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

The DPIA is a process designed to assess the data-protection impacts of a project, policy, programme, product or service and, in consultation with relevant stakeholders, to ensure that remedial actions are taken as necessary to avoid or minimise potential negative impacts on the data subjects.

* A DPIA helps you to identify personal data privacy risks when planning a new (and revising existing) activity and to identify actions to mitigate these risks.
* A DPIA should be carried as it is a useful tool to help UCL comply with data protection law.
* A DPIA is a legal requirement when you are undertaking high risk processing of personal data:
  + Special Category Data, a non-exhaustive list of examples of high-risk processing is: racial or ethnic origin, political opinions, religious beliefs or other beliefs of a similar nature, trade union membership, physical or mental health or condition, sex life and sexual orientation, genetic data and biometric data.
  + Criminal Records Data.
  + More than 1000 data subjects at one time.
  + Automated Decision making (Artificial Intelligence) with profiling.
  + As part of a subject matter which, in the event of a breach, could cause significant harm to the individuals.

**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 activity 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 activity.

**Who should complete this DPIA?**

* The Information Owner (IO) with support from the Project Manager or ISD Solution Architect should own and complete this DPIA. The DPIA should only be submitted to ISG if required and to the Data Protection Officer only if the activity is classed as high-risk processing of personal data. Relevant internal stakeholders should also be consulted throughout the DPIA completion process to assist in identifying privacy risks.
* The IO can seek information from other experts regarding the section: Confidentiality, Integrity, Availability (Step 5 vii).

**How should a DPIA be completed?**

* This document must be read in conjunction with the [**guidance**](https://www.ucl.ac.uk/legal-services/ucl-general-data-protection-regulation-gdpr/guidance-notices-ucl-staff/data-privacy-impact). 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 level of detail a DPIA should be proportionate to the size of the activity and the related privacy risk. Account should be taken of the nature, scope, context and purpose of the data processing.

# DPIA Team

|  |  |
| --- | --- |
| UCL Information Owner owning DPIA: | Click or tap here to enter text. |
| Job Title: | Click or tap here to enter text. |
| Email: | Click or tap here to enter text. |

# Information

|  |  |
| --- | --- |
| Activity name: | Click or tap here to enter text. |
| Department / entity: | Click or tap here to enter text. |
| Parties involved (relevant internal stakeholders): | Click or tap here to enter text. |

# Identify the need for a DPIA

## Purpose/aims of the activity. Benefits to UCL. Benefits to individuals.

Click or tap here to enter text.

## Why was the need for a DPIA identified? Explain the role of personal data in the activity.

Click or tap here to enter text.

# Describe the data flows

Data flow diagrams may be submitted separately.

Click or tap here to enter text.

# Assess the activity against the key Data Protection Principles.

Please refer to the guidance for further explanation.

## Lawfulness, fairness and transparency

Click or tap here to enter text.

## Purpose limitation

Click or tap here to enter text.

## Data minimistaion

Click or tap here to enter text.

## Accuracy

Click or tap here to enter text.

## Storage Limitation

Click or tap here to enter text

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## Rights of individuals

Click or tap here to enter text.

## Integrity and confidentiality (security)

Click or tap here to enter text.

## International transfer

International transfers have been significantly impacted by a European Court of Justice decision in July 2020. Please see the additional guidance document for further information

| **Consideration** | **Answer** | **Guidance notes** |
| --- | --- | --- |
| Is the data being transferred outside the UK or EEA? | Yes No  **If no, go to 5.10** | All data transfers outside the UK/EEA now carry some risk. It is important to ensure that appropriate technical measures are in place to protect the data, such as encryption. You should explain where personal data is being transferred to. |
| Will SCCs be put in place to cover the data transfer in questions? | Click or tap here to enter text. | It is strongly recommended that SCCs are in place for all international data transfers although they do not eradicate all risk. |
| Does the data transfer require a new contract? | Click or tap here to enter text. | Continuation of existing contracts is considered a lower risk while we await further guidance on the impact of the 2020 judgment. |
| What awareness will the data subject have of the specific data transfer? | Click or tap here to enter text. | Greater awareness could mean a lower risk that a data subject may object to the transfer. |
| What benefits does the data subject get from the processing that involves the data transfer? | Click or tap here to enter text. | A free service providing significant benefits to the data subject may have less risk of complaint than a data transfer that is done purely for UCL’s benefit. |
| What personal data is included in the transfer? | Click or tap here to enter text. | Transfer of special category data may carry greater risk. |
| Is the processing/transfer in an area that has seen ICO enforcement? | Click or tap here to enter text. | The ICO follow a risk-based enforcement policy. Their assessment of risk can be inferred from historic enforcement activity. In particular you should consult the DPO if your proposed processing activities involve international transfer in relation to unsolicited marketing, data scraping or includes information that might be of interest to intelligence services. |
| Is the data transfer unique to UCL or part of common service? | Click or tap here to enter text. | Data transfers deriving from use of  popular/widespread services may carry less risk that a complaint would be made to UCL specifically. |
| Does the processing / data transfer help adherence to other data protection requirements? | Click or tap here to enter text. | For example, a project to standardise UCL activity with one selected supplier would carry considerable benefits for data accuracy, data minimisation, purpose limitation etc. These benefits may partially mitigate the risks associated with a transfer. |
| Does the third party demonstrate a decent level of GDPR compliance? | Click or tap here to enter text. | For example, do they still rely on the Privacy Shield, do they explain how they comply with the GDPR? |
| Conclusion:  Based on the above risk assessment, please explain why you believe any risks of international transfer have been mitigated for this research study. | Click or tap here to enter text. | Please use this box to summarise your review of the data transfer risks and how you have mitigated them. |

## Local laws and regulations

Click or tap here to enter text.

## Data Processors

Click or tap here to enter text.

# 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 |
| --- | --- | --- | --- | --- | --- |
| Lawfulness, fairness and transparency | Choose an item. | Choose an item. | Click or tap here to enter text. | Choose an item. | Click or tap here to enter text. |
| Purpose limitation | Choose an item. | Choose an item. | Click or tap here to enter text. | Choose an item. | Click or tap here to enter text. |
| Data minimisation | Choose an item. | Choose an item. | Click or tap here to enter text. | Choose an item. | Click or tap here to enter text. |
| Accuracy | Choose an item. | Choose an item. | Click or tap here to enter text. | Choose an item. | Click or tap here to enter text. |
| Storage limitation | Choose an item. | Choose an item. | Click or tap here to enter text. | Choose an item. | Click or tap here to enter text. |
| Rights of individuals | Choose an item. | Choose an item. | Click or tap here to enter text. | Choose an item. | Click or tap here to enter text. |
| Confidentiality, integrity, availability | Choose an item. | Choose an item. | Click or tap here to enter text. | Choose an item. | Click or tap here to enter text. |
| International transfer | Choose an item. | Choose an item. | Click or tap here to enter text. | Choose an item. | Click or tap here to enter text. |
| Local laws and regulations | Choose an item. | Choose an item. | Click or tap here to enter text. | Choose an item. | Click or tap here to enter text. |
| Data processors | Choose an item. | Choose an item. | Click or tap here to enter text. | Choose an item. | Click or tap here to enter text. |

# 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?

Click or tap here to enter text.

# Integrate

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

Click or tap here to enter text.

# Approval

|  |  |
| --- | --- |
| UCL Information | Click or tap here to enter text. |
| Signature: | Click or tap here to enter text. |
| Date: | Click or tap here to enter text. |