**Data Protection Impact Assessment: List of Requirements**

Before submitting your DPIA template to the DP Office, please ensure that you have completed and addressed all relevant points below. **The DP Office will not review your DPIA unless you can demonstrate engagement with or reference to the checklist and its attending documents and requirements.**

**Are your data** [**anonymous**](https://www.gla.ac.uk/myglasgow/dpfoioffice/forstaffandstudents/dataprotection/anonymousandpseudonymousdata/)**?**

**Yes**

**No**

If you are claiming that your data are anonymous, are there any potential data linkages that would allow someone to identify your data subjects? Note that simply removing a name does not constitute anonymisation. Have you considered the impact of other identifiers e.g. you are studying individuals with an uncommon medical condition and working with gender, age, and location data or other factors that narrow your population and could lead to identification (i.e. the ‘mosaic’ or ‘jigsaw’ effect)?

**Are your data** [**pseudonymous**](https://www.gla.ac.uk/myglasgow/dpfoioffice/forstaffandstudents/dataprotection/anonymousandpseudonymousdata/)**?**

**Yes**

**No**

If you hold an identifier key(s) that would allow you or another party to identify your masked data then it is pseudonymous and therefore must be treated as personal data.

**Is the University a** [**data controller or a data processor**](https://www.gla.ac.uk/myglasgow/dpfoioffice/forstaffandstudents/dataprotection/datacontrollerorprocessor/) **for this project?**

**Data controller**

**Data processor**

**Will you require third parties (outwith UofG) to assist you in gathering, storing, accessing, or translating or transcribing the data?**

**Yes**

**Explain:**

**No**

**Do you have a** [**data sharing agreement**](https://www.gla.ac.uk/myglasgow/dpfoioffice/forstaffandstudents/dataprotection/datasharingwiththirdparties/) **in place?**

**Yes**

**No**

If you do not have an agreement, but you require one, complete the [Questionnaire for Data](https://www.gla.ac.uk/media/Media_681808_smxx.docx)

[Processing Involving Third Parties](https://www.gla.ac.uk/media/Media_681808_smxx.docx) and return to the [Contracts Team](https://www.gla.ac.uk/myglasgow/researchsupportoffice/contracts-team/).

**Have you completed a** [**privacy notice**](https://www.gla.ac.uk/myglasgow/dpfoioffice/forstaffandstudents/dataprotection/privacynotices/)**to inform data subjects on the intended use of their**

**personal data? *(If you answer “yes”, please attach for review.)***

**Yes**

**No**

**Have you completed the University's online** [**Data Protection**](https://www.gla.ac.uk/myglasgow/dpfoioffice/forstaffandstudents/training/) **and/or** [**Information Security**](https://www.gla.ac.uk/myglasgow/dpfoioffice/forstaffandstudents/training/)

**trainings? (These trainings are mandatory for all staff; the full project team should complete both training modules)**

**Yes**

***If yes, please indicate dates of completion for all colleagues:***

**No**

**Have you completed a** [**research data management plan**](https://www.gla.ac.uk/myglasgow/openresearch/researchdatamanagement/beforeyoubegin/) **and reviewed the** [**DMP and DPIA Workflow chart**](https://www.gla.ac.uk/myglasgow/openresearch/researchdatamanagement/beforeyoubegin/#legalandethicalconsiderations)**?**

**Yes**

**No**

***If no, please explain why you do not require a data management plan.***

**Have you applied for, or received ethical approval?**

**Yes**

***If yes, when was the application submitted? Approved? Please submit a copy with this DPIA submission.***

**No**

**Consider the following ways to reduce potential risk and demonstrate practical compliance:**

* + [pseudonymisation](https://www.gla.ac.uk/myglasgow/dpfoioffice/forstaffandstudents/dataprotection/anonymousandpseudonymousdata/)
  + [data minimisation](https://www.gla.ac.uk/myglasgow/dpfoioffice/forstaffandstudents/dataprotection/dataprotectionprinciples/)
  + [storage limitation](https://www.gla.ac.uk/myglasgow/dpfoioffice/forstaffandstudents/dataprotection/dataprotectionprinciples/)
  + access restrictions
  + detailed data flow modelling
  + technical solutions (e.g. [encryption](https://www.gla.ac.uk/myglasgow/it/informationsecurity/confidentialdata/))
  + organisational measures (e.g. policies, procedures and workflows to comply with GDPR requirements)

# Project Overview

|  |  |
| --- | --- |
| **Project Name:** |  |
| **Brief description of the Project:** |  |
| **Project Owner:**  **Name, designation and email address** |  |
| **Project Manager:**  **Name, designation and email address** |  |
| **External project partners, if any:** |  |
| **Summarise identified need for DPIA:** |  |
| **Timing of the Project:**  **Start/end dates, duration as applicable** |  |
| **Date template completed:** |  |
| **Date submitted to the Data Protection Office:** |  |

