

Data Protection Impact Assessment (DPIA)

What is a DPIA?

Article 35 of the General Data Protection Regulation (GDPR) refers to Data Protection Impact Assessments (DPIAs) as a tool which help organisations identify, assess and mitigate or minimise privacy risks with data processing activities. They're particularly relevant when a new data sharing or processing, system or technology is being introduced.

DPIAs also support the accountability principle, as they help organisations comply with the requirements of the GDPR and demonstrate that appropriate measures have been taken to ensure compliance.

When should a DPIA checklist be completed?

The GDPR mandates a DPIA to be completed where data processing “is likely to result in a high risk to the rights and freedoms of natural persons”.

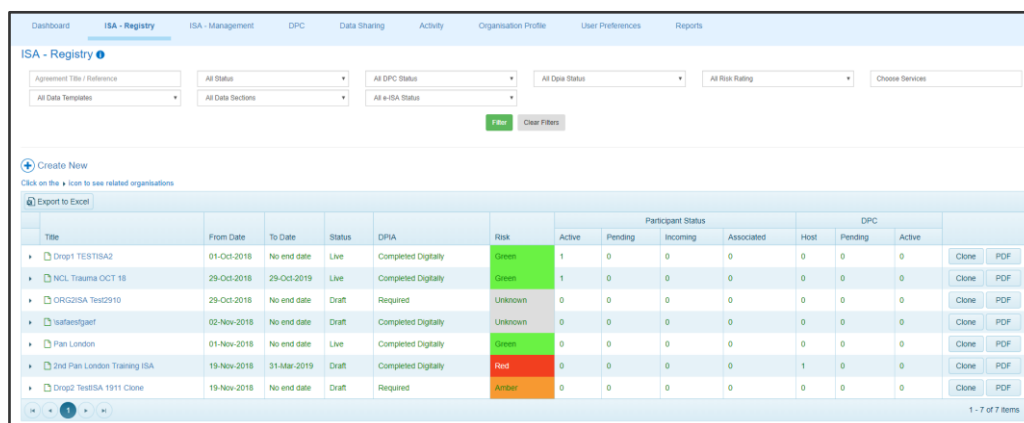
A DPIA should be completed as early as possible within any new project lifecycle, so that its findings and recommendations can be incorporated into the design of the processing operation.

Known as privacy by design, the embedding of data privacy features into the design of projects can have the following benefits:

- Potential problems are identified at an early stage.
- Addressing problems early will often be simpler and less costly.
- Increased awareness of privacy and data protection across the organisation.
- Organisations will be less likely to breach the GDPR.
- Actions are less likely to be privacy intrusive and have a negative impact on individuals.

How do I complete a DPIA checklist?

As a host of an ISA you can see a ‘DPIA’ column in the ‘ISA – Registry’ table which indicates the DPIA status for each ISA.



Title	From Date	To Date	Status	DPIA	Risk	Active	Pending	Incoming	Associated	Host	Pending	Active	DPC
Drop1 TESTISA2	01-Oct-2018	No end date	Live	Completed Digitally	Green	1	0	0	0	0	0	0	Clone PDF
NCL Trauma OCT 18	29-Oct-2018	29-Oct-2019	Live	Completed Digitally	Green	1	0	0	0	0	0	0	Clone PDF
ORG2ISA Test2910	29-Oct-2018	No end date	Draft	Required	Unknown	0	0	0	0	0	0	0	Clone PDF
Isafestgaer	02-Nov-2018	No end date	Draft	Completed Digitally	Unknown	0	0	0	0	0	0	0	Clone PDF
Plan London	01-Nov-2018	No end date	Live	Completed Digitally	Green	0	0	0	0	0	0	0	Clone PDF
2nd Plan London Training ISA	19-Nov-2018	31-Mar-2019	Draft	Completed Digitally	Red	0	0	0	0	1	0	0	Clone PDF
Drop2 TestISA 1911 Clone	19-Nov-2018	No end date	Draft	Required	Amber	0	0	0	0	0	0	0	Clone PDF

Data Protection Impact Assessment (QRG)

