

## Data Protection Impact Assessment (DPIA)

---

<b>DPIA in relation to:</b>
[Insert name/reference number of project being assessed]
<b>Name and Position of Individual(s) responsible for DPIA:</b>
[Insert Name and Job title of individual(s)]
<b>Assessment date:</b>
[Insert date]

## Step 1: Identify the need for a DPIA

Explain broadly what the project aims to achieve and what type of processing it involves. You may find it helpful to refer or link to other documents, such as a project proposal. Summarise why you identified the need for a DPIA.

You need to check whether your processing is on the list of types of processing which automatically require a DPIA. If not, you need to screen for other factors which might indicate that it is a type of processing which is likely to result in high risk.

## Step 2: Describe the processing

**Describe the nature of the processing:** How will you collect, use, store and delete data? What is the source of the data? Will you be sharing data with anyone? You might find it useful to refer to a flow diagram or other way of describing data flows. What types of processing identified as likely high risk are involved?

**Describe the scope of the processing:** What is the nature of the data, and does it include special category or criminal offence data? How much data will you be collecting and using? How often? How long will you keep it? How many individuals are affected? What geographical area does it cover?

**Describe the context of the processing:** What is the nature of your relationship with the individuals? How much control will they have? Would they expect you to use their data in this way? Do they include children or other vulnerable groups? Are there prior concerns over this type of processing or security flaws? Is it novel in any way? What is the current state of technology in this area? Are there any current issues of public concern that you should factor in? Are you signed up to any approved code of conduct or certification scheme (once any have been published/approved by the ICO)?

**Describe the purposes of the processing:** What do you want to achieve? What is the intended effect on individuals? What are the benefits of the processing – for you, and more broadly?

### Step 3: Consultation process

**Consider how to consult with relevant stakeholders:** Describe when and how you will seek individuals' views – or justify why it's not appropriate to do so. Who else do you need to involve within your organisation? Do you need to ask your processors to assist? Do you plan to consult information security experts, or any other experts?

### Step 4: Assess necessity and proportionality

**Describe compliance and proportionality measures, in particular:** What is your lawful basis for processing? Does the processing actually achieve your purpose? Is there another way to achieve the same outcome? If appropriate, How will you prevent the use of the technology or system beyond the purpose for which it was originally intended? How will you ensure data quality and data minimisation? What information will you give individuals? How will you help to support their rights? What measures do you take to ensure processors comply? How do you safeguard any international transfers?

## Step 5: Identify and assess risks

Describe source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary.	Likelihood of harm	Severity of harm	Overall risk
	Remote, possible or probable	Minimal, significant or severe	Low, medium or high

## Step 6: Identify measures to reduce risk

**Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 5**

Risk	Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved
		Eliminated reduced accepted	Low medium high	Yes/no

## Step 7: Sign off and record outcomes

Item	Name/date	Notes
Measures approved by:		Integrate actions back into project plan, with date and responsibility for completion
Residual risks approved by:		If accepting any residual high risk, consult the ICO before going ahead
DPO advice provided:		DPO should advise on compliance, step 6 measures and whether processing can proceed
Summary of DPO advice:		
DPO advice accepted or overruled by:		If overruled, you must explain your reasons
Comments:		
Consultation responses reviewed by:		If your decision departs from individuals' views, you must explain your reasons
Comments:		
This DPIA will be kept under review by:		The DPO should also review ongoing compliance with DPIA