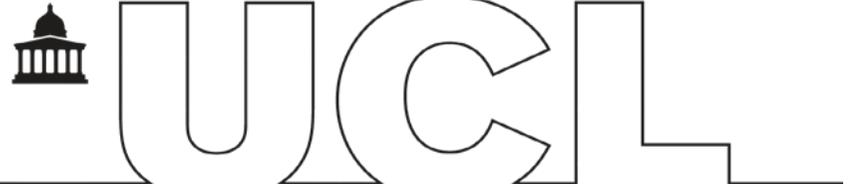
Step 4 Describe the personal information/personal data flows, envisaged processing operations and the overall purposes.
Please refer to the [guidance](#) for further explanation and an example.



Step 5 Assess project against the key Data Protection Principles. Please refer to the [guidance](#) for further explanation.

(i) Lawfulness, fairness and transparency

(ii) Purpose limitation

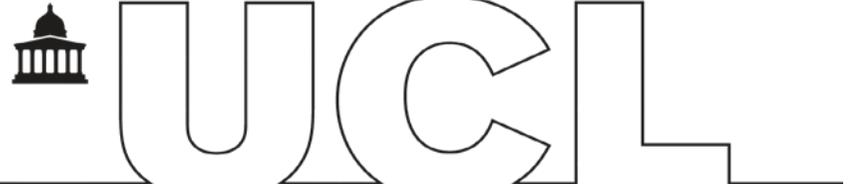


(iii) Data minimisation

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(iv) Accuracy

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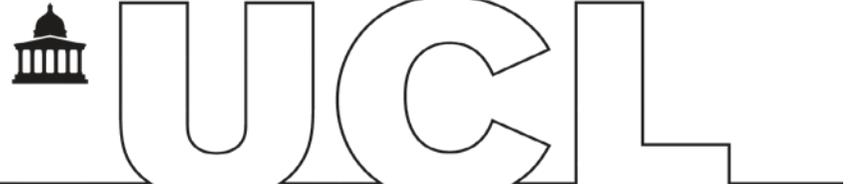


(v) Storage limitation

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(vi) Rights of individuals

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(vii) Security, integrity and confidentiality

(viii) International transfer

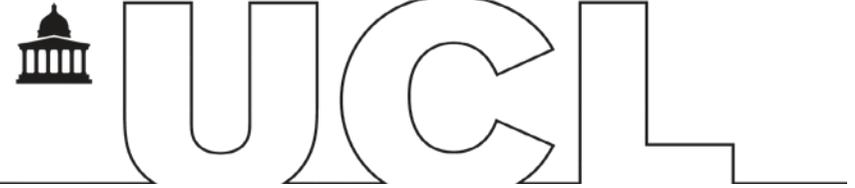


(ix) Data processors

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(x) Local laws and regulations

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Step 6 – Privacy Risks. Please refer to the guidance for further explanation.

	What is the privacy risk to individuals? low/medium/high	How likely is the harm to individuals? remote/possible/likely	Solution/Action to be taken (including safeguards and security measures to ensure protection of personal data)	Result: is the risk eliminated, reduced, or accepted?	Deadline for implementing solution
(i) Lawfulness, fairness and transparency					
(ii) Purpose limitation					
(iii) Data minimisation					
(iv) Accuracy					
(v) Storage limitation					
(vi) Rights of individuals					
(vii) Security, integrity and confidentiality					
(viii) International transfer					
(ix) Data processors					
(x) Local laws and regulations					



Step 7 Evaluation. Please refer to the guidance for further explanation.

Is the final impact on individuals a necessary and proportionate way of achieving the purposes of the project?

Please tick if the answer is yes, if the answer is no, please contact the DPO: data-protection@ucl.ac.uk

Step 8 Integrate the DPIA outcomes back into the project plan. Please refer to the guidance for further explanation.

Step 9 Approval of DPIA, including risks and solutions identified.

	Print Name	Signature	Date
UCL Project Manager			