# Describe the processing activities

|  |
| --- |
| **Describe the nature and purpose of the processing:**  You might find it useful to refer to a flow diagram or another way of describing data flows |
| * **What is the source of the data?** * **How will you collect data?** * **How will you use the data?** * **How will you store the data?** * **How will you delete the data?** * **Will you be sharing data with anyone (within the University or external to the University)?** * **What measures do you take to ensure** [**data** **processors**](https://www.gla.ac.uk/myglasgow/dpfoioffice/forstaffandstudents/dataprotection/datacontrollerorprocessor/) **comply? Do you have a** [**data sharing agreement**](https://www.gla.ac.uk/myglasgow/dpfoioffice/forstaffandstudents/dataprotection/datasharingwiththirdparties/) **drafted?** * **What types of processing identified as likely** [**high risk**](https://www.gla.ac.uk/myglasgow/dpfoioffice/forstaffandstudents/dataprotection/informationsecurity/) **are involved?** * **What do you want to achieve?** * **What is the intended effect on participants or users?** * **What are the benefits of the processing for you or the University, and more broadly?** |

|  |
| --- |
| **Describe the scope and context of the processing:** |
| * **What is the nature of the data, and does it include** [**special category**](https://www.gla.ac.uk/myglasgow/dpfoioffice/forstaffandstudents/dataprotection/specialcategorydata/) **or criminal offence data?** * **How many individuals are affected by your planned processing?** * **What is the nature of your relationship with the individuals whose data you will process?** * **How much control will they have over what you do with their data?** * **Does your processing include children or other vulnerable groups?** * **What geographical area does it cover?** * **Are there concerns over this type of processing generally or more specifically regarding information security ? *If yes, have you contacted*** [***Information Security***](https://www.gla.ac.uk/myglasgow/it/helpdesk/) ***for advice?*** * **Does the project involve the use or development of new technology? *If yes, have you contacted*** [IT Services](https://www.gla.ac.uk/myglasgow/it/helpdesk/) ***for advice?*** * **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)?** |
| * **Do you have stakeholders, either within the University or external, that you must consult with regarding this intended processing? *If yes, who are they?*** * **Describe when and how you will seek these stakeholders’ views – or justify why it’s not appropriate to do so.** * **Do you need to involve anyone else within your organisation?** * **Do you need to ask your** [**data processors**](https://www.gla.ac.uk/myglasgow/dpfoioffice/forstaffandstudents/dataprotection/datacontrollerorprocessor/) **to assist with consultation?** * **Do you plan to consult information security experts, or any other experts?** |

# Ensuring basic compliance

|  |
| --- |
| **Describe how you will uphold the** [**data protection principles**](https://www.gla.ac.uk/myglasgow/dpfoioffice/forstaffandstudents/dataprotection/dataprotectionprinciples/)**:** |
| * **What is your** [lawful basis for processing](https://www.gla.ac.uk/myglasgow/dpfoioffice/forstaffandstudents/dataprotection/lawfulbasisforprocessing/)**?** * **What information will you give to individuals about the project, *e.g. privacy notice, participant information sheet etc.*** * **How will you help to** [**support their rights**](https://www.gla.ac.uk/myglasgow/dpfoioffice/informationrequests/datasubjectrights/)**?** * **How will you prevent function creep?** * **How will you ensure data quality and** [**data minimisation**](https://www.gla.ac.uk/myglasgow/dpfoioffice/forstaffandstudents/dataprotection/dataprotectionprinciples/)**?** * **How will the data be kept up to date, if necessary?** * **How long will you** [**keep the data**](https://www.gla.ac.uk/myglasgow/dpfoioffice/forstaffandstudents/managinginformation/)**?** * **How will the retention be reinforced?** * **How will the data be kept securely, both during the project and after completion?** * **Will you be sharing data internationally, *e.g. sending it to or receiving it from an organisation abroad, or using an international service/platform to process your data*?** |

# Identify and assess risks and measures to reduce risk

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Describe the source of risk and nature of potential impact on individuals.** Include associated compliance and corporate risksas necessary. | **Likelihood of harm**  **+**    (Remote, possible or probable) | **Severity of harm**  **=**  (Minimal, significant or severe) | **Overall risk**  (Low, medium or high) | **Options to reduce or eliminate risk** | **Residual risk** *(after reduction)*  (Low, medium or high) |
| *-- e.g. Medical interview transcriptions performed by external company may result in data loss or misuse* | *Possible* | *Significant* | *High* | *Acquire contract and/or data sharing agreement with company covering all parties responsibilities and expectations* | *Low* |

# Data Protection & FOI Office recommendations

|  |  |  |
| --- | --- | --- |
| DP & FOI Office advice provided: |  | DP & FOI Office should advise on  compliance and measures to reduce risk |
| Summary of DP & FOI advice: | | |

# Sign off and record outcomes

# (**To be completed by the PI/Project Lead**)

|  |  |
| --- | --- |
| Mitigation measures and residual risks approved by *(sign & date)*: | Notes:   * All mitigation measures must be integrated back into the project, with a documented date and responsibility for completion. * The ICO must be consulted if high risks are identified and cannot be mitigated. * If the DP & FOI Office advice is overruled, an explanation must be provided. |

|  |  |  |
| --- | --- | --- |
| This DPIA will be kept under review by: |  | A copy of the most recent version should be sent to the DP & FOI Office and retained in the IAR\* by the PI/Project Lead. |

\*The University’s Information Asset Register (IAR) is a repository for all data protection compliance documents, e.g. privacy notices, DPIAs etc. You can access the IAR (using VPN or remote staff desktop) here: <https://www.gla.ac.uk/myglasgow/dpfoioffice/forstaffandstudents/dataprotection/informationassetregister/>