

GUIDANCE ON COMPLETING A DATA PROTECTION IMPACT ASSESSMENT (DPIA)

WHAT IS A DPIA?

A Data Protection Impact Assessment (DPIA) is a process to help you to identify and minimise the data protection risks of a project.

A full DPIA is a legal requirement for processing that is likely to be high risk. But an effective DPIA can also bring broader compliance, financial and reputational benefits, helping you demonstrate accountability and building trust and engagement with individuals.

You must carry out STEP 1 of the attached DPIA for any significant new project involving the use of personal data.

Examples of projects where you should complete STEP 1 would include:

- A new system to share student data with schools
- A new student records system
- The introduction of new CCTV cameras in classrooms or a new security swipe card system

It may not be necessary to carry out a full DPIA in every instance where we are using personal data but we need to carry out STEP 1 for all relevant projects.

A DPIA may cover a single processing operation or a group of similar processing operations. A group of controllers can do a joint DPIA e.g. all of the colleges in the Glasgow region might carry out a joint DPA.

WHEN DO WE NEED A DPIA?

You must carry out STEP 1 of the DPIA for any major new project in the College involving the use of personal data. This will ensure that all risks to personal data are objectively considered, assessed and mitigated to reduce the risk of any form of data breach to the College.

A full DPIA is likely to be required if you plan to:

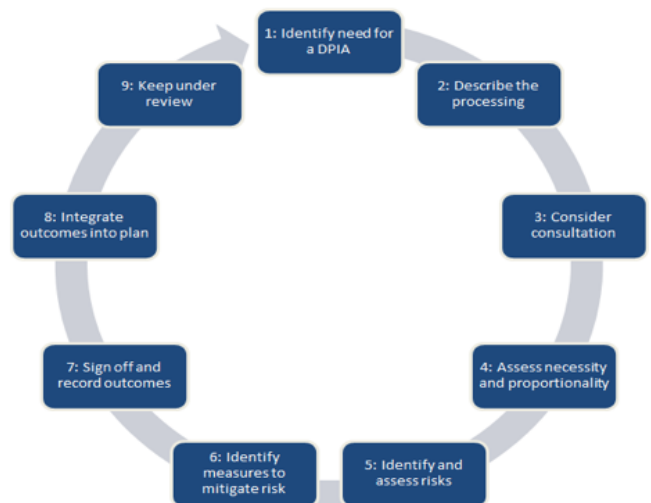
- process special category (eg. health, race, trade union membership) or criminal offence data on a large scale;
- systematically monitor publicly accessible places on a large scale;
- use new technologies;
- use profiling or special category data to decide on access to services;
- match data or combine datasets from different sources;
- track individuals' location or behaviour.

HOW DO WE CARRY OUT A DPIA?

In the College we have developed a staged process for assessing the data protection risks and privacy impact of any project including the development of any new process or system.

At the outset of your project you should complete STEP 1 of the template associated with this procedure and submit that to the College's named Data Protection Officer (DPO), who is currently the Director of Corporate Support. There is guidance as to how to complete each question at every step as you progress through the form. The DPO will assess the information you have provided and determine whether, in terms of the law and considering the risks involved, a full DPIA should be completed. **Therefore you will only require to proceed to STEP 2 if the DPO decides that is necessary.** The DPO will support you through the process from STEP 2 onwards.

Legally a DPIA must consider a number of areas which are all incorporated into the College template assessment which follows the STEPS set out in this diagram.



If you have any queries about any aspect of this guidance you should seek advice from the College's Data Protection Officer who is currently the Director of Corporate Support.