**UNIVERSITY OF DUNDEE**

**INFORMATION GOVERNANCE**

**Data Protection Impact Assessment**

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**UNIVERSITY OF DUNDEE**

**Data Protection Impact Assessment (DPIA)**

**YOU MUST HAVE COMPLETED AN INITIAL DATA RISK ASSESSMENT (IDRA) FORM BEFORE YOU COMPLETE THIS DPIA. IF YOU HAVE NOT DONE SO, PLEASE DO SO NOW.**

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| 1. **The IDRA (Initial Data Risk Assessment)** |

ATTACH THE **INITIAL DATA RISK ASSESSMENT** TO THIS FORM. IT IS ASSUMED THAT THE IDRA REQUIRES YOU TO COMPLETE A DPIA FOR YOUR PROPOSED ACTIVITIES.

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| 1. **Details about the processing of personal data** | |
| **How will you collect, use, store and delete personal data?** |  |
| **How often will you be collecting data and how long will you keep it?** |  |
| **How much data will you be using and/or collecting?** |  |
| **What is the source of the personal data?** |  |
| **Will you be sharing the personal data?** |  |
| **Where and how will the data flow?** |  |
| **What technology, assets and other means will you use to process personal data?** |  |
| **How many individuals and what type of individuals are covered by the data processing?** |  |
| **What types of personal data are to be processed?** |  |
| **Are you processing any special category data or sensitive data?**   1. **personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs;** 2. **trade-union membership;** 3. **genetic data, biometric data processed solely to identify a human being;** 4. **health-related data;** 5. **data concerning a person’s sex life or sexual orientation** |  |

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| 1. **Context and Purpose of processing** | |
| **What do you want to achieve by processing the data?** |  |
| **What will be the effect on data subjects?** |  |
| **What is the nature of the University’s relationship with the data subject?** |  |
| **Are they expecting you to use their data in the way you’ve proposed?** |  |
| **Are there prior concerns with this proposed activity in the public domain that you are aware of?** |  |

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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** | 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. **International Issues** | |
| **Does the processing involve data subjects or data transfers outside the UK?** |  |
| **Location of individuals or Sub processors outside the UK** |  |

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| 1. **University’s legal basis for processing** | |
| **Legal grounds for processing (delete as appropriate)** | **(a) Consent:** the individual has given clear consent for you to process their personal data for a specific purpose.  **(b) Contract:** the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering a contract.  **(c) Legal obligation:** the processing is necessary for you to comply with the law (not including contractual obligations).  **(d) Vital interests:** the processing is necessary to protect someone’s life.  **(e) Public task:** the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.  **(f) Legitimate interests:** the processing is necessary for your legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect the individual’s personal data which overrides those legitimate interests. (This cannot apply if you are a public authority processing data to perform your official tasks.) |

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| 1. **Security of processing and safeguards** | |
| **Security measures and other mechanisms to protect personal data** |  |
| **Is the University signed up to any codes of conduct in respect of the data processing?** |  |
| **Are there sufficient resources to meet the data security requirements for this type of processing?** |  |

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| 1. **Quality of data** | |
| **How will you ensure that the data is accurate and up to date?** |  |
| **Steps taken to review / update data** |  |

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| 1. **Children and Vulnerable individuals** | |
| **Are you using personal data of any children and/or vulnerable individuals?** |  |
| **If yes, details of any special arrangements required to comply with safeguarding (if applicable)** |  |

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| 1. **Consultation** | |
| **Consultation with the University’s Data Protection Officer and/or Information Governance** | Date:  Advice of the DPO: |
| **Consultation with data subjects (if applicable)** | Date and method of consulting:  Comments received and consideration given in the implementation of the activities:  Reason for not consulting: |

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| 1. **Data subjects’ rights** | |
| **All data processing will be subject to the Data Subject’s Rights. Please note the University will not support any derogation of these rights. Consult Information Governance if you are in any doubt.** | 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: |

**TEMPLATE RISK REGISTER FOR THE RISKS IDENTIFIED IN THE DATA PROCESSING ACTIVITY UNDER DPIA**

**RISK**

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| **Likelihood of harm** | **PROBABLE** | **GREEN** | **RED** | **RED** |  | **RED** | **= HIGH RISK** |
| **POSSIBLE** | **GREEN** | **AMBER** | **RED** |  | **AMBER** | **= MEDIUM RISK** |
| **REMOTE** | **GREEN** | **GREEN** | **GREEN** |  | **GREEN** | **= LOW RISK** |

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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** |
|  |  |  | Severity: | Likelihood: |  |  |  |  |  |  |
|  |  |  | Severity: | Likelihood: |  |  |  |  |  |  |
|  |  |  | Severity: | Likelihood: |  |  |  |  |  |  |
|  |  |  | Severity: | Likelihood: |  |  |  |  |  |  |

**DECLARATION – I, THE RESPONSIBLE PERSON FOR THE DATA PROCESSING HAVE COMPLETED THIS DPIA AND PROVIDED ANSWERS TO THE BEST OF MY KNOWLEDGE AND BELIEF. I ALSO CONFIRM THAT ALL DATA PROCESSING WILL BE NECESSARY AND PROPORTIONATE AND I WILL KEEP THIS DPIA UNDER REVIEW.**

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| 1. **Declaration and Signing** | |
| **Responsible Person** |  |
| **Signature** |  |

**DPIA SENT TO INFORMATION GOVERNANCE ON ......................................................................................................................Date**

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| 1. **INFORMATION GOVERNANCE/DPO COMMENTS (if any) and SIGN OFF** |
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