**UNIVERSITY OF DUNDEE**

**INFORMATION GOVERNANCE**

**Data Protection Impact Assessment**

**[Please consult the Guidance Note before completing this template]**

**Activities: *[Note 1]***

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**UNIVERSITY OF DUNDEE**

**Data Protection Impact Assessment (DPIA)**

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| 1. **Document management *[Note 2]*** | | | | |
| **Version control** | **Date** | **Summary of change (if applicable)** | **Name and role** | **Sign-off** |
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| 1. **Executive summary** |
| *[Note 3]* |

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| 1. **The Activities** | |
| **Name of Organisation** | University of Dundee, Nethergate, Dundee, DD1 4HN |
| **Name of school or department** | *[Note 4]* |
| **Description of the activities** | *[Note 5]* |
| **Business context** | *[Note 6]* |
| **Aims and expected benefits of the activities** | *[Note 7]* |
| **Operational responsibility for the activities** | *[Note 8]*  Name:  Role:  University address:  Telephone:  E-mail: |
| Name:  Role:  University address:  Telephone:  E-mail: |
| **Responsibility for data privacy and this DPIA** | *[Note 9]*  Name:  Role:  University address:  Telephone:  E-mail: |
| Name:  Role:  University address:  Telephone:  E-mail: |
| **Details of other stakeholders or third parties involved** | *[Note 10]*  Name:  Involvement in the activities:  Contact name:  E-mail: |
| Name:  Involvement in the activities:  Contact name:  E-mail: |

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| 1. **Requirement to complete a DPIA** | | |
| **Screening Questions** *[Note 11]* | | **Y/N** |
| **Are the activities likely to result in a high risk to individuals? (answer automatically ‘Yes’ if answer to any of the below questions is ‘Yes’)** *[Note 12]* | |  |
| Q1: Do the activities involve systematic and extensive profiling or automated decision-making to make significant decisions about people? *[Note 13]* | |  |
| Q2: Do the activities involve special category data or criminal offence data on a large scale? *[Note 14]* | |  |
| Q3: Do the activities involve systematic monitoring a publicly accessible place on a large scale? *[Note 15]* | |  |
| Q4: Do the activities involve the use of new technologies? *[Note 16]* | |  |
| Q5: Do the activities involve the use of profiling, automated decision-making or special category data to help make decisions on someone’s access to a service, opportunity or benefit? *[Note 17]* | |  |
| Q6: Do the activities involve profiling on a large scale? *[Note 18]* | |  |
| Q7: Do the activities involve biometric or genetic data? *[Note 19]* | |  |
| Q8: Do the activities involve combining, comparing or matching personal data from multiple sources? *[Note 20]* | |  |
| Q9: Do the activities involve the use of personal data without a privacy notice being provided to the individual? *[Note 21]* | |  |
| Q10: Do the activities involve tracking individuals’ online or offline location or behaviour? *[Note 22]* | |  |
| Q11: Do the activities involve using children’s personal data for profiling or automated decision-making or for marketing purposes, or offering online services directly to children? *[Note 23]* | |  |
| Q12: Do the activities involve using data which could result in a risk of physical harm in the event of a security breach? *[Note 24]* | |  |
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| **Further screening questions** *[Note 25]* | | **Y/N** |
| Q13: Do the activities involve any evaluation or scoring? *[Note 26]* | |  |
| Q14: Do the activities involve automated decision-making with significant effects? *[Note 27]* | |  |
| Q15: Do the activities involve systematic processing? *[Note 28]* | |  |
| Q16: Do the activities involve processing of sensitive data or data of a highly personal nature? *[Note 29]* | |  |
| Q17: Do the activities involve large scale processing? *[Note 30]* | |  |
| Q18: Do the activities involve data of vulnerable individuals? *[Note 31]* | |  |
| Q19: Do the activities use innovative technological / organisational solutions? *[Note 32]* | |  |
| Q20: Is this a major initiative for the University? *[Note 33]* | |  |
| Q21: Do the activities involve preventing individuals from exercising a right or using a service or contract? *[Note 34]* | |  |
| Q22: Is there a change to the nature, scope, context or purposes of use of personal data by the University? *[Note 35]* | |  |
| Q23: Finally, taking into account the nature, scope and context of processing, is there any other reason why the activities may result in a high risk? *[Note 36]* | |  |
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| **Is a DPIA Required for the activities ?** *[Note 37]* | |  |
| **Further details** | | |
| **Reasons why DPIA is / is not required** | *[Note 38]* | |
| **Person carrying out screening** | *[Note 39]*  Name:  Role: | |
| **Person making decision whether DPIA is required** | *[Note 40]*  Name:  Role: | |
| **Date** | *[Note 41]* | |
| **Signature** | *[Note 42]* | |

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| 1. **The scope of this DPIA** | |
| **The activities dealt with in this DPIA** | *[Note 43]* |
| **Parts of the activities which are not considered in this DPIA** | *[Note 44]* |
| **Details of other processing covered by this DPIA** | *[Note 45]* |

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| 1. **Details about the processing of personal data** | |
| **Description of the proposed processing** | *[Note 46]* |
| **Description of the technology, assets and other means used to process personal data** | *[Note 47]* |
| **Types of individuals** | *[Note 48]* |
| **Types of personal data** | *[Note 49]* |
| **Sources of personal data** | *[Note 50]* |
| **Length and frequency of processing** | *[Note 51]* |
| **Processing volumes** | *[Note 52]* |

