**St Georges, University of London (SGUL)**

**Data Protection Impact Assessment**

Data Protection Impact Assessments (DPIAs) are a tool which can help organisations identify the most effective way to comply with their data protection obligations under the Data Protection Act 2018 (DPA 18) and meet individuals’ expectations of privacy.

DPA 18 requires that a DPIA must be carried out when:

* new technologies are used and/or the processing is likely to result in a high risk to the rights and freedoms of individuals.

Therefore, within SGUL a DPIA will be carried out for both internal and partnership projects which require the collection/processing of personal data in any format. The DPIA has been developed to ensure compliance by SGUL with the DPA 2018 and must be submitted by the project lead person and signed off by the appropriate Information Asset Owner.

The DPIA should be carried out towards the start of the project, in order to identify any associated information risks and mitigate in the early stages, before you start processing. Any changes to the original submitted DPIA must be reflected in a new or updated DPIA

Completed DPIAs are to be sent to the Data Protection Officer (DPO) for review before being passed, if required, to the Senior Information Risk Owner for comment and approval. All DPIA submissions are regularly notified to the Information Governance Security Group.

The DPO or the Head of Information Governance can be contacted at any time during the compilation of the form for advice and assistance.

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| --- | --- |
| **Project/Process Name** |  |
| **Institute / Professional Service** |  |
| **Lead Person** |  |
| **Job Title** |  |
| **Team** |  |
| **Telephone** |  | **Email** |  |
| **PROJECT / PROCESS DETAILS** |
| **Project / process description:****- include / attach processing operations (include a flow diagram or another way of explaining data flows), the purpose and where applicable what SGULs lawful basis is for the processing of the information** |
|  |
| **What personal data do you intend to use, and why (list all categories – name, address etc)**  |
|  |
| **Will the personal data be identifiable, pseudonymised or anonymised (if a mix tick accordingly)** |
| Identifiable |  |  |
| Pseudonymised |  |  |
| Anonymised |  |  |
| **Length of the Project – include an assessment of the necessity and proportionality of the processing in relation to the purpose. Also include who, internally & externally, has been consulted in the preparation of this DPIA.** |
|  |
| **List all organisations / agencies which will have access to the personal data collection used for this project / process** |
|  |
| **If external organisations / agencies are involved, is there a contract or information sharing agreement in place with clauses containing –suitable clauses for data protection and data incident reporting, if not why not?** |
|  |
| **RISK** |
| **Can you achieve your objectives using anonymised data? – see ICO Code of Practice on Anonymisation**  |
| Yes |  |  |
| No |  | Why not? |  |
| **What are the benefits to the individual of their personal data being used for this purpose?**  |
|  |
| **What are the organisational benefits of the individual’s personal data being used for this purpose?** |
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| **What are potential negative impacts to the individual of their personal data being used for this purpose in the event of a Data Breach occurring.** |
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| **How will you avoid causing unwarranted or substantial damage/distress to the individual when using their personal data for this purpose?**  |
|  |
| **Is the data already held by the SGUL?** |
| Yes |  |  |
| No |  |  |
| **Is it held by one of the partner organisations / agencies involved in this process/project?** |
| Yes |  |  |
| No |  | Which agency will be collecting the data |  |
| **Have you told the individuals whose personal data you want to use for this purpose, how and why you intend to use their data?** |
| Yes |  |  |
| No |  | Why not? |  |
| **If not, are you intending to tell them?** |
| Yes |  |  |
| No |  | Why not? |  |
| **Do you already have the individual’s consent to use their data for this purpose?**  |
| Yes |  |  |
| No |  | Why not? |  |
| **If not, are you going to ask for their permission?** |
| Yes |  |  |
| No |  | Why not? |  |
| **Have individuals been given the opportunity to refuse us permission to use their data for this purpose?**  |
| Yes |  |  |
| No |  | Why not? |  |
| **Is your project driven by any statutory/legal obligations?** |
| Yes |  | Please list |  |
| No |  |  |
| **How will you make sure that the personal data you are using is kept accurate and up to date?**  |
|  |
| **How will the data beheld /stored?**  |
|  |
|  |
|  |
| **How will you make sure that you are holding data for the appropriate length of time and no longer?** |
|  |
| **What technical security measures will be in place?**  |
|  |
| **Are you implementing new software or electronic system** |
| Yes |  |  |
| No |  |  |
| **If answered Yes to the previous question have you discussed this with the IT Department to ensure no compatibility issues with the SGUL IT Infrastructure** |
| **Yes** |  |  |
| **No** |  | Why not? |  |
| **How will personal data be transferred / shared between the organisations / agencies involved in this project?**  |
|  |
| **Will you be transferring personal data to a country or territory outside of the UK?** |
| Yes - EEA |  |  |
| Yes – non EEA |  | Country(s) |
| No |  |  |
| **How will you ensure that third parties will comply with data protection obligations?** |
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| **What organisational measures are in place to ensure only appropriate and authorised access to and use of, personal data?** |
|  |
| **How will technical and organisational security be monitored/audited?** |
|  |
| **List supporting documentation provided:** |
|  |
| The Data Protection Officer conclusions regarding this proposal’s overall compliance with the DPA 18 Regulations and recommendations for changes/amendments to the project which are required to ensure compliance. |
|  |
| DPIA reference number |  |
| **Lead Person.** I confirm that the information recorded on this form is, to the best of my knowledge, an accurate and complete assessment of the potential privacy impacts of this project. |
| Name |  | Signature |  | Date |  |
| **Information Asset Owner Sign-off** |
| Name |  | Signature |  | Date |  |
|  |  |  |  |  |