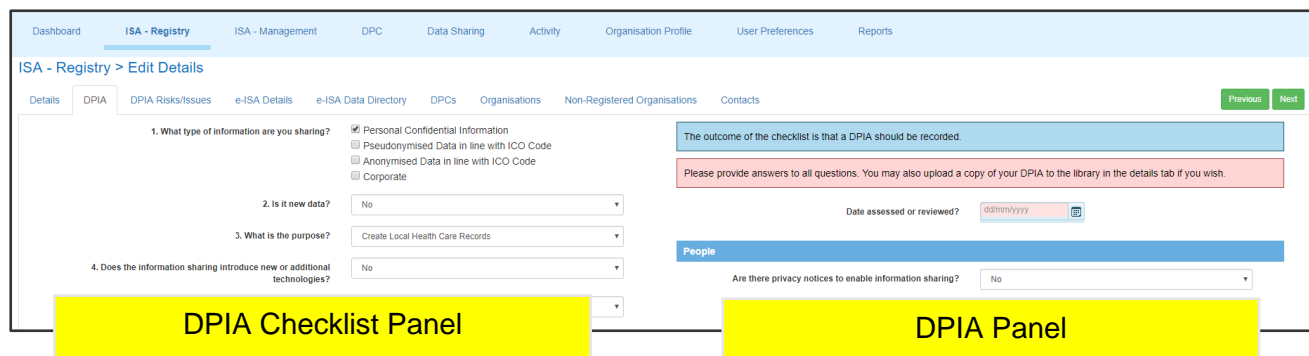
The following DPIA statuses exist within the DCC:

DPIA Status	DPIA Stage	Description
Checklist Required	Prior to DPIA checklist	All ISA hosts are required to complete the DPIA checklist and digital DPIA in order to save an ISA.
Required	After DPIA checklist or Prior to DPIA outcome	After the 10 DPIA checklist questions, the digital DPIA is also required and you will have the option to upload PDF DPIA if you wish.
Complete Digitally	Record DPIA Digitally	Complete Digitally enables you to record your DPIA by providing an answer to all the questions
Upload copy of DPIA	After completion of digital DPIA	Should you wish, you can also upload a copy of your DPIA to the library in the details tab if you wish

DPIA Checklist

When creating an ISA, it is a mandatory requirement to answer the DPIA checklist questions and digital DPIA.

Caution: Please be careful when completing a DPIA. Once a DPIA checklist has been completed or a DPIA has been digitally created / uploaded, it cannot be removed. However, you are able to amend the information that you have previously recorded.



The screenshot shows the 'ISA - Registry > Edit Details' screen. The 'DPIA' tab is selected. The 'DPIA Checklist Panel' (highlighted in yellow) contains the following questions:

- What type of information are you sharing?
 - ☒ Personal Confidential Information
 - ☐ Pseudonymised Data in line with ICO Code
 - ☐ Anonymised Data in line with ICO Code
 - ☐ Corporate
- Is it new data?
 -
- What is the purpose?
 -
- Does the information sharing introduce new or additional technologies?
 -

The 'DPIA Panel' (highlighted in yellow) contains the following information:

- The outcome of the checklist is that a DPIA should be recorded.
- Please provide answers to all questions. You may also upload a copy of your DPIA to the library in the details tab if you wish.
- Date assessed or reviewed?
- People
- Are there privacy notices to enable information sharing?

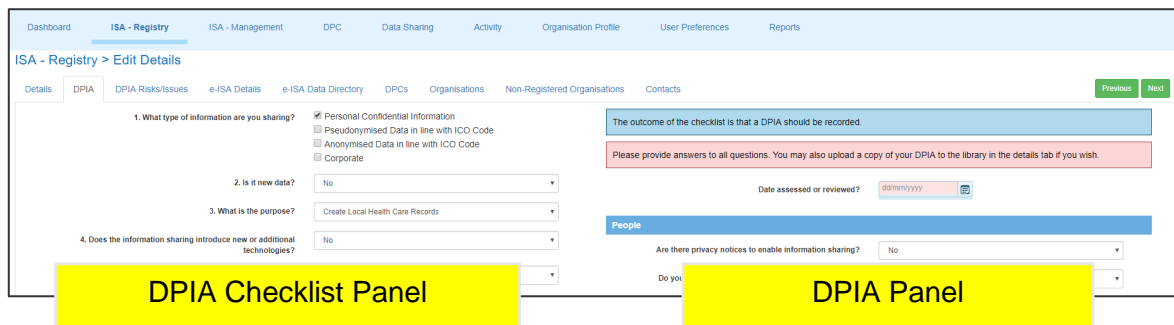
1. Select the 'DPIA' tab from the **ISA – Registry > Create New** screen
2. Complete the DPIA checklist questions that appear in the DPIA checklist panel, as per the table below:

