

**St Georges, University of London (SGUL)**  
**Guidance on Completing the Data Protection Impact Assessment Form**

**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

Provide a basic description of your project, what’s involved and what you are hoping to achieve from it. Describe how personal data will be used, and describe the flows of data, e.g. where the data originates from, where it will be held for the purposes of the project, which department(s) or team(s) it will be used by within the University, any systems it will be imported into (whether internal or external), any external organisations it will be shared with etc. See an example of a flow diagram at the end of this document.

**What personal data do you intend to use, and why (list all categories – name, address etc)**

You should list all categories of personal data you will be using in the project, irrespective of whether or not it is data that the University already holds.

**Will the personal data be identifiable, pseudonymised or anonymised (if a mix tick accordingly)**

Identifiable	<input type="checkbox"/>	Your project may involve using personal data in more than one ‘format’, e.g. you may use identifiable data for the main purpose but only share anonymised data with an external partner. So you should tick <u>all</u> that are relevant to your project.
Pseudonymised	<input type="checkbox"/>	
Anonymised	<input type="checkbox"/>	

**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.**

If you don’t have an exact end date give an idea of when you will intend to review the progress of the project. If you are implementing a new system or service that will become permanent then you should indicate that the project will be ongoing. You should list all the people you have consulted with regard to the project, e.g. IT Services, Data Protection Officer, General Counsel, Procurement, SGUL committees, external suppliers, partner organisations.

**List all organisations / agencies which will have access to the personal data collection used for this project / process**

If you are using an external service provider who will hold the personal data on their systems/servers, you should include them in the list of people who will have access to the data,

**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?**

All contracts, data sharing agreements and other legal documents associated with your project should be reviewed by the SGUL General Counsel (in-house legal advisor). If the contract is not already in-place you should indicate its status at the time of filling out the form, e.g. “being reviewed by the General Counsel”

<b>RISK</b>		
<b>Can you achieve your objectives using anonymised data? – see ICO Code of Practice on Anonymisation</b>		
Yes	<input type="checkbox"/>	
No	<input type="checkbox"/>	Why not?
		The code is currently being updated, but you can still refer to the 'old' code <a href="https://ico.org.uk/media/1061/anonymisation-code.pdf">https://ico.org.uk/media/1061/anonymisation-code.pdf</a>
<b>What are the benefits to the individual of their personal data being used for this purpose?</b>		
For example, by sharing student name and email address with a journal publisher the student will benefit from free access to online journals and other e-resources relevant to their course.		
<b>What are the organisational benefits of the individual's personal data being used for this purpose?</b>		
For example, by implementing a new accident logging system the University will be better able to manage its compliance with health & safety laws.		
<b>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.</b>		
The impact of a data breach could be that the personal data is accessed by unauthorised persons, that the person's data is lost or stolen, that the individual becomes the victim of identity theft. The impact could depend on the categories of personal data being used for the project, and whether the breach is internal or public		
<b>How will you avoid causing unwarranted or substantial damage/distress to the individual when using their personal data for this purpose?</b>		
An example of the way you might limit the negative impact on the individual is by only using the minimum personal data necessary for the project, e.g. only using staff members name and email address as opposed to their name, email address and home address.		
<b>Is the data already held by the SGUL?</b>		
Yes	<input type="checkbox"/>	
No	<input type="checkbox"/>	
<b>Is it held by one of the partner organisations / agencies involved in this process/project?</b>		
Yes	<input type="checkbox"/>	
No	<input type="checkbox"/>	Which agency will be collecting the data
<b>Have you told the individuals whose personal data you want to use for this purpose, how and why you intend to use their data?</b>		
Yes	<input type="checkbox"/>	You might have done this through a <a href="#">Privacy Notice</a> , for example.
No	<input type="checkbox"/>	Why not?
<b>If not, are you intending to tell them?</b>		
Yes	<input type="checkbox"/>	You might do this by drafting <a href="#">a new Privacy Notice</a> for your project.
No	<input type="checkbox"/>	Why not?
<b>Do you already have the individual's consent to use their data for this purpose?</b>		
Yes	<input type="checkbox"/>	Where you are relying on consent it must be <i>specific to the purpose of your project</i> . And remember that consent can be withdrawn – how could that affect your project?
No	<input type="checkbox"/>	Why not?
<b>If not, are you going to ask for their permission?</b>		
Yes	<input type="checkbox"/>	

