

**University College Cork**

**– National University of Ireland, Cork**

**Data Protection Impact Assessment Template**

**Version 0.4**

DPIA Template

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| **Step 1a: DPIA Screening Checklist** |
| **Does your project involve:** | **Yes** | **No** |
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| Evaluation or scoring of personal data (including profiling and predicting) |  |  |
| Automated decision-making with legal or similar significant effects  |  |  |
| Systematic monitoring including through a publicly accessible place on a large scale |  |  |
| Sensitive data or data of a highly personal nature (including special categories of data and criminal data) |  |  |
| Data processed on a large scale |  |  |
| Matching or combining data sets |  |  |
| Data concerning vulnerable people (including children) |  |  |
| Innovative use or applying technological or organisational solutions |  |  |
| Processing preventing data subjects from exercising a right or using a service or contract |  |  |
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| If you have answered yes to any of the above questions, you must carry out a DPIA. Please see the DPIA Procedure for further information. <link> |
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| **Step 1b: Identify the Need for a DPIA** |
| Explain broadly what the project aims to achieve and what type of processing of personal data 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 (this can draw on your answers to step 1/ the screening questions). |
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| **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 another way of describing data flows. What types of processing identified as likely high risk are involved? |
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| **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? |
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| **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 approved)? |
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| **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? |
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| **Step 3: Assessment of Necessity and Proportionality of Processing** |
| **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? How will you prevent function creep? 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? Prior consultation? |
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| **Step 4: Consult with Stakeholders** |
| **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? |
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| **Steps 5 & 6: Risk Assessment - Identifying Privacy Risks and Evaluating Privacy Solutions** |
|  |  | **Name of College/School/Service/Project:\_XXXX** |  |  |  |  |  |  | **Risk Register Owner: XXXX** |
| **Risk ID** | **Risk Description** | **Consequence** | **Risk Owner**   | **Current internal CONTROLS (provide details of how you currently manage the risk)** | **Assessment of Risk** | **Describe what further ACTIONS you will take to reduce the Impact/Likelihood and mitigate the risk. State who is the risk owner for each action** |
| **Impact** (1,2,3,4,5) | **Likelihood** (1,2,3,4,5) | **Score** |
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| Step 7: Document DPIA Outcomes |
| **Item** | **Name/date** | **Notes** |
| Measures approved by: |  | Integrate actions back into project plan, with date and responsibility for completion |
| 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: |
| Residual risks approved by: |  | If accepting any residual high risk, consult the Data Commissioner before going ahead |
|  |  |  |
| 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 |