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| 1. **Purpose of processing** | |
| **Purposes of processing** | *[Note 53]* |
| **Benefits of processing** | *[Note 54]* |

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| 1. **Disclosure / sharing of personal data by the University** | |
| **Details of disclosures / sharing of personal data in connection with the activities** | *[Note 55]*  Name:  Role/ function of recipient:  Disclosed data:  Purposes for disclosure / sharing:  Details of relevant agreements with recipients:  Monitoring / action by University: |
| Name:  Role/ function of recipient:  Disclosed data:  Purposes for disclosure / sharing:  Details of relevant agreements with recipients:  Monitoring / action by University: |

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| 1. **Countries** | |
| **Details of international data transfers** | *[Note 56]*  Name and role of recipient:  Countries:  Reason for transfer:  Agreement:  University’s grounds for international transfer: |
| Name and role of recipient:  Countries:  Reason for transfer:  Agreement:  University’s grounds for international transfer: |
| **Location of individuals** | *[Note 57]* |

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| 1. **University’s legal basis for processing** | |
| **Legal grounds for processing** | *[Note 58]* |
| **Details on how the University meets the requirement of lawful processing** | *[Note 59]*  Purpose limitation:  Necessity and proportionality: |
| **Steps the University will take to ensure it complies with the requirement for processing to be fair?** | *[Note 60]* |
| **Steps the University will take to comply with the principle of data minimisation?** | *[Note 61]* |

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| 1. **Security of processing and safeguards** | |
| **Practical and organisational safeguards** | *[Note 62]* |
| **Security measures and other mechanisms to protect personal data** | *[Note 63]* |
| **Steps the University will take to demonstrate compliance with data protection legislation?** | *[Note 64]* |

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| 1. **Quality of data** | |
| **Assessment of the quality of the data** | *[Note 65]* |
| **Steps taken to review / update data** | *[Note 66]* |

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| 1. **Data subjects’ rights** | |
| **How will the University ensure that it complies with rights of individuals under data protection legislation?** | *[Note 67]*  Right to be informed:  Right of access:  Right to rectification of personal data:  Right to erasure:  Right to object to processing:  Right to restrict processing:  Right to data portability:  Rights in relation to international transfers:  Rights to be consulted:  Rights in relation to automated decision-making: |

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| 1. **Retention and disposal** | |
| **How long will the personal data be retained by the University?** | *[Note 68]* |
| **Details of other relevant measures relating to retention of Personal Data** | *[Note 69]* |
| **How will the University dispose of personal data** | *[Note 70]* |

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| 1. **Vulnerable individuals** | |
| **Details of vulnerable individuals** | *[Note 71]* |
| **Details of special arrangements required to safeguard vulnerable individuals** | *[Note 72]* |

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| 1. **Consultation** | |
| **Consultation with the University’s Data Protection Officer** | *[Note 73]*  Date:  Advice of the DPO: |
| **Consultation with relevant University schools / departments** | *[Note 74]*  Date:  Comments received: |
| **Consultation with individuals** | *[Note 75]*  Date and method of consulting:  Comments received and consideration given in the implementation of the activities:  Reason for not consulting: |
| **Consultation of other interested parties and stakeholders** | *[Note 76]*  Name of party:  Date:  Comments received: |
| **Consultation with the Information Commissioner’s Office (if relevant)** | *[Note 77]*  Date:  Advice of the ICO: |

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| 1. **Risk assessment** | | | | | | | | | | |
| **Risk to / potential impact on individuals** | **Risk to the University** | **Other identified risk** | **Severity and likelihood of harm** | | **Overall risk level** | **Solution / mitigation** | **Residual risk level** | **Decision: is the residual risk eliminated, reduced or accepted?** | **Assessment** | **Authority for the decision** |
| *[Note 78]* | *[Note 79]* | *[Note 80]* | *[Note 81]*  Severity: | *[Note 82]*  Likelihood: | *[Note 83]* | *[Note 84]* | *[Note 85]* | *[Note 86]* | *[Note 87]* | *[Note 88]* |
|  |  |  | Severity: | Likelihood: |  |  |  |  |  |  |
|  |  |  | Severity: | Likelihood: |  |  |  |  |  |  |
|  |  |  | Severity: | Likelihood: |  |  |  |  |  |  |

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| 1. **Actions** | | | |
| **Action** | **Owner** | **Date added** | **Due date for completion** |
| *[Note 89]* | *[Note 90]* | *[Note 91]* | *[Note 92]* |

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| 1. **Any other relevant information** |
| *[Note 93]* |

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| 1. **Outcome** | |
| **Outcome and reasons** | *[Note 94]* |
| **Decision made by** | *[Note 95]* |
| **Signature** | *[Note 96]* |

**ANNEX 1**

**RELEVANT DOCUMENTS**

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| **Relevant documents** | | | |
| **Document** | **Date** | **Location** | **Attached to this Data Protection Impact Assessment? (Y/N)** |
| *[Note 97]* |  |  |  |
| [Data Flow Map] |  |  | [Y – Annex 2] |
| [Advice of the DPO] |  |  | (Y- Annex 3] |
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**ANNEX 2**

**[DATA FLOW MAP]**

*[Note 98]*

**ANNEX 2**

**[ADVICE FROM THE DATA PROTECTION OFFICER]**

*[Note 99]*