No	<input type="checkbox"/>	Why not?	<input type="text"/>
<b>Have individuals been given the opportunity to refuse us permission to use their data for this purpose?</b>			
Yes	<input type="checkbox"/>		
No	<input type="checkbox"/>	Why not?	<input type="text"/>
<b>Is your project driven by any statutory/legal obligations?</b>			
Yes	<input type="checkbox"/>	Is there a law or statutory obligation that <u>requires</u> you to collect or process the	
No	<input type="checkbox"/>	personal data for your project.	
<b>How will you make sure that the personal data you are using is kept accurate and up to date?</b>			
Do you carry out regular reviews of the data? Is there a process that allows the individual to update their personal data themselves?			
<b>How will the data be held /stored?</b>			
You should list all the locations in which you intend to hold the data, both within SGUL and in terms of any external suppliers or organisations you intend to share the personal data with.			
<b>How long will you need to hold the personal data for?</b>			
How long will it be <i>necessary</i> to keep the data, as opposed to how long do you <i>want</i> to keep the data for. Can you delete the data at the end of your project?			
<b>How will you make sure that you are holding data for the appropriate length of time and no longer?</b>			
You should refer to the <a href="#">SGUL records retention schedule</a> for the type of record that your personal data relates to, e.g. staff recruitment, student appeals. If you cannot find reference to an appropriate record in the schedules, or you are unsure about how long you should keep the data, please contact the Records Manager.			
<b>What technical security measures will be in place?</b>			
If your project involves storing the personal data on the systems of an external supplier, then ask them if they have a technical security document that they provide their users with. If so you can append it to your DPIA form. If you will be storing the data on SGUL systems, do you have a way of controlling access, e.g. is access by unique login for authorised persons only? Is the data going to be stored on a network drive that only authorised staff have access to? Is the spreadsheet that contains the personal data password protected?			
<b>Are you implementing new software or electronic system</b>			
Yes	<input type="checkbox"/>		
No	<input type="checkbox"/>		
<b>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</b>			
Yes	<input type="checkbox"/>		
No	<input type="checkbox"/>	Why not?	<input type="text"/>
<b>How will personal data be transferred / shared between the organisations / agencies involved in this project?</b>			
NB this must be done securely. SGUL has a few options for doing this, e.g. <a href="#">Office Message Encryption</a> (when using email) or the secure uploads service <a href="#">iDrop</a> . More info on these services, and on how to password protect or encrypt files, is available from IT Services.			

**Will you be transferring personal data to a country or territory outside of the UK?**

Yes - EEA	<input type="checkbox"/>	
Yes – non EEA	<input type="checkbox"/>	Country(s) – If you answer ‘yes’ to this question you must list the countries.
No	<input type="checkbox"/>	Even though your supplier is based in the UK, their servers may not be – make sure you check this with them.

**How will you ensure that third parties will comply with data protection obligations?**

The best way to ensure this is by having an appropriate contract in place that contains clauses covering data protection. The SGUL General Counsel can provide you with help or advice on this.

**What organisational measures are in place to ensure only appropriate and authorised access to and use of, personal data?**

How will you control access to the personal data? Do you have a process in place for removing access for someone after they have left, e.g. deactivating their login access. Will you make sure the staff in question have received appropriate data protection and information security training?

**How will technical and organisational security be monitored/audited?**

If the system is with provided by external supplier, either check their technical security document (if they have one) or ask them to provide details of how they monitor/audit their system.  
If the personal data is being held on SGUL systems, IT Services should routinely monitor and audit our network.

**List supporting documentation provided:**

e.g. supplier system security document, contract / data sharing agreement

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	<input type="text"/>	Signature	<input type="text"/>	Date	<input type="text"/>
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**Information Asset Owner Sign-off**

Name	<input type="text"/>	Signature	<input type="text"/>	Date	<input type="text"/>
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The ‘Information Asset Owner’ will typically be the Director of the professional services department or institute in which the project sits.

This diagram shows how personal data flows from the Student Records System into the Library Records System.

From there it goes to the systems that manage the issuing of books and the gate entry.

It also flows outside of the University where it is uploaded to the Online Journals Service.

A diagram doesn't have to be complicated in order to show the flow of personal data between systems or in / out of the University.

