

Data Protection Impact Assessment (DPIA) Template

A DPIA is designed to describe your processing and to help manage any potential harm to individuals' in the use of their information. DPIAs are also important tools for demonstrating accountability, as they help you as a Controller to comply with the requirements of the Data Protection Legislation. Non-compliance with DPIA requirements can lead to fines imposed by the Information Commissioners Office (ICO); this includes not carrying out a DPIA at all, carrying out a DPIA in an incorrect way or failing to consult the ICO where required.

DPIA's are not new; the use of Privacy Impact Assessments has become common practice in the NHS and can provide evidence of compliance within the Data Security and Protection toolkit (DSPT); DPIAs build on that practice.

It is not always clear whether you should do a DPIA or not but there are a number of situations where a DPIA **should** be considered or where a DPIA is a **legal requirement**. If you can tick against the criteria below it is highly recommended that you undertake a DPIA and if you decide not to, ensure that you document the reasons for your decision.

You as Controller **MUST** carry out a DPIA where you plan to:

	Tick or leave blank
Use profiling or automated decision-making to make significant decisions about people or their access to a service, opportunity or benefit;	<input type="checkbox"/>
Process special-category data or criminal-offence data on a large scale ;	<input type="checkbox"/>
Monitor a publicly accessible place on a large scale;	<input type="checkbox"/>
Use innovative technology in combination with any of the criteria in the European guidelines;	<input type="checkbox"/>
Carry out profiling on a large scale;	<input type="checkbox"/>
Process biometric or genetic data in combination with any of the criteria in the European guidelines;	<input type="checkbox"/>
Combine, compare or match data from multiple sources;	<input type="checkbox"/>
Process personal data without providing a privacy notice directly to the individual in combination with any of the criteria in the European guidelines;	<input type="checkbox"/>
Process personal data in a way that involves tracking individuals' online or offline location or behaviour, in combination with any of the criteria in the European guidelines;	<input type="checkbox"/>
Process children's personal data for profiling or automated decision-making or for marketing purposes, or offer online services directly to them;	<input type="checkbox"/>
Process personal data that could result in a risk of physical harm in the event of a security breach.	<input checked="" type="checkbox"/>

You as Controller should **consider** carrying out a DPIA where you

	Tick or leave blank
Plan any major project involving the use of personal data;	<input type="checkbox"/>
Plan to do evaluation or scoring;	<input type="checkbox"/>
Want to use systematic monitoring;	<input type="checkbox"/>
Process sensitive data or data of a highly personal nature;	<input checked="" type="checkbox"/>
Processing data on a large scale;	<input type="checkbox"/>
Include data concerning vulnerable data subjects;	<input checked="" type="checkbox"/>
Plan to use innovative technological or organisational solutions;	<input type="checkbox"/>

A new DPIA should be carried out if you decide that there is a significant enough change to what you originally intended but it is good practice for DPIAs to be kept under review and revisited when necessary.

There is guidance to help you. Your Data Protection Officer (DPO) can be consulted before completing a DPIA in order to provide specialist advice and guidance or simply to talk things through with you.

Background Information	
Date of your DPIA :	05/06/2023
Title of the activity/processing:	Oxford CHC Team Office Move – Paper Records
Who is the person leading this work?	██████████ – Estates Workstream Lead, CHC Transfer Project
Who is the Lead Organisation?	BOB ICB
Who has prepared this DPIA?	██████████
Who is your Data Protection Officer (DPO)?	██████████
Describe what you are proposing to do: (Include as much background information as you can about why the new system/change in system/sharing of information/data processing is required).	<p>On 01 July 2023, the Oxford All Age Continuing Healthcare (CHC) team will be transferring employment from Oxford Health FT to BOB ICB.</p> <p>In preparation for this, the Oxford CHC team will be vacating their current offices at Abingdon Community Hospital (OHFT premise) and moving to Sandford Gate (BOB ICB premise) on Friday 30 June.</p> <p>This will require the move of physical patient/service user records.</p> <p>Crown Workspace are the removals contractor. A few days before the move, they will supply the CHC team with crates to store paper records and numbered seals to ensure that the paper records are kept secure during the move.</p> <p>The business managers will pack the crates with the paper records and seal them. On the day of the move, they will be on site to oversee the crates being moved to the removals van and will be present on site when they arrive at Sandford Gate to receive them and unpack the crates into lockable filing cabinets.</p> <p>The Estates Workstream Lead will also be present during the office move to oversee and coordinate the process.</p>
Are there multiple organisations involved? (If yes – you can use this space to name them, and who their key contact for this work is).	<p>Oxford Health FT – ██████████, Head of Operations (CHC)</p> <p>BOB ICB – ██████████, Assistant Director of All Age Continuing Care</p> <p>Crown Workspace (removals contractor) - ██████████</p>
Can you think of any other Key Stakeholders that should be consulted or involved in this DPIA? (If so then include the details here).	No
Detail anything similar that has been undertaken before?	Unknown

1. Categories, Legal Basis, Responsibility, Processing, Confidentiality, Purpose, Collection and Use		
1.1.		
What data/information will be used?	Tick or leave blank	Complete
Tick all that apply.		
Personal Data	✓	1.2

Special Categories of Personal Data	✓	1.2 AND 1.3
Personal Confidential Data	✓	1.2 AND 1.3 AND 1.6
Sensitive Data (usually criminal or law enforcement data)	<input type="checkbox"/>	1.2 but speak to your IG advisor first
Pseudonymised Data	<input type="checkbox"/>	1.2 and consider at what point the data is to be pseudonymised
Anonymised Data	<input type="checkbox"/>	Consider at what point the data is to be anonymised
Commercially Confidential Information	<input type="checkbox"/>	Consider if a DPIA is appropriate
Other	<input type="checkbox"/>	Consider if a DPIA is appropriate

1.2.

Processing has to be lawful so identify which of the following you believe justifies what you are proposing to do and include an explanation as to why in the relevant box. You must select at least one from a – f.

Article 6 (1) of the GDPR includes the following:	
a) THE DATA SUBJECT HAS GIVEN CONSENT	Tick or leave blank <input type="checkbox"/>
Why are you relying on consent from the data subject? Click here to enter text.	
What is the process for obtaining and recording consent from the Data Subject? (How, where, when, by whom). Click here to enter text.	
Describe how your consent form is compliant with the Data Protection requirements? (There is a checklist that can be used to assess this). Click here to enter text.	
b) IT IS NECESSARY FOR THE PERFORMANCE OF A CONTRACT TO WHICH THE DATA SUBJECT IS PARTY	Tick or leave blank <input type="checkbox"/>
(The contract needs to be between the Controller and the individual and not concern data being processed due to someone else having a contract with the Controller. Processing can happen before the contract is entered into e.g. processing a pre-health assessment for a private or cosmetic procedure that is a paid for service with the delivery of that care done under contract between the Patient and the Practitioner).	
What contract is being referred to? Click here to enter text.	
c) IT IS NECESSARY UNDER A LEGAL OBLIGATION TO WHICH THE CONTROLLER IS SUBJECT	Tick or leave blank <input type="checkbox"/>
(A legal obligation mandates processing of data as a task in itself where there are likely to be legal measures available if not adhered to e.g. an Employer has a legal obligation to disclose salary information to HMRC).	
Identify the legislation or legal obligation you believe requires you to undertake this processing. Click here to enter text.	
d) IT IS NECESSARY TO PROTECT THE VITAL INTERESTS OF THE DATA SUBJECT OR ANOTHER NATURAL PERSON	Tick or leave blank <input type="checkbox"/>
(This will apply only when you need to process data to protect someone's life. It must be necessary and does not only relate to the individual whose data is being processed. It can also apply to protect another person's life. Emergency Care is likely to fall into this category but planned care would not. You may need to process a Parent's data to protect the life of a child. The individual concerned is unlikely to be able to provide consent physically or legally; if you are able to gain consent then this legal basis will not apply).	
How will you protect the vital interests of the data subject or another natural person by undertaking this activity? Click here to enter text.	
e) IT IS NECESSARY FOR THE PERFORMANCE OF A TASK CARRIED OUT IN THE PUBLIC INTEREST OR UNDER OFFICIAL AUTHORITY VESTED IN THE CONTROLLER	Tick or leave blank <input checked="" type="checkbox"/>
(This is different to 6 c). If you are processing data using this basis for its lawfulness then you should be able to identify a specific task, function or power that is set out in law. The processing must be necessary, if not then this basis does not apply).	

What statutory power or duty does the Controller derive their official authority from? NHS Commissioning Board and CCG (Responsibilities and Standing Rules) Regulations 2012 Part 6 Health & Social Care Act	
f) IT IS NECESSARY FOR THE LEGITIMATE INTERESTS OF THE CONTROLLER OR THIRD PARTY <small>(Public authorities can only rely on legitimate interests if they are processing for a legitimate reason other than performing their tasks as a public authority. See the guidance for more information about the legitimate interest test).</small>	Tick or leave blank <input type="checkbox"/>
What are the legitimate interests you have? Click here to enter text.	
Article 9 (2) conditions are as follows:	
a) THE DATA SUBJECT HAS GIVEN EXPLICIT CONSENT <small>(Requirements for consent are the same as those detailed above in section 1.2, a))</small>	Tick or leave blank <input type="checkbox"/>
b) FOR THE PURPOSES OF EMPLOYMENT, SOCIAL SECURITY OR SOCIAL PROTECTION <small>(Schedule 1, part 1 of the Data Protection Act 2018 gives more detail on when this can apply to processing and further guidance is available).</small>	Tick or leave blank <input type="checkbox"/>
c) IT IS NECESSARY TO PROTECT THE VITAL INTERESTS OF THE DATA SUBJECT OR ANOTHER NATURAL PERSON WHERE THEY ARE PHYSICALLY OR LEGALLY INCAPABLE OF GIVING CONSENT <small>(Requirements for this are the same as those detailed above in section 1.2, d))</small>	Tick or leave blank <input type="checkbox"/>
<i>d) It is necessary for the operations of a not-for-profit organisation such as political, philosophical, trade union and religious body in relation to its members</i>	NA
<i>e) The data has been made public by the data subject</i>	NA
<i>f) For legal claims or courts operating in their judicial category</i>	NA
g) SUBSTANTIAL PUBLIC INTEREST <small>(Schedule 1, part 2 of the Data Protection Act 2018 gives more detail on when this can apply to processing and further guidance is available).</small>	Tick or leave blank <input type="checkbox"/>
h) PROCESSING IS NECESSARY FOR THE PURPOSES OF PREVENTIVE OR OCCUPATIONAL MEDICINE, FOR THE ASSESSMENT OF THE WORKING CAPACITY OF THE EMPLOYEE, MEDICAL DIAGNOSIS, THE PROVISION OF HEALTH OR SOCIAL CARE OR TREATMENT OR THE MANAGEMENT OF HEALTH OR SOCIAL CARE SYSTEMS AND SERVICES ON THE BASIS OF UNION OR MEMBER STATE LAW OR PURSUANT TO CONTRACT WITH A HEALTH PROFESSIONAL AND SUBJECT TO CONDITIONS AND SAFEGUARDS <small>(Schedule 1, part 1 of the Data Protection Act 2018 gives more detail on when this can apply to processing and further guidance is available).</small>	Tick or leave blank <input checked="" type="checkbox"/>
i) PROCESSING IS NECESSARY FOR REASONS OF PUBLIC INTEREST IN THE AREA OF PUBLIC HEALTH, SUCH AS PROTECTING AGAINST SERIOUS CROSS-BORDER THREATS TO HEALTH OR ENSURING HIGH STANDARDS OF QUALITY AND SAFETY OF HEALTH CARE AND OF MEDICINAL PRODUCTS OR MEDICAL DEVICES, ON THE BASIS OF UNION OR MEMBER STATE LAW WHICH PROVIDES FOR SUITABLE AND SPECIFIC MEASURES TO SAFEGUARD THE RIGHTS AND FREEDOMS OF THE DATA SUBJECT, IN PARTICULAR PROFESSIONAL SECRECY <small>(Schedule 1, part 1 of the Data Protection Act 2018 gives more detail on when this can apply to processing and further guidance is available).</small>	Tick or leave blank <input type="checkbox"/>
j) PROCESSING IS NECESSARY FOR ARCHIVING PURPOSES IN THE PUBLIC INTEREST, SCIENTIFIC OR HISTORICAL RESEARCH PURPOSES OR STATISTICAL PURPOSES IN ACCORDANCE WITH <u>ARTICLE 89(1)</u> BASED ON UNION OR MEMBER STATE LAW WHICH SHALL BE PROPORTIONATE TO THE AIM PURSUED, RESPECT THE ESSENCE OF THE RIGHT TO DATA PROTECTION AND PROVIDE FOR	Tick or leave blank <input type="checkbox"/>

SUITABLE AND SPECIFIC MEASURES TO SAFEGUARD THE FUNDAMENTAL RIGHTS AND THE INTERESTS OF THE DATA SUBJECT.

(Schedule 1, part 1 of the Data Protection Act 2018 gives more detail on when this can apply to processing and further guidance is available).

1.3.

If using special categories of personal data, a condition for processing under Article 9 of the GDPR must be satisfied in addition to a condition under Article 6. You must select at least 1 from a) to c) or g) to i). NOTE: d), e) and f) are not applicable

1.4.

Confirm who the Controller and Processor is/are. Confirm if the Controller/s are solely or jointly responsible for any data processed?

(Identify any other parties who will be included in the agreements and who will have involvement/share responsibility for the data/information involved in this project/activity. Use this space to detail this but you may need to ask your DPO to assist you. Copy and paste the last empty row in the table to add organisations where required (the text has been left unlocked for this purpose on that row only).

Name of Organisation	Role
BOB ICB	Sole Controller
Crown Workspace	Processor
Click here to enter text.	Choose an item.
Click here to enter text.	Choose an item.
Click here to enter text.	Choose an item.
Click here to enter text.	Choose an item.
Click here to enter text.	Choose an item.

1.5.

Describe exactly what is being processed, why you want to process it and who will do any of the processing?

CHC contract transfer paper CHC clinical records are being transferred from outgoing provider to BOB ICB CHC office for continuation of service. The paper records will be transferred by Crown Workspace.

1.6.

Tick here if you owe a duty of confidentiality to any information. ✓

If so, specify what types of information. (e.g. clinical records, occupational health details, payroll information)

Clinical records

1.7.

How are you satisfying the common law duty of confidentiality?

Legal Duty (please specify)

If you have selected an option which asks for further information please enter it here

The National Health Service Commissioning Board and Clinical Commissioning Groups (Responsibilities and Standing Rules) Regulations 2012 Part 6

Health and Care Act 2022

Children and Families Act 2014

The Mental Health Act 1983

1.8.

Are you applying any anonymisation/pseudonymisation technique or encryption to any of the data to preserve the confidentiality of any information?

No

If you are then describe what you are doing.

[Click here to enter text.](#)

If you don't know then please find this information out as there are potential privacy implications with the processing.

1.9.

Tick here if you are intending to use any information for a purpose that isn't considered as direct patient care. ✓

If so describe that purpose.

Onward commissioning of the CHC service, assessments, care planning and review of patient care

1.10.

Approximately how many people will be the subject of the processing?

51 to 100

1.11.

How are you collecting the data? (e.g. verbal, electronic, paper (if you need to add more selections then copy the last 'choose an item' and paste, the text has been left unlocked for you to do this.)

Other method not listed

Choose an item.

Choose an item.

Choose an item.

Choose an item.

If you have selected 'other method not listed' describe what that method is.

Transferring paper records from one organisation to another as part of contract transfer

1.12.

How will you edit the data?

Data will not be edited – paper records as part of contract transfer

1.13.

How will you quality check the data?

OHFT is responsible for ensuring data quality prior to the contract transfer.

1.14.

Review your business continuity or contingency plans to include this activity. Have you identified any risks?

Yes

If yes include in the risk section of this template.

1.15.

What training is planned to support this activity?

No training required

2. Linkage, Data flows, Sharing and Data Opt Out, Sharing Agreements, Reports, NHS Digital

2.1.

Are you proposing to combine any data sets?

No

If yes then provide the details here.

[Click here to enter text.](#)

2.2.

What are the Data Flows? (Detail and/or attach a diagram if you have one).

Crown Workspace are the removals contractor. A few days before the move, they will supply the CHC team at Abingdon Community Hospital with crates to store paper records and numbered seals to ensure that the paper records are kept secure during the move.

The business managers will pack the crates with the paper records and seal them. On the day of the move, they will be on site to oversee the crates being moved to the removals van and will be present on site when they arrive at Sandford Gate to receive them and unpack the crates into lockable filing cabinets.

The Estates Workstream Lead will also be present during the office move to oversee and coordinate the process.

2.3.

What data/information are you planning to share?

No data will be shared – paper records being transferred from outgoing provider to BOB ICB CHC Office

2.4.

Is any of the data subject to the National Data Opt Out?

No - it is not subject to the national data opt out

If your organisation has to apply it describe the agreed approach to this

[Click here to enter text.](#)

If another organisation has applied it add their details and identify what data it has been applied to

[Click here to enter text.](#)

If you do not know if it applies to any of the data involved then you need to speak to your Data Protection Officer to ensure this is assessed.

2.5.

Who are you planning to share the data/information with?

Please see 2.3

2.6.

Why is this data/information being shared?

Please see 2.3

2.7.

How will you share it? (Consider and detail all means of sharing)

Please see 2.3

Tick if you are planning to use Microsoft Teams or another similar online networking/meeting solution that may have the facility to store or record conversations or related data as part of the sharing arrangements

Provide details of how you have considered any privacy risks of using one of these solutions

[Click here to enter text.](#)

2.8.

What data sharing agreements are or will be in place?

None required

2.9.

What reports will be generated from this data/information?

None

2.10.

Are you proposing to use Data that may have come from NHS Digital (e.g. SUS data, HES data etc.)?

No

If yes, are all the right agreements in place?

[Choose an item.](#)

Give details of the agreement that you believe covers the use of the NHSD data

Click here to enter text.

If no or don't know then you need to speak to your Data Protection Officer to ensure they are put in place if needed.

3. Data Processor, IG Assurances, Storage, Access, Cloud, Security, Non-UK processing, DPA

3.1

Are you proposing to use a third party, a data processor or a commercial system supplier?

Yes

If yes use these spaces to add their details including their official name and address. If there is more than one then include all organisations. If you don't know then stop and try and find this information before proceeding.

Crown Workspace

1 Ardra Road

London

N9 0BD

Click here to enter text.

Click here to enter text.

Click here to enter text.

Click here to enter text.

Click here to enter text.

3.2

Is each organisation involved registered with the Information Commissioner? Copy and paste the last empty row in the table to add organisations where required (the text has been left unlocked for this purpose on that row only)

Name of organisation	Registered	Registration details or comments if not registered
BOB ICB	Yes	ZB343068
Click here to enter text.	Choose an item.	Click here to enter text.
Click here to enter text.	Choose an item.	Click here to enter text.
Click here to enter text.	Choose an item.	Click here to enter text.
Click here to enter text.	Choose an item.	Click here to enter text.
Click here to enter text.	Choose an item.	Click here to enter text.

3.3

What IG assurances have been provided to you and does any contract contain IG clauses that protect you as the Controller? (e.g. in terms and conditions, their contract, their tender submission). Copy and paste the last empty row in the table to add organisations where required (the text has been left unlocked for this purpose on that row only)

Name of organisation	Brief description of assurances obtained
Crown Workspace	Crown Workspace are the removals contractor and the agreed activity schedule includes the provision of filing crates and numbered seals to securely seal patient records during the move.
Click here to enter text.	Click here to enter text.
Click here to enter text.	Click here to enter text.
Click here to enter text.	Click here to enter text.
Click here to enter text.	Click here to enter text.
Click here to enter text.	Click here to enter text.

3.4

What is the status of each organisation’s Data Security Protection Toolkit?

DSP Toolkit

Copy and paste the last empty row in the table to add organisations where required (the text has been left unlocked for this purpose on that row only)

Name of organisation	ODS Code	Status	Published date
BOB ICB	QU9	Not published – new organisation	By 30/06/2023
Click here to enter text.	Click here to enter text.	Click here to enter text.	Click here to enter text.
Click here to enter text.	Click here to enter text.	Click here to enter text.	Click here to enter text.
Click here to enter text.	Click here to enter text.	Click here to enter text.	Click here to enter text.
Click here to enter text.	Click here to enter text.	Click here to enter text.	Click here to enter text.
Click here to enter text.	Click here to enter text.	Click here to enter text.	Click here to enter text.
Click here to enter text.	Click here to enter text.	Click here to enter text.	Click here to enter text.

3.5

How and where will the data/information be stored? (Consider your answer to 2.7 and the potential storage of data in any online meeting or networking solution).

Sandford Gate in locked filing cabinets in the CHC offices

3.6

How is the data/information accessed and how will this be controlled?

Access for CHC Team only, locked in filing cabinets in the CHC offices

3.7

Is there any use of Cloud technology?

No

If yes add the details here.

Click here to enter text.

3.8

What security measures will be in place to protect the data/information?

Crown Workspace are the removals contractor. A few days before the move, they will supply the CHC team at Abingdon Community Hospital with crates to store paper records and numbered seals to ensure that the paper records are kept secure during the move.

The business managers will pack the crates with the paper records and seal them. On the day of the move, they will be on site to oversee the crates being moved to the removals van and will be present on site when they arrive at Sandford Gate to receive them and unpack the crates into lockable filing cabinets.

The Estates Workstream Lead will also be present during the office move to oversee and coordinate the process

Is a specific System Level Security Policy needed?

No

If yes or don’t know then you need to speak to your Data Protection Officer to ensure one is put in place if needed.

3.9

Is any data transferring outside of the UK? (you must determine this so only select don’t know if you have further investigations to make but the DPIA will not be approved without this information)

No

If yes describe where and what additional measures are or will be in place to protect the data.

Click here to enter text.

3.10

What Data Processing Agreement is already in place or if none, what agreement will be in place with the organisation and who will be responsible for managing it?
None required.

4. Privacy Notice, Individual Rights, Records Management, Direct Marketing

4.1 Describe any changes you plan or need to make to your Privacy Notice and your proposed completion date?
(There is a checklist that can be used to assess the potential changes required or if you wish for it to be reviewed then add the link below).
None required

4.2 How will this activity impact on individual rights under the GDPR? (Consider the right of access, erasure, portability, restriction, profiling, automated decision making).
No impact. Individual Rights requests will be managed in line with BOB ICB Individual Rights Policy and SOP.

4.3 How long is the data/information to be retained?
In line with BOB ICB Records Management Policy. The Privacy notice states records will be retained for 8 years and then reviewed and destroyed if no longer required.

4.4 How will the data/information be archived?
Records will be archived in line with BOB ICB Records Management Policy

4.5 What is the process for the destruction of records?
Records will be destroyed in line with the destruction of paper records process in BOB ICB Records Management Policy

4.6 What will happen to the data/information if any part of your activity ends?
CHC is currently a statutory function for the ICB so activity is not expected to end. If decisions are made to transfer and part of the function to a new provider, a similar process to the current contract transfer would be required.

4.7 Will you use any data for direct marketing purposes? (you must determine this so only select don't know if you have further investigations to make but the DPIA will not be approved without this information)
No
If yes please detail.
[Click here to enter text.](#)

5. Risks and Issues

5.1 What risks and issues have you identified? The DPO can provide advice to help complete this section and consider any measures to mitigate potential risks.

Describe the source of risk and nature of potential impact on individuals. (Include associated compliance and corporate risks as necessary and copy and paste the complete bottom row to add more risks (the text has been left unlocked in both tables to enable you to do this)).	Likelihood of harm	Severity of harm	Overall risk
Unauthorised/accidental access	Possible	Significant	Low
Deliberate/accidental loss in transit	Remote	Significant	Low

Paper records left unattended on delivery	Remote	Significant	Low
	Choose an item.	Choose an item.	Choose an item.

5.2

Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in 5.1

Risk	Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved (SIRO)
Unauthorised/accidental access - The paper records will be stored in locked filing cabinets in the CHC offices at Sandford Gate, however the doors to the office will be unlocked during the day.	<p>Filing cabinets will be locked by business managers who will retain the key.</p> <p>Sandford Gate reception is manned 8am-5pm.</p> <p>Doors to offices are unlocked each morning and locked at the end of the day by ICB staff.</p> <p>All ICB staff will be issued with photographic ID badges in June.</p>	Reduced	Low	Choose an item.
Click here to enter text.	Click here to enter text.	Choose an item.	Choose an item.	Choose an item.
Click here to enter text.	Click here to enter text.	Choose an item.	Choose an item.	Choose an item.
Click here to enter text.	Click here to enter text.	Choose an item.	Choose an item.	Choose an item.

5.3

What if anything would affect this piece of work?

See risks

5.4

Please include any additional comments that do not fit elsewhere in the DPIA?

Nothing further to add

6. Consultation

6.1

Have you consulted with any external organisation about this DPIA?

Yes

If yes, who and what was the outcome? If no, detail why consultation was not felt necessary.

OHFT Head of CHC agreed transfer of paper records process

6.2

Will you need to discuss the DPIA or the processing with the Information Commissioners Office? (You may need the help of your DPO with this)

No

If yes, explain why you have come to this conclusion.

[Click here to enter text.](#)

7. Data Protection Officer Comments and Observations

7.1

Comments/observations/specific issues

There is a risk in physically moving the paper records but these have been identified and mitigated as far as is possible

8. Review and Outcome

Based on the information contained in this DPIA along with any supporting documents, you have determined that the outcome is as follows:

A) There are no further actions needed and we can proceed

If you have selected item B), C) or D) then please add comments as to why you made that selection

[Click here to enter text.](#)

We believe there are

Choose an item.

If you have selected item B) or C) then list these in the amber boxes below and then consider additional measures you could take and include these in the green boxes below

Residual risks and nature of potential impact on individuals. (Include associated compliance and corporate risks as necessary and copy and paste the complete bottom row to add more risks (the text has been left unlocked in both tables to enable you to do this)).	Likelihood of harm	Severity of harm	Overall risk
Click here to enter text.	Choose an item.	Choose an item.	Choose an item.
Click here to enter text.	Choose an item.	Choose an item.	Choose an item.
Click here to enter text.	Choose an item.	Choose an item.	Choose an item.
Click here to enter text.	Choose an item.	Choose an item.	Choose an item.

Additional measures you could take to reduce or eliminate residual risks identified as medium or high risk above (B and C)

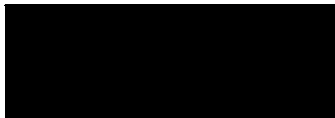
Risk	Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved (SIRO)
Click here to enter text.	Click here to enter text.	Choose an item.	Choose an item.	Choose an item.
Click here to enter text.	Click here to enter text.	Choose an item.	Choose an item.	Choose an item.
Click here to enter text.	Click here to enter text.	Choose an item.	Choose an item.	Choose an item.
Click here to enter text.	Click here to enter text.	Choose an item.	Choose an item.	Choose an item.

Signed and approved on behalf of Buckinghamshire Oxfordshire and Berkshire West Integrated Care Board

Name: [REDACTED]

Job Title: Data Protection Officer

Signature:



Date: 08/06/2023

Signed and approved on behalf of [Click here to enter text.](#)

Name: [Click here to enter text.](#)

Job Title: [Click here to enter text.](#)

Signature: [Click here to enter text.](#)

Date: [Click here to enter a date.](#)

Please note:

You should ensure that your Information Asset Register and Data Flow Mapping Schedules are updated where this is relevant as a result of this project.

This DPIA can be disclosed if requested under the Freedom of Information Act (2000). If there are any exemptions that should be considered to prevent disclosure detail them here:

[Click here to enter text.](#)