DPIA Checklist questions	Response
1. What type of information are you sharing?	Options: <input type="checkbox"/> Personal Confidential Information <input type="checkbox"/> Pseudonymised Data in line with ICO Code <input type="checkbox"/> Anonymised Data in line with ICO Code <input type="checkbox"/> Corporate
2. Is it new data?	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Unsure
3. What is the purpose?	<input type="checkbox"/> Create Local Health Care Record <input type="checkbox"/> Individual care and treatment <input type="checkbox"/> Make diagnoses and decisions <input type="checkbox"/> Other
4. Does the information sharing introduce new or additional technologies?	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Unsure
5. Does the information sharing about the individual raise privacy concerns?	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Unsure
6. Does the information sharing involve you using new technology which might be perceived as being intrusive? For example, the use of data to make a decision about care that's automated?	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Unsure
7. Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information?	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Unsure
8. Will the project require you to contact individuals in ways which they may find intrusive	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Unsure
9. Will 3 or more organisations be involved in sharing the information?	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Unsure
10. Will the information sharing involve new or significantly changed consolidation, inter-linking, cross referencing or matching of personal data from multiple sources?	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Unsure
11. Is any adult or children data involved?	<input type="radio"/> Adult's data <input type="radio"/> Both Adult's and Children's data <input type="radio"/> Children's data <input type="radio"/> Not sharing patient data
11.b Definition of adult	<input type="radio"/> 13+ <input type="radio"/> 15+ <input type="radio"/> 16+

Data Protection Impact Assessment (QRG)

DPIA

The DPIA panel will only be enabled after completing the checklist questions.



The screenshot shows the 'ISA - Registry > Edit Details' page. On the left, the 'DPIA Checklist Panel' contains questions 1 through 4. Question 1 asks 'What type of information are you sharing?' with options for Personal Confidential Information, Pseudonymised Data, Anonymised Data, and Corporate. Question 2 asks 'Is it new data?' with a 'No' option. Question 3 asks 'What is the purpose?' with 'Create Local Health Care Records' as an option. Question 4 asks 'Does the information sharing introduce new or additional technologies?' with a 'No' option. On the right, the 'DPIA Panel' is visible, showing the outcome of the checklist: 'The outcome of the checklist is that a DPIA should be recorded.' It also includes a date field for 'Date assessed or reviewed?' and a section for 'People' with a question about privacy notices.

Complete DPIA digitally

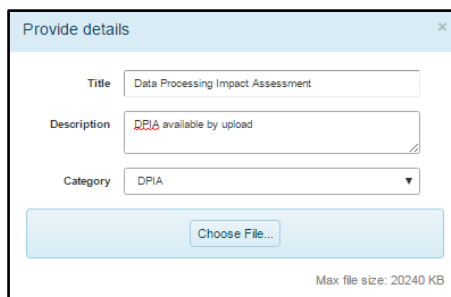
1. Provide the answers to the DPIA outcome, as per the table below:

DPIA Outcome questions	Response
Date assess or reviewed?	Enter a date
Are there privacy notices to enable information sharing?	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Unsure
Do you have a defined subject access request process?	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Unsure
Do you adhere to the accessibility information standards?	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Unsure
What is the lawful basis for processing information?	Select the applicable option(s) from the available checkboxes
Are the new purposes for processing information stated in the current ISA likely to be identified in the future?	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Unsure
Have all organisations sharing or consuming information met the Data Security and Protection (DSP) Toolkit?	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Unsure
Will any information stated in the ISA be transferred outside EEA?	<input type="radio"/> Yes <input type="radio"/> No
If required, do you or any parties subject to the ISA have the means to make changes to the data?	<input type="radio"/> Yes <input type="radio"/> No
Is there a section within the ISA that covers Data Quality?	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Unsure
Does the organisation and agreement comply with records management code?	<input type="radio"/> Yes <input type="radio"/> No

	<input type="radio"/> Unsure
Is your information security proportional to the sensitivity of the data being transferred?	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Unsure
If the answer to the question above is yes, there are two further questions 1. Specify where outside EEA 2. If limited to the USA, is the processor on the Privacy Shield Scheme?	<input type="radio"/> Free text field <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Unsure <input type="radio"/> Not applicable
If required, do you or any parties subject to the ISA have the means to make changes to the data?	<input type="radio"/> Yes <input type="radio"/> No
Is there a section within the ISA that covers Data Quality?	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Unsure
Does the organisation and agreement comply with records management code?	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Unsure
Is your information security proportional to the sensitivity of the data being transferred?	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Unsure
Select the data covered?	Select the applicable option(s) from the available checkboxes

Upload a copy of your DPIA

1. Navigate to the ISA details tab
2. Click on 'Upload new' button



3. Enter the DPIA *Title*, *Description* and *Category*
4. Select the **Choose File...** button to upload your DPIA to the DCC document library
5. Click the **Save and stay** (Save and stay) or the **Save and return** (Save and return) button to commit the changes