**Research Data Protection Impact Assessment (DPIA)**

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.

A DPIA helps identify data privacy risks when planning new, or revising existing, projects and to identify actions to mitigate these risks. In the rare cases where risks cannot be mitigated at all it may be necessary to consult with the Information Commissioner's Office (ICO). Under data protection legislation it is a legal requirement to complete a DPIA in the following circumstances:

* • where data processing is likely to result in a high risk of harm to individuals, e.g. new, invasive technology is proposed
* • when large volumes of personal data are processed, e.g. use of behavioural profiles based on website usage
* • when processing special category personal data on a large scale, e.g. healthcare data, genetic tests to assess and predict the disease/health risks

• where publicly accessible areas are monitored, e.g. CCTV or when filming public areas

Therefore a DPIA will be carried out for both internal and partnership projects which require the collection/processing of personal data in any format for the purpose of research.

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.

|  |  |
| --- | --- |
| **Study Title/Acronym:** |  |
| **JRES Reference Number:** |  |
| **Chief Investigator Name:** |  |
| **Chief Investigator Email Address:** |  |

|  |
| --- |
| **PROJECT 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 St George’s lawful basis is for the processing of the information.** |
|  |
| **What personal data do you intend to use, and why? (List all categories)**  |
|  |
| **Will the personal data be identifiable, pseudonymised or anonymised (if a mix tick accordingly)**  |
| Identifiable |  |  |
| \*Pseudonymised |  |  |
| Anonymised |  |  |
| *\*Confirm that the key to this data is kept securely away from the used data with strict controlled access* |
| **List all organisations / agencies which will have access to the personal data collection used for this project / process** |
|  |
| **Length of the study – 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 external organisations / agencies are involved, is there a contract or information sharing agreement in place with 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?** |
|  |
| **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?** |
|  |
| **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 City St George’s/SGHFT?** |
| 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 |  |  |
| **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 |  |  |
| **How will you make sure that the personal data you are using is kept accurate and up to date?**  |
|  |
| **What steps or controls are you taking to minimise risks to privacy?****Please tick those which apply and provide details of how each is ensured** |
| * Risks to individual privacy are minimal
* Personal data is pseudonymised
* Encryption of data at rest, i.e. when stored
* Encryption used in transfers
* Information compliance training for staff has been completed - data protection,

information security, FOI* Adherence to privacy by design principles
* Special category personal data is not used
* Participant opt out at any stage of the research
* Personal data kept in the UK
* Research is not used to make decisions directly affecting individuals
* Short retention limits
* Restricted access controls
* Other (please specify)
 |  |
| **How long will you need to hold the personal data for after the study has completed?** |
|  |
| **How will you make sure that you are holding data for the appropriate length of time and no longer?** |
|  |
| **How will the data be held /stored?**  |
|  |
| **Will you be using any electronic and/or paper Case Report Forms (CRFs) to collect data? If so what are these and how will they be held securely and managed at the end of the project?** |
|  |
| **Will personal data be transferred/shared between the organisations involved in this project? If so how?** |
|  |
| **Will you be transferring personal data to a country or territory outside of the UK?** *If yes, name countries and receiving parties*. |
| Yes – within EEA |  |  |
| Yes – outside of EEA |  |  |
| No |  |  |
| **How will you ensure that third parties will comply with data protection obligations?** |
|  |
| **What 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?** |
|  |

**Declaration**

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 study.

Name:

Signature:

Date:

**Institute Director (CSG) or Care Group Lead (SGHFT)**

Name:

Signature:

Date:

**JRES Reviewer**

Name:

Signature:

Date: