

You should complete Step 1 of this template at the start of any significant project in the College involving the use and processing of personal data e.g. where you are introducing new systems or technology, designing new processes or if you are making a significant change to an existing process or system. For an explanation of what personal data is please refer to the **College's Data Protection Policy**.

You should then liaise with the Director of Corporate Support (named College Data Protection Officer (DPO)) who will assess the information you have provided and determine whether a full DPIA is required. **You need only proceed to Step 2 if the DPO decides that this is necessary.** The DPO will support you through the full DPIA process. If a full DPIA is carried out that then the final outcomes must be integrated into your project plan.

Step 1: Identify the need for a DPIA

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Explain broadly what the project aims to achieve, the benefits for the College and what personal data is being processed. Highlight at this stage if any sensitive personal data is being processed e.g. data relating to criminal convictions, health or protected characteristics. Identify key partners and stakeholders involved.

The next section must be completed by the DPO, before you proceed to Step 2.

Requirement to proceed to full DPIA? Yes No

Is there a clear lawful basis for processing and if so what is it?

Authorised by Director of Corporate Support (named College DPO)

Name:

Signature: _____ Date: _____

Step 2: Describe the processing

Describe the nature of the processing: How will you collect, use, store and delete data? Where does the data come from/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.

Describe the scope of the processing: What is the nature of the data, and does it include special category or criminal offence data? Give an analysis of the amount of data being collected e.g. from all College staff or students or a smaller group. Give an idea of the timeline involved – is this a short project after which the data will be securely deleted or a new college system that has a longer life span?

Describe the context of the processing: What is the nature of the College's relationship with the individuals e.g. students, prospective students, commercial customers, building users? How much control will they have in relation to the processing? Would they expect you to use their data in this way? Do they include children or other vulnerable groups?

Consider the system or process itself more broadly: Are there prior concerns over this type of processing or security flaws? Is this a new or innovative system or process that may not have been tried and tested? Are there any current issues of public concern that you should factor in?

Step 3: Consultation process

Consider how to consult with relevant stakeholders and colleagues: Who else do you need to involve in the College? Will you seek the views of the data subjects– or justify why it’s not appropriate to do so. 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: Does the processing actually achieve your purpose? Is there another way to achieve the same outcome? How will you ensure data quality and data minimisation? What measures will you take to ensure staff who are processing the data 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 Remote, Possible or Probable?	Severity of harm Minimal, Significant or Severe?	Overall risk Low, Medium or high?
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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 Eliminated, Reduced or Accepted?	Residual risk Low, Medium or High?	Measure approved Yes/No?
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Step 7: Sign off and record outcomes

Measures approved by (name/date):

Integrate actions back into project plan, with date and responsibility for completion.

Residual risks approved by (name/date):

If accepting any residual high risk, consult the ICO before going ahead.

DPO advice provided (name/date):

DPO should advise on compliance, step 6 measures and whether processing can proceed.

Summary of DPO advice:

DPO advice accepted or overruled by (name/date):

If overruled, you must explain your reasons.

Comments:

Consultation (if applicable)

responses reviewed by (name/date):

If your decision departs from individuals' views, you must explain your reasons.

Comments:

This DPIA will kept under review by (name/date):

The DPO should also review ongoing compliance with